

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

Summary

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

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

A new pedestrian route (Heneage Arcade) running north to south through the site is proposed at ground level which would support enhanced activity and vibrancy across the site and facilitate increased permeability through the site. This route would re-introduce an historic connection linking Bevis Marks to Bury Street. Active ground floor frontages are proposed within Heneage

Arcade through flexible commercial uses (Class E), including a minimum of 60sq.m of retail floorspace that would be secured by condition.

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

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

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

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

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

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

The development requires an EIA assessment.

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

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

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

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

The impact on daylight to Bevis Marks Synagogue would be minor adverse with very small absolute VSC changes which would be minimally noticeable at ground floor level and slightly more noticeable but to a limited area only to the mezzanine level. The losses experienced would be minimal with small absolute reductions recorded between 1.7%-1.8% for VSC. The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.

The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).

It therefore follows that there is a very limited impact on the visual appreciation of the historic interior and on the visual appreciation of interior features of key religious significance such as the Bimah and the Ark. Consequently, the visual appreciation of the religious ceremonies and associated activities including the reading of religious text is not diminished to a significant or perceptible degree. From this it can be concluded that based

on the quantifiable daylight impact results the impact on daylight to the interior of the Synagogue will not compromise the religious use or activities therein.

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

The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

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

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

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

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

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

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

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

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

Additional material considerations are as follows:

- Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification,

vitality and growth of the Cluster as a 24/7 world class business destination

- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
- Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane.
- The provision of generous community space that is intended to reach out to the wider community and provide a gateway into the City for the population in neighbouring boroughs to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality, through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area.
- The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the

S106 and S278 Agreement. Together these would go some way to mitigate the impact of the proposal.

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

Recommendation

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

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

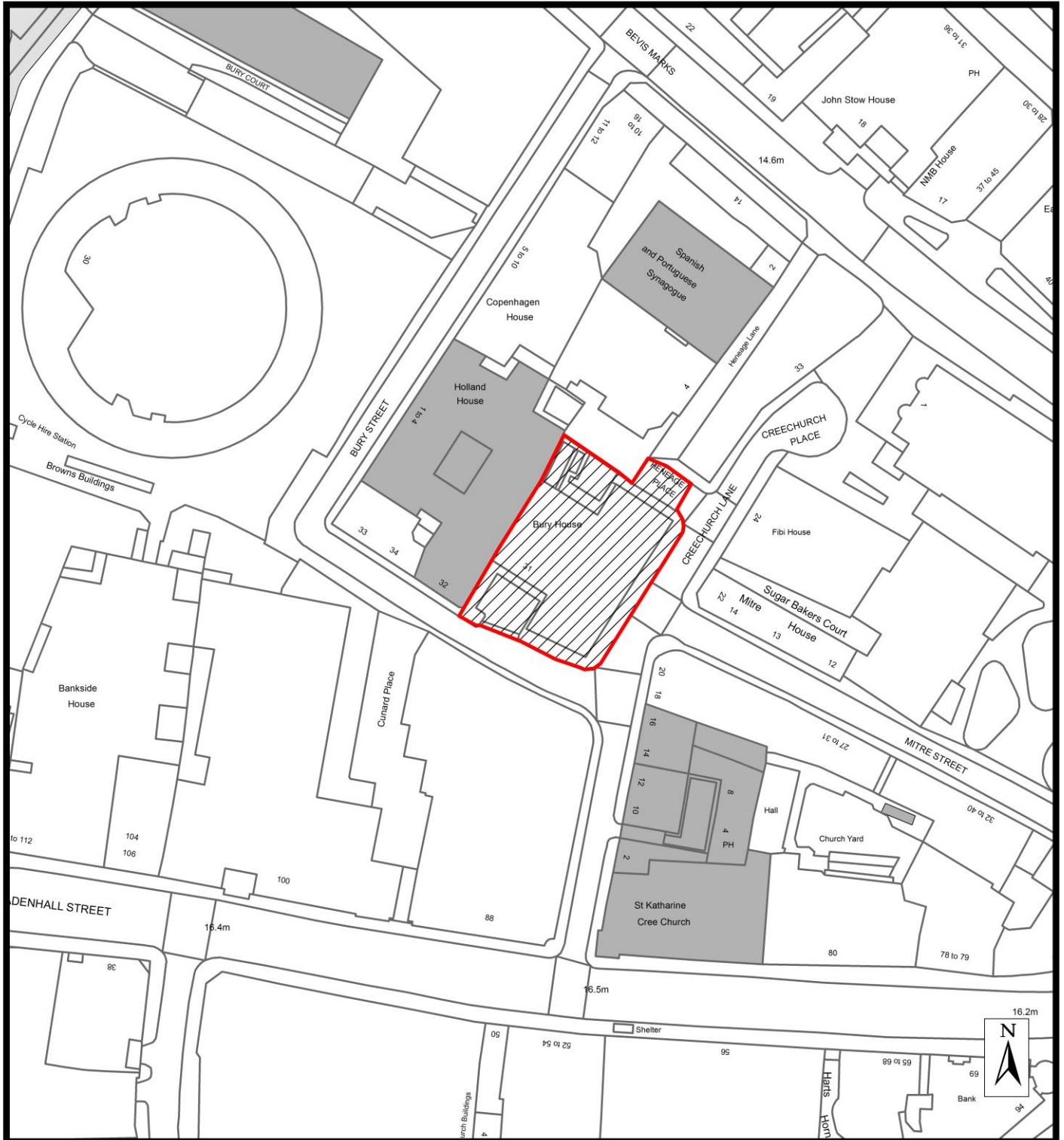
b) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highways Act 1980 in respect of those matters set out in the report, the decision notice not be issued until the Section 106 obligations have been executed;

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

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

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

Site Location Plan



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ADDRESS:

31 Bury Street, London EC3A 5AR



SITE LOCATION



LISTED BUILDINGS



CONSERVATION AREA BOUNDARY



CITY OF LONDON BOUNDARY

CASE No.
20/00848/FULEIA



**CITY
OF
LONDON**

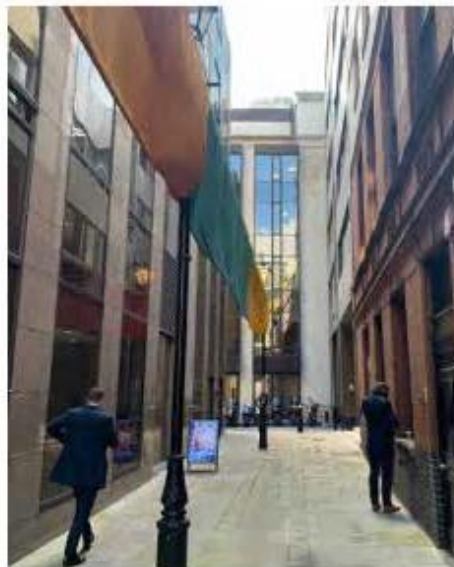
DEPARTMENT OF THE BUILT ENVIRONMENT



View from Bury Street



View from Creechurch lane



View 1 from Heneage lane



View 2 from Bury Street



View from Bury Street



View from Creechurch Ln

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - (a) To examine the environmental information;
 - (b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
 - (c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - (d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.
5. The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.
6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.
7. The Environmental Statement is available online together with the application, drawings, relevant policy documents and the representations received in respect of the application.
8. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information is also available online along with any further representations received in conjunction with the information.

Site and Surroundings

9. The Site comprises Bury House, 31 Bury Street, a 7-storey commercial building. The site is bound by Creechurch Lane to the east, Bury Street to the south and west, and built form to the north. Heneage Lane is located on the site's boundary to the north east. The building also contains an underground car park that can be accessed via a car lift to the north of the site from Heneage Place.
10. The building was constructed in the 1960s for use as commercial offices and has remained relatively unchanged since.
11. The existing building was built in 1967 and comprises office accommodation arranged over ground plus six upper storeys. A single storey basement provides some ancillary storage 10 cycle parking spaces and 18 car spaces.
12. Existing vehicular access to the site (and underground parking) is achieved from Heneage Place via a car lift located along the northern boundary of the Site. There are also 1 car parking space and 15 cycle parking spaces located at ground level.
13. Immediately to the west of the site is Holland House, a Grade II* Listed building and the Grade I listed Bevis Marks Synagogue is located approximately 30m north of the site. There are a number of other listed buildings in close proximity to the site. These include:
 - The Church of St Katherine Cree (Grade I)
 - Church of St Botolph (Grade I)
 - Church of St Andrew Undershaft (Grade I)
 - 2-6 Creechurch Lane (Grade II)
 - 38 St Mary Axe (Grade II)
14. The Tower or London World Heritage Site is located approximately 600 m to the south-east of the Site.
15. The Site is not located within a Conservation Area. Lloyd's Avenue and St Helen's Conservation Area are located within 250m of the site.
16. The Site is within City of London's Eastern Cluster Zone (as identified in the Local Plan. Furthermore, within the draft new City Plan (2036), the Site lies within the 'The City Cluster Key Area of Change'. A key vision for this area according to the draft City Plan includes increasing the provision of world class buildings, delivering tall buildings on appropriate sites that make a positive contribution to the City's skyline.

Proposal

17. Planning Permission is sought for:

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

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

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

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

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

21. A new pedestrian route (Heneage Arcade) running north to south through the site is proposed at ground level which would support enhanced activity and vibrancy across the site and facilitate increased permeability through the site. This route would re-introduce an historic connection linking Bevis Marks to Bury Street. Active ground floor frontages are proposed within Heneage Arcade through flexible commercial uses (Class E), including a minimum of 60sq.m of retail floorspace that would be secured by condition.
22. A new pocket Park (James' Court) is proposed at the southern end of the Site, off Bury Street, which would be partially covered and colonnaded. James' Court would comprise planting and trees including a 32m high green wall.
23. Alongside the new street level public realm, a mezzanine level (421sq.m GIA) provides for a generous internal public realm area accessible by the public between 7am – 11pm. There would be scope for local groups to book and use parts of this level, as part of an extension to the Community Space described below. The Mezzanine level would be accessible via a dedicated prominent staircase at the front end of the building, alongside dedicated lift access.
24. The development would include 507sq.m (GIA) of community space (Class Sui Generis), referred to as Creechurch Hall, located at Level 1 of the proposed development. The level 1 community space has the capacity to accommodate up to 480 people, with flexibility built in so that the space can be used to meet varying user needs from large gatherings to smaller meeting spaces. The community space would be available to pre-book, free of charge for community-based groups between 10am – 9pm on weekdays and 9am – 5pm on Saturdays. This space has been designed to encompass formal and informal flexible space that could be utilised by local communities and networks, as well as hosting a range of providers from local non-profit organisations, schools and other education uses, local community groups. Access to the first floor would be via a dedicated staircase and lift. The offer and programme for Creechurch Hall would be developed in consultation with potential operators, community partners, institutions, businesses and end users. The delivery and management of Creechurch Hall would be secured through the Section 106 Agreement.
25. A total of 443 long stay and 26 short stay cycle parking spaces would be provided at basement level, along with associated cycling facilities including lockers and showers. Access for cyclists would be via a prominent cycle parking entrance at ground level off Creechurch Lane, or via a dedicated cycle lift in the same location. Short stay spaces would be located at basement level, with a concierge service provided at ground floor level.

26. The servicing of the building would take place within a dedicated off-street service area at ground level, accessed through Heneage Place. Servicing would be subject to offsite consolidation which would be secured via a S106 obligation.
27. Dedicated areas of planting and greening would be incorporated into the development through a combination of green walls, green landscaping and new tree planting at ground level within the surrounding public realm.

Consultation

28. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. Prior to the application being submitted the applicant has undertaken extensive pre-application consultation with key decision making authorities, key stakeholders and local community (including nearby residents). The applicants have ongoing engagement with Bevis Marks Synagogue from pre-application through the application process.
29. Two virtual Public Exhibitions were held between 1st July to 28th July 2020 and again between 25th September to 13th October. 1,553 newsletters were sent twice, first in June 2020 and the second in September 2020, advertising the consultation website and inviting feedback. The responses to the pre-application consultation included; the need for additional office space that can adapt to a post-covid world, high quality floorspace of a different scale, high quality public realm, the addition of new retail and community space, welcomed a new pocket park and the north south pedestrian route and the positive benefits of a new community space.
30. The applicants have directly engaged with The Aldgate School to discuss how the community spaces can be made relevant to the pupils at the school and provide outreach opportunities for the pupils and other local children.
31. The applicants have also directly engaged with Aldgate BID which welcomed the community space which would be valuable for holding training and skills workshops.
32. Following receipt of the application it has been advertised on site and in the press and following the receipt of additional information has been consulted upon twice, under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

33. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.
34. The applicants have provided a detailed response to matters raised in consultee and third-party responses which are available to view on the public website and are listed in the background papers list at the end of this report.

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

Grade I listed Bevis Marks Synagogue (View 45)

View 45 illustrates a major juxtaposition in scale between Bevis Marks and the proposed development which encroaches on the secluded courtyard setting of the synagogue.

The cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. The proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building.

Grade II* listed Holland House (View 42 from Bury Street and View 43 from Bury Court)

The proposed development would be highly visible in both views, and would rise up directly behind Holland House. HE consider that this would diminish the appreciation of the striking architectural form of the building, therefore causing some harm to its significance - this harm to be low due to the wider tall building context in the area.

Overall, HE consider that the development would cause a high level of harm to a designation of outstanding significance, principally due to the impact on the Tower of London, particularly evident in LVMF View 10A.1. HE objects to this application, and continue to strongly recommend that a reduction in height of the proposed development is explored in order to avoid this harm. As HE have identified harm to a World Heritage Site, the Authority is required to notify State Parties (DCMS in this case) who will make a decision on whether to notify the World Heritage Centre.

Officer Response to Comments: Consideration of the impacts identified in Historic England's response are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.

Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1

	<p>from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view.</p> <p>Paragraph 202 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.</p> <p>Impact on Holland House: The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. The views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. The proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not cause harm to the setting or significance of the listed building.</p> <p>Officers consider that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and designated heritage assets (including within the Tower of London WHS) and non-designated heritage assets, causing no harm.</p>
Greater London Authority	<p>Principle of development: The redevelopment of the site for an office-led development within the CAZ, recognising its importance as an internationally and</p>

	<p>nationally significant office location is supported in principle. Further discussions are required regarding affordable workspace and how the proposed mezzanine space and pocket park would operate in synergy as a legible and functional public space.</p> <p>The applicant should also ensure that active frontages are achieved on Creechurch Lane and consider the height and proportions of the arcade, ensuring that the retail/café frontage is not perceived as an internalised lobby.</p> <p>Historic Environment: The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to the significance of a number of Listed Buildings and Conservation Areas. The Heritage Impact Assessment does not include a number of heritage assets that will be impacted and the Townscape, Built Heritage and Visual Impact Assessment lacks sufficient detail to enable a comprehensive assessment of the heritage impacts of the proposal. Further information is required to enable GLA officers to consider the impact of the proposals upon the historic environment prior to Stage 2 and to carry out the required planning balance.</p> <p>Design: A tall building is acceptable in principle given the site is located within the Eastern Cluster but requires a sensitive design approach given its location in the setting of a number of heritage assets and the Tower of London WHS – in particular the materiality of the upper part of the building should be reconsidered to ensure the building reads as being familial to the Eastern Cluster and more different from the WHS.</p> <p>Strategic views: The height, scale and appearance of the proposed development within LVMF view 10A.1 would cause harm to this strategic view.</p> <p>Grade II* Listed Holland House: The proposed development would increase the sense of scale of development in the streetscape and though it is offset to the rear of the building, the proposed development would have an impact upon the ability to appreciate the heritage asset. From views adjacent to 30 St Mary Axe Holland House has a</p>
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clear backdrop of open sky. GLA officers consider that it would clearly have an impact on the setting of the heritage asset and the contribution it currently makes to the ability to appreciate the architectural significance of Holland House.

Other Heritage Assets to Consider:

Church of St. Botolph - Whilst some views are already compromised by modern buildings, the proposed development is considered to cause harm to the setting of the Grade I Listed church.

Church of St Katharine Cree – The proposed development would significantly alter the scale of built form and reduce the level of open sky on the street, causing harm to the setting of the Grade I Listed building.

Bevis Mark Synagogue – The proposed development, together with the future proposed development of 1 Undershaft and 100 Leadenhall, would alter the setting of the synagogue and result in harm.

Church of St Helen at Bishopsgate - in consideration of the future development of 1 Undershaft, it may be likely that the proposal would not constitute change such that it would further impact on the setting or the wider conservation area.

Trinity Square Gardens – GLA officers consider there would potentially be some negative impact on the setting of the heritage asset and the conservation area.

Lloyd's Avenue - The proposed development would be visible and dominant next to 30 St Mary Axe, rising significantly taller and impacting the views from the conservation area. Taking into consideration future proposed development, the proposals would further diminish the view and have a negative impact on the conservation area and its setting.

An assessment on the impacts of the following heritage assets should be provided: Church of St Andrew Undershaft; Church of St Helen's Bishopsgate; Sir John Cass School Aldgate; 38 St Mary Axe; Bishopsgate Institute; Tower Bridge – views from Shad Thames; Church of All Hallows; 72-75 Fenchurch Street/1Lloyds Avenue; Bishopsgate Institute; and 2 Brushfield Street Grade II*

Officer Response to Comments: Consideration of the impacts on the ToL WHS are contained in the

	<p>following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.</p> <p>Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer’s ability to appreciate its OUV, integrity, authenticity or significance in this view.</p> <p>Paragraph 202 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.</p> <p>Impact on Holland House: The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. The views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. The proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not cause harm to the setting or significance of the listed building.</p> <p>Overall, it has been found that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and other designated</p>
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	<p>heritage assets (including Church of St Botolph, St Katherine Cree, Trinity Square Gardens, Lloyds Avenue CA) , including those within the Tower of London WHS, and non-designated heritage assets, including the additional heritage assets requested for assessment by the GLA (Church of St Andrew Undershaft; Church of St Helen’s Bishopsgate; Sir John Cass School Aldgate; 38 St Mary Axe; Bishopsgate Institute; Tower Bridge – views from Shad Thames; Church of All Hallows; 72-75 Fenchurch Street/1Lloyds Avenue; Bishopsgate Institute; and 2 Brushfield Street Grade II*), causing no harm.</p> <p>Transport: Proposed car and cycle parking is acceptable. Future impacts on station capacity and crowding should be considered. Widening of footways should be secured via s278 or s106 agreement to ensure pedestrian comfort levels are acceptable.</p> <p>Access through the north -south pedestrian route should be conditioned.</p> <p>The applicant should consider how cyclists would be segregated from servicing vehicles using the same street.</p> <p>A contribution of £220,000 has been requested for a new Cycle Hire station. A full Travel Plan, Delivery and Servicing Plan and full Construction Logistics Plan should be secured by condition.</p> <p>Officer Response to Comments:</p> <p>Pedestrian priority would be delivered through the S278 agreement and the broad details of this are set out in the transport and highways section of the report.</p> <p>Servicing hours will be restricted during peak hours (Am, lunch and PM peaks) when there are likely to be more cyclists commuting to and from the building.</p> <p>The applicant has agreed to carry out an assessment of the cycle route between the site and Cycle Superhighway 2 (CS2) using TfL Cycle Route Quality Criteria prior to Stage 2, and provide a contribution toward cycling improvements, both to cycle hire and cycle routes, in the nearby area and this would be secured by planning obligations.</p>
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	<p>Access through the north -south pedestrian route would be secured via planning obligations including the hours of access.</p>
<p>Historic Royal Palaces (HRP)</p>	<p>HRP recognise that the aim of the design approach is to cut back at the upper part of the proposed tower, in order to maintain some visual separation from the White Tower silhouette in the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge. Without the cut back from the 84m high 'base', the upper part of the tower would appear visually to 'touch' the western side of the White Tower in this view. With the cut back, there remains just a sliver of sky space to separate it, but, is not static: if you move a few metres north the proposal would appear to rise directly out of the White Tower.</p> <p>The LVMF guidance for view 10A.1 states that: 'The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued.'</p> <p>Regarding the background to the Tower, the LVMF guidance notes, <i>'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site.'</i></p> <p>HRP state that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The proposal for Bury House, would now increase the existing compromise of the free space around the White Tower.</p> <p>HRP states that the attention given to LVMF view 10A.1, does not mitigate the damaging visual impacts that are evident in the dynamic journey across Tower Bridge and in the local views from</p>

	<p>within the inner ward and the northern ramparts of the Tower identified in our Local Setting Study 2010. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVIA view 22) and in the view from the northern wall walk east of the Devereux Tower (TBHVIA view 25), as well as from the causeway between the Byward and Middle Towers (TBHVIA view 28). In these views, the proposed building would rise like a narrow finger, standing apart from the existing and consented buildings of the Cluster and increasing the visual intrusion of the modern city skyline into the inner ward and important outward views. The intrusion would not be softened or screened when the trees are not in leaf.</p> <p>HRP states that a key impact of the proposed development would be that it would extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the City. Although relatively modest in height, the proposal would be high enough to suggest a further continuation of the downward slope of the Cluster towards the White Tower - pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme.</p> <p>Historic Royal Palaces objects to the proposed development, which we believe would be harmful to the OUV of the Tower of London WHS.</p> <p>Officer Response to Comments: Consideration of the impacts identified in HRP's response are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.</p> <p>Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view.</p>
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	<p>Paragraph 202 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.</p>
<p>Transport for London</p>	<p>Stage 1 Road Safety Audits (RSAs) to be carried out prior to determination for all local highway works proposed.</p> <p>Contribution of Section 106 (S106) funding, Section 278 (S278) works or works in kind to the City Cluster Liveable Neighbourhood project, to mitigate poor expected Pedestrian Comfort Levels (PCLs) close to and partially caused by the proposed development.</p> <p>.</p> <p>Pedestrian Comfort Levels (PCLs) close to and partially caused by the proposed development. Further discussions should take place between the applicant, TfL and the City Corporation to resolve this issue prior to determination.</p> <p>The covered pedestrian route is to be publicly accessible from 07:00-23:00 each day and the pocket park will be open to the public 24 hours a day, both of these should be secured by condition or in the S106 agreement.</p> <p>Investigation on the removal of general car parking on Creechurch Lane, to provide more space between cyclists and service vehicles would be supported.</p> <p>S106 contribution of £220,000 for a new Cycle Hire station.</p> <p>A full Active Travel Promotion Plan to be secured by condition.</p>

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

London Borough of Hackney	No objection.
London Borough of Southwark	<p>No formal objection is raised to the proposed development but the Council wishes to make the following comments:</p> <p>Design</p> <p>Of note is the overwhelming presence of the City cluster of tall buildings – the proposal would be one of a number of tall buildings in close proximity. A number of views have been tested in the application documents, and those relevant to Southwark are:</p> <p>View 8 - It is recognised that there would be some impact on the Tower Hill War Memorial, however, there would be limited harm arising due to the combined effect of the City cluster clearly visible in this view.</p> <p>View 9 - It is recognised that there would be some impact on the Tower of London World Heritage Site (WHS) - the proposal would echo the features of the tower, only it would be notably taller than the WHS.</p> <p>Views 16, 17 and 18 - The tower would form the new eastern-most edge of the City cluster in these view. It would have a limited effect on the viewer's ability to recognise and appreciate the strategic landmark of the Tower of London WHS.</p> <p>In these views the proposal would be separated and, in some instances, isolated beyond the eastern edge of the City cluster. These dynamic views demonstrate that the proposal would introduce a new feature into the view that would be a constant presence.</p> <p>Transport:</p> <p>The TA must cover demolition and construction. Cumulative effects of the Proposed Development and other committed schemes in the surrounding area must also be considered, together with the following issues:</p> <ul style="list-style-type: none"> • Road safety encompassing the analysis of at least the last 3years traffic accidents occurring in the vicinity of this development, identifying the associated contributory factors and suggesting ameliorative measures where there is any specific pattern. • The evaluation of the impact on highway/public transport and pedestrian/cyclist conditions should include improvement measures where deficiencies are identified.

- The scope of the Transport Assessment must include measures to assist the mobility-impaired pedestrians/cyclists and the cycle parking provision must meet the New London Plan standard.

The following supplementary documents would also need to be provided:

- Construction management plan;
- Delivery and service management plan and;
- Car parking management plan detailing the provision of adequate disabled car parking spaces even though no other car parking provision is proposed.

Officers Response to Comments:

Design:

Consideration of the impacts on views and the impact on the Tower of London are contained in the following sections in this report: Design and Heritage, Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.

Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view.

Paragraph 202 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.

Transport:

The impact on the surrounding highway and public transport network is considered in the transport sections of this report.

	<p>Cycle parking will meet the London Plan 2021 standards for both short and long-term parking, as set out in the sections on cycle parking.</p> <p>The applicant will be required to fund walking and cycling improvements to the surrounding highway network as detailed in the transport section of this report.</p> <p>A demolition logistics plan, a construction logistics plan and a delivery and servicing management plan will be secured by condition/obligation. No car parking is proposed and as such a car parking management plan is not considered necessary.</p>
London Borough of Tower Hamlets	<p>The London Borough of Tower Hamlets is of the view that the proposals would result in a significance adverse impact on the Grade I listed Tower of London WHS including its setting and townscape views.</p> <p>The proposals would diminish the ability to appreciate the OUV of the Tower of London WHS. As illustrated in LVMF views and views from within and around the WHS, the height and location of the proposed development in relation to the Tower of London WHS are considered to adversely affect the following attributes of the OUV; the physical prominence of the White Tower; the concentric defences; the site's strategic and landmark setting; and the site's status as an internationally famous monument.</p> <p>Officer Response to Comments: Consideration of the impacts on the ToL WHS are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.</p> <p>Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view.</p>

	<p>Paragraph 202 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.</p>
City of Westminster	No objection.

Representations (objections)	
<p>London Sephardi Trust (The Trust) And The Spanish & Portuguese</p>	<p>Representatives of the Trust have met with the Applicants and their team a number of times in the Spring and Summer of 2020 prior to the application being submitted and continue to be in correspondence.</p> <p>The Trust objects to the proposals due to the significant adverse impacts the proposed development will have on</p> <ul style="list-style-type: none"> a) the impacts on the heritage significance of the synagogue; b) the daylight and sunlight impacts on the synagogue building and courtyard; c) sense of enclosure and encroachment on the Synagogue courtyard <p>The impacts of the proposed development need to be viewed individually and also (whether approved or under consideration including the application for a further tall office building at 33 Creechurch Lane).</p> <p>In formulating its representations, the Trust is being advised by independent consultants Caroe Architecture Ltd (Heritage), Point2 Surveyors Ltd and Paragon Building Consultancy Ltd (the expert reports have been appended to the representation and is available to view online).</p> <p>Harm to the heritage significance of the Grade I listed Synagogue complex and its setting</p>

	<p>The Trust are concerned that the application documents do not present a full picture of the proposal's impacts on the Synagogue and its setting. The Caroe report highlights that more robust 3-dimensional modelling and CGI views are required in order for Officers and Members to appreciate the impact on the north and west facades of the Synagogue and Beadles House from within the courtyard.</p> <p>On the basis of what has been provided, the Trust's heritage experts conclude:</p> <ul style="list-style-type: none">• The proposed development will have a significant impact on the heritage significance of the Synagogue and its historic Courtyard setting as well as Beadle's House due to its proximity and scale.• The proposed building will significantly reduce the visible sky in the south-eastern view from inside the Courtyard and detract from the viewer's ability to clearly discern the historic character and aesthetic and architectural qualities of the Synagogue building.• Caroe's report considers that given the harm caused by existing development to the setting of the Synagogue, the Synagogue's setting cannot withstand further harm and the harm resulting from this proposal is incapable of being justified.• Caroe's view is that where the cumulative effects of consented and proposed developments are considered (including 33 Creechurch Lane) represents harm at the very upper end of the 'less than substantial harm' spectrum to Bevis Marks Synagogue. <p>The Trust states that the Applicant has not provided a clear and convincing case to justify the harm to the heritage asset which is a key requirement of New London Plan policy D9 (Tall Buildings). The public benefits are not capable of outweighing the harm that will be caused. The public benefits promoted by the applicant are minor and are not unique to this development. The scale of development proposed is not necessary to secure public benefits of a similar</p>
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	<p>magnitude. Whilst there is policy support for office space in the City there is already a significant pipeline of offices both under construction and with permission within the City of London. Other benefits of the scheme are private in nature and will only accrue to the developer.</p> <p>Officer Response to Comments:</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>There is no harm identified to the Synagogue, officers have undertaken an assessment of the public benefits of the scheme in respect of the harm to the ToL WHO (engaging NPPF para 202). The assessment of the public benefits is set out in the ‘Public Benefits’ Section of the report.</p> <p>Daylight, Sunlight and Overshadowing</p> <p>The Trust states that the Synagogue already experiences poor light levels. The most vulnerable part of the Synagogue is the Bimah – the raised platform from which prayers are led. This requires adequate light and the entrance to the courtyard which currently benefits from adequate sunlight levels which contribute greatly to its amenity.</p> <p>The natural lighting of the Synagogue has religious significance. The existing low levels of light within the Synagogue mean that the building cannot withstand further substantial losses of daylight. The Synagogue and its worshipers rely on natural daylight, which is how it was designed to be experienced. It is very difficult and intrusive to install electric lighting.</p> <p>Point2 (surveyors on behalf of the Synagogue) state that the proposed development would reduce the daylight and sunlight available to the Synagogue and the courtyard to levels significantly below BRE guidelines.</p>
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Daylight

- The windows in the south façade of the Synagogue which face Bury House will experience a noticeable alteration of vertical sky component (VSC) with reductions of VSC of up to circa 32%. In the cumulative scenario, where 33 Creechurch Lane is also developed the impacts will be even more severe resulting in VSC reductions of 45%.
- These losses are exacerbated by the fact these windows already receive low levels of light. The existing light is so low that any further reduction in light has a large effect necessitating electric lighting at most times during the day. There is incremental loss and the synagogue cannot afford any further loss because the last bits of light are central to the Bimah (raised platform with a reading desk).
- Further reductions will be seriously harmful to the overall light levels received and will force the Synagogue to rely on the use of artificial lighting (which is not easily retro fitted due to the Grade 1 listed nature of the Synagogue).

Overshadowing

The courtyard is integral to Synagogue's communal functions and religious significance and represents the only place where worshippers of all sexes can gather before and after worship and is used for rituals and functions.

The Courtyard amenity space will experience significant overshadowing in the summer months when the space is most used. The Synagogue's existing courtyard is already poorly lit and receives low levels of sunlight due to the surrounding development. If the proposed development is approved it will suffer even greater reductions of direct sunlight which will harm its usability, its amenity value and its contribution to the setting of the synagogue.

- Based on the overshadowing assessment, all direct sunlight to the Courtyard amenity space from 12:30 to 14:00 in the height of summer will be materially impacted and effectively lost as a result the proposed redevelopment of 31

	<p>Bury Street. This is further compounded in the cumulative scenarios.</p> <ul style="list-style-type: none"> • The proposed development at 33 Creechurch Lane will result in over shadowing of the majority of the Courtyard from 09:00-11:30 • The proposed development at 31 Bury Street will result in over shadowing of the majority of the Courtyard from 12:30-14:00 • The proposed development at 100 Leadenhall will result in over shadowing of the majority of the Courtyard from 14:00-15:00 • Thereafter there remains no direct sunlight due to the remaining buildings in the eastern cluster lying to the Courtyards west. <p>The impact this would have on the use of the Synagogue is significant and the Trust considers this unacceptable and in breach of development plan policies Policy DM10.7(1) of the <i>City of London Local Plan (2015) and D9 3) a) of the New London Plan</i>. The Trust asks that the City refuse the development on this ground alone.</p> <p>Officer Response to Comments: The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration. Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC</p>
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	<p>changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p> <p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Dr Paul Littlefair acknowledges that the loss would only be to a small area and the impact would be minor adverse. Officers consider the loss of sunlight to the Courtyard would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance</p>
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	<p>that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.</p>
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Servicing, Deliveries and Access

The proposed development will lead to a significant increase in pedestrian, cycle and vehicular movements along Heneage Lane that would cause noise disturbance to the Synagogue. These impacts, unless properly controlled, would have a detrimental impact on religious services and other activities within the Synagogue.

The proposed layout of the scheme introduces a new pedestrian and cycle route through the application site connecting with Heneage Lane and Bevis Marks. This route is likely to significantly increase the number of pedestrians and cyclists using Heneage Lane. At present the Lane is a quiet passageway in keeping with the setting of Synagogue.

Officer Response to Comments: The impact of noise and disturbance by pedestrians and cyclists is covered in the Transport and Noise and Vibration sections of the report.

Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane (approx. 70 net trips/ hours at AM and PM peak periods) following the continuation of the north/south desire line through the site. The additional pedestrian trips on Heneage Lane would not be considered likely to unduly impact pedestrian comfort.

It is not anticipated that cyclists would use Heneage Lane following the redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site.

The proposals would result in the removal of 18 car parking spaces and as such the number of car journeys to the site is expected to fall as part of the development. There is a modest increase in taxi and motorcycle journeys predicted, 6 each in the am and pm peak hours, the impact of which are not expected to be significant.

	<p>Access</p> <p>Heneage Lane is not suitable for the proposed intensification and the increased use particularly by cyclists will cause a danger for members of the Community accessing the Synagogue and particularly those with mobility difficulties.</p> <p>Officer Response to Comments: The proposed development would not alter the access to the Synagogue for any visitors.</p> <p>Servicing and Deliveries</p> <p>The proposed development's Servicing Strategy relies on a proposed servicing bay located in the same location which currently serves the existing building. The Applicant relies on what they describe as a "legal right of way" which comprises of a vehicular route through an undercroft beneath Valiant House, known as Heneage Place. The Trust owns the freehold to Valiant House and in turn to the right of way to the service yard within the application site. The Trust objects to any intensification of this right of way as proposed by the scheme.</p> <p>Officer Response to Comments: This is considered to be a neighbourly matter and not a material planning consideration.</p> <p>Due to the significant proposed uplift in floor area the proposed servicing bay and access to it will be subject to a significant intensification of its use. The Transport Statement suggests that there will be 43 servicing vehicle trips per day and will rely on consolidation. without details relating to how this would work in practice it is considered unrealistic to predict a reduction in the number of servicing vehicles.</p> <p>Officer Response to Comments: A cap limiting the number of deliveries per day to 22 would be secured through the S106 agreement. Off-site consolidation centres require deliveries to be routed to a site for consolidating onto fewer, fuller vehicles. The achievement of a 50% reduction in delivery and servicing vehicle numbers through the mandatory use of an off-site consolidation centre is considered realistic.</p>
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The management of the loading bay would be detailed within the Delivery and Servicing Plan (DSP), (secured through the S106 agreement). The S106 agreement would prohibit deliveries during peak pedestrian hours of 0700 – 1000, 1200 – 1400 and 1600 – 1900. The DSP would detail measures to minimise the impact of deliveries and servicing vehicles, including the use of a booking system to ensure only one vehicle is servicing the site at any given time.

Further details of this is discussed in detail in the Transport section of the report.

Construction Impacts

- **Ground heave and movement** - due to the delicate nature of the Synagogue there must be no construction activities carried out likely to cause ground movement. Real-time 24-hour monitoring will be required.

Officers Response to Comments: consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.

- **Vibration** – there is some potential for damage and disturbance from vibration during the works. We would expect to, but have not seen a vibration strategy for keeping the levels to no higher than 1mm per second.
- **Noise** – the submitted Construction Environmental Management Plan confirms the developers intention to work to approved statutory working hours. We will need to secure additional restrictions to ensure there is no noise and disturbance during prayer times and services including weekday mornings before 08.30.

Officer Response to Comments: consideration of these impacts are set out in the Noise and Vibration section of the report. Details of noise and vibration mitigation, including control over working hours and

	<p>types of equipment to be used would be included in the Scheme of Protective Works and Construction Environmental Management Plan which are to be secured by condition.</p> <ul style="list-style-type: none"> • Dust – must be managed to ensure no penetration of the internal spaces and no health risk to users of the Courtyard. <p>Officer Response to Comments: The applicant would be required to submit a Construction Environmental Management Plan which would need to include details of the management of construction dust. Consideration of these impacts are set out in the Noise and Vibration and Air Quality section of the report.</p> <ul style="list-style-type: none"> • De-watering - Mace have set out the outline proposals for temporary works sequencing to form the 3 storeys of basements including extensive de-watering using large steel props spanning the complete width of the excavation (known as cross-site propping) and a secant piled perimeter wall. We will need to assess this impact specifically for the Synagogue’s structure with such large scale de-watering of the ground on the Bury House site. <p>Officers Response to Comments: consideration of these impacts are set out in the ‘Impact to Synagogue Foundations and Ground Movement’ section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.</p> <p>Cumulative Impacts</p> <p>Cumulative impacts of development are an issue particularly pertinent to the Synagogue given the magnitude of change which has occurred in the streets immediately surrounding the Synagogue in recent years. Para.28 of Historic England ‘Managing Significance in decision-Taking in the Historic Environment both set out the importance of considering cumulative impacts stating that:</p> <p><i>“The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale</i></p>
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change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape"

Officers Response to Comments: Cumulative impacts have been taken into account when assessing the significance of the Synagogue. consideration of these impacts are set out in the 'Designated Heritage Assets' section of the report. The Environmental Statement makes the following comment in respect of cumulative impacts on the Synagogue:

'Permanent Adverse effect interactions in relation to daylight, sunlight and noise amenity to existing non-residential property (Bevis Marks Synagogue). The effect interaction is not considered significant on the basis that the individual daylight, sunlight and noise effects are not themselves significant and Operational Noise Management Plans can be implemented to achieve suitable rating noise limits'

The Trust states that it is questionable whether the proposal and others coming forward in the surrounding area would comply with the City of London's own Local Plan policy CS14: Tall Buildings.

Officer Response to Comments: The Environmental Impacts of the proposed development have been thoroughly assessed taking into account cumulative assessments and the impacts are considered to be acceptable and mitigation measures have been proposed (via conditions and S106 obligations) where necessary. When assessed against the development plan, the environmental impacts would be compliant with the development. The proposal has been assessed against Local Plan Policy CS14 and this assessment is set out in the Design and Heritage section of the report.

Conclusion

The Trust states that the scale of the proposed development is such that it will have multiple significant adverse impacts on the Synagogue both individually and cumulatively. The uniqueness of the Synagogue as a heritage asset means that even modest impacts of the proposed office building are not acceptable in policy terms.

The impacts on the setting, on the daylight and the sense of encroachment and loss of sunlight to the special entrance Courtyard would be overwhelmingly harmful. The balance to be struck is between the harm to a unique asset in the UK versus a serviceable but ordinary office building with limited public benefits.

Further Representation dated 17.09.2021

A further representation has been received from the Synagogue following the latest consultation in August 2021.

After reviewing the Townscape, Built Heritage and Visual Impact Assess, the Synagogue disagree with the view set out in the revised assessment (Addendum to ES Vol.2) and the moving renders prepared by Montague Evans. The Synagogue disagrees with the views set out in the revised assessment that *'the proposed development does not change the appreciation of the heritage asset'* and their conclusion that 'the significance of the effect would be Negligible Neutral'. The additional modelling provided whilst welcome has not addressed the concerns previously set out. The views and particularly those from within the Courtyard clearly demonstrate the harmful impact of the proposed scheme on the significance of the setting of Bevis Marks Synagogue.

The harm caused also affects the ability to appreciate the historical and aesthetic significance of the historic complex of Synagogue, Courtyard and Beadle's House. In this respect the proposals remain contrary to paragraphs 199 and 200 of the NPPF.

The video presentation "Bury Street Animation – Emerging" whilst including all other proposed building – omits the proposed building at 33 Creechurch Lane.

Caroe Architecture in their assessment of the submitted material go on to reaffirm their view that the cumulative harm arising from the proposed and consented schemes remain at the upper end of less than substantial harm. The public benefits promoted are not of such magnitude and nor are they only delivered by a scheme as harmful as that proposed. We therefore remain firmly of the view that the proposed development will be overbearing and harmful to the significance and setting of the Grade 1 listed Synagogue contrary to National, Regional and Local Planning Policy and should be refused on this basis.

Officers Response to Comments: Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. There is no harm identified to the Synagogue, officers have undertaken an assessment of the public benefits of the scheme in respect of the harm to the ToL WHO (engaging NPPF para 202). The assessment of the public benefits is set out in the 'Public Benefits' Section of the report.

Sunlight/Daylight and Radiance Survey

The report prepared by GIA presents the current situation and clearly demonstrates how little direct view of the sky remains and how light levels within the Synagogue are already very low. However, this metric alone is not the most appropriate to consider the full additional impact the proposed development will cause to light conditions within the Synagogue and its courtyard.

The proposed development at 31 Bury Street will cause increased shading of the Courtyard. Using the standard metrics promoted by CofL, GIA's report does not adequately consider that 31 Bury Street will substantially shadow the current sunlight cast onto the courtyard.

The flawed consideration of this matter is further exacerbated by the fact the study does not take into account the predominant use of the Synagogues Courtyard being in the summer months not 21st March.

	<p>Whilst we object to their scheme the Synagogue would like to thank the developers for their openness and their willingness to continue to engage throughout the planning process.</p> <p>Officers Response to Comments: The submitted Radiance study and the review of the Daylight, Sunlight and Overshadowing assessment has been independently reviewed by Dr Paul Littlefair. With regards to Radiance studies Dr Paul Littlefair states that there is no objective yardstick to use when using radiance images. In contrast BRE guidelines give clear cut measures by which the loss of light may be judged. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in the Environmental Statement in line with BRE Guidelines, which is the methodology established within the development plan/policy framework.</p> <p>The daylight, sunlight and overshadowing assessment has been reviewed and the full details are set out within this part of the report. A response is also provided above following the receipt of the initial objection the Synagogue sent.</p>
<p>Eversheds Sutherland (International) LLP on behalf of The Wardens And Society Of The Mystery Or Art Of The Leathersellers</p>	<p>Leathersellers owns a number of property holdings within the immediate vicinity of the application site: 3, 5, 6, 7, 15, 16 and 17 St Helen’s Place;</p> <ul style="list-style-type: none"> • 33 Great St Helens; • 52-68 and 88 Bishopsgate; • 12/20 Camomile Street; and • 25-51 and 61 St Mary Axe <p>Impact on the St Helen’s Place Conservation Area and The setting of nearby heritage sites and listed buildings</p> <p>The proposed development has a direct impact upon the setting of a series of significant heritage assets within the immediate vicinity of the application site and, more particularly, in respect of the scheme’s relationship with the Tower of London World Heritage Site (ToL WHS).</p> <p>The representation letters sets out the assessment and conclusion raised in Historic England’s Consultation Response in respect if the impact to the</p>

	<p>TOLWHS. They state that they are unable to agree with the findings in the submitted Townscape, Built Heritage and Visual Impact Assessment and have concerns that the findings of the assessment cannot reasonably conclude that the application proposal <i>“would be at the low end of less than substantial harm under the terms of paragraph 202 of the NPPF”</i></p> <p>Officer Response to Comments: Consideration of the impacts on the ToL WHS are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.</p> <p>Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer’s ability to appreciate its OUV, integrity, authenticity or significance in this view.</p> <p>Paragraph 202 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.</p> <p>Daylight and Sunlight Impacts The properties at 15 and 16 St Helen’s Place, 12/20 Camomile Street and 61 St Mary Axe have been identified in the baseline for assessment. None of these properties are the subject of any detailed sensitivity assessment for daylight/sunlight impacts, overshadowing, solar glare or light intrusion. The objector states that the absence of any explanation leaves them in doubt that the assessment is complete. They state that they have yet to conclude our detailed impact assessment of the proposed development and reserves their position in relation to these issues. They do have</p>
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	<p>concerns that 15 and 16 St Helen’s Place, 12/20 Camomile Street and 61 St Mary Axe will experience a significant adverse impact as a result of the construction of another tall building in this area.</p> <p>Officer Response to Comments: Officers can confirm that the submitted daylight, sunlight, overshadowing, light intrusion and solar glare assessment does take into account the stated properties within the ‘baseline conditions’ These properties are considered to be further away approximately 135-190m away from the proposed development and none of the windows directly face the Site. Due to the distance of these properties, a detailed technical assessment was not carried out. The applicants have since confirmed in a letter that there would be no material impact to the properties identified. Your officers concur with these conclusions and do not consider that there would be a material impact to the properties identified.</p>
<p>Board of Deputies of British Jews</p>	<p>A letter has been received regarding the affect both the application scheme and adjacent scheme at 33 Creechurch Lane could have on the Bevis Marks synagogue. It raises the following concerns:</p> <ul style="list-style-type: none"> • The proposed Bury House development would block out light. The synagogue was designed with natural light in mind and any severe restriction to that would be detrimental to worshippers. • Bevis Marks has significant importance as a living symbol of the place of British Jews in this country. It is also a symbol to wider society, of how diversity is integral to London. It has been in constant use for over 300 years. <p>The potential risk to the Synagogue’s foundations, loss of light or restricted disabled access is upsetting. Bevis Marks Synagogue is of such enormous significance that the City of London consider explicit long-term protection for the building and its surrounds so that they no longer have to fight each development individually.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing and Access and Inclusivity.</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It</p>

	<p>is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual</p>
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	<p>period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p> <p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Dr Paul Littlefair acknowledges that the loss would only be to a small area and the impact would be minor adverse. Officers consider the loss of sunlight to the Courtyard would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative</p>
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	<p>scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.</p> <p>Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.</p> <p>The proposed development does not propose any alterations to the way visitors access the Synagogue.</p>
Office of the Chief Rabbi	A letter has been received outlining the Synagogue's importance and raising the following concerns regarding the proposed development.

	<ul style="list-style-type: none"> • The potential to significantly affect the natural light that can reach the building and, in turn, disrupt prayers taking place inside. • This would have a notable impact on the atmosphere that Bevis Marks, to the detriment of those worshipping there, especially when coupled with a separate planned development on Creechurch Lane. • The Synagogue is considered to be a cherished landmark of the community, and a source of great spiritual sustenance to British Jews. It is essential that it be carefully protected, as any other place of worship so steeped in history would. • Necessary arrangements are made to ensure that this new development does not cause lasting damage to Bevis Marks Synagogue. <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of</p>
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	<p>Courtyard would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The</p>
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<p>The Worshipful Company of Ironmongers</p>	<p>An objection has been received raising following concerns:</p> <ul style="list-style-type: none"> • The synagogue is a building of huge historical significance and occupies an important place in the Jewish religion in this country. • The application for a 50-storey building at 31 Bury Street would massively reduce the light in the historic courtyard of the Synagogue. • The proposed building at 33 Creechurch Lane appears to have 22 storeys which will completely block all light from the window at that end of the Synagogue for most of the day. • Neither of the proposed developments appears to have taken any account of these issues. • Bevis Marks Synagogue is unique by virtue of its location, history, architecture and its cultural and religious significance. • If these developments proceeded, they would impact severely on the continuance of Bevis Marks as a functioning Synagogue. <p>The Ironmongers' Company urges the Corporation and the Planning Committee to give due consideration to these factors when the proposed developments are discussed and brought forward for a decision.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing.</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It</p>

	<p>is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would be minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual</p>
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Drapers' Company	<p>An objection has been received raising following concerns:</p> <ul style="list-style-type: none"> • Bevis Marks Synagogue is not only an exquisite Grade 1 listed building but is also the only non-Christian place of worship in the City. It has been used continuously for worship longer than any other synagogue in the world and occupies a crucial place in the history of the Jewish religion in this country. • By any objective measure it is a building of huge historical significance. Given the Synagogue's importance for both the City and this country's Jewish community, the Drapers' Company is anxious that the building should be protected.

- The proposed 50-storey development would have the effect of reducing light to the courtyard of the Synagogue.
- The proposed 20-storey development in Creechurch Lane will result in loss of light into the synagogue. There will also be an adverse impact on levels of light in the courtyard of the Synagogue.
- Neither development seems to take account of these issues.

The Drapers' Company urges the City to give due consideration to these factors when the proposed development comes up for decision.

Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.

Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.

The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).

	<p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would be minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p> <p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Dr Paul Littlefair acknowledges that the loss would only be to a small area and the impact would be minor adverse. Officers consider the loss of sunlight to the Courtyard would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to</p>
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	<p>detrimentally impact on the community or societal significance.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and its Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact.</p>
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	The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.
Ancient Monuments Society	<p>A letter has been received to testify the synagogues outstanding significance and details the following:</p> <ul style="list-style-type: none"> • It is historically the most significant synagogue in the country. In 1928 it was recognised as a scheduled monument, some twenty years before the concept of Listing was first introduced. • All established authorities, such as Dr Sharman Kadish, give it that first rank. It receives 5 pages, including full-page, illustrations in her “Jewish Heritage in Britain and Ireland” of 2015, published by Historic England. • It was the subject of one of the first ever individualised campaigns – the Bevis Marks Anti-Demolition League, set up in the 1880s. • Part of its emotive power is that it is such an obvious survivor, a diminutive surprise in its own internal courtyard, without a street frontage. It lies surrounded by the office blocks of the City, of which it could so easily have been a victim, had not the Jewish-led campaign, endorsed fifty years after that by the secular authorities, saved it a century and a half ago. <p>It is remarkable, precious and of national, if not international, significance.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p>
The Georgian Group	<p>Bevis Marks Synagogue of high communal value locally and nationally</p> <p>Considerable harm would be caused to the setting and potential fabric of the synagogue - scale and</p>

	<p>massing of the building would harm setting of building and courtyard, as well as potential to cause substantial harm to the historic fabric from construction and environmental conditions created by tall buildings in close proximity</p> <p>Cumulative impact must be taken into account</p> <p>Georgian Group objects to application on heritage grounds.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Impact to Synagogue Foundations and Ground Movement' and Environmental Impact of Proposals on Surrounding Area</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.</p> <p>The Environmental Impacts of the proposed development have been thoroughly assessed taking into account cumulative assessments and the impacts are considered to be acceptable and mitigation measures have been proposed (via conditions and S106 obligations) where necessary. When assessed against the development plan, the environmental impacts would be compliant with the development.</p>
Rabbi of Bevis Marks Synagogue	<p>One of the best surviving examples of an intact Wren style City church with original interior;</p> <p>The backdrop of the Synagogue would be changed from having views of the sky to being framed by a 50 storey building;</p>

	<p>windows peering down on Synagogue would erase the sense of escape and tranquillity of the courtyard;</p> <p>Increased noise from footfall and cycling down Heneage Lane alongside the Synagogue eastern wall would disrupt prayers;</p> <p>Loss of light from height of proposed building - inability to read prayers with natural light;</p> <p>Religious vandalism from blocking out sun as it determines times of prayers;</p> <p>Loss of privacy in garden courtyard of 2 Heneage Lane (Rabbi's House);</p> <p>National Lottery Heritage Fund Heritage Centre planned for Synagogue, bringing in 40k visitors a year. This would be impacted negatively by proposed development.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Design, Designated Heritage Assets; Daylight and Sunlight and Overshadowing; Transport and Noise and Vibration.</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>Officers do not consider that there would be any more risk and loss of privacy than the existing situation as there are already a number of tall buildings which are in close proximity to the Synagogue.</p> <p>Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane (approx. 70 net trips/ hours at AM and PM peak periods) following the continuation of the north/south desire line through the site. The additional pedestrian trips on Heneage Lane would not be considered likely to unduly impact pedestrian comfort. It is not anticipated that cyclists would use Heneage Lane following the</p>
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redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site. The land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or have a detrimental impact that religious services would not be able to be carried out.

The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.

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	<p>overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p> <p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Dr Paul Littlefair acknowledges that the loss would only be to a small area and the impact would be minor adverse. Officers consider the loss of sunlight to the Courtyard would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or</p>
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	<p>consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard and ancillary buildings. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of the visibility of taller buildings seen in the backdrop to historic buildings. The close, immediate setting of the synagogue preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong contribution to its significance but the wider setting has changed significantly and now has a fundamentally different modern character that makes no material contribution to the historic significance of the Synagogue.</p> <p>The Synagogue Courtyard, is not considered to be a private residential courtyard but is seen to be part of the Synagogue as a place of worship.</p> <p>The intensification of the cluster would be considered to be an benefit to attract more visitors to the new Heritage Centre.</p>
<p>Furniture History Society</p>	<p>The significance of light in the design of Bevis Marks synagogue, which has already been impaired by the development of high-rise buildings in the area, is fundamental both to the architecture and to the appreciation of its historic contents. The proposed structures at 33 Creechurch Lane and at 31 Bury Street will reduce the light considerably within the building and will dwarf both the synagogue and the Rabbi's House. . The changing light during the day is fundamental not only to the proper appreciation of its historic fittings but plays a part in the spiritual purpose of the building.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It</p>

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<p>Conference of European Rabbis</p>	<p>Should the further development be allowed at 33 Creechurch Lane and 31 Bury Street, the Synagogue will come to be enveloped in shadow, its necessary light blocked, its privacy lost and its prayers disturbed by noise. These things will cause serious detriment to the functioning of this historical community, and in some respects make it impossible for them to carry out their religious duties. Causing harm to a Jewish Community's function is not only tantamount to bulldozing a synagogue building; it is worse. Any development on this site would be a profound desecration for the United Kingdom.</p> <p>Officer Response to Comments: Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance</p>

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	<p>numbers on Heneage Lane (approx. 70 net trips/ hours at AM and PM peak periods) following the continuation of the north/south desire line through the site. However, the land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. It is not anticipated that cyclists would use Heneage Lane following the redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or to have a materially detrimental impact on the use of the building to hold religious services.</p>
<p>Jewish Museum London</p>	<p>Bevis Marks Synagogue is a place of outstanding significance.</p> <p>It is much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government.</p> <p>This historically significant building does not exist within a vacuum and its relation to the proximity of other buildings and most importantly the light that fills the Synagogue, brings with it the symbolic meaning.</p> <p>The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers.</p> <p>Jewish Museum London delivering the multi-million pound investment from the National Lottery Heritage Fund to both protect and preserve the heritage within this unique space and also build a centre for learning for people.</p> <p>By being able to see the Synagogue with natural light illuminating the sanctuary through the windows and reflecting on the symbolism behind this message from the architect, students will understand the shared belief systems between faiths when it</p>

	<p>comes to our relationship with the natural world and how we create space that compliments and works with it even in urban areas.</p> <p>The Synagogue is a living, breathing community space that is readying to welcome more visitors than ever before and act as a place for interfaith and inter-community understanding.</p> <p>Officer Response to Comments:</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The</p>
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<p>Jonathan Djanogly MP</p>	<p>Bevis Marks Synagogue is a place of outstanding significance.</p> <p>It is much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government.</p> <p>This historically significant building does not exist within a vacuum and its relation to the proximity of other buildings and most importantly the light that fills the Synagogue, brings with it the symbolic meaning.</p> <p>The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers.</p> <p>Jewish Museum London delivering the multi-million pound investment from the National Lottery Heritage Fund to both protect and preserve the heritage within this unique space and also build a centre for learning for people.</p> <p>By being able to see the Synagogue with natural light illuminating the sanctuary through the windows and reflecting on the symbolism behind this message from the architect, students will understand the shared belief systems between faiths when it comes to our relationship with the natural world and how we create space that compliments and works with it even in urban areas.</p> <p>The Synagogue is a living, breathing community space that is readying to welcome more visitors than ever before and act as a place for interfaith and inter-community understanding.</p> <p>Officer Response to Comments:</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It</p>

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<p>Mitre House, 12-14 Mitre Street</p>	<p>Mitre House, 12-14 Mitre Street (commercial office space) raises concerns why this property has not been included in the daylight and sunlight assessment submitted by the applicant and why they have not been consulted on the application. It is likely that the proposed development would have an impact on the daylight and sunlight to this property.</p> <p>Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Daylight and Sunlight and Overshadowing</p>

<p>Cardinal Nichols (Archbishops of Westminster)</p>	<p>Historic Places of Worship, both Christian and of other faiths, are hallmarks of the London architectural landscape. The Bevis Marks Synagogue in Aldgate has a particular significance as it is the oldest synagogue in the UK to be in continuous use. The Archbishop states that he hoped the concerns of the Jewish community receive a proper hearing, and that everything possible is done to protect the Bevis Marks Synagogue from developments that would be detrimental to its architectural context and to the needs of the worshipping community.</p> <p>Officer Response to Comments:</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would be minor adverse with very small absolute VSC</p>
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	<p>considered to be a benefit to attract more visitors to the new Heritage Centre.</p>
<p>Master Robert Bell – Worshipful Company of Solicitors of the City of London</p>	<ul style="list-style-type: none"> • Bevis Marks Synagogue is a well-known City institution and a vital part of the City’s diverse cultural and historical heritage. The Synagogue is the only non-Christian place of worship in the City. National Heritage Lottery Fund Visitor Centre, whose patron is HRH The Prince of Wales, is due to open soon and the functioning Synagogue is at its heart. • The two developments (33 Creechurch Lane and 31 Bury Street) look set to have a dramatic impact on the Synagogue’s access to natural light and therefore to represent a substantial loss of amenity which could well pose an existential threat to the Synagogue and the community it serves. • The first development relates to the erection of a 20+ storey building at 33 Creechurch Lane. If built, this development would be just four metres from the eastern wall of the Synagogue. It would completely block all light from the window at this end of the Synagogue for most of the day. Due to the Grade 1 listing of the Synagogue, it is not possible to increase artificial light to compensate. Further, it will also have a substantial impact on the light in the much-used courtyard of the building. • The other application at 31 Bury Street is for a 50 Storey building. This also promises to significantly reduce the light into the Synagogue’s historic courtyard and represent a major loss of amenity. The cumulative effect of both developments, if they were to be built as proposed, could have a devastating impact on this important centre of worship. Respectfully ask that the interests of the Synagogue and its access to adequate light are specifically taken into account when considering these applications and that the representations made by the Synagogue are carefully considered and given the attention which they deserve. • In the event that the Planning Committee were minded to give permission for either development, would respectfully ask that careful consideration be given to any conditions attached to those permissions with a view to protecting as far as possible the level of light to the Synagogue and its historic courtyard so as

to preserve the level of amenity that this unique and very important Synagogue has hitherto enjoyed.

Officers Response to Comments: Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

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	<p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.</p>
<p>The Honourable Company of Master Mariners (Mr Roger Hoefling)</p>	<ul style="list-style-type: none"> • Have objected formally to the Tulip, the HCMM does not wish to see the proposed development overlook Tower Hill and its environs. Bringing the City's Eastern Tall Building Cluster even closer, would diminish the events, sacrifice and achievements that have helped shape world history represented on and around Tower Hill. • HCMM is concerned that the proposed building would lead to increasing development east of the Eastern Cluster of which 'The Gherkin is the

	<p>current eastern limit. Such an expansion would be to the further visual detriment of the adjacent local authority conservation areas, viz St Helen's Place, Lloyd's Avenue; Fenchurch Street station; Trinity Square and the Crescent as well as the Tower of London UNESCO World Heritage Site. • The EC3 postcode area uniquely tell the story of how London's origins lie with the sea and trade. Between 31 Bury Street and the Thames are at 21 Historic England listed sites with maritime associations, nine being Grade I, five Grade II* and seven Grade II, while the Tower also is a UNESCO World Heritage Site. The nine are the London Wall, All Hallows by the Tower,; Tower of London; St Olaves; Custom House; Trinity house; Tower Bridge; the Merchant Navy Memorial First World War section and Lloyd's Building. EC3 has 127 Historic England listed sites in addition to many other unlisted heritage assets like the Tower Hill Memorial. (The full representation (attached to this addendum report) sets out the background of many of the listed buildings referenced in the full representation).</p> <ul style="list-style-type: none"> • The website for 31 Bury Street proposals claims that the development 'represents an appropriate response to the character of the immediate area, nearby conservation area, listed buildings and other identified heritage assets including the Tower of London World heritage Site'. This is firmly refuted in challenges submitted by such as Historic England, Tower Hamlets Council, Historic Royal Palaces and the senior most Jewish faith in the UK suggested that any consultation with bodies such as these was very limited at best in its scope and that their views were ignored. There does not appear to have been any consultation with the maritime sector only reinforces this view. • The representation describes the history of Tower Hill and the Merchant Navy Memorial. • A visual is provided on page 7 of the representation showing the proposed development (31 Bury Street) and the Tulip as well as other buildings in the Eastern Cluster as viewed from Tower Bridge with the Tower of London in the foreground. A map showing the Conservation Areas and controlling authorities
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	<p>is also provided. The heritage sites of, principally, maritime significance in the area of 31 Bury Street are also mapped.</p> <ul style="list-style-type: none"> • The Corporation's Planning and Transportation committee has never rejected an application for a tower block. This was confirmed in evidence to the Tulip Appeal inquiry on 27th November while the committee subsequently has continued that unbroken record. This raises concern for heritage of an apparent lack of awareness that such decisions are being taken not just for the City of even London but for the whole of the UK. The Officer's report on 31 Bury Street mentions in referring to Trinity house at paragraph 228; 'an ensemble of seagoing structures and buildings surrounding...' and at 234 '...illustrating London's sea going past'. 'Seagoing structure' sounds ambitious while 'past' ignores the present as evidenced across the City and London today. Further, both the presence and significance of a war memorial bearing more names than any other in the UK as the focal point of Trinity Square is ignored. • By way of context, Historic England records that 6 out of the top 10 of the most visited paid attractions in England in 2018 were heritage attraction while putting the Gross Value Added (GVA) of heritage to the UK in 2019 as £21 billion or 1.9% of the national total. • The Merchant Navy and the Royal Navy have always been overlooked in having to conduct business over the horizon in peace and war. In recent years ships have become larger but fewer in number, in turn requiring smaller crews. As 'Global Britain' comes to the fore, so too will maritime trade in which London was founded and on which the City continues to prosper. The respect that past is to respect that future too. The Honourable Company of Master Mariners wishes to ask that Tower Hill and all it represents is respected in requesting that the City of London Corporation declines the planning application in question. <p>Officer Response to Comments: An assessment of the impact of the proposed development on designated heritage assets including Trinity House and the various surrounding listed buildings and conservation areas has been carried out and is set out in the main officer's report. Consideration of the</p>
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	<p>impacts are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report. Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer’s ability to appreciate its OUV, integrity, authenticity or significance in this view. With regards to Trinity House, officers have assessed that the proposed building would be seen in views of the building’s principal façade looking north to the west of the listed building, reading as part of the emerging, dynamic backdrop of modern tall buildings in the City Cluster. There would be no harm to the setting or the significance of the listed building which would remain pre-eminent in the immediate foreground setting. This is true of the other heritage assets with maritime connexions which have been assessed as part of the application.</p>
<p>Vivienne Littlechild MBE JP CC</p>	<p>Support all the points put forward by the Synagogue and is seriously concerned about the damage the current applications will have on these premises.</p>
<p>Carole Hiley (President Institute of Tourist Guiding)</p>	<p>Bevis Marks Synagogue symbolises this history of religious freedom, whenever visited with others, from this country as well as from overseas, they are all impressed with the Synagogue. The fact that Bevis Marks has received funding for a visitor museum, educational and exhibition space emphasises its importance not just to visitors but to the people of London. A balance between the history of London and its everyday life is not easy, and feel that if these developments go ahead in their present form it will be to the detriment of the area.</p> <p>The Institute of Tourist guiding, is the regulatory body responsible for the qualification of guides, not just in London, including the City of London, but around the country, and know that many of my colleagues will share my concerns with regard to these developments.</p>
<p>Nickie Aiken MP</p>	<p>This superb Grade 1 listed building is the oldest synagogue in UK; the only synagogue in the world to have held continuous worship since it was built in 1701; and is the only non-Christian house of worship in the City of London. It is already surrounded by offices. I understand that the synagogue’s elders have</p>

	<p>objected to the application and been in discussions with the Corporation of London to highlight their concerns regarding what is proposed by WELPUT in this application which they believe is likely to have a detrimental effect on the synagogue from light, wind, noise and heritage perspectives.</p> <p>aware of the extensive number of objections that have been made against this application. Many objectors raise concerns that this application will adversely affect Bevis Marks Synagogue which is recognised across Judaism as both a religious and heritage site of international significance.</p> <p>The historic nature and international and national significance of this building should, be protected. Is sure that the Committee hearing the application will also wish to defend the synagogue from any significant harm and protect the City of London's reputation for safeguarding its heritage, adhering to the Corporation of London's Local Plan in which I note in <i>Policy DM 12.1 Managing change affecting all heritage assets and spaces</i>.</p> <p>Rabbis and worshippers require as much natural light as possible to read privately and out loud from prayer books and the Torah Scroll. There is an electric light system which was installed nearly a hundred years ago. I understand that the synagogue's authorities did investigate whether the whole system could be upgraded to compensate for any loss of light the WELPUT development may cause. However, due to the building's Grade 1 listed status, experts have advised that its interior is unsuitable for the necessary upgrade. Thus, there is the requirement for the acts of worship to continue to have the same levels of natural light it currently enjoys. The elders of the synagogue have serious concerns that if this application is granted the loss of light is likely to detrimentally affect the ability to pray and may contravene the Corporation's Local Plan <i>Policy DM 10.7 Daylight and sunlight 1. To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines</i>.</p> <p>Officers Response to Comments: Daylight and Sunlight</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented</p>
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	<p>schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would be minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p> <p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on</p>
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	<p>21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Dr Paul Littlefair acknowledges that the loss would only be to a small area and the impact would be minor adverse. Officers consider the loss of sunlight to the Courtyard would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of</p>
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the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Noise

Consideration of these impacts are set out in the Noise and Vibration section of the report. Details of noise and vibration mitigation, including control over working hours and types of equipment to be used would be included in the Scheme of Protective Works and Construction Environmental Management Plan which are to be secured by condition.

Wind

The results of the wind microclimate study demonstrates that within the courtyard associated with the Bevis Marks Synagogue, in all configurations tested, the conditions within the courtyard are suitable for 'Frequent Sitting' (e.g., for outdoor seating / café / restaurant space) throughout the year (all seasons).

In respect of the Thermal Comfort, the courtyard associated with the Bevis Marks Synagogue would experience conditions falling into the all season category, where the Courtyard would be suitable for use all year round.

Heritage

Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic

	<p>interest and heritage significance of the synagogue and its setting and would meet the policy requirements of Local Plan Policy CS12 in respect of preserving the setting of the listed building.</p>
<p>LAMAS (London and Middlesex Archaeological Society)</p>	<p>The proposal for a 48-storey tower immediately adjacent to the Grade I listed Bevis Marks Synagogue will substantially harm the exceptional significance of the Synagogue, the country's oldest Synagogue that remains in continuous use. Historic England's listing of the Synagogue at grade I notes it was "<i>the second Synagogue erected in England after the resettlement of 1656 and in its little altered state is of exceptional historic interest</i>". The significance of the Synagogue is drawn not just from the fabric of the building but also from its setting, including the courtyard.</p> <p>The present Bury House is not listed or in a conservation area; however it is physically attached to the Grade II* listed Holland House which Historic England lists as '<i>an office building of 1914 designed by Hendrik Petrus Berlage</i>'.</p> <p>The height and proximity of the proposed tower would damage the historic secluded setting of the Grade I listed Synagogue; would also reduce the natural light through the eastern windows and thus harm the daytime experience of the Synagogue's interior; and would also result in a substantial reduction in natural light and privacy in the surrounding historic courtyard.</p> <p>The increased height, scale and bulk of the proposed building would add greater additional built form, dominating the view from the rear of the secluded courtyard. This change would cause harm to the significance of the listed building in its setting by further eroding its prominence in its immediate surroundings.</p> <p>These proposals will also result in loss of light within the listed building due to their proximity and scale. The impact of the proposed tower at 31 Bury Street will be greatest at the south east and south west of the building, a focal point for worship, and would cause a reduction of natural light within the building and consequently an effect on its character and ambience. Paragraph 194 of the NPPF requires that: <i>any harm to, or loss of, the significance of a designated heritage asset (from its alteration or</i></p>

destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings, or grade II registered parks or gardens, should be exceptional.

Paragraph 202 of the NPPF requires that: *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

The proposed building will cause significant additional harm to the setting and significance of the Grade I listed Bevis Marks Synagogue that must be considered in accordance with NPPF para. 202. This weight of harm should be considered as high in this case, as the designated heritage asset is listed at Grade I and therefore of the highest importance, and that the minimal public benefits and justifications put forward for the scheme do not outweigh this harm.

Officer Response to Comments:

Consideration of the impacts identified in LAMAS's response are contained in the following sections in this report: Design and Heritage – Designated Heritage Assets and Assessment of the Public Benefits sections of the report.

Impact on Bevis Marks Synagogue: It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah and reading from prayer books. The difference between the existing and proposed condition for daylight and sunlight is so small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not alter the way the Synagogue could be used or appreciation of its use or historic interior.

	<p>Impact on Holland House: The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. The views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. The proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not cause harm to the setting or significance of the listed building.</p> <p>Officers consider that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and designated heritage assets (including within the Tower of London WHS) and non-designated heritage assets, causing no harm.</p>
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Representations from members of the public (objections)	
Loss of light to the Synagogue	Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Daylight and Sunlight and Overshadowing
Overshadowing to the Courtyard	Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Daylight and Sunlight and Overshadowing
Comparison to Development Near St. Paul's	Though both Grade I listed, the architecture, setting, location and presence on the wider London skyline of St Paul's Cathedral and the Synagogue are markedly different and in this respect both listed buildings and their setting are not directly comparable.
Poor architectural design	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Design and Heritage.

Detrimental impact to the heritage significance of Synagogue	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Height/bulk of the proposed building is unacceptable	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Loss of privacy to the synagogue worshippers	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Privacy
Impact on the views out of the synagogue & the loss of sky	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Damage to foundations of the Synagogue	Officers Response to Comments: consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.
Need for the consideration of cumulative impacts	Officers Response to Comments: The submitted Environmental Statement assesses the cumulative impacts. The assessment of the cumulative impacts is set out in the main report.
General objection to the scheme	Officers Response to Comments: a full assessment of the proposed development is set out in the report.
Environment impacts	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Environmental Impact of Proposals on Surrounding Area, Daylight, Sunlight, Overshadowing, Solar Glare, Light Intrusion, Wind, Thermal Comfort, Air Quality and Noise and Vibration.
Pollution	Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Air Quality, Noise and Vibration
Impact on evacuation from synagogue in an emergency	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Proposed uses and assessment of the public benefits.
Wheelchair access/disabled bays during construction on Creechurch Lane and Mitre Street	Officers Response to Comments: The proposed development does not propose any alterations to the way visitors access the Synagogue. Car Parking and impact on Disabled Car Parking Bays during construction is set out in the Transport section of the report.

	The outline construction management plan submitted with the application shows that at least one blue badge parking bay would need to be suspended during the works. Any application to suspend blue badge parking bays must be supported by an Equalities Analysis (EA). Through the EA the applicant would be required to consult with local stakeholders to understand the usage patterns of the bays in question, and to establish whether their re-provision in the nearby area would be required.
Fire risk	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Fire Safety
Security risk from the increased footfall in the area as a result of the development	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Transport and Security
Wind impacts from the proposed development	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Wind Microclimate
Pedestrians at peak times accessing Liverpool Street and Aldgate Stations which is already very crowded	Officers Response to Comments: consideration of these impacts are contained in the following sections of the report: Transport
Do not demolish the Synagogue	Officers Response to Comments: the proposal does not comprise the demolition of the Synagogue.
The revised assessments haven't taken into account the residential properties at 27-31 Mitre Street	Officers Response to Comments: Any additional assessments in relation to 27 to 31 Mitre Street have not been undertaken on the basis that these properties are a greater distance from the site than other properties that have been considered where the impacts have been assessed using radiance analysis and concluded to be acceptable. The work that has been undertaken in relation to this property shows minor/negligible impact and therefore it is concluded that further radiance analysis was not considered necessary to provide any further information for officers and members. Consideration of the impact on the Mitre Street flats is set out in the Daylight and Sunlight section of the report.
Adverse effect of the development on the character and appearance of the local area and Conservation Area or heritage assets within it	Officers Response to Comments: The proposal site is not located within a Conservation Area. A full assessment of the impact of the development on the character and appearance of the surrounding conversation areas is set out in the 'Conservation Areas' section of the report.

Impact on nearby listed buildings	<p>Officers Response to Comments: It has been found that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and non-designated heritage assets, causing no harm.</p> <p>A full assessment of the impact on surrounding buildings has been undertaken and the detail of this is set out in the 'Impact on significance and setting of listed buildings'</p>
Design issues including bulk and massing, detailing and materials and character in terms of appearance and character of the area	<p>Officers Response to Comments: Architecturally, the proposed building would be a distinguished and sophisticated addition to the City Cluster. the building is well-designed which would enhance the City's architectural character and would be sympathetic to the local character, function well and add to the overall quality of the area. A full assessment of the design of the proposal including the bulk and massing is set out in the 'Design and Heritage' section of the report.</p>
There is no need for so much additional office floorspace post pandemic	<p>Officers Response to Comments: Although the pace and scale of future growth in the City of London is uncertain in the short term, the longer term geographical, economic and social fundamentals underpinning the success of the City as a vibrant centre of business creativity and innovation remain in place. Strong interest in pre-application planning advice and investment suggest continued confidence in the City as a place in which to do business. The ways that people live, work, travel and use city centres will in the future be different, but the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation.</p>

Representations from members of the public (support)	
Supports architecture of tower and proportions - details and use of facades is innovative	
Proposed development will fit well with other consented tall buildings in City	

Appropriate for location for a tower	
Design and form of building complimentary to surroundings	
Very attractive building and adds to skyline	
Amenity space will add to area and office jobs support the local economy	
Juxtaposition of religious building and neighbouring high-rises makes cities vibrant places to live and visit	
Building looks high quality and would be a positive addition to city skyline	

Representations (support)	
Deputy Hugh Morris	Registers support for the proposals. Deputy Hugh Morris has had a number of discussions with the developers and believes the proposal adds measurable value to the affected area of Aldgate. IT is in line with the plans for redevelopment in this part of the eastern cluster. Greatly in favour of the carefully thought through community benefits that the developers propose
Canon Barnett Primary School	Prior to the application to planning, Canon Barnett and WELPUT have had discussions about the potential for collaboration on a variety of projects to support the school community. Some suggested opportunities have included: a) Presentations to the students about the building environment and an introduction to different careers involved in the build; b) Volunteers to support the school in a variety of ways, for example through supporting extracurricular and pastoral activities

	<p>c) Use of the community space included within the application for school community events for both the children and parents The school believes the opportunity to collaborate with WELPUT will be beneficial to the school community.</p>
<p>Tower Hamlets Education Business Partnership (THEBP)</p>	<p>THEBP have had several in-depth conversations with the Applicant team over the past six months. The development would provide many opportunities to local charities and community groups, creating a sustainable local ecosystem related to employment and upskilling local residents. In relation to the charity, THEBP would specifically benefit from the development's following features: - A first floor which is open to external organisation for hosting events. We would take advantage of this area for our careers-related events where local young people work with volunteers from the business community. We currently have no open event space to host these events in our own office, but this new space would allow us to host large careers networking events and mass mock interview practise sessions and UCAS application form review sessions. This in turn will make our young people more employable and help to turn the tide in youth unemployment and intergenerational poverty in the area. - The Applicant has committed to taking on our local students for work experience during the construction process of the build so that they can see first-hand the processes that go into this industry. This is a very welcome opportunity for our students who struggle to find high quality work experience placements themselves and is a key way for them to appeal to future employers by having this experience on their CVs. - The Applicant is anticipating that the future tenants of the building will support local community projects and therefore we would build volunteering and sponsorship opportunities with these new tenants to improve the future sustainability of our charity. The design includes a large open terrace which is beneficial to providing a healthy break in the fresh air during events.</p>
<p>Dhruv Patel OBE CC</p>	<p>Elected as a Common Councilman for Aldgate Ward in 2013 on a pro-development platform. Welcome the community benefits, SME/affordable targeting, and public realm improvements of this proposed development. With regards to the heritage impacts, believes these are no worse than the recently approved application for Bevis Marks House and already built developments at 6 Bevis Marks and 1 Creechurch Place, and therefore would not consider them a fair reason for refusal. On balance, support the application.</p>

Policy Context

35. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
36. The City of London has prepared a draft plan which is a material consideration to be taken into account.
37. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As such, the draft City Plan is a material consideration in the determination of applications.
38. Government Guidance is contained in the National Planning Policy Framework (NPPF) July 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.
39. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure (GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.
40. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (CoL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.

Considerations

41. The Corporation, in determining the planning application has the following main statutory duties to perform:-
 - to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
 - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
42. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
43. The NPPF states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
44. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
45. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of date, granting permission unless:
 - c) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - d) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
46. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);

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

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

47. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

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

49. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

50. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health”.

51. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

52. Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

53. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

54. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
55. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
56. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
57. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
58. Paragraph 195 of the NPPF advises that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
59. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness."

60. Paragraph 199 of the NPPF advises “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
61. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- (a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - (b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional
62. Paragraph 202 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.
63. Paragraph 203 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

Considerations in this case

64. In considering this planning application account has to be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
65. There are policies in the Development Plan which support the proposal (including policies CS1, CS10, CS4 and DM1.3 of the Local Plan and policies D5, SD4, T6, T7G and E1 of the London Plan) and others which do not including policies CS12 and CS13 of the Local Plan and policies D9(e) HC2, HC3 and HC4 of the London Plan. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

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

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

Economic Issues

67. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.

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

that physical proximity to business customers and rivals can provide a significant competitive advantage.

69. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
70. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
71. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.
72. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
73. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
74. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

75. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
76. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
77. The application site is located within the area identified as the Eastern Cluster in the Local Plan 2015.
78. The areas to which the cluster policy applies is defined by illustrative diagrams in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on suitable (Local Plan) or appropriate (emerging City Plan) sites. As outlined at para 2.7 of the Local Plan and paras 3.55 and 7.13 of the draft City Plan 2036 the boundary as shown in the diagrams is indicative and not prescriptive. The application site lies within the Eastern Cluster area as shown in Figure G in the adopted Local Plan and within the City Cluster Key Area of Change as shown in Figure 33 of the emerging City Plan 2036.
79. Para 3.4.4 of the draft City Plan 2036 identifies the City Cluster as a key area of change where office and employment growth will be accommodated by a cluster of tall buildings, complemented by retail, leisure, cultural and educational facilities, ground floor animation, additional greening, high quality public realm and improved pedestrian movement and permeability.
80. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm,

urban greening and a radical transformation of the City's streets in accordance with these expectations.

Proposed Uses

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

Proposed Office Accommodation

82. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036.
83. The existing site contains 3,258 sq.m (GIA) of office floorspace and a minimum total of 25,460sq.m (GIA) is proposed which would provide an additional 22,202sq.m (GIA). The office floorspace is considered to be well designed, flexible office accommodation in an attractive and sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan 2036 policy S4.
84. The proposed development would provide flexible floorplates of approximately 350sq.m - 500 sq.m. Space of this type is not usually found in the Eastern Cluster and would complement the existing offer. The proposed development would also provide a different option for potential SME office tenants who are looking for a smaller area, but do not want to occupy shared space in co-working environments. The smaller office floorplates in the proposed development have the benefit of providing office tenants with their own private entrance and dedicated floor rather than sharing with other tenants.
85. An office amenity area is proposed at level 20 and 21 accessible by all office tenants of the building. This provides an informal area for occupiers of the building to come together for it to become a place

where staff can meet, socialise, share and collaborate. This area is referred to as the 'Creechurch Hive'.

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

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

Proposed Affordable Workspace

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

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

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

Proposed Retail

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

92. The development would provide 60 sq.m (GIA) of retail floorspace. The proposed north-south route through the site, referred to as Heneage Arcade, would be lined with retail units and spaces which are designed to be utilised as vitrines for a rolling programme of displays including artworks, local community information, reference to the important history of the site and products of local artisans. These spaces could

also be utilised as small workshop and retail units for emerging local businesses and craft. The intention would be to help foster and support emerging local talent and provide space to create, make, display and sell their creations.

93. The increase in a diverse retail provision on the site, would enhance the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages. A condition is recommended to ensure that spaces proposed for retail use remain in that use and are not changed to any other use within Class E.
94. The proposed increase in retail provision on the site and variety in unit sizes accords with Local Plan policies CS20 and DM20.4, and draft City Plan 2036 policies S5 and RE2. The mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5 as well as provision for other workers, visitors and residents of the City in accordance with draft City Plan 2036 Policy OF1.

Public Realm

95. Extensive public realm improvements are proposed providing 400 sq.m (GIA) of ground floor publicly accessible floorspace with the creation of a new pocket park and route through the building.
96. A north- south walking route through the site is proposed, which would re-introduce an historic connection between Heneage Lane and Bury Street. This route through is referred to as Heneage Arcade. It is proposed that Heneage Arcade is open 7am – 11pm daily. As described above this route would comprise retail units which would activate the route. The opening hours would be secured via a planning obligation.
97. The arcade would be enriched by a curated and flexible programme of permanent, bespoke architectural sculpture integrated into the structural members, portraying local and City-wide historical and contemporary themes. This would be developed in collaboration with craftspeople studying at the City & Guilds School and the Sculpture in the City initiative and would constitute not only a major new piece of public art but also make the Heneage Arcade a cultural destination in its own right. The local cultural programme would be secured by a S106 obligation.
98. James' Court, a new pocket park is introduced which re-establishes an historic city court. It is intended to be available for access to the public 24 hours a day. The new James' Court would also increase the quantity of urban greening in this location, with a generous nine-storey high green wall rising above the pocket park on the proposed building creating a humane gentle environment conducive for the public to dwell.
99. The opening hours would be secured via planning obligations.

100. The application also proposes 421 sq.m (GIA) of internal publicly accessible amenity space (Sui Generis) at mezzanine level, as an extension to the proposed public realm. This would be located above Heneage Arcade and would have a dedicated entrance from ground floor level, off Creechurch Lane. This area is proposed to offer an area which is additional to the external public realm at ground floor level allowing all year round use. It is proposed that there will be scope for parts of this space to be booked by local groups as part of an extension to the Community Space offer.
101. Extended public realm improvements are also proposed outside the red line boundary, along Bury Street and Creechurch Lane. These would be secured via a section 278 agreement and details of this is discussed later on in the report.

Community Space – ‘Creechurch Hall’

102. Policy S1 of the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
103. At level 1 of the proposed building, the application proposes 507 sqm (GIA) of community space. The flexible community space is designed to be an inclusive dedicated space for the local community, charity, religious groups (including Bevis Marks Synagogue), cultural/art and education groups and organisations to hold events, gatherings and exhibitions such as careers events, micro workshops or gallery/rehearsal space for local artists. The community space is intended to provide a gateway for the population of the more economically deprived areas around the City fringe to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and economically inclusive manner. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space an outreach, training and skills centre. It therefore offers the potential to make a contribution towards training and skills opportunities for local communities. The details of the community space together with a management plan would be secured via S106 obligation to ensure that the facility is designed to be diverse and inclusive from the outset to provide services and facilities that benefit local communities and to be a welcoming and accessible place for those communities to visit.
104. The applicants have submitted a ‘Building Ecosystem’ document setting out what the vision for this new building. The vision *‘to curate a unique and enriching environment...a regenerative ecosystem abundant in circular opportunity for the local community, visitors and businesses alike. Where skillsets, knowledge and amenity are shared. Where founders mentor budding entrepreneurs, makers inspire local*

students and residents, artworks entice visitors and a community hub provides a flexible platform for leaning, culture, collaboration and celebration.'

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

Design and Heritage

Principle: Demolition of the existing building

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

Height and bulk

107. The proposed building would be in the (Eastern) Cluster Policy Area in the adopted Local Plan (2015) and the City Plan 2036. Both policies identify the Cluster as the preferred location for siting tall buildings, where suitable or appropriate. The principle of a new tower here is acceptable in broad policy terms though its height and design, including the impact on strategic views and heritage, need to be considered in accordance with policy CS14 of the Local Plan.
108. The proposed building would rise to 197.94m AOD, stepping down from the apex at 22 Bishopsgate / 1 Undershaft towards the Tower of London in the east. As a comparison, the following list outlines the heights of existing, emerging and permitted towers in the City Cluster (in descending AOD height order, with the proposal in bold):
- 1 Undershaft: 305.9m
 - 22 Bishopsgate: 294.94m
 - 100 Leadenhall Street: 263.40m
 - 122 Leadenhall Street: 239.40m
 - 110 Bishopsgate (former Heron Tower): 217.80m
 - 52-54 Lime Street: 206.50m
 - Tower 42: 199.60m
 - **31 Bury Street: 197.94m**
 - The Gherkin (30 St Mary Axe): 195m
 - 6-8 Bishopsgate: 185.10m
 - 1 Leadenhall Street: 182.70m
 - 100 Bishopsgate: 184m
 - 40 Leadenhall Street: 170m

109. The Planning and Transportation Committee were informed on 26 April 2016 that the Department of the Built Environment is undertaking three-dimensional (3D) digital modelling of the City Cluster to better understand the effect of existing planning policies for that area and its relationship to its environs and other parts of the City and in particular the Tower of London. This work is providing confidence that the Cluster can evolve while taking full account of views. The purpose of the modelling is to allow an appreciation of impacts arising from proposed development. The 3D modelling does not set policy or determine the future shape of the cluster.
110. Through this 3D modelling initiative, the City is aspiring to develop a Cluster of towers that step up in height from all directions towards an apex around 22 Bishopsgate/1 Undershaft. This was informed by the complex amalgamation of key views of the Tower of London, St Paul's Cathedral and other landmarks. In views from the south and south-east, the proposed building's height at its location would be broadly compliant with this modelled future shape and form of the City Cluster. The proposed building's height, form and high architectural quality would enhance and consolidate the dynamic profile of the Cluster on London's skyline. That said, due to its height, the proposed building would have a significant impact on London-wide and local townscape views.

Design approach

111. Architecturally, the proposed building would be a distinguished and sophisticated addition to the City Cluster. It would have excellent sustainability credentials, be aesthetically pleasing, contextual at several scales and would enhance existing and provide new high-quality public realm appropriate to the character of the City.
112. The proposed architecture distinguishes itself through the thoughtful, contextual articulation of base, middle and upper sections, delivering a coherent, well-proportioned building with a strong overall sense of architectural integrity. The modelling, detailing and materials are accomplished, resulting in architecture of the highest quality as befitting the City skyline. On a challenging site it works successfully at various scales and is designed to read as three elements – the ground floor public levels, a mid-section block and the slenderer pencil tower.
113. The existing building forms an irregular, impermeable block with inactive frontages to Heneage Place, Creechurch Place and Bury Street. Between it and Holland House on Bury Street there is a small, recessed area of open space with some poor-quality planting. At ground floor level, the proposed building would replace the impenetrable site

with a permeable ground floor plane with increased public realm, planting and active frontages.

114. Despite the relatively small site footprint, the proposed building would provide 322 sqm of new external public realm at ground floor level as compared with the existing 95 sqm. The chief feature would be a new public pedestrian route running north-east to south-west which would reinstate the lost south-western end of Heneage Lane. The 'Heneage Arcade' would be generous in scale, a maximum of 8m wide with a 7m high ceiling at its greatest extent, and would be paved in York stone to blend seamlessly into the City's existing public realm. The generous scale will draw the eye and attract the public from numerous vantages. The ceiling soffit would be eye-catching with a sense of rhythm created by the architectural 'ribs' that would further draw pedestrians through. The arcade would draw inspiration from the established tradition of covered walkways elsewhere in London and would be flanked internally by retail units, including a dedicated space for a changing cast of makers to display their wares and further spaces for public facing retail uses to create a new mixed-use arcade destination for the locality and the wider City. It would significantly raise the quantum of active frontages, making a strong contribution to the local character of the area and providing shelter in inclement weather and during hot summer days.
115. The arcade would be enriched by a curated and flexible programme of permanent, bespoke architectural sculpture integrated into the structural members, portraying local and City-wide historical and contemporary themes, including interpretation of the former Holy Trinity Priory which survives below the wider area. This would be developed in collaboration with craftspeople studying at the City & Guilds School and the Sculpture in the City initiative and would constitute not only a major new piece of public art but also make the Heneage Arcade a cultural destination in its own right. The details of this would be secured by S106 obligations.
116. At the southern exit of Heneage Arcade, a new pocket park, 'James' Court', would be created to the south-west of the building. This would increase the area of public realm at the heart of the dense Cluster, opening up the entire ground floor plane on the south-west part of the site to pedestrians as well as creating a new amenity space for people in the locality. The new James' Court would also increase the quantity of urban greening in this location, with a generous nine-storey high green wall rising above the pocket park on the proposed building creating a humane, gentle environment conducive to public use.
117. New areas of public space would also be created within the building. As well as the north-east and south-west entrances to

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

118. The elevations to these floor areas would be treated differently from the rest of the building to reflect and celebrate their public status. They would take the form of a 'triple order' of faience columns wrapping around the building from the south-west to the north-east, rooted in a granite plinth and rising to a strong cornice line which would be a focal point for further public artwork. This 'triple order' device builds upon architectural precedent elsewhere in the locality and would relate the building appropriately to its townscape. The faience of these areas would be executed in a darker blue hue to further differentiate them from the upper storeys. Their colour tone, materiality and modelling would ensure the proposed building relates appropriately to its local setting at street level; the Creechurch locality here is characterised by a number of unlisted brick and terracotta historic buildings and the sophisticated faience of the grade II* listed Holland House.

119. From the first-floor level to the twenty-second-floor level, the footprint of the building would be extruded upwards to provide office floorplates. From the twentieth to twenty-second floors there would be a double-height mezzanine space incorporating an external terrace. This would be the focal point of the 'Creechurch Hive', the mix of office floorspace and dedicated SME/incubator space that would characterise the floor levels of the proposed building above the public areas. This mezzanine level would be heavily planted and would read as an 'encore' of the public spaces provided at the lower levels. Above this

level, the building's form would be stepped back to form a slenderer and elegant tower which would rise for the remaining twenty-four storeys to roof level. This has been sculpted in an integral and organic architectural manner whilst responding to strategic views of the Tower of London and other sensitive views.

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

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

122. At the uppermost floor levels, the double order at mid-level would recur across the uppermost 'penthouse' office floors. Above these, the three-storey plant room is housed in a triple order echoing that of the ground floor but executed to a simpler pattern, a successful visual termination of the design. The mirroring and echoing of these architectural devices give the overall architectural design a cohesion which would further distinguish it on the skyline and in the local townscape. The parapets of both the mid-level 'shoulder' and the top of the building are subtly broken by the columns terminating above them to add further architectural modelling and interest. The location of plant and greening in the uppermost three storeys will cause minimal light spillage and appear restrained when seen in conjunction with the WHS.

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

124. Lighting, in accordance with the City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be secured via condition.
125. Overall, the proposed building is considered to harmonise with the principles of paragraph 130 of the NPPF in that it is a building which is sustainable and beautiful, being a well-designed proposal which would enhance the City's architectural character and would be sympathetic to the character of the locality, function well and add to the overall quality of the area.

Heritage assets

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

126. The seven overarching attributes of Outstanding Universal Value are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: (i) an internationally famous monument, (ii) landmark siting and (iii) physical dominance of the White Tower.
127. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposed building is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations, where relevant assessed here together.
128. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre, stating (at para 2.4.25) 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It is also acknowledged that the relationship between the ToL and the Cluster is long-established, having existed for over half a century. It acknowledges that the Cluster forms a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify

as a distinct and separate element to the ToL. The Management Plan, at para 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider (i) their effect on the established Cluster (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

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

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

Strategic Views

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

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

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

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

- guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).
134. From here the proposal would be appreciated at a significant distance to the north and west, providing an eastern 'bookend' to the baseline and cumulative Cluster form. The proposed building would be visible between 30 St Mary Axe (the Gherkin) and the White Tower against the backdrop of Heron Tower and Bishopsgate Plaza, which it would partially occlude.
135. The baseline and consented Cluster of towers steps downwards from the centre at 22 Bishopsgate/1 Undershaft in a deferential manner towards the Tower of London. This profile has been carefully negotiated through numerous planning decisions to mediate between the City Cluster and the Tower of London. Under both baseline and cumulative scenarios, the proposed building would rise beyond the gradual stepping down towards the White Tower, creating a somewhat abrupt and, to a degree, assertive eastern bookend hard up against the turrets of the White Tower, eroding some of the sky gap between it and the Cluster. The proposal would, to a limited degree, challenge the physical dominance of the Tower of London, its visual separateness from the City and its landmark siting on the River, undermining, again to a limited degree, those attributes of OUV in a strategic/representative view.
136. The proposal would not breach the skyline of the four towers of the White Tower or its castellations, in accordance with the relevant part of paragraph 186 of the visual management guidance, and would continue to pre-emanate over the foreground, the whole ToL ensemble with a commanding presence on the River. In addition, those wider landmarks, including the Monument, would not be obscured, and a relationship between these landmarks would remain undiluted, in accordance with paragraph 185 of the SPG. However, by reason of its proximity to the WHS, its height and vertical profile, the proposed building would appear, to a limited degree, to challenge the dominance of the Tower of London, albeit it is not considered that the Tower of London would be dominated, in particular in the cumulative scenario, and so does not conflict with paragraph 183 of the SPG.
137. Paragraph 186 of the SPG seeks to retain 'some' visual separation between the upper parts of the White Tower and the Cluster and, whilst the proposal would do this, it would to a degree erode that visual separation and clear sky 'breathing space'. Whilst paragraph 187 anticipates the consolidation of the Cluster as a distinct urban form, which the proposal would contribute towards, it does state this must relate well to skyline features, in particular of course the WHS. This view is identified as view 9 in the Tower of London Local Setting Study.

The guidance for this view seeks to ensure ‘buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point’. Due to its height, strong vertical form and proximity, it is considered that the proposal would, to a limited degree, diminish the perceived scale and pre-eminence of the ToL here, in conflict with this guidance.

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

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

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

140. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413).

141. The Protected Vista and Silhouette would remain unaffected.

142. Given the pre-eminence of the River Thames in the foreground and the openness of the ToL ensemble defining its north bank, the ToL and White Tower would remain the dominant feature towering above its immediate surroundings with a sky-etched silhouette, which is less vulnerable to wider visual influence from the emerging Cluster. The proposed building would appear at a significant distance away from the WHS at the eastern end of a consolidating Cluster in baseline and cumulative. At no point in the three Assessment viewpoints would the proposal appear near the White Tower and only in the most easterly viewpoint (25A.3) would it rise above the curtain walls, but the impact here would be minimal due to existing modern buildings in the backdrop of this part of the Tower. The proposal would not undermine the composition and characteristics of the view or those landmark elements. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it.
143. The attractive, sleek and slender profile would comprise a high-quality design, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 418-422) and guidance contained in the Local Setting Study.

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

144. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.
145. In assessment points 11B.1 and 11B.2, the upper storeys of the proposed building would be visible directly east of 20 Fenchurch Street. The proposed building would appear as closely associated with the City Cluster and would read as a further high-quality augmentation and consolidation of the Cluster. It would consequently not harm the setting of the Tower of London World Heritage Site, which is to the extreme east of the view, nor would it harm the wider settings of the listed

Adelaide House, Custom House, St Magnus the Martyr or Billingsgate Market.

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

Other World Heritage Site views

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

Inner Ward, Tower Green and the Scaffold Site

148. These views are deemed by the Local Setting Study to illustrate well the ToL’s significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under ‘key issues’ it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings – qualified in the associated ‘Objectives and Guidance’ development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.
149. The Local Setting Study acknowledges that there is a range of views in the Inner Ward. A more detailed and comprehensive assessment of the visual impact on the Inner Ward was required as part of the submission. Being entirely occluded behind the Chapel Royal of St Peter ad Vincula, the proposed building would not be visible from the Scaffold Site viewpoint (LSS view 1) in the Inner Ward. However, the Local Setting Study acknowledges that there is a range of views within the Inner Ward including LSS views 2 and 4. It is clear that the City Cluster of towers represent a prominent backdrop to views within the Inner Ward. From the centre of the Inner Ward the proposed building

would appear prominently over the east end of the grade I listed Chapel Royal of St Peter ad Vincula. From the south side of the Inner Ward, the proposed building would be glimpsed above the roof of No. 2 Tower Green. Approaching the Chapel on the northern side of the Inner Ward, most of the existing towers are concealed by the Chapel. Stepping further forwards towards the Chapel, the proposed building and the rest of the Cluster are concealed from view.

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

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

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

Inner Curtain Wall (South)

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

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

Inner Curtain Wall (North)

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

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

Main entrance to the Tower

157. The Local Setting Study acknowledges that this is a 360-degree experience which reveals the 'Tower's relationship to the River Thames and the City of London and emphasises the Tower's defensive architecture. The identified aims are (i) to maintain views which reveal the relationship between the Tower, the river to the south and the City to the North and (ii) enhance appreciation of the medieval military architecture of the Tower.
158. In the view from the Byward Tower (LSS view 5), the proposed building would consolidate and augment the profile of the Cluster rising directly to the east of the Gherkin and would not harm view out of the World Heritage Site from this point. In the baseline and cumulative scenarios both the Tower's relationship with the City and Thames and the emphasis of its defensive architecture would remain pre-eminent and their appreciation undiluted.

Dynamic Journey across Tower Bridge

159. Historic Royal Palaces have raised concerns about the impact of the proposed building in the sequence of views of the ToL as once proceeds northwards over Tower Bridge, approaching the WHS. It is the view of your officers that the proposed building would not cause harm to this viewing experience.
160. The experience is identified in the Local Setting Study as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the River Prospect at LVMF 10A.1. The identified aim is 'to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than 'lost in the City'; in which the scale of the White Tower is perceived as more prominent as than the building surrounding it; and in which the military architecture of the Tower and its defences can be appreciated'.
161. Viewpoints corresponding to this experience have been assessed in the submitted TBHVIA and addendums and in the three-dimensional digital model. From the sequence of viewpoints crossing Tower Bridge and onto the northern bridge approach the proposed building would appear as a new part of the Cluster behind the ToL WHS. At all points, in both baseline and cumulative scenarios, the White Tower is considered to retain its prominence and the presence of the military architecture and defences of the WHS remain undimmed by the proposed building.

Other Views

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

Conclusion – Impact on Tower of London World Heritage Site:

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

164. Otherwise, in all other views including the additional views provided in response to GLA comments, the proposed building would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. In all other views, including the relevant approach and representative views, it is considered in line with the WHS SPG that the scale of change in all instances is deemed to be between negligible and minor and where the magnitude of impact is considered small on those relevant attributes of OUV. Overall, it is considered that sufficient information has been submitted to assess the impact on the significance of the WHS. Apart from its impact on LVMF 10A.1, it is considered that the proposed building would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble.

Wider London View Management Framework Impact:

165. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's character and identity at a strategic level.
166. The site falls outside of Protected Vistas in the LVMF but impacts on a number of the identified Assessment Points. Designated London Panoramas at View 1 (Alexandra Palace), 2 (Parliament Hill), 4 (Primrose Hill), 5 (Greenwich Park) 6 (Blackheath Point) and 19 (Lambeth Bridge) are all assessed in the submission, as the proposal would be seen. The magnitude of change in these broad panoramas is considered negligible positive, and in all it would accord with the visual management guidance by consolidating the City Cluster, which is identified as a landmark in these compositions, preserving that composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral. From the designated Townscape View LVMF 26A (St James Park) the proposal would not have an impact.
167. Particular attention is given to the River Prospects where the magnitude of potential impact is greater, here addressed in turn.

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

168. The proposed building would be visible between the existing 122 Leadenhall Street (the Cheesegrater) and consented silhouette of Leadenhall Court when viewed from and between assessment points 15B.1 and 15B.2. It would be of high architectural quality and would assist in consolidating the coherent form of the emerging Cluster in accordance with paragraph 263 of the LVMF SPG.
169. The proposal would not draw tall buildings closer to St Paul's, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paragraphs 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified.

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

170. From assessment points 16B.1 and 16B.2 the proposed building would appear as a sliver between the Cheesegrater and the consented silhouette of Leadenhall Court; it would be wholly obscured by the consented silhouette of 100 Leadenhall Street. Consequently, it would not harm the appreciation, views or setting of St Paul's Cathedral.
171. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, preserving and enhancing the townscape setting of St Paul's whilst not

detracting from wider landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

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

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

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

Conclusion – Summary of LVMF Impacts

174. Aside from its impact on LVMF 10A.1 already discussed, the proposed building would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LVMF SPG.

Other Strategic Views (Local)

The Monument to the Great Fire of London

175. The proposed building would fall outside the identified viewing cones from the Monument and would not harm or conceal views of important heritage assets. The proposed building would be completely obscured by 20 Fenchurch Street in views from the north of the Monument viewing gallery. The proposed building would not harm or obstruct important views of the Monument from afar or in local views.

176. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be in its setting. It would be visible in i.) views from Tower Bridge (paragraph 4.22 of the SPD) and ii.) the Queen's Walk (western end) (paragraph 4.26). It would not be visible on the approach from Gracechurch Street (paragraphs 4.24 - 4.25), Princes/King William Street (4.19-4.21) or

Monument Street (4.23) and would have no impact. The proposal would be set a significant distance from the Monument in views from i.) and ii.) and would have a neutral impact on its setting in baseline and cumulative scenarios, causing no conflict with the Protected Views SPD guidance.

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

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

St Paul's Cathedral

178. The proposed building would be not visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral.

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

Views from other publicly accessible elevated viewing areas

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

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

Other Local views

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

Impact on significance and setting of listed buildings

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

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

Significance and contribution of setting:

184. Synagogue of 1699-1701. This is the oldest synagogue in the country and survives to a remarkably little altered degree. It comprises an undemonstrative rectangular plan, of simple red brick with modest Portland stone classical dressings and tall pitched roof (originally clad in clay tile, now slate) behind a plain (rebuilt) parapet above cornice level. The principal elevation is off-street, the western elevation containing the main entrance and is symmetrically composed around a central axis door with good early Georgian door and architrave topped by an elliptical window. Otherwise the building has two registers of windows, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense, built-up mid-block location. The building was constructed by Joseph Avis, a carpenter with links to the office of Sir Christopher Wren. Architecturally the building reflects the simple vernacular of contemporaneous City churches and nonconformist chapels. Inside, the plan form, fixtures and fittings are still of 1701. It is a single double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers, while much of the original woodwork interior and fittings are uniquely intact.

185. The site, particularly the interior, plays host to the unique and rich religious traditions of the Sephardi Jewish community in Britain,

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

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

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

consequently the ensemble of the synagogue, its neighbouring buildings and the courtyard has high architectural and historic significance. Because of its informal, secluded setting, there are no formal viewpoints of the synagogue but rather a series of informal vistas and closeups.

188. In terms of the contribution of setting to significance, the wider modern setting includes a number of tall and very tall buildings, both existing and consented, some of which are clearly visible as prominent elements from the courtyard such as One Creechurch Place, No. 6 Bevis Marks and the Gherkin. All have visual impacts on upward views from within the courtyard and visually reinforce the appreciation the synagogue's secluded location in the heart of the modern City. Additional consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard and ancillary buildings.
189. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of taller buildings as a backdrop to historic buildings. This is a defining characteristic of the Cluster and the positive frisson between the historic and modern City is unique in townscape terms. In all courtyard views the synagogue holds the eye, is overwhelmingly prominent and is the defining focal point.
190. The close, immediate setting of the synagogue preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong and defining contribution to its significance but the wider setting beyond has changed significantly and now has a fundamentally different modern character that makes no material contribution to the significance of the listed building.
191. The close, intimate setting of the narrow Heneage Lane creates an insular domestic human scale feel, divorced from the high-rise commercial City beyond. It retains the appearance of a historic City alley accentuated by the worn York Stone flagged floor and traditional Victorian Windsor lanterns. Here simple, secondary elevations draw subtle attention to the only incidents of note, the complementary eastern elevations of the Synagogue and the Rabbi's House, in a setting where there is a good sense of history and authenticity amplifying the architectural and historic significance of the Synagogue.

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

Impact Assessment:

193. The impact of the proposal would be indirect, via change in its wider setting, rather than direct and physical. The core significance, architectural, evidential, historical and communal, which is drawn from the authentic and tangible physical fabric which has played host to the spirit of the place, in particular the interior, would be undiluted and are very self-contained. No fabric would be lost, obscured or de-contextualised, but the ever-changing and dynamic wider townscape setting which provides the backdrop canvass to this, and which accentuates and makes even more remarkable the survival of this heritage, would change somewhat, but would not prevent those rich traditions from continuing.
194. Given the secluded off-street siting of the Synagogue, there would be little to no interface between it and the proposal, or the Cluster of tall buildings in which it is embedded before the observer reaches the courtyard. At this point, to relative degrees, the arrival experience would make clear to the observer that they are in the heart of an area defined by tall buildings, where the *genius loci* is one of dynamic, striking contrasts between tall and small, old and new. For this reason, the felt presence of tall buildings in the courtyard is not shocking, or in principle, incongruous, but is understood as a part of the character of the place, another layer of history and change. The main impact is one of the qualities of juxtaposition.
195. In views from the courtyard entrance, from where both the synagogue and the proposed building can be viewed to their fullest extent, the proposed building would rise strikingly above the principal north-west elevation. The most visible part of the proposed building would be the slenderer upper storeys, with only the upper storeys of the more fulsome lower half appearing in these views. The proposed building would replace some clear sky with slender massing and sophisticated pale blue faience elevations. In views further into the eastern and western arms of the courtyard, approaching the Rabbi's House and outside the synagogue's main entrance, the uppermost storeys of the proposed building would appear as a sliver of slender blue faience above the brick parapet of the synagogue, again seen in concert with the uppermost parts of an eclectic array of other modern tall buildings. Aside from the courtyard entrance viewpoints, these views of the proposed building within the courtyard would be glimpses caught

when deliberately craning beyond a comfortable field of view, and are high level and in the oblique.

196. Historic England have identified a small degree of incremental harm arising from the proposed building as a result of the closeness of the proposed building to the synagogue which would 'further diminish the sense of seclusion in the courtyard'. The GLA consider that the proposed building, together with the consented proposals for 1 Undershaft and 100 Leadenhall, would 'alter the setting of the synagogue and cause harm'.
197. The London Sephardi Trust contend that the impact of the proposed building, due to its proximity and scale would result in less than substantial harm to the significance of the synagogue and its setting. The Trust considers that the proposed building would detract from the ability to clearly discern the historic character and aesthetic and architectural qualities of the synagogue building. The Trust considers that the proposed building with the cumulative effects of consented and proposed developments would all result in less than substantial harm 'at the very upper end' of the spectrum.
198. Your officers do not concur with these conclusions for the following reasons. In the clearest view of the proposed building and synagogue from the courtyard entrance, the proposed building would add another modern form into the backdrop. It would occupy a significant portion of currently clear sky space over the synagogue. However, as set out in the paragraphs above, a number of modern buildings are already visible in views from the courtyard, reflecting its location in the heart of a dynamic and continually evolving modern City Cluster. Architecturally, the rooflines of the synagogue and the surrounding courtyard are simple forms that do not depend on a clear sky backdrop to be appreciated to the fullest extent; the architecture of the courtyard is prevalently that of simple brickwork frontages of an informal character commensurate to their 'backstreet' location. It is not considered that the proposed building would mar the viewer's ability to appreciate the powerfully simple architectures of the synagogue or the courtyard buildings. From within the courtyard the synagogue would remain the prominent building and focal point.
199. Historically, part of the significance of the synagogue's setting is that it has always been a sanctuary of worship secluded and feeling a world away within a densely developed urban area. It is not considered that the proposed building would materially alter this perception, nor would it form an unexpected or incongruous backdrop to those viewing the synagogue from within the courtyard, given that the journey there must necessarily pass within sight of other towers in the City Cluster.

The proposed building would be a sophisticated piece of architecture with slender massing and well-modelled elevations of pale blue faience, all of which would mitigate the impact and provide a high-quality backdrop distinct from the pre-eminent historic architecture of the synagogue and its courtyard.

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

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

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

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

204. During daylight hours, the synagogue's capacious windows provide a level of ambient light which enables an appreciation of the exceptional interior and allows services and readings to take place. There are large windows on all four elevations, resulting in a multi-aspect interior receiving daylight throughout the day. Artificial light within

the building is minimised and largely restricted to historic fittings. The London Sephardi Trust and a number of other objectors consider that the proposed building would cause harm to the heritage significance of the synagogue through a reduction of the natural light levels.

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

205. As set out in preceding paragraphs, the Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. Although the loss of VSC would be outside the BRE guidelines, the impact on daylight to Bevis Marks Synagogue would be minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and more noticeable but to a limited area only to the mezzanine level on the south side. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%).

206. Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal. Officers do not consider that the loss of light experienced within the Synagogue would impact on the ability of worshippers to read prayers or would significantly reduce light to the raised platform where prayers are read (the *Bimah*).

207. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented and unconsented buildings in the cumulative scenario (including the proposed development under consideration at 33 Creechurch Lane).

Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and its Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the *Bimah*, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.

208. A number of objections have been received, including from the London Sephardi Trust, relating to the loss of light of the synagogue and the impact this would have specifically on the building's heritage significance through an undermining of the appreciation of key components of the historic interior and the ability to use the building for worship and associated events.
209. Whilst acknowledging the impact in pure daylight and sunlight terms upon users of the building discussed in the daylight and sunlight section of the report, the reduction in ambient light levels caused by the proposed building is not considered to have an impact on the building's heritage significance in the sense that the historic interior would be as appreciable to as before. This would be true both of the baseline and cumulative scenarios assessed. There are no prominent stained-glass windows or other internal fittings which rely specifically upon bright daylight/sunlight for their appreciation. Rather, the potential impact on the historic interior and ambiance would be general in nature, and the fractional reduction in ambient light levels would not have a harmful impact on the heritage significance of the synagogue
210. Assessment of the impact of the scheme on daylight and sunlight into the Synagogue has to be grounded in quantifiable BRE-compliant evidence, rather than subjective conjecture. The extensive technical assessments undertaken show that the diminishment of internal light levels within the Synagogue would be minimally noticeable in the Synagogue at ground floor level and more noticeable but to a limited area only to the mezzanine level on the south side. It therefore follows that the proposed building could not affect (i) a visual appreciation of the historic interior or (ii) a visual appreciation of particularly significant features such as the Bimah or Ark and therefore the proposed building could not diminish appreciation of the religious ceremonies and associated activities including the reading of religious texts. Consequently, based on the quantifiable assessments of daylight impacts, it can be concluded that the proposed building would not compromise the religious use of, activities within or historic interior of the Synagogue.
211. It has been said that reductions in sunlight to the courtyard would harm the contribution this makes to the significance of the Synagogue. Officers have reviewed the submitted daylight and sunlight assessment (which has also been independently assessed) and consider that although the reduction in sunlight may slightly reduce the amenity of the courtyards this impact would not be such as to alter the current appreciation of the courtyard and synagogue, including during events and services which occupy the courtyard.

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

213. A number of other objections have been received relating to noise, additional activity and overlooking generated by the proposed building in both baseline and cumulative scenarios and how these would affect the use of the synagogue and the quiet character of Heneage Lane which contributes towards its significance. These have been addressed in Noise and Vibration and Transport sections of the report and are not considered to have a specific bearing on the heritage significance of the synagogue or its courtyard complex, notwithstanding the impacts identified upon amenity and other areas. It is not considered that there would be a harmful impact upon the significance of the listed building with regards to noise during the construction and operational stages of the development. It is acknowledged that there would be an increase in the number of pedestrians in the area as a result of the proposed development. However, there is no evidence that the use of the building for holding religious services would be affected by noise resulting from the use or operation of the proposed development. Conditions are recommended to control construction working hours around religious services to mitigate any heritage impact in the short term.

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

Conclusion:

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

Holland House: grade II*

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

217. Holland House has a principal frontage facing north-west onto Bury Street and a secondary frontage facing south-east onto a small open space off Bury Street. Both facades are seen as part of a dense urban townscape, closely neighboured by the tall buildings of the Cluster with the Gherkin, opposite, prominent in the foreground of views of the principal frontage and a prominent backdrop to the building's secondary elevation. The backdrop to the listed building's principal elevation is clear sky. The building remains part of a street block of a comparable scale and density to when it was originally constructed, and this immediate setting contributes to the building's significance. It originally formed part of the frontage to one of the narrowest streets in the City located opposite the former Baltic Exchange. It was designed to address the narrow street and the lustrous, exquisite faience and projection of the closely spaced chamfered piers made the building appear solid in oblique views despite being highly glazed. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening up longer views of Holland House across the north-east and south-east corners of the new Gherkin plaza – but this was not how the building was originally designed to be seen and these views do not contribute significantly to the significance or appreciation of the listed building.

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

context in the area'. LAMAS have reached a very similar conclusion to Historic England in relation to the impact of the proposed building upon Holland House.

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

Church of St Katharine Cree: grade I

220. Church of 1631 with a tower of c.1504; a rare example of a 'Laudian' church of the Caroline period; an exceedingly rare example of the early use, internally, of classical architectural motifs alongside perpendicular gothic features. The building is therefore of exceptional architectural and historic interest, with the enclosed churchyard to the north-east contributing to its significance.
221. The church is located on the south-west corner of the street block in a characterful immediate setting of masonry warehouse buildings and offices with terracotta decorative flourishes. These are prevaillingly Victorian and Edwardian in date and form a cohesive townscape group. This immediate historic setting contributes to the special architectural and historic interest of the church; more widely, the church is seen in the context of larger modern buildings and the tall buildings of the City Cluster which do not contribute to the significance of the church but which create an established, contrasting modern setting. The church is not listed as one of the City Churches with a Skyline Presence in Figure 11 of the City of London Protected Views SPD (2012).
222. The proposed building would appear in views of the church. When looking from the south and south-east, the proposed building would appear over the body of the church as part of the City Cluster of towers. In views of the church looking north along Creechurch Lane, the graceful faience elevations of the proposed building would form a

characterful new backdrop to the church. The GLA consider that the proposed building would, by altering the scale of the built form and reducing the level of open sky on the street, cause harm to the setting of the church.

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

Church of St Andrew Undershaft: grade I

224. Church dating to the 12th century, rebuilt in the 16th century with a 15th century tower. It has exceptional architectural and historic significance as one of the City's few pre-Fire buildings to survive. The small churchyard to the north, including its walls and railings, contributes to the building's setting and significance. Otherwise the church's setting is defined immediately by mid-rise buildings of similar scale and more widely by the tall modern buildings of the City Cluster, which lie in close proximity to the north, south and west. The juxtaposition between the church at the Gherkin has become 'iconic' in the iconography of the City and London generally.
225. Under the baseline scenario, the proposed building would appear as a prominent feature on the skyline in views of the church. In perhaps the optimal view of the church from the south-west, the upper stages of the proposed building would rise above the neighbouring buildings to the east of the church and present a prominent new element in the view. However, under the cumulative scenario, the proposed building would be completely occluded by the consented form of 100 Leadenhall Street.
226. As with St Katherine Cree, the church is already seen in dynamic contrast to the taller buildings of the City Cluster. As such, it is considered that the proposed building would not harm the setting or significance of St Andrew Undershaft.

Church of St Helen Bishopsgate: grade I

227. Nunnery of the 13th century which became a parish church from the Reformation; many additions of fabric from the 14th to the 20th centuries and a building of the highest architectural and historic significance. It is one of the City's few surviving pre-Fire buildings. The churchyard to the west contributes to the significance of the listed building.
228. From the west, the church's immediate setting comprises a group of 19th and 20th century buildings, with the tall buildings of the City Cluster providing a long-established, dramatic contrast in scale and materiality immediately to the south and west. The Gherkin is prominent behind the church in views looking east. There is a narrow slice of clear sky above the church between the Gherkin and No. 1 Undershaft obscured by a prominent tree in the churchyard.
229. In the baseline scenario, the proposed building would infill the existing clear sky gap between the Gherkin and No. 1 Undershaft. It would be partially occluded by the churchyard tree when in leaf but would be more visible in the winter months. However, the setting of the church in this view is predominantly of taller modern forms and the proposed building would be an augmentation of this. Additionally, in the cumulative scenario, the proposed building would be occluded by the consented 1 Undershaft and 100 Leadenhall Street. The proposed building is not considered to harm the setting or significance of St Helen Bishopsgate.

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

230. Church of 1744, of stock brick with classical stone detailing and a distinctive obelisk tower. The churchyard, railings and associated drinking fountain and police call box all contribute to the building's setting and significance. The church's setting is further enhanced by the open space of Aldgate Square to the west and the group relationship with the Aldgate School. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with the tall buildings of the Cluster set some distance away to the west.
231. The proposed building would be seen in the backdrop of the church as part of the City Cluster. The GLA consider that the proposed building would cause harm to the setting of the church. Your officers do not concur with this conclusion. The proposed building would read as a distant element of the established City Cluster of modern towers in the

backdrop to the church when seen from the east. It would not be harmful to its setting or significance.

Church of All Hallows by the Tower (grade I)

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

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

Lloyd's Building: grade I and grade II

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

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

Trinity House: grade I

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

significance from its dignified setting of Trinity Square and the ensemble of seagoing structures and buildings surrounding.

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

Tower Bridge: grade I

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

239. In views of the bridge from the south-east, from Butlers' Wharf and other locations along the South Bank, the proposed building would be seen as a high-quality architectural addition to the established and consolidating City Cluster of modern towers to the north of the bridge, which would remain the commanding foreground landmark guarding the Upper Pool of London. There would be no harm to the setting or the significance of the listed building.

Lloyd's Register of Shipping: grade II*

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

backdrop of the tall modern office buildings of the City Cluster – or its significance.

Former Port of London Authority Building: grade II*

242. Offices of 1922 by Sir Edwin Cooper for the former Port of London Authority. Crowned by a distinctive tower incorporating allegorical sculpture, the building is a rich and robust essay in the Edwardian Baroque and possesses high architectural and historic significance. It draws much significance from its setting, too, with Trinity Square and its monuments in the foreground and the neighbouring Trinity House all coalescing to form a dignified group of buildings illustrating London's seagoing past.
243. In views from Trinity Square, the upper storeys of the proposed building would be visible to the right of the listed building. It would appear suitably divorced from the foreground ensemble of historic buildings and would read as part of the emerging City Cluster in the distance, as a subsidiary player to the consented silhouettes of 100 Leadenhall Street, 1 Undershaft and 40 Leadenhall Street. This character of a modern skyline context being so, the proposed building would not be harmful to the setting of significance of the listed building.

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

244. School of 1908, of red brick with classical stone detailing in the 'neo-Wren' manner. The associated playground and railings all contribute to the building's setting and significance. To the east, the church's setting is further enhanced by the open space of Aldgate Square and the group relationship with St Botolph's church; to the west, the school is framed by the finer grain and historic townscape of Mitre Street. The setting is otherwise characterised by modern commercial buildings of medium scale in the City, with the tall buildings of the Cluster located to the west.
245. The proposed building would be seen in the backdrop of the school as part of the City Cluster and would not be harmful to its setting or significance. In particular, the proposed building would form a dynamic new terminus to Mitre Street in the background of north-westerly views of the school's western frontage.

Bishopsgate Institute and Library: grade II*

246. Institute of 1895 by Charles Harrison Townsend in the unique stylistic fusion of that architect, incorporating free gothic elements and much terracotta detailing. The main frontage to Bishopsgate is most elaborate while the longer Brushfield Street elevation is more subdued.

The building has high architectural significance and derives a degree of significance from its setting on the south side of Brushfield Street, where it forms a group with two eighteenth century grade II listed buildings.

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

38 St Mary Axe: grade II

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

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

Nos. 2-16 Creechurch Lane: grade II

250. Warehouses of 1885, of brick and stucco and exhibiting the light-industrial architectural characteristics that were once common to parts of the City, but which have nearly now all been lost. The building forms a group with the other warehouse buildings in the vicinity, of similar age and materiality though unlisted and classed as non-designated heritage assets.

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

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

252. Offices of 1900, of Portland stone in the Edwardian baroque style of its fellow buildings in the Lloyd's Avenue Conservation Area. The building has high architectural significance. It draws significance

from its setting as part of the enclave of Edwardian buildings in the Lloyds Avenue Conservation Area.

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

The Setting of other Listed Buildings

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

Conservation Areas

Lloyd's Avenue

255. The conservation area lies to the south east of the site and comprises a significant group of Edwardian and later buildings. The area is focused on the Lloyd's Avenue thoroughfare, with the existing view north up this street terminated by 105 Fenchurch Street and flanked by Lloyd's Register (grade II*) and Dixon House (grade II). The Gherkin is a distinctive focal point in views along Lloyd's Avenue, which along with the consented 100 Leadenhall Street tower create a modern termination to the view. The proposed building would introduce elegant faience architecture into this view as a counterpoint to the existing modern towers. Given the characteristic backdrop of tall buildings in this view and the enclosed character of the conservation area, the proposed building would not harm its significance.

Trinity Square

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

Non-designated heritage assets

257. The Creechurch area harbours a number of unlisted historic buildings of merit, considered to be non-designated heritage assets, of which a number are located within the immediate setting of the proposed building.
258. The Rabbi's House adjoins Bevis Marks synagogue to the east and presents a simple frontage to the synagogue courtyard of stock brickwork and stone dressings. Its more architecturally significant elevation is that to Heneage Lane, of red brick and Mansfield stone dressings incorporating Tudor detailing. It possesses a high level of historical significance for its associations with the synagogue and a moderate level of architectural significance for its well-composed, high-quality elevations. The building's setting as part of the synagogue complex contributes highly to its significance.
259. 113-116 Leadenhall Street is a stone-built bank of 1891 with refined detailing. As one of few remaining historic buildings on Leadenhall Street, the building is an important element of local townscape and reinforces and contributes to the setting of the church of St Andrew Undershaft. It possesses a moderate level of architectural significance for its high-quality, refined architecture. It forms a group with the Church of St Andrew Undershaft but its setting otherwise contributes neutrally to its significance.
260. 33-34 Bury Street is an office building of 1912, built for Messrs Burge, grain dealers. The building typifies the kind of diminutive, early 20th century office building once very common in the City and now hardly to be seen. It has high-quality stone carved stone detailing and makes a strong local townscape contribution, particularly as a group with Holland House. It possesses a moderate level of architectural and historic significance for its high-quality design and as a now-rare example of this building typology. Its forms a group with Holland House but otherwise its setting contributes neutrally to its significance.
261. To the east of Creechurch Lane are a characterful group of 19th century former warehouse buildings. Each is considered a non-designated heritage asset for the positive contribution it makes to the townscape and the setting of the church of St Katherine Cree. The buildings form a strong, cohesive group intrinsically and with the listed warehouses in this location, united by the shared use of brickwork and sophisticated terracotta detailing. Collectively they are a valuable survival of historic townscape at the eastern edge of the City Cluster

and make a very strong local townscape contribution. The buildings are: 18-20 Creechurch Lane (Cree House), 24 Creechurch Lane (Fibi House), 12-14 Mitre Street (Mitre House) and 27-31 Mitre Street. They possess high architectural significance for their high-quality materials and stone/terracotta detailing and high historic significance as a good surviving group of a now-rare building type in the City. Their immediate setting as a cohesive group strongly contributes to their significance. Their wider setting is a mix of buildings of various heights and ages which makes a neutral contribution to their significance.

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

Conclusion on Heritage Impact:

263. The proposed building would cause a low degree of less than substantial harm to the OUV/significance of the Tower of London World Heritage Site through its impact on the LVMF view 10A.1, in which it would affect the viewer's ability to appreciate the OUV, its authenticity and integrity and would be contrary to London Plan policies D9(e), HC2, HC3, HC4 and Local Plan policies CS12, CS13.
264. When addressing the balancing exercise, as considered below, this harm has been afforded considerable importance and weight, and account taken of the importance of this as a World Heritage Site in accordance with the advice given in paragraph 199 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The heritage balancing exercise alongside the public benefits is addressed later in this report..
265. Otherwise, it has been found that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and non-designated heritage assets, causing no harm.

Archaeology

266. The site is in an area of archaeological potential located within the Roman and medieval City Wall, and within the precinct of the medieval Holy Trinity Priory, which was founded in the 11th century. An Archaeological Desk-Based Assessment has been submitted with the

application and there is potential for remains of all periods to survive in this area.

267. There is high potential for Roman remains as evidence of several phases of buildings, ditches and other occupation such as quarrying and glassmaking has been recorded in the area. There is high potential for medieval remains including foundations of buildings of the Holy Trinity Priory, as the site is within its' precinct and close to the location of the south gate. In addition, there is evidence of burials, recorded in the vicinity, which pre-date the construction of the Priory.
268. The potential for remains to survive on the site has been affected by the construction of the existing building basement and foundations. Archaeological evaluation would be required to better understand the level of disturbance and additional information on the type, character and date of any surviving remains which may survive below the existing basement. The results of this evaluation would inform the design of an appropriate mitigation strategy.
269. The proposed building would have four levels of basement which would remove all surviving archaeological remains.
270. The proposals are acceptable subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundations and piling design.

Transport and Highways

Public Transport

271. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B.
272. The site is located close to Fenchurch Street, Liverpool Street and Cannon Street Rail Stations, to Aldgate, Aldgate East, Liverpool Street, Tower Hill and Bank underground stations, to Tower Gateway DLR station and is also close to several bus routes with bus stops on St Katherine Cree, Dukes Place, Gracechurch Street/ Bishopsgate and Aldgate High Street.
273. The submitted Transport Assessment indicates that the overall increase in trips across all modes would have a negligible impact on the surrounding highway and public transport network capacities.

Car Parking

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

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

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

Long Stay Cycle Parking

276. London Plan policy T5 requires cycle parking at least in accordance with the minimum requirements published in the plan. Policy T5 requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
277. London Plan 2021 standards require 432 long stay cycle parking spaces are provided. The applicant is proposing 443 long stay cycle parking spaces, in excess of the London Plan standards. 5% of the cycle parking would be able to accommodate larger cycles, including adapted cycles for disabled people, in line with London Cycle Design Standards guidance.
278. The long stay cycle parking is proposed at basement level 1 and basement mezzanine level 1 and would be accessed via two lifts from the pedestrian walkway and via a staircase access from Heneage Place. Cyclists would access for the lifts in the pedestrian walkway, off the public highway. The applicant has demonstrated that the lifts would provide enough capacity for access to and from the cycle parking during peak times to ensure queuing cyclists would not unduly obstruct the pedestrian walkway.
279. 46 showers, 443 lockers and a drying room are proposed alongside the cycle parking for active travel. The locker provision is in line with London Plan 2021 policy 10.5.7, which recommends a minimum of 2 lockers per 3 long-stay spaces. The shower provision is compliant with the London Plan 2021 policy 10.5.7, which is at least 1 shower per 10 long-stay spaces.
280. The applicant would be required to produce a Cycling Promotion Plan which is a cycling focused Travel Plan and this would be secured by a S106 obligation for approval in line with London Plan 2021 policy T4.

Short Stay Cycle Parking

281. London Plan 2021 standards require 26 short-stay cycle parking spaces. The applicant is proposing 26 short stay cycle parking spaces at

basement level 1 and basement mezzanine level 1, next to the long stay cycle parking.

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

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

Cycle Hire Docking Station and Improvements to Cycling

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

Servicing and deliveries

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

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

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

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

- secured as obligations in the S106 agreement.
289. Waste collection will take place in the same way as all other servicing vehicles and will be included in the daily cap of 22 vehicles.
290. The number of deliveries as a result of the proposed development would result in an increase of 12 additional vehicles throughout the day when compared to the existing situation. An additional 12 vehicles throughout the course of the day, would not be considered to unduly impact on the amenity or use of the Synagogue. It should be noted that 18 car parking spaces would be removed which would reduce the number of vehicle movements to and from the servicing area on Heneage Place.

Pedestrian Comfort

291. A Pedestrian Comfort Level (PCL) assessment has been conducted for the streets surrounding the development, including Creechurch Lane, Mitre Street, Bury Street, Cunard Place and Heneage Lane.
292. Trip generation estimates in the transport assessment demonstrate that the development would result in a net increase of 588 pedestrian movements in the AM peak and 582 pedestrian movements in the PM peak. This includes trips by all modes except cycling, as modes which require the final part of the journey to be completed on foot.
293. The applicant was unable to undertake pedestrian surveys on the streets surrounding the site due to the COVID-19 pandemic. Pedestrian count data has been taken from the transport assessments for nearby applications, including 100 Leadenhall Street and the Tulip. The future base flow (2041) used in the PCL assessment is based upon the one used for 100 Leadenhall Street and assumes a 26.6% increase in pedestrian numbers between 2016 and 2041.
294. The transport assessment has modelled the likely arrival routes for pedestrians based on the proximity of nearby transport links and the frequency of services to those links. 58% of pedestrian arrival are predicted from the west (Bank and Cannon Street) via Cunard Place and Creechurch Lane, 22% of pedestrian arrivals are predicted from the north (Liverpool Street) via Bury Street and Heneage Lane, 15% from the south (Fenchurch Street) via Cunard Place and Creechurch Lane and 5% from the east (Aldgate) via Mitre Street.
295. Representations have been received raising concerns that the scheme introduces a new pedestrian and cycle route through the application site connecting with Heneage Lane and Bevis Marks and that this route is likely to significantly increase the number of pedestrians and cyclists using Heneage Lane. Heneage Lane is approximately 3.5m wide and has the capacity to accommodate around 2000 pedestrians per hour at a comfort level of B+. The proposed development would lead to an increase in pedestrian numbers on Heneage Lane following continuation of the north/south desire line through the site. The submitted pedestrian

comfort analysis predicts that an additional c. 70 trips per hour during peak periods would be likely to use Heneage Lane. Pedestrians would also have the choice to use Bury Street along the same desire line. Officers consider that the additional pedestrian trips on Heneage Lane would not unduly impact on the noise and disturbance at Heneage Lane.

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

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

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

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

Section 278 Agreement

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

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

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

Stopping Up

301. Several small areas of stopping up would be required on Bury Street and Heneage Place, totalling 0.9sqm. The applicant is proposing to dedicate areas on Heneage Place, Creechurch Lane and Bury Street as public highway, totalling 8.7sqm. Overall, there is a net gain of 7.8sqm of public highway. There is also a gain, to be secured via 1 S106 obligation, of publicly accessible space within the development in the form of the new walkway which would be open to the public between 0700 and 2300, of approximately 215 sq.m.
302. The stopping up would not affect vehicular access to either street and overall the facilities for pedestrians would be improved through the Section 278 works and proposed building permeability.

Construction Logistics

303. The submission of a deconstruction logistics plan and construction logistics plan will be secured by condition. The logistics arrangements will be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.
304. The outline construction management plan submitted with the application shows that at least one blue badge parking bay would need to be suspended during the works. Any application to suspend blue badge parking bays must be supported by an Equalities Analysis (EA). Through the EA the applicant would be required to consult with local stakeholders to understand the usage patterns of the bays in question, and to establish whether their re-provision in the nearby area would be required.

Public Access and Inclusivity

305. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.
306. The building entrances from Creechurch Lane, Bury Street and Heneage Lane would be step free and would provide automated sliding doors and clear openings to ensure unencumbered access to all.
307. Vertical circulation to the office floors would be via 12 x 21-person passenger lifts in the main core. The 12 lift cars would work as twin lifts within six lift shafts for passenger movements to the office floors. Access to the upper cab entry lobby is via stair supported by a

- life for users with mobility needs. Horizontal circulation would be step free through the officer floor areas.
308. The terraces at level 20 and 21 would be accessed via the lift bank from the ground floor and mezzanine level. The two terrace spaces are linked by an external stair which is designed to ambulant disabled standards.
309. The scheme introduces a step free publicly accessible route (Heneage Arcade) between Bury Street and Heneage Lane to improve the permeability of the site. The retail units would provide facilities which are designed for inclusive access in respect of entrance doors, counter height, seating and hearing difficulty.
310. The new pocket park James' Court as an extension of the public realm has been designed with level access throughout and provides inclusive seating areas.
311. The public mezzanine and first-floor community space are accessed via the feature stairs from the ground floor arcade and are also served by the separate northern lift bank.
312. A dedicated and prominent cyclist entrance from ground floor has been integrated into the design of the building. The entrance would be accessed via automated sliding doors to Creechurch Lane and internally into the arcade. A shallow stair with a 'cycle gutter' would provide access to the secure cycle parking at basement and basement mezzanine level. Alternative cycle access to the basement is provided via a lift within the north core.
313. Accessible sanitary facilities including unisex accessible and ambulant WCs would be provided at all office levels. It is intended that wherever WC facilities are located, an accessible cubicle will be provided. Accessible showers, WCs and changing facilities would be provided. Unisex and accessible toilets would also be provided for use by the public and visitors at ground floor, mezzanine and first floor level.
314. Representations have been received that the proposed development would restrict disabled access to the Synagogue. The proposed development does not propose any alterations to the way visitors access the Synagogue.
315. The outline construction management plan submitted with the application shows that at least one blue badge parking bay would need to be suspended during the works. Any application to suspend blue badge parking bays must be supported by an Equalities Analysis (EA). Through the EA the applicant would be required to consult with local stakeholders to understand the usage patterns of the bays in question,

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

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

Security

317. Local Plan Policy DM3.2, draft City Plan 2036 Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) sets out how appropriate security and safety provision must be incorporated into all development. Policy D11 of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.
318. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police.
319. The building has been designed with an 'internal' structural solution to mitigate the impact of any vehicle borne attack. As part of the detailed design, a detailed Vehicle Dynamic Assessment will be carried out to better understand the threat and risks associated with all possible approach routes.
320. The new public realm would be designed with landscaping and planters which would double up as security mitigation measures for the new public realm.
321. Further details of security mitigation measures would be secured via a Section 278 Agreement. This would incorporate the requirements of vehicle mitigation measures, including traffic calming to protect pedestrians when entering and leaving the building.
322. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

Energy and Sustainability

Energy and CO2 emissions

323. The Energy Statement accompanying the planning application demonstrates that the building has been designed to achieve an overall

39.2% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

324. The proposed energy demand reduction measures include a building envelope with an optimised glazing ratio of 40% glass to solid that balances daylight availability with reducing peak solar gain and associated cooling load. In addition, the inclusion of natural ventilation as part of a mixed mode system is proposed due to the opportunities of the relatively shallow floor plates and the consideration that 50% of the occupied office hours would have suitable external temperatures. The savings from energy demand reduction would achieve a 2% carbon emissions reduction overall. The applicants are committed to achieving further façade design optimisation through the detailed and technical design stages to significantly improve on the results of the lean energy strategy stage. This will be requested by a pre-commencement condition.
325. There are currently no opportunities to connect the development to an existing or planned district heating network. However, drawings demonstrating how the site is to be future-proofed for a potential connection to a district heating network have been provided.
326. It is proposed to use Air Source Heat Pump (ASHP) technology for space heating, cooling and hot water. Other renewable energy technologies are not proposed, most notably due to the lack of space on the roof for a PV panel installation. Overall, the carbon emissions savings due to ASHP amount to 37.9% compared to the lean design stage development.
327. This energy strategy demonstrates compliance with the London Plan carbon targets (London Plan Policy S12). A S106 clause is recommended requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

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

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

Whole Life-Cycle carbon emissions

330. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
331. A Whole Life-Cycle carbon assessment has been submitted. The re-use or recycling of existing materials is not accounted for in this statement – this will be considered as part of the detailed design development once a pre-demolition audit has been carried out. This audit will be required by condition.
332. The planning stage assessment of low carbon structural solutions includes an all-electric servicing strategy and material efficiency measures such as the use of lower carbon profiled façade materials (e.g. ceramic), the use of prefabricated structural and façade systems, the rationalisation of the structural grid to minimise concrete and steel quantities and assessing different foundation options to minimise material use.
333. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate emissions well below the Greater London Authority's benchmark emissions target, close to reaching the GLA's aspirational target. This performance could be attributed to the options appraisals of the embodied carbon of the structure and façade. The confirmation of the strategy including further improvements, and a confirmation of the post-construction results have been requested by conditions.

Circular Economy and Waste

334. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.
335. Due to the significant uplift in the number of storeys, the foundation and structure of the existing building cannot be retained, with the exception of the basement retaining walls. A pre-demolition audit will be undertaken, requested by pre-commencement condition, to investigate how recycling of construction, demolition and excavation material can be maximised.
336. The submitted Draft Circular Economy Statement highlights that the approach to Circular Economy will evolve as the design evolves and describes the following objectives for the detailed design phase:
- Smart material choices (prioritisation of durable, biodegradable, recycled/recyclable materials and materials that can be reused or re-purposed, where possible)
 - Incorporation of modular elements for higher levels of design flexibility and adaptability
 - Procurement of products as a service - leasing access to a solution instead of buying it
 - Product life extension through improved maintenance, remanufacturing, repairing and upgrading / upcycling
 - Closed loop / Take back - working with manufacturers who take back used products to recover the value by using them to make new products.
337. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm full details and achievement of the aspirations have been requested by conditions. The detailed assessment will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Urban Greening and Biodiversity

338. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.
339. A visually striking landscaping feature is proposed in the form of a 3-storey tall green wall in the pocket park area at ground level. This

would include artificial lighting when the daylight levels are not sufficient. Planters and tree planting are proposed at public realm level. The roof terraces at levels 20 and 21 would incorporate planters, including opportunities for small trees. The majority of the plantroom walls at roof level would be utilised for climbing plants growing from 47 sqm of planter around the perimeter of the roof, and 122 sqm of sedum blankets would be installed across the top of the plantroom.

340. A Biodiversity Net Gain calculation has been carried out, achieving a percentage increase of 416.71% (due to the existing low habitat value of the site), and therefore meets the proposed net gain requirement of at least 10% increase in biodiversity value required by the draft Environment Bill. This is largely as a result of proposed green wall and the extensive green roof which will also include small log piles and bird feeders.
341. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO₂ while releasing O₂, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people. The scheme would exceed the draft Local Plan UGF. The officers assessment indicates that the UGF would exceed the City Plan target and lies in the range 0.33 to 0.39 which would exceed draft City Plan 2036 (Policy OS2) minimum target of 0.3.
342. Substantial greening has been incorporated at ground floor level within the new public realm areas by landscaping and trees as well as an 8 storey green wall (approx. 32m in height and over 200sq.m in terms of surface area).
343. The siting, size and planting palette would ensure year-round seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits.
344. Details of the quality and maintenance of the proposed urban greening measures would be reserved by condition.

Flood Risk, Sustainable Urban Drainage

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

346. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk) as such it is at a low risk of fluvial and tidal flooding. The proposed drainage strategy includes capturing some runoff from the proposed building using green roof and wall to limit the overall volume of water run-off that needs to be discharged. An attenuation tank is proposed below ground level . Surface water (including stormwater) run off would be discharged into the public combined sewer system at an acceptable rate. The SuDS strategy has been developed to cope with potential changes in the climate allowing for a 30% increase in rainfall.
347. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2036 and policies S112 of the London Plan.
348. The Lead Local Flood Authority and Thames Water have raised no objections to the proposals and have recommended conditions to be attached.

Climate Resilience

Heat Stress

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

Water Resources

350. The development targets a minimum of 40% reduction in water consumption over baseline building water consumption and rainwater harvesting for landscaping irrigation is suggested. These measures will enable the development to minimise the use of fresh potable water which will be under increasing pressure as we experience longer periods of drought.

Natural Capital and Pest & Diseases

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

warmer wetter winter, more extreme weather events and pests and diseases.

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

Conclusion

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

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

Environmental Impact of Proposals on Surrounding Area

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

Daylight and Sunlight and Solar Glare and Overshadowing

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

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

- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
- Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be

noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

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

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

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

359. Officers consider that the applicants have completed comprehensive daylight assessments of the potential impact on Bevis Marks Synagogue, as set out within Environmental Statement (ES) Volume 1, Chapter 10 and ES Volume 3, Appendix: Daylight, Sunlight and Overshadowing, Light Intrusion and Solar Glare. The daylight effects were assessed in accordance with BRE Report 209, '*Site layout planning for daylight and sunlight – A guide to good practice*', 2011 ('the BRE Guidelines'). This is the principal reference document used by most local authorities in consideration of daylight and sunlight matters, throughout the UK and including CoL, and is referenced in key planning policy including in Local Plan policy DM 10.7 and in draft local plan policy DE8.

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

361. Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing

lighting levels, the City Corporation will take into account the cumulative effect of development proposals.

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

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

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

364. Members have requested (at Planning and Transportation Committee on 20 July 2021) that officers should request a radiance analysis from applicants as a tool to help visualise the impact of the loss of light within properties. As requested by officers, the applicant submitted a radiance-based daylight assessment for the Bevis Marks Synagogue and the residential properties at 10-12, 14-16 and 18-20 Creechurch Lane as well as a review of the submitted daylight, sunlight and overshadowing assessment within the Environmental Statement which was prepared by Avison Young.

The City appointed Dr Paul Littlefair (BRE) to independently review the radiance based daylight analysis prepared by GIA as well as carry out a review of the submitted daylight, sunlight and overshadowing assessment submitted in the Environmental Statement prepared by Avison Young. A copy of this report is available to view online.

365. It should be noted that when using radiance images to assess the loss of light there is no objective yardstick to use. In contrast, the BRE guidelines give clear cut measures by which the acceptability of loss of light may be judged.

366. The Average Daylight Factor (ADF) assessment is a measure of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room's finished floor level. The ADF can be calculated a number of ways but the most commonly used methodology is the formula set out in the BRE guidelines. This formula takes account of: the size and shape of a room and its serving

window(s); the actual or reasonably assumed reflectance values of a room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.

367. The BRE Guidelines recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

368. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). Similar to measuring the ADF of a room, this method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

369. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE's recommended ADF target values. Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in the Environmental Statement in line with BRE Guidelines, which is the methodology established within the development plan/policy framework.

370. The submitted radiance study is accompanied with images depicting the ADF results and these images show absolute levels of light in the existing scenario and the compared with the proposed development in place (Future Baseline 1) as well as with the cumulative surroundings with unconsented developments in place, including The Tulip and 33 Creechurch Lane (Future Baseline 2). This is discussed in more detail in the paragraphs below.

A representation has been received from Leathersellers stating that a number of properties they own, including; 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe have been identified in the baseline assessment for daylight, sunlight, overshadowing, light intrusion and solar glare but none of these properties are subject to detailed sensitivity analysis. Officers can confirm that the submitted

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

371. A representation has also been received from the occupiers of the office/commercial unit at 12-14 Mitre Street raising concerns that the proposed development would have an impact on daylight and sunlight to this property and questions why the property has not been included in the submitted daylight and sunlight assessment.

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

Daylight

373. The residential buildings and open spaces to be considered include those at;

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

- 2 Heneage Lane

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

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

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

2 Creechurch Lane

Existing Vs Proposed

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

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

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

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

Cumulative Impact – Future Baseline 1

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

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

Cumulative Impact – Future Baseline 2

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

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

4-8 Creechurch Lane

Existing Vs Proposed

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

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

analysed although they are less important' and are therefore considered less sensitive than other uses.

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

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

Cumulative Impact – Future Baseline 1

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

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

Cumulative Impact – Future Baseline 2

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

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

10-12 Creechurch Lane

Existing Vs Proposed

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

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

394. For the VSC analysis none of the 32 windows assessed would meet the BRE guidelines. 5 of the 32 windows would experience reductions of between 20-30% which would be considered to be a minor

adverse impact. 13 windows of the 32 windows assessed would experience alterations of between 30-40% and which would be considered to be a moderate adverse impact. 14 of the remaining windows would experience alterations in excess of 40% which would be considered to be a major adverse impact. It is worth noting that these windows have an oblique view of the site and the absolute VSC changes are between 1.8%-3.2%. For the NSL analysis, 8 of the 16 rooms assessed would meet the BRE guidelines which would be considered to be a negligible impact. Of the remaining 8 rooms, 2 would experience alterations between 20-30%, which is considered to be a minor adverse impact. 4 of the remaining 8 rooms would experience alterations between 30-40% which is considered to be a moderate adverse impact. The 2 remaining rooms would experience alterations in excess of 40% which is considered to be a major adverse impact. It is worth noting that all of these rooms have low existing NSL values (well below 50% of the total room areas) such that the large percentage reductions arise from only small absolute alterations.

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

Cumulative Impact – Future Baseline 1

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

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

Cumulative Impact – Future Baseline 2

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

399. The overall effect to daylight would be considered to be moderate adverse in the future baseline 2 scenario.

14-16 Creechurch Lane

Existing Vs Proposed Scenario

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

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

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

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

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

Cumulative Impact – Future Baseline 1

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

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

Cumulative Impact – Future Baseline 2

407. In considering the cumulative impact_(the proposed development and other consented schemes and those under consideration), out of the 36 windows assessed, 1 window would experience a moderate adverse impact and the remaining 35 windows would experience a major adverse impact with alterations in excess of 40%. It should be noted that the absolute VSC alterations range between 1.6% - 3%. The potential impact is more than that is seen in the previous existing vs proposed scenario and it can be concluded that this is largely attributable to the consented schemes of the cumulative assessment.

18-20 Creechurch Lane and 27-31 Mitre Street

Existing Vs Proposed Scenario

408. This property is located to the southeast the site and contains mixed use with commercial at ground floor and residential accommodation above. A total of 175 windows serving 34 rooms have been assessed for daylight.
409. The building façade at the corner junction of Mitre Street and Creechurch Lane faces directly opposite the proposed development and is separated by 10-12m. in this context it is worth noting that any redevelopment on this site which is higher than the existing building is likely to have a greater effect than the targets in the BRE guidelines.
410. For the VSC analysis, 35 of the 175 windows assessed would meet the BRE criteria and would therefore have a negligible impact. Of the remaining 140 windows, 37 windows would experience reductions of between 20-30%, which would be considered to be a minor adverse impact. It should be noted that approximately one third are understood to serve bedrooms, which the BRE acknowledge have a lower expectation of light than primary habitable spaces (such as living rooms).
411. Out of the 103 remaining windows, 20 windows would experience alterations between 30-40% which would be considered to be a moderate adverse impact. The remaining 83 windows would experience reductions in excess of 40% which would be considered to be a major adverse impact. Of these 83 windows, 23 windows appear to serve bedrooms which are less important, while the remainder of the windows serve multi-purpose living spaces. These living areas are understood to be dual aspect and served by multiple windows (windows from north east and north west) which would provide mitigating light. The absolute VSC alterations range between 1.1% and 11.7% for VSC.
412. For the NSL, all of the 34 rooms assessed would meet the BRE guidelines where these rooms would experience very little change in the daylight distribution and a direct view of the sky would be retained to the back of all the rooms. The impact would be considered to be negligible.
413. In consideration of the adverse VSC effects, retained light levels and negligible effect on NSL the overall effect to daylight would be considered to be moderate adverse for the proposed vs existing scenario.

Cumulative Impact – Future Baseline 1

414. In considering the cumulative impact_(the proposed development and other consented schemes), out of the 175 windows assessed, 32 windows would experience a negligible impact,35 windows would experience a minor adverse impact, 17 windows would experience a moderate adverse impact and 91 windows would experience a major

adverse impact. 23 of the 91 which experience a moderate adverse impact windows are thought to serve bedrooms which have a lower expectation of light. The remainder of 68 windows serve multi-purpose living spaces. These living areas are understood to be dual aspect and served by multiple windows (windows from north east and north west) which would provide mitigating light). The absolute VSC alterations range between 1.1% and 9.6%.

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

Cumulative Impact – Future Baseline 2

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

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

Residential Use at 2 Heneage Lane

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

Existing Vs Proposed Scenario

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

Cumulative Impact – Future Baseline 1 and 2

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

Bevis Marks Synagogue

Existing Vs Proposed Scenario

421. This religious building is located to the north of the site. A total of 28 windows serving 2 rooms have been assessed for daylight.
422. For the VSC analysis, 23 of the 28 windows tested would meet the BRE guidelines and therefore would have a negligible effect. Of the remaining 5 windows 4 would experience reductions between 20-30% which is considered to be a minor adverse impact. The absolute reductions experienced by these 4 windows range between 1.7%-1.8%. The 1 remaining window would experience alterations between 30-40%, which would be considered to be a moderate adverse impact. The absolute VSC changes would be 1.3%.
423. The small absolute VSC changes to these 5 windows are fractional and would likely to be imperceptible to the occupants and it is also worth noting that there are very low existing VSC values and the small absolute changes translate into a high percentage. The Synagogue is also served by 23 other windows which remain unaffected.
424. For NSL, both of the rooms assessed would meet the BRE guidelines and therefore would be considered to experience a negligible impact.
425. In consideration of the above, including the small absolute VSC changes and the negligible effect on NSL, the effect to daylight within this building is considered to be minor adverse in the proposed vs existing baseline. It should also be noted that the Synagogue is served by 23 windows which remain unaffected.

Cumulative Impact – Future Baseline 1

426. In considering the cumulative impact_(the proposed development and other consented schemes), out of the 28 windows assessed 23 windows would experience a negligible impact, 2 windows would experience a minor adverse impact and 3 windows would experience a moderate adverse impact. The absolute alterations to the effected windows range between 1.2%-1.8% and it is considered that these are very small reductions which would be imperceptible to occupants but translate to a high percentage. For the NSL analysis, 2 of 2 rooms tested would experience a negligible impact.
427. The overall effect to daylight would be considered to be minor adverse in the future baseline 1 scenario. The potential impact is slightly more than that is seen in the previous existing vs proposed scenario

(i.e. more windows are experiencing a moderate adverse impact) and it can be concluded that this is largely attributable to the consented schemes of the cumulative assessment.

Cumulative Impact – Future Baseline 2

428. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 28 windows assessed 21 windows would experience a negligible impact, 1 windows would experience a minor adverse impact, 1 windows would experience a moderate adverse impact and 5 would experience a major adverse impact. The absolute VSC alterations ranging between 0.1% -1.8% which are considered to be fractional and imperceptible alterations. For the NSL analysis, 1 of 2 rooms tested would experience a negligible impact (the first floor balcony area). 1 room would experience a minor adverse impact (the ground floor area).
429. The overall effect to daylight would be considered to be minor adverse in the future baseline 2 scenario. The potential impact is slightly more than that is seen in the previous existing vs proposed and Future baseline 1 scenarios (i.e. more windows are experiencing a major adverse impact) and it can be concluded that this is largely attributable to the proposed development at 33 Creechurch Lane.
430. The conclusions on the impact of the loss of light to the Synagogue, as a place of worship, and when considering impact on heritage significance, is set out in the preceding paragraphs.
431. On the basis of the analysis set out above it is the view of officers that the impact on daylight would not be such as to cause a material impact on the ability to manifest religion in worship in the Bevis Marks synagogue.
432. In determining this application, the City is subject to the public sector equality duty imposed by section 149 of the Equality Act 2010. Due regard is to be had to the need to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
433. The relevant protected characteristics include sex, race, and religion or belief.

434. It is the view of officers that, although the impact on the level of daylight will be more noticeable in a limited area of the mezzanine floor on the south side (an area which is understood to be used by female members of the congregation) the proposal will not have a material impact on the continued use of the synagogue as a place of worship for all who share relevant protected characteristics and those who do not do so and that the duty is complied with.

St Katherine Cree Church

Existing Vs Proposed Scenario

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

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

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

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

Cumulative Impact – Future Baseline 1

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

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

Cumulative Impact – Future Baseline 2

441. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 39 windows assessed, 27 would meet the BRE criteria and would

experience a negligible impact, the remaining 12 windows experience a minor adverse impact with absolute VSC alterations below 3.8%.

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

Overall Daylight Conclusion

443. The applicants have identified all of the relevant locations in the vicinity of the development which would have a requirement for daylight, and have been comprehensive in this respect, by including a number of residential, religious, and educational properties.
444. The nearest ones are the Bevis Marks Synagogue and associated Rabbi's House, residential dwellings at 2, 4-8, 10-12, 14-16 and 18-20 Creechurch Lane and the Church of St Katherine Cree.
445. In terms of daylight, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 10-12 Creechurch Lane, 14-16 Creechurch Lane and 18-20 Creechurch Lane & 27-31 Mitre Street which would experience moderate adverse impacts.

With regards to the residential properties at 10-12 and 14-16 Creechurch Lane, these buildings have very low daylight levels in the existing situation due to their location within a dense urban surrounding and therefore would experience relatively disproportionate percentage change in daylight levels when factoring in the proposed development. With regards to the residential properties at 18-20 Creechurch Lane and 27-31 Mitre Street, the rooms which are affected by daylight losses benefit from other windows do not directly face the development and which ensure reasonable levels of daylight amenity are maintained.

446. The impact to Bevis Marks Synagogue and the residential property at 2 Heneage Lane would minor adverse with very small absolute VSC changes.
447. The conclusions on the impact of the loss of light to the Synagogue, as a place of worship, is set out in the preceding paragraphs. The impacts on the Synagogue, as a place of worship have been considered within the context of the Equality Act 2010 and the Human Rights Act 1998.
448. In the cumulative scenario, many of the existing buildings would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.

449. The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low.
450. It is considered that the proposed development would not reduce noticeably the daylight and sunlight levels to unacceptable levels, and that daylight and sunlight to surrounding premises would be sufficient, acceptable and appropriate for its context and complies with London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Sunlight (Annual Probable Sunlight Hours (APSH))

451. The potential effect of the Proposed Development on the sunlight received by key nearby sensitive receptors has been assessed against the existing baseline conditions using the Annual Probable Sunlight Hours (APSH) methodology.
452. The following properties do not have windows that face the site and are not orientated within 90° of due south and therefore a sunlight analysis is not required, in accordance with the BRE guidelines:
- 2 Creechurch Lane
 - 4-8 Creechurch Lane
 - 10-12 Creechurch Lane
 - 14-16 Creechurch Lane
 - 2 Heneage Lane.
453. The following properties have been assessed and would experience no losses of annual probable sunlight hours (APSH) and would fully satisfy the BRE guidelines in all cases in the proposed vs existing scenario:
- The Aldgate School
 - The Parish of St Helen Bishopsgate
 - St Katherine Cree Church

Bevis Marks Synagogue

454. Within Bevis Marks Synagogue, not all of the windows would meet the BRE guidelines for APSH and the impact to this building is discussed below.
455. A total of 28 windows have been assessed for sunlight. It should be noted that not all 28 windows face within 90 degrees of due south; 15 of these windows are north facing (10 face north east, 5 face north west); 13 are south facing (3 face south-east, 10 face south west).

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

Existing Vs Proposed Scenario

456. 20 (71%) of the 28 windows assessed would experience no losses of sunlight as a result of the proposed development. 15 of these windows are north facing, five are south west facing and at ground floor level. A further two windows on the south west elevation of the building (at first / balcony floor level) would experience small reductions in annual sunlight, that would be within the BRE guidelines, which would be considered to be a negligible impact.
457. Of the 6 windows remaining, greater relative reductions in annual sunlight would be experienced with alterations in excess of 40%, which in itself would be considered to be a major adverse impact. The effected windows (W9-W11/101 on the south west elevation and W14-W16/101 on the south east elevation) relate to the first floor of the Synagogue building, which are obstructed by the existing surrounding buildings including 4 Heneage Lane immediately to the south west, and 33 Creechurch Lane immediately to the south east, resulting in low existing values, particularly in the winter period when the sun's path is lower in the sky.
458. The absolute reductions in annual sunlight for the affected windows ranges between 7% and 13%. The south west facing windows (W9-W11/101), which benefit from the highest levels of APSH (16%, 13% and 12%) would be reduced to 3%, 4% and 5% respectively. The south east facing windows (W14-W16/101), which currently receive low existing levels of annual sunlight of between 7% and 8% APSH, would experience a 100% reduction in the annual sunlight that they receive with the proposed development in place.
459. The Environmental Statement concludes that the impact on the Synagogue for sunlight would be minor adverse in the existing vs proposed scenario.
460. As noted above, the City of London have reviewed the detailed daylight and sunlight assessment submitted with the application and have had it independently reviewed by daylight and sunlight consultants. The majority of the windows assessed (22 out of 28) would meet the BRE guidelines, 15 of these windows do not directly face the development site and are therefore expected to be minimally affected.
461. On the basis of the major adverse losses to the south facing windows and taking into consideration the small absolute reductions, it is the view of officers that the overall impact of the proposed development on the sunlight received by the Bevis Marks Synagogue would be moderate adverse in the proposed vs existing scenario, and not minor adverse as was concluded Environmental Statement.

Cumulative Scenario – Future Baseline 1

462. In considering the cumulative impact, taking account of the proposed development and other consented schemes, out of the 28 windows assessed, 22 windows would meet the BRE guidelines for annual probable sunlight.
463. Of the 6 windows remaining, greater relative reductions in annual sunlight would be experienced, with alterations in excess of 40%. The effected windows (W9-W12/101 on the south west elevation and W14-W16/101 on the south east elevation) relate to the first floor of the Synagogue building and are obstructed by the existing surrounding buildings. The absolute reductions for the affected windows in the annual period ranges between 5% and 13%.
464. The site facing windows (on the south west elevation) would not experience a material difference from that in the proposed vs existing baseline scenario. The south east facing windows (W14-W16/101), would have lower existing levels of annual sunlight of 5% APSH, which would be reduced to 0% APSH with the proposed development in place.
465. On the basis of the major adverse losses to the south facing windows and taking into consideration the small absolute reductions, it is the view of officers that the overall impact of the proposed development for sunlight, on Bevis Marks Synagogue, would be moderate adverse (and not minor adverse as was concluded by the applicants in the Future Baseline 1 scenario).

Cumulative Scenario – Future Baseline 2

466. In the future baseline 2 scenario, which takes account of nearby consented developments and schemes currently under consideration (the Tulip and the redevelopment of 33 Creechurch Lane), the sunlight received by the windows in the Synagogue in the existing baseline condition would be significantly reduced or removed.
467. In this scenario, there would be no sunlight received by the ground floor windows of the Synagogue. The sunlight received at first floor level would be limited to six of the eight south facing windows only, with very low levels of APSH of between 1% and 4% to five windows and 7% to the remaining window (W9/101). In the proposed condition of the future baseline 2 scenario, these remaining levels of sunlight would be further reduced to 0% APSH.
468. In considering the impact of the proposed development on sunlight received by the Synagogue in future baseline 2 scenario, 27 of the 28 windows assessed would meet the BRE guidelines for annual sunlight. This is because the absolute reductions of sunlight to these

windows over the whole year would be no greater than 4% APSH. The one remaining window (W9/101) would experience reductions in sunlight in excess of 40%, and an absolute reduction of 7% across the whole year.

469. In the future baseline 2 scenario, the cumulative impact of nearby consented developments, schemes currently under consideration and the proposed development on the sunlight received by the Synagogue would be considered to be major adverse (and not minor adverse as was concluded by the applicants in the Future Baseline 2 scenario).. As noted above, a significant proportion of this impact would be attributable to cumulative schemes, including those under consideration (the Tulip and 33 Creechurch Lane).
470. On the basis of the analysis set out above it is the view of officers that the impact on sunlight would not be such as to cause a material impact on the ability to manifest religion in worship in the Bevis Marks synagogue.
471. In determining this application the City is subject to the public sector equality duty imposed by section 149 of the Equality Act 2010. Due regard is to be had to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
472. The relevant protected characteristics include race, and religion or belief. It is the view of officers that the proposal will not have a material impact on the continued use of the synagogue as a place of worship and that the duty is complied with.

Overall Sunlight Conclusion

473. Whilst the Synagogue would experience a degree of harm in terms of sunlight (moderate adverse), taking into account the BRE Guidance and the context of the building's location within a dense urban commercial environment, it is not considered that the proposed development would result in an unacceptable impact on the existing use of the property nor would it change the pattern of use of the Synagogue. The majority of the absolute reductions in sunlight experienced as a result of the proposed development are considered to be low (and would be just beyond the BRE's 4% APSH threshold). Therefore, the

degree of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Overshadowing – Sunlight Hours on Ground (SHOG)

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

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

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

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

The Aldgate School

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

Existing vs Proposed Scenario

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

Cumulative – Future Baseline 1 and Future Baseline 2

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

30 St Mary Axe

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

Existing Vs Proposed Scenario

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

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

Cumulative - Future Baseline 1

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

Cumulative - Future Baseline 2

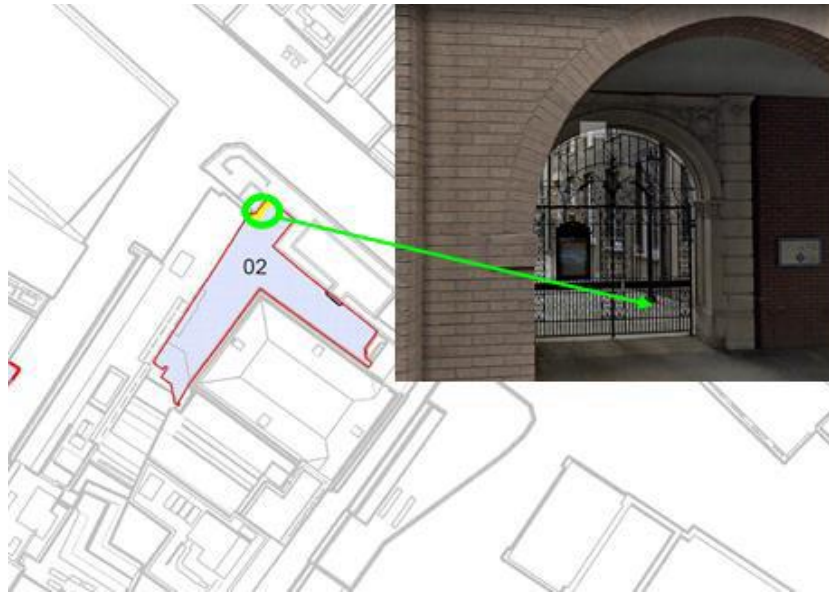
484. Due to the high levels of obstructions in the Future Baseline 2 context, the impact of the proposed development of the amenity area would be negligible in the Future Baseline 2 scenario and would meet the BRE guidelines.

Bevis Marks Synagogue

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

Existing Vs Proposed Scenario

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



487. It is worth noting that On 21st June, at the height of summer, the results show that the proposed development would cast a shadow, which is largely confined to the rooftops and to a comparatively small area in the courtyard. However, this is only fleetingly, from around 1pm-2pm. The shadows would move quickly and for the majority of the day, the courtyard would remain unaffected.

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

Cumulative - Future Baseline 1 and 2

489. Due to the high levels of obstructions in the Future Baseline context and that no part of the Synagogue Courtyard receives sunlight, the impact would be negligible. The potential impact is slightly more than that is seen in the previous existing vs proposed it can be concluded that this is largely attributable to the cumulative schemes.

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

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

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

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

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

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

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

Overall conclusion on Overshadowing (SHOG)

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

Transient Overshadowing

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

21st March

Proposed vs Existing Scenario

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

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

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

Cumulative – Future Baseline 1

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

Cumulative – Future Baseline 2

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

21st June

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

Proposed vs Existing Scenario

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

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

Cumulative – Future Baseline 1 and 2

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

21st December

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

Proposed vs Existing Scenario

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

Cumulative – Future Baseline 1 and 2

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

Overall Conclusion on Transient Overshadowing

510. In conclusion the results show that there would be no significant overshadowing effects caused by the development to any public

amenity areas. The proposed development would impact on the sunlight enjoyed by these amenity spaces on 21st March and June. Overall the impact would not cause unacceptable harm to the open amenity areas and complies with policies London Plan D6, Local Plan policy DM10.7 and Policy DE8 of the draft Local Plan.

BRE Independent Review of the Radiance Based Daylight Study and the Daylight, Sunlight and Overshadowing Assessment

Radiance Study Methodology

511. The BRE report does not recommend using average daylight factor to assess the loss of light to existing buildings. The use of ADF as a criterion tends to penalise well daylit existing buildings, because they can take a much bigger and closer obstructions and still remain above the minimum ADFs.
512. Dr Paul Littlefair states that there is no objective yardstick to use when using radiance images. In contrast BRE guidelines give clear cut measures by which the loss of light may be judged.
513. Because radiance studies include internal and external reflected light and the results depend on the layout of rooms, they are dependent on the assumptions that have been made in respect of room layouts. Where access to properties has not been possible standard reflectances are used (i.e. Creechurch Lane flats). It should be noted that where reflectances and layouts do not match those in the flats, the results are likely to be incorrect.
514. The internal reflectances assumed by GIA in the radiance study for the Synagogue are broadly similar to those measured on site by Dr Paul Littlefair. The Synagogue does appear to derive a significant proportion of its light from the external reflection from the light coloured buildings to the north, west and south. GIA have not stated in their report what assumptions they have used for the surrounding buildings. Measurements on site carried out by Dr Paul Littlefair gave a 33% external reflectance. The radiance report for the Creechurch Lane Flats a 20% reflectance was use for the surrounds. If the same reflectances, as was assumed for the Creechurch Lane flats, were also assumed for the Synagogue, it could underestimate the light within the Synagogue (although not to the extent of the ADF stated in their report).
515. As a point of clarification, Dr Paul Littlefair has raised concerns about the way the difference between the Average Daylight Factor within the Environmental Statement prepared by Avison Young and the Average Daylight Factor GIA have calculated stating that they are substantially lower in GIA's report. Officers have sought clarification on this from the applicant (and GIA and Avison Young) and they have

stated that GIA have had more time to 3D model the Synagogue in greater detail. They have run the radiance studies with specific materials instead of more generic ones which are typically used when studying daylight in neighbouring properties which are considered to be a sounder basis for assessment than the generic assumptions made by Avison Young's and that GIA's ADF figures should be preferred to the Avison Young's ADF figures.

516. GIA have only produced aerial views of the radiance images and do not show every part of the space. For Creechurch Lane flats, only the areas next to the windows are shown and the area to the back of the room is not shown.

517. Dr Paul Littlefair in his review, notes that the Environmental Statement incorrectly classifies minor adverse impacts as not significant. When reviewing daylight and sunlight, losses of light outside of BRE guidelines should be treated as significant even if they constitute a minor adverse impact.

Bevis Marks Synagogue

518. Dr Paul Littlefair has concluded that the Synagogue would have high sensitivity to the loss of light.

519. The supplementary radiance-based daylight study reiterates the conclusions of the submitted daylight assessments with the Environmental Statement for the Bevis Marks Synagogue. The impact would be minor adverse, because the relative loss of daylight is not far outside the BRE guidelines and the affected room has other sources of daylight. The radiance study images show that significant losses to daylight would be confined to the south side of the balcony area nearest to the proposed development.

520. The Environmental Statement has also assessed the cumulative scenarios. In each case Avison Young have compared the cumulative scenario assuming all of the proposed buildings have been constructed excluding 31 Bury Street (future baseline), with the cumulative scenario including 31 Bury Street (future baseline plus proposed). Dr Paul Littlefair considers this to be a reasonable approach as it allows the extra impact of 31 Bury Street itself to be quantified.

521. In terms of daylight, these show that the Synagogue could experience losses of light from other proposed buildings surrounding it. In Future Baseline 1 scenario, five windows would not meet VSC recommendations, with relative reductions due to the 31 Bury Street of 29%-37%. With Future Baseline 2, two additional windows would not

meet the VSC recommendations and relative reductions would be in the 26%-46% range. The daylight distribution at ground floor level in this scenario would be outside guidelines, but only a tiny area is affected because so little direct light penetrates the ground floor under Future Baseline 2.

522. In both scenarios, the City's independent assessors agree that the impact of 31 Bury Street could still be classified as minor adverse as the room has other sources of light, and the overall reduction in the whole space would not be large. The mean VSC for the sixteen upper windows is currently 5.2%, this would go down to 4.2% in Future Baseline 1 scenario, 3.1% in Future Baseline 2 scenario and 2.6% with Future Baseline 2 and the proposed development at 31 Bury Street. The overall cumulative impact of all the proposed developments would be classed as major adverse, because the mean VSC would be halved. Most of this reduction would be due to other development and not 31 Bury Street.

523. The Synagogue would experience significant reductions in sunlight as a result of the proposed development at 31 Bury Street. The south facing windows currently receiving the most sunlight would be reduced. The City's independent assessors (Delva Patman and BRE) agree that the loss of sunlight should be classified as moderate adverse in the Future Baseline 1 scenario (and not minor adverse as was concluded by the applicants in the Future Baseline 1 scenario)). The impact on sunlight would be more marked in the cumulative scenarios, particularly in the Future Baseline 2 scenario. The cumulative impact of all the developments in place would stop all sunlight reaching the centres of the windows at any time of the year and would be considered in Future Baseline 2 to be a major adverse impact (and not minor adverse as was concluded by the applicants in the Future Baseline 2 scenario).

524. Dr Paul Littlefair states that from the radiance diagrams and the VSC changes that changes in light levels would be perceptible but limited to the area on the south side of the Synagogue at mezzanine level. However this loss of light would still be classified as minor adverse and on most of the Synagogue the relative loss of light would be small.

525. In taking into consideration BRE's independent assessment, which states that the loss of light would be noticeable in the gallery area but in most of the Synagogue the relative loss of light would be small, officers consider that the change in light levels would be minimally noticeable at ground floor level and more noticeable but to a limited degree at mezzanine level only near the five windows which are

affected on the south elevation (which face the proposed development). There would be greater loss of daylight in the cumulative scenarios including other proposed developments nearby. Most of this reduction is due to other developments and not 31 Bury Street. However, the impact would still be classified as minor adverse and in most of the Synagogue the relative loss would be small. The majority of the impact would be at mezzanine level and the reductions in light levels to the Bimah and the Ark at ground floor level would be minimally noticeable and would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The overall cumulative impacts would be classified as major adverse impact but most of these reductions would be due to other developments and not 31 Bury Street.

526. The courtyard by the Synagogue currently receives two hours sunlight on 21 March over just 1.5% of its area, near the entrance passage and following the proposed development this area would not receive two hours of sunlight. Dr Paul Littlefair states that the actual area losing sun on 21 March would be small. Additionally, in June the Courtyard space receives more sunlight and with the proposed development in place could shadow it from 1pm. By 2pm, the shadow of the development would have moved around and would no longer be cast on the Courtyard. The loss of sunlight would be classed as minor adverse.

Residential Properties at Creechurch Lane

527. The flats on Creechurch Lane are already heavily obstructed by the buildings opposite and by other developments in the area. The flats in 2-16 Creechurch Lane would have an oblique view of the new development. Flats at 18-20 Creechurch Lane would be closer to the development and would have the biggest daylight losses. The loss of sunlight would not be an issue for any of these flats because the new development would lie to the north west of them.

528. The flats at 4-8 Creechurch Lane are down a side alley and their view of the new building would be partly obscured by the other flats in Creechurch Lane. The loss of VSC to seven windows would be outside of BRE, but not by much and would experience a minor adverse impact.

529. The flats at 2 Creechurch Lane are located furthest away from the development site. The loss of VSC to 19 windows would be outside

BRE guidelines, but in most cases the loss of light would not be far outside of the BRE guideline and would experience a minor adverse impact.

530. The residential properties in 10-12 and 14-16 would receive large relative reductions in daylight. The submitted radiance diagrams suggest that the light that would be lost enters the room at an oblique angle and the light does not penetrate far into the rooms and some of the obliquely incident light would already be blocked by the window reveals. The City's independent assessors agrees that the loss of daylight is assessed as moderate adverse in Proposed vs Existing scenario, Future Baseline 1 and 2 scenario (This could be subject to change dependent on the correctness of the assumptions made about the room layout (GIA and Avison Young have not gained access to these residential properties the room layouts have been assumed). In the cumulative scenarios in particular Future Baseline 1, the relative reductions are higher, because other proposed development such as 40 and 100 Leadenhall Street block light in other directions.

531. In the main part of 18-20 Creechurch Lane, nearly all the windows would experience losses of light outside of BRE guidelines and the impact would be classified as moderate adverse in the proposed vs existing and Future Baseline 1 scenarios but would experience major adverse in the Future Baseline 2. The worst affected rooms would be living rooms in the corner building, however these rooms have adjoining windows which do not directly face the site but would still experience reductions in light and this is represented in this radiance diagrams for these properties.

St Katherine Cree Church

532. Dr Paul Littlefair has concluded that the Synagogue would have high sensitivity to the loss of light. Some of the windows serving this property have stained glass windows.

533. The loss of VSC would be experienced to between 12-14 windows which would be outside BRE guidelines. The loss of VSC would be in 20-32% range, which would be classified as minor adverse.

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

Response to objections on the impact to daylight and sunlight

534. The Synagogue have submitted a document 'Bevis Marks Synagogue Significance and Community Impact Study' which sets out the details of how the Synagogue is used and how any further reductions in light would have a detrimental impact on the religious significance and use of the Synagogue. Concerns are raised about the

loss of light to the raised platform where prayers are read (the Bimah). The report states that Jewish Worship requires each individual to read prayers from a prayer book at services throughout the week. If lighting is further reduced, worshippers, particularly vulnerable elderly members, would find it difficult to read and would no longer be able to attend.

535. The 'Bevis Marks Synagogue Significance and Community Impact Study' also states that in a Jewish house of prayer, light and windows are not just an amenity but a religious requirement. Judaism and its rituals are connected with the positions of the sun and moon and at the morning service at 10am, light currently shines into the Courtyard and penetrates into the Synagogue. They state that the blocking out of the sun is a form of religious vandalism, forcing them to dislocate their worship from its original meaning.
536. Officers do not consider that the loss in daylight experienced within the Synagogue would impact on the ability of worshippers to read from prayer books or would materially reduce light to the raised platform where prayers are read (the Bimah). The losses experienced by the effected 8 windows (out of 28 assessed) in terms of VSC would be minimal with very small absolute reductions recorded between 1.7%-1.8%.
537. It should be noted that the Synagogue does already experience low levels of sunlight in the existing condition. The majority of the absolute reductions in sunlight experienced as a result of the proposed development are considered to be low ranging between 7-13% (and would be just beyond the BRE's threshold) and there would also be a number of mitigating windows which would continue to receive some levels of sunlight (16 out of 20).
538. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be minimally noticeable in the Synagogue at ground floor level and more noticeable but to a limited area only to the mezzanine level on the south side Officers consider that such fractional light alterations in real terms would not change the ability of worshippers to read prayers from the Bimah or from prayer books.
539. Overall in assessing the impact of the loss of daylight and sunlight to the Synagogue, for the reasons set out above, officers do not consider that the proposed development would result in losses which would have a detrimental impact on the use of the Synagogue.

Response to objections on loss of sunlight to the Courtyard

540. A number of objections have been received concerning the impact of the reduction in sunlight to the courtyard. The objections state that the courtyard is integral to Synagogue's communal functions and religious significance and represents the only place where worshippers of all sexes can gather before and after worship and is used for rituals and functions. If the proposed development is approved it will suffer even greater reductions of direct sunlight which will harm its usability, its amenity value and its contribution to the setting of the synagogue.
541. It is also explained how the courtyard adds an important amenity to the use and historic function of the Synagogue. They state that sunlight appears in the early afternoon when the space is most likely to be enjoyed, either for gatherings after services, before weddings or for an outdoor afternoon prayer service during the week for City workers. The Rabbi and his family use the courtyard to enjoy the sunlight on Sabbath afternoons in spring and summer and the loss of any sunlight would cause a detriment to their lives as local residents.
542. The Synagogue Courtyard, is not considered to be a private residential courtyard but is seen to be part of the Synagogue as a place of worship.
543. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. On 21st March only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. The overshadowing assessment map shows the small area which would lose the remaining sunlight within the courtyard, which is against the northwest corner of the courtyard. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but are of the view that it would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.

Response to objections on loss of clear sky from the Courtyard

544. The 'Bevis Marks Synagogue Significance and Community Impact Study' outlines the importance of sunlight into the Courtyard and states that many Jewish rituals are determined by the views of the sky. It also states that upon entering the courtyard of the Synagogue, the views of clear sky would be lost.
545. In the clearest view of the proposed building and synagogue from the courtyard entrance, the proposed building would add another modern form into the backdrop. It would occupy a significant portion of currently clear sky space over the synagogue. However a number of

modern buildings are already visible in views from the courtyard, reflecting its location in the heart of a dynamic and continually evolving modern City.

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

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

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

Response to objections on loss of Privacy

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

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

Solar Glare

551. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. In this case, viewpoints for the analysis were positioned at points before a signalised railway, road junctions and pedestrian crossings where a distraction to motorists may occur.
552. A total of 8 viewpoints have been identified in the ES as sensitive to solar glare within 150m of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings at these locations.
553. The assessment concludes that the development would have a negligible effect on 6 of the 8 viewpoints. At Viewpoint 5, the solar glare assessment indicates potential incidences of solar glare for a period of 15-20 minutes at an angle of $<30^\circ$ and $30^\circ>$, mainly during February, March, September and October. At viewpoint 7, the solar glare assessment indicates potential incidences of solar glare for a period of 10 minutes at an angle of $<30^\circ$ and $30^\circ>$, mainly during January, February, March, April, August, September, October and November. It is considered that these occurrences are not lengthy or unusual for a proposed development of this typology.
554. Based on a combination of criteria including the angle of the solar reflection in relation to the road users' line of sight, the ability to deploy a visor, the duration of the solar glare and the existence of alternative traffic signals at junctions enabling the road user to use different options, the effects of solar glare are assessed as being 'minor adverse' at both viewpoint 5 and viewpoint 7. The Assessment concludes that no additional mitigation are required to mitigate the impact of solar glare.
555. If planning permission were to be granted, a S106 obligation would be recommended to require a post completion solar glare assessment to be submitted if requested by the City, which would include details of any mitigation measures (if considered necessary). The development would comply with Local Plan policy DM10.1 and draft City Plan 2036 policy DE(8) to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Intrusion

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

557. Potential light pollution impacts arising from the Proposed Development have been assessed in relation to 5 buildings which have been identified as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance. These properties include:
- 2 Creechurch Lane
 - 10-12 Creechurch Lane
 - 14-16 Creechurch Lane
 - 18-20 Creechurch Lane
 - 27-31 Mitre Street
 - Bevis Marks Synagogue & residential use at 2 Heneage Lane
558. The light intrusion study indicates that pre-curfew (11pm), the levels of light trespass would be within the 25-lux level suggested by the ILP for the city centre location for 4 out of the 5 receptors under consideration. The one receptor that does not fully meet this pre-curfew threshold is 18-20 Creechurch Lane and 27-31 Mitre Street, where just over half of the windows will be within the 25 lux threshold, while the remaining minority will exceed this level. The latter windows are at first to fifth (top) floor and are located at the corner junction of Mitre Street and Creechurch Lane (i.e. directly opposite the site) where the highest lux levels are likely to be recorded. The windows affected primarily relate to living rooms rather than bedrooms.
559. The light intrusion assessment indicates that post-curfew (11pm) the light levels would be below the 5 lux level suggested by the ILP for a city centre location for 3 out of the 5 receptors under consideration. The two exceptions are 18-20 Creechurch Lane and 27-31 Mitre Street and 14-16 Creechurch Lane.
560. For 14-16 Creechurch Lane, half of the windows would be within the 5 lux threshold, which are located slightly further south along Creechurch Lane (no.14); while the remainder that exceed the threshold (between circa 7.5 and 17.5 lux) are at first to fourth floor located within the façade in closer proximity to the Site (no.16).
561. In relation to 18-20 Creechurch Lane and 27-31 Mitre Street, close to half the windows would meet the post-curfew 5 lux threshold within the façade further to the east along Creechurch Lane. The remaining windows would exceed the post-curfew threshold (circa between 7.5 - 25+ lux) and are located at first to fifth floor. This is due to the very close proximity of these windows to the Site, with those located at the corner junction of Mitre Street and Creechurch Lane no more than 10-12 metres away from the Proposed Development. Where the highest lux is recorded, this is understood to relate to areas, with bedrooms generally receiving much lower levels.
562. The assessment is undertaken on a worst case scenario, assuming both a generic lighting design and that all office area within

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

563. The overall effects of light intrusion to the properties at 2 Creechurch Lane, 10-12 Creechurch Lane and Bevis Marks Synagogue and the residential use at 2 Heneage Lane would be negligible. The effect to 14-16 Creechurch Lane would be minor adverse and the effect to 18-20 Creechurch Lane and 27-31 Mitre Street would be considered to be Major Adverse.
564. If planning permission were to be granted, a condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

Wind Microclimate

565. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. CFD simulation and analysis has also been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
566. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/Uncomfortable.
567. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
568. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the

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

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

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

571. The following configurations have been assessed:

- Existing site with existing surrounding buildings
- Proposed scheme with existing surrounding buildings
- Proposed scheme with consented cumulative schemes
- Proposed scheme with consented cumulative schemes and additional developments, specifically The Tulip and the proposals at 33 Creechurch Lane
- Several phasing scenarios (in the event a consented scheme is not get implemented)

Existing Baseline Conditions

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

573. The existing wind conditions within Bevis Marks Synagogue Courtyard in would be suitable for frequent sitting in the winter and summer seasons.

Wind conditions at thoroughfares

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

575. The wind conditions at most of the off-site thoroughfare locations remain unchanged to that in the existing baseline conditions and are

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

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

Wind conditions at entrances

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

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

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

Wind conditions in amenity spaces

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

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

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

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

583. Representations have been received raising concerns about increased windiness within the Bevis Marks Synagogue courtyard as a result of the proposed development. The Bevis Marks Synagogue courtyard has been assessed and the wind conditions would continue to remain suitable for frequent sitting throughout the year (including the windiest and summer season). The wind conditions within the courtyard would remain the same as in the existing situation. This is the same in the cumulative scenarios with future unconsented schemes in place.

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

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

Wind Microclimate Conclusion

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

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

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

Thermal Comfort Assessment

589. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be

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

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

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

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter	Appropriate for public

	OR ≤50% in any other season.	spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).
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592. Four configurations have been assessed including; the existing site with existing surrounding buildings, the proposed development with the existing surrounding buildings and the proposed development with consented cumulative surrounding buildings and proposed development with consented and unconsented cumulative surrounding buildings.

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

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

Existing Baseline Conditions

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

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

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

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

599. The Thermal Comfort conditions within the Bevis Marks Synagogue courtyard and its immediate vicinity are appropriate for the intended use and it achieves the all seasons category.

Proposed Development with the Existing Surrounding Buildings

600. At ground level, the proposed development increases the percentage of time for which the area between 33 Creechurch Lane and One Creechurch Place would be thermally comfortable during the winter season (from 75%-90%). There would be a slight decrease in the area to the southwest of the building, along Bury Street, which would alter from being thermally comfortable during the winter season from 95% - 80%. It should be noted however that the thermal comfort categorisations of these areas or any others in the vicinity would be not be materially altered when compared to the existing baseline conditions.
601. The introduction of the Proposed Development would not have a material impact on the thermal comfort conditions around the Bevis Marks Synagogue, with all-season thermal comfort conditions occurring in the immediate vicinity of the Synagogue.
602. The entire area of the 1st floor public amenity terrace would have all-season thermal comfort conditions across the entire terrace and would be suitable conditions for the intended use.
603. The 21st floor private amenity terrace would also have mostly all-season thermal comfort conditions. A small area of seasonal thermal comfort conditions was predicted close to the building façade. This is likely due to afternoon shadowing from the remainder of the tower. The thermal comfort conditions would also be suitable for the intended usage of this terrace.
604. The introduction of the proposed development would not have any material impact on the thermal comfort conditions of Leadenhall Market and the existing podium and roof level amenity spaces in the local area.

Proposed Development with the Consented Cumulative Surrounding Buildings

605. In the immediate area surrounding the proposed development, thermal comfort conditions were predicted to be similar to those in the existing vs proposed scenario. As such, all areas at ground level around the proposed development in the cumulative scenario would have acceptable thermal comfort conditions for their intended use.
606. Further away from the site, the simulations predict that with the introduction of the consented cumulative schemes, there are increased short-term and short-term seasonal thermal comfort conditions to the west of 1 Undershaft and 100 Leadenhall Street. It is worth noting that the zone of short-term conditions in the plaza south of 1 Undershaft (as

described in the previous existing vs proposed scenario) has shrunk, and the zone of all-season conditions at the north end has slightly increased in area.

607. Thermal comfort conditions at the on-site terrace level areas would be same as in the existing vs proposed scenario, as such all on-site terrace level areas would be suitable for the intended use.
608. Thermal comfort conditions within Leadenhall Market would also be generally similar to those in the existing baseline scenario, however, the area to the north and west of Leadenhall Market would have some areas of short-term seasonal thermal comfort conditions. This is due to the areas experiencing a significant reduction in winter thermal comfort. The areas of short-term comfort are thoroughfares and as such the short-term conditions can be considered appropriate.
609. The introduction of the Proposed Development with consented cumulative surroundings would not have a material impact on the thermal comfort conditions around the Bevis Marks Synagogue, with all-season thermal comfort conditions occurring in the immediate vicinity of the Synagogue and within the courtyard.
610. The introduction of the cumulative schemes does not alter the thermal comfort conditions of the existing surrounding podium and roof level terraces to a level that would be incompatible with their uses. All terraces are expected to have short-term thermal comfort conditions or better and only small areas of short-term seasonal conditions.

Proposed Development with the Consented and Unconsented Cumulative Surrounding Buildings

611. The introduction of the unconsented cumulative schemes would have little effect on the thermal comfort of the area around the proposed development. 33 Creechurch Lane would cause slightly more of the area to the northeast of the proposed development to have seasonal (rather than all-season) thermal comfort conditions. These minor changes would not affect the suitability of the thermal comfort of the area and its current use.
612. All areas at ground level around the proposed development would continue to have suitable thermal comfort conditions for the intended use.
613. Thermal comfort conditions at the on-site terrace level areas would be materially the same as in the proposed vs existing and consented cumulative scenarios. More of the 21st floor terrace level would have all-season thermal comfort conditions due to an increase in winter thermal comfort. This is likely a result of the unconsented cumulative schemes calming winter winds.

614. Thermal comfort conditions within and around Leadenhall Market would not be materially altered due to the introduction of the unconsented cumulative schemes, as such conditions would remain as reported in the consented cumulative scenario and would be suitable for the intended use.
615. The introduction of the Proposed Development with consented and unconsented cumulative surroundings (including The Tulip and 33 Creechurch Lane) would not have a material impact on the thermal comfort conditions around the Bevis Marks Synagogue, with all-season thermal comfort conditions occurring in the immediate vicinity of the Synagogue and within the courtyard.
616. The unconsented cumulative schemes would not materially alter the thermal comfort categories of the existing, or consented cumulative, surrounding podium and roof level terrace. All terraces in the local areas, including those of the unconsented schemes, would have short-term thermal comfort conditions or better with only small areas of short-term seasonal conditions. As such all off-site podium and roof level terraces would have suitable thermal comfort conditions for the intended use.

Overall Thermal Comfort Conclusion

617. The existing Site and existing surrounding context have thermal comfort conditions appropriate for their use, with the majority of the surrounding area falling into the seasonal and all-season categories. There are more areas of short-term conditions to the west of the Site amongst the tall buildings of the Eastern Cluster.
618. The Proposed Development is expected have an impact on thermal comfort in the surrounding urban realm, the change however is very limited. No areas around the Proposed Development were predicted to have their thermal comfort category reduced by the Proposed Development to a point where it would be incompatible with their use.
619. The Proposed Development features a public terrace at the 1st floor level and a private office amenity terrace at the 21st floor level. The 1st floor terrace would have all-season thermal comfort conditions, suitable for the intended use. At the 21st floor terrace, the majority of the area would have all-season conditions but there would be a small area close the façade of the building that is categorized as appropriate for seasonal uses. These thermal comfort conditions would be considered suitable for the intended use of this terrace.
620. Thermal comfort conditions at all areas in and around the Proposed Development would be materially the same with the introduction of the consented cumulative schemes and remain suitable

for the intended use. The same is true with the introduction of the unconsented cumulative schemes.

Noise and Vibration

621. Local Plan policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that level of noise emitted from any new plant should be at least 10dBa below background noise levels.
622. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operational phase of the development; and noise associated with increases in road traffic, which could be attributed to the development.
623. In most City redevelopment schemes the main noise and vibration issues occur during demolition and early construction phases. The assessment identifies a major adverse impact on residential receptors at 18-22 Creechurch Lane) and a Moderate Adverse impact (significant) on residential receptors at 2 Heneage Lane and 10-16 Creechurch Lane. At the nearby places of worship; Bevis Marks Synagogue and Church of St Katherine Cree, the assessment identifies a negligible impact.
624. During the operational phase of the development, the assessment concludes that there would be a negligible impact on noise levels from road traffic and pedestrian movements compared with the existing.
625. As set out in the consultation responses table a number of representations have been received regarding the adverse impact of the proposed development on the Bevis Marks Synagogue in terms of noise, not only during the demolition and construction phase but also during the operational phase of the development.
626. As identified in the above paragraphs, the impact on Bevis Marks Synagogue is assessed as being negligible in terms of noise and vibration during the construction and operational phases. Notwithstanding and taking into account the representations received, details of noise and vibration mitigation measures, including control over working hours and details of the types of equipment to be used would be required to be submitted to and approved and this would be done via the submission of a Scheme of Protective Works and Construction Environmental Management Plan which are to be secured by condition.

627. The Synagogue have submitted a document 'Bevis Marks Synagogue: Significance & Community Impact Study'. Comprised in this document are further details about Synagogue Worship and a sample timetable setting out when religious services are held. The applicant would be required to engage with the Synagogue to establish suitable construction working hours so that disruption could be minimised so not to impact on the religious services at the Synagogue.
628. Furthermore, freight movements would be controlled through the Construction Logistics Plan and would be secured by condition. The Scheme of Protective Works, the Construction Management Plan and the Construction Logistics Plan would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.
629. Concerns are also raised by objectors regarding the noise and disturbance from pedestrians and cyclists walking up and down Heneage Lane.
630. The main cycle access is proposed to be via Creechurch Lane as this is where the cycling entrance is located. It is not intended to encourage cyclists to divert off this intended route to use Heneage Lane as a cycle route. It should also be noted that the existing scheme has cycle parking that is accessed via the privately managed area of Heneage Place. The proposed scheme has all cycle access via the adopted highway with a cycle staircase accessed directly from Creechurch Lane and a cycle lift provision accessed via the eastern end of Heneage Place.
631. It is anticipated that the increased scale of the building would result in an increase in overall trips by pedestrian (as set out in the transport section of this report). Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane (approx. 70 net trips/ hours at AM and PM peak periods) following the continuation of the north/south desire line through the site. Pedestrians would also have a choice of using Bury Street or Heneage Lane to access the site depending on their preferences. However, the land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. Section 278 works are also proposed to improve the immediate highway network around the proposed site including on Creechurch Lane and Bury Street which would improve the pedestrian priority of the surrounding highway network, which would encourage pedestrian to the use of these alternative routes.
632. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or to have a

materially detrimental impact on the use of the building to hold religious services..

633. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.
634. Subject to the recommended conditions, the proposal would comply with London Plan policy D13, Local Plan policy DM 15.7 and draft City Plan 2036 policy HL3.

Air Quality

635. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.
636. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.
637. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans with the inclusion of an Air Quality Dust Management Plan (AQDMP) to be submitted and approved under conditions attached to the planning permission.
638. For the completed development, the proposed development would meet its energy demand for space and water heating from Air Source Heat Pumps (ASHP) with no onsite combustion. Therefore, the total building emissions would be zero. As there are no combustion processes, the Proposed Development would be considered air quality neutral for building emissions.
639. The development would be car-free and the assessment states that the transport emissions associated with the servicing vehicles would have negligible impact. The assessment concludes that the development would have no significant impacts on local air quality.

640. The development meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.
641. The City's Air Quality Officer has no objections and recommends that a condition is applied requiring the submission and approval of an Air Quality Report to detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and the submitted Air Quality Assessment.
642. Subject to the compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy S11 of the London Plan which all seek to improve air quality.

Health Impact Assessment

643. The applicants have submitted a HIA which has been based on the Healthy Urban Development Unit criteria, with adaptations to take into account the particular circumstances of the City. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
 - Provision of a pocket park at St James' Court providing much needed green space;
 - Provision of a high-quality public realm in the form of an arcade; providing a north-south route which would improve connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
 - Inclusivity and accessibility as placemaking priority areas;
 - A car free building minimising vehicle travelling to the site along with cycle parking to support active travel
 - Building and landscape design considering sustainability and climate change with Air Source Heat Pumps (ASHP)
 - Building and landscape design also providing an enhanced environment for workers and site users as well as the wider public through an attractive public realm, greening measures and active travel measures; and
 - Provision of community floorspace and affordable workspace providing significant public benefits to the local community.
644. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:
- Implementation of a travel plan to maximise uptake of active travel options;
 - Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;

- Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;
- Secure local employment and training initiatives via planning obligations
- An Air Quality and Management Plan to minimise the impact of dust at the construction phase; and
- The requirement for an Operational Management Plan to minimise noise at the operational and commercial uses.

645. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Fire Safety

646. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.

647. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further details would be required regarding the fire service access and the application of the evacuation lifts and these would be developed as the detailed design of the building progresses in consultation with City District Surveyors and the London Fire Brigade.

648. If planning permission were to be granted, a condition would be recommended requiring the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) with details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority in consultation with the London Fire and Emergency Planning Authority, Building Control Health and Safety Team prior to construction of the building and the strategy shall remain in place thereafter.

649. Subject to compliance with the condition the proposed development would meet the requirements of Policy D12 of the London Plan.

Assessment of the Public Benefits and the paragraph 202 NPPF balancing exercise

650. Paragraph 202 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”. The National Planning Practice Guidance states that “public benefits...could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits”. Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

651. The key social, environmental and economic public benefits of the proposal are considered to be as follows:

Economic Benefits

- Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the generation of employment (anticipated creation in the range of 1,195-1,685 additional jobs following completion of the development) and increased spending in the locality boosting local businesses and a post-covid resurgence. This is a benefit which should be afforded substantial weight.

Retail Benefits

- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages. Heneage Arcade, would be aligned with retail units and spaces which are designed to be utilised as vitrines for a rolling programme of displays including artworks, local community information, reference to the important history of the site and products of local artisans. These spaces could also be utilised as small workshop and retail

units for emerging local businesses and craft. The intention would be to help foster and support emerging local talent and provide space to create, make, display and sell their creations. This is a benefit which would attract moderate weight.

Public Realm Benefits

- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys. This includes;
 - A north-south route through the building is proposed, which would re-introduce an historic connection between Heneage Lane and Bury Street.
 - James' Court, a new pocket park is introduced which re-establishes an historic city court.
 - Within the public realm it is proposed to incorporate temporary and permanent art installation program to showcase work of local artists'. (secured by a S106 obligation).
- Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane. These improvements would be secured via a section 278 agreement. These benefits should be afforded substantial weight.

Social and Community Benefits

- The provision of a dedicated community space within the building at mezzanine and level 1, referred to as 'Creechurch Hall'. This space is specifically designed for local groups, including schools and other education uses, charities and cultural/art groups. The space would be available for use at no charge between 10am -9pm on weekdays and 9am-5pm on Saturdays. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space as an outreach, training and skills centre. This space would be flexible to provide for a wide range of uses including small meetings, larger organised events or rehearsal space for local artists in the area. It therefore offers the potential to make a significant contribution towards training and skills opportunities in the City. The community space is intended to provide a gateway for the population of the more economically deprived areas around the City fringe to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and economically inclusive manner. This is a benefit that should be afforded substantial weight.

Environmental Benefits

- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles. The proposed building is a fossil-fuel free, all electric building with zero combustion on site. This is a benefit that would attract moderate weight.

Townscape Benefits

- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality. The proposed building would, at ground floor level, present a sophisticated, dark blue faience elevations of a triple order to the surrounding townscape, complementing the existing warehouse buildings of brick with terracotta detailing which characterise the Creechurch locality. Through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area. This is a benefit that would attract moderate weight.

652. When applying the policy in paragraph 202 of the NPPF those public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report, namely the harm to the significance and OUV of the Tower of London WHS arising from the impact on its setting in LVMF View 10A.1.

653. It is the view of officers that ascribing weight to the public benefits as set out above, including delivering accommodation for City type businesses thereby contributing to economic growth, , and giving great weight to the conservation of designated heritage assets and therefore to the less than substantial harm to their significance and considerable importance and weight to the desirability of preserving the setting of the listed buildings, the public benefits of the proposal outweigh the harm to significance of heritage assets as identified in this report.

CIL and Planning Obligations

654. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions

would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

655. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
656. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
657. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL 2 Payable	£4,409,466	£4,233,087	£176,379

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,959,450	£1,861,477	£97,973
<u>City Planning Obligations</u>			
Affordable Housing	£1,306,300	£1,293,237	£13,063
Local, Training, Skills and Job Brokerage	£783,780	£775,942	£7,838
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£649,800	£649,800	£0
Section 278 (Evaluation and Design) <i>Not indexed</i>	£100,000	£100,000	£0
Security Measures (Eastern City Cluster)	£261,260	£261,260	£0
S106 Monitoring Charge	£4,750	£0	£4,750
Total liability in accordance with the City of London's policies	£5,065,340	£4,941,716	£123,624

City's Planning Obligations

658. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations
- Construction Monitoring Costs
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Cycling Promotion Plan
- Cycle Hire Contribution (*£220,000 tbc*)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connections

- Cultural Implementation Strategy
- Section 278 Agreement
- Public Route (Heneage Arcade - between Heneage Lane and Bury Street) and Publicly Accessible Amenity (421sqm) on Mezzanine Level (*Specification & Access / Management*) Open daily 7am-11pm
- Public Realm & James' Court Pocket Park - Open 24/7 (*Specification & Access / Management Plan*)
- Incubator (642sqm at Level 2) & SME Spaces
- Community Space at Level 1 (507sqm - 480 people) open 10am-9pm weekdays and 9am-5pm Sat/Sun (*Access & Management Plan*)
- Television Interference Survey
- Wind Audit
- Solar Glare

659. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

660. The scope of the s278 agreement shall include, but is not limited to, improvements to Creechurch Lane, Mitre Street and Bury Street to provide pedestrian priority on these streets.

Monitoring and Administrative Costs

661. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

662. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

663. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the wider area. In some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Cumulative Impacts

664. The Planning Practice Guidance on Environmental Impact Assessment states that "*Each application (...) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed*

development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development.”

665. The impacts of the proposed development have been considered as part of the comprehensive Environmental Impact Assessment, which considered cumulative effects. The schemes identified for inclusion in the cumulative assessment are listed at paragraph 2.84 of Volume 1 of the Environmental Statement, and the locations shown on Fig 2.1. The schemes considered include those which have a full planning consent, those which have the benefit of a resolution to grant consent, and applications which have been submitted but not yet considered by a planning committee or determined.
666. A series of cumulative scenarios including one with just ‘consented’ schemes (referred to as Future Baseline 1; i.e. those with planning permission) and, separately, including those that do not and are either the subject of a live planning application (referred to as Future baseline 2 – those schemes include 33 Creechurch Lane, which is currently being evaluated and has not yet been reported to your Committee and the Tulip, land adjacent to 20 Bury Street, which was refused and is being considered at appeal). The assessment of cumulative scenarios has demonstrated that it is largely the potential impacts of the proposal for 33 Creechurch Lane which would give rise to moderate to major adverse cumulative daylight or sunlight impacts. All other developments considered in the cumulative scenarios including this 31 Bury Street application would give rise to minor to moderate adverse impacts on daylight and sunlight.
667. Officers consider the approach taken in the Environmental Statement to assessment of cumulative effects to be appropriate. When assessing the proposals your officers have had regard to, and save if otherwise indicated in this report, have placed reliance upon the cumulative impact assessment contained in the environmental statement.

Impact to the foundation of the Synagogue and Ground Movement

668. Objections have been received raising concerns about the impact the proposed development and potential damage it would cause to the Synagogue Foundations.
669. An Objection has also been received in relation to the impact de-watering ground movement during construction stating that due to the delicate nature of the Synagogue, there must be no construction activities carried out likely to cause ground movement and monitoring will be required.

670. The applicants have submitted a Structural Statement and Basement Impact Assessment. The applicants have also confirmed that ground movement would be continually monitored throughout the demolition and construction process. With regards to monitoring, the applicants have stated that this would be undertaken in the excavation and on surrounding buildings in order to track movements against those predicted. They have also confirmed that a system of notifications would be set up to monitor movements and the system would create alerts should the results deviate from those expected. The submitted Structural and Basement Impact Assessment sets out the planned groundworks associated with the proposed development and it is not expected that any damage would be caused to the Synagogue particularly given the distance of the Synagogue from the site (approx. 29m to the north of the site).

671. The submitted assessment has been reviewed by District Surveyor, who advised that due to the fact that the Synagogue is located some distance from the proposed development, there would be no material impact to its foundations. Notwithstanding, a condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.

Equality Impact

672. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

673. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-

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

674. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

675. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
676. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
677. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:
- Bevis Marks Synagogue
 - Church of St Helen Bishopsgate
 - Church of St Katherine Cree
 - Tower Hamlets Business Education Partnership
 - Aldgate School
 - Canon Barnet Primary School
678. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included a targeted community outreach programme, which sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notable the community space and how that space can best serve the identified stakeholder.
679. As set out earlier in the report, it is intended that the community space is a free to use dedicated community space specifically designed for the diverse local community, charity, religious, cultural/art and education groups and organisations to hold events, gatherings and exhibitions for the public to take part in.
680. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed, including the impacts on the use and functionality of the spaces, including on the Bevis Marks Synagogue. Officers do not consider that they would be detrimentally impacted in so far as these spaces become unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.
681. In addition the proposed development has been assessed against policy GG1 of the New London Plan and would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

682. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights (“ECHR”).
683. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.
684. As set out above, it is the view of officers that there would be no infringement of Article 9 of the ECHR, and in particular there would be no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

Conclusion

685. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft London Plan and the draft Local Plan and considering all other material considerations.
686. The scheme delivers a high quality, office-led development within the City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.
687. The scheme makes optimal use of the site and provides an increase in office and retail floorspace in accordance with the City’s objective to support a thriving economy and remain the world’s leading international financial and professionals services centre.
688. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies which supports post-covid recovery as identified in the ‘London Recharged: Our Vision for London in 2025’ report.
689. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM ‘Outstanding’ and adopting Circular Economy principles and Whole Life Carbon principles.

690. The scheme delivers significant public realm enhancement and new amenity space including an accessible new north-south public route through the site, connecting Heneage Lane to Bury Street, as well as a new pocket park (James' Court).
691. The scheme delivers a dedicated community space within the building at mezzanine and level 1, referred to as 'Creechurch Hall'. The flexible community space is designed to be an inclusive dedicated space for the local community, charity, religious groups (including Bevis Marks Synagogue), cultural/art and education groups and organisations to hold events, gatherings and exhibitions such as careers events, micro workshops or gallery/rehearsal space for local artists. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space as an outreach, training and skills centre, providing training and skills opportunities for local communities. The community space is intended to reach out to the wider community and is intended to provide a gateway for the population in neighbouring boroughs to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community.
692. The increase in floorspace and occupation places extra pressure on the comfort and safety of the City's streets. In order to improve the pedestrian comfort levels, the nearby pedestrian environment will be improved by the implementing pedestrian priority streets on Creechurch Lane, Heneage Place, Mitre Street and Bury Street and the introduction of the new pedestrian routes which would draw people away from the busy main streets, which will be secured via a section 278 agreement.
693. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel.
694. In terms of daylight, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 10-12 Creechurch Lane, 14-16 Creechurch Lane and 18-20 Creechurch Lane & 27-31 Mitre Street which would experience moderate adverse impacts. With regards to the residential properties at 10-12 and 14-16 Creechurch Lane, these buildings have very low daylight levels in the existing situation due to their location within a dense urban surrounding and therefore would experience relatively disproportionate percentage change in daylight levels when factoring in the proposed development. With regards to the residential properties at 18-20 Creechurch Lane and 27-31 Mitre Street, the rooms which are affected by daylight losses, benefit from other windows which ensure good levels of daylight amenity are maintained.
695. The impact on daylight to Bevis Marks Synagogue and the residential property at 2 Heneage Lane would be minor adverse with very small absolute VSC changes which would be minimally noticeable in

the Synagogue at ground floor level and slightly more noticeable but to a limited area only to the mezzanine level on the south side

696. The Synagogue would experience a minor adverse impact in terms of sunlight. In the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. The area to which this reduction would occur is 4.86sq.m which arises to be a thin area of ground in the northwest corner of the outer courtyard and would experience a minor adverse impact. Officers do not consider that the impact of daylight and sunlight to the Synagogue would be unacceptable and is not considered to impact the existing use of the property nor would it change the pattern of use of the Synagogue. It is considered that the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the impact.
697. In the cumulative scenario, many of the existing buildings would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane).
698. The impact on the scheme on daylight and sunlight in to the Synagogue has to be based on quantifiable BRE compliant evidence and assessment as opposed to subjective conjecture. The results of the daylight and sunlight assessment clearly shows that the diminishment in daylight in to the Synagogue resulting from the proposal is minimally noticeable at ground floor level and slightly more noticeable but to a limited area only to the mezzanine level. It therefore follows that there is a very limited impact on the visual appreciation of the historic interior and on the visual appreciation of interior features of key religious significance such as the Bimah, Ark etc. Consequently the visual appreciation of the religious ceremonies and associated activities including the reading of religious text is not diminished to a significant or perceptible degree. From this it can be concluded that based on the quantifiable daylight impact results the impact on daylight to the interior of the Synagogue will not compromise the religious use or activities therein.
699. The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected

rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight to unacceptable levels, and would provide sufficient daylight and sunlight to surrounding housing which is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

700. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
701. Objections have been received from statutory consultees and third parties, relating to the design of the development, its impact on designated and non-designated heritage assets including Bevis Marks Synagogue, the impact on the Tower of London World Heritage Site.
702. Numerous objections have also been received regarding the impact to the historical, religious and societal significance and the setting of Bevis Marks Synagogue. Concerns raised include; the loss of daylight and sunlight to the Synagogue and the Courtyard, the impact of noise and disturbance from construction and the increased number of pedestrian and cyclists as a result of the proposed development. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations. Officers do not consider the proposed development would cause a detrimental impact such that it would alter the use of the Synagogue or impact on the historical, religious and societal significance of Bevis Marks Synagogue.
703. It is a shared view with HE and HRP that the proposal results in harm to the setting (and to the significance) of the World Heritage Site of the Tower of London.
704. It is considered that the proposed development would result in less than substantial harm to the significance of the Tower of London World Heritage Site as result of the impact on setting arising as a result of the impact of the proposal in the view from the north bastion of Tower Bridge and would be contrary to Local Plan Policy CS12, and D9(e) London Plan Policies HC2, HC3 and HC4.

705. The proposal is contrary to Local Plan Policy CS13 and London Plan Policy HC 4 due to non-compliance with the LVMF visual management guidance for view 10A1 from the north bastion of Tower Bridge.
706. In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.
707. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
708. In this case, while the proposals are in compliance with a number of policies which seek to promote economic growth, in including (including policies CS1, CS10, CS4 and DM1.3 of the Local Plan and policies D5, SD4, T6, T7G and E1 of the London Plan. The application site is a suitable site for a tall building within the City's Eastern Cluster. It is for the City as local planning authority to make a judgement as to whether the proposed development complies with the development plan when considered as a whole. It is the view of officers that the proposals are not in compliance with the development plan when considered as a whole due to non-compliance with the heritage policies identified above.
709. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
710. The other material considerations relevant to this case are set out below.
711. Paragraph 8 of the NPPF sets out that there is a presumption in favour of sustainable development.
712. Paragraph 81 of the NPPF sets out that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
713. Paragraph 130 of the NPPF sets out that great weight should be given to buildings which are high quality, beautiful and promote high levels of sustainability and which help raise the standard of design more generally in the area.

714. As set out in paragraph 199 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 200, that any harm should require clear and convincing justification. The world heritage site status and the Grade I listing places the Tower of London at the very highest level of importance and as a result greater weight should be given to the asset's conservation.
715. Paragraph 202 of the NPPF sets out that where development proposals will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal (set out below).
716. The proposals have been assessed against the policies in the NPPF and your officers consider that the proposals are in compliance with the NPPF.
717. The proposal has been assessed in accordance with the definition of the Outstanding Universal Value and significance of the World Heritage Site as set out in the Tower of London World Heritage Site Management Plan (2016). In addition, the proposal has been assessed in terms of the guidance set out in the Tower of London Local Setting Study (2010) and the London Views Management Framework SPG. The proposal would to a limited degree dominate the Tower of London in view 10A.1 from Tower Bridge, and would not conflict with paragraph 183 of the LVMF guidance. In addition, the proposal by reason of its close proximity to the Tower, its vertical profile and eye-catching design would compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site contrary to paragraph 186 of the LVMF guidance for this view (10A.1).
718. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
719. Additional material considerations are as follows:
- Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination
 - Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
 - Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.

- Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane.
- The provision of generous community space that is intended to reach out to the wider community and provide a gateway into the City for the population in neighbouring boroughs to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality, through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area.

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

721. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal.

722. In carrying out that balancing exercise considerable importance and weight must be given to preserving the settings of listed buildings. As set out in paragraph 199 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 200, that any harm should require clear and convincing justification. The world heritage site status and the Grade I listing places the Tower of London at the very highest heritage level of importance.

723. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the

desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal nevertheless outweigh the priority given to the development plan and other material considerations against the proposals. As such that the application is recommended to you for approval subject to all the relevant conditions being applied and section 106 obligations being entered into in order to secure the public benefits and minimise the impact of the proposal.

Background Papers

Application Submission Documents

Initial submission (Oct 2020)

- Existing and Proposed Plans and Drawings, prepared by Stiff + Trevillion;
- Design and Access Statement, prepared by Stiff + Trevillion;
- Landscape Strategy and Drawings, prepared by Bowles & Wyer;
- Environmental Statement, prepared by Trium;
- Planning Statement including draft Heads of Terms, prepared by DP9;
- Statement of Community Involvement, prepared by Kanda Consulting;
- Tower of London Heritage Impact Assessment, prepared by Montagu Evans;
- Transport Assessment, prepared by Steer;
- Framework Travel Plan, prepared by Steer;
- Delivery and Servicing Plan (including Waste Management Strategy), prepared by Steer
- Energy Statement, prepared by Hoare Lea;
- Sustainability Statement, prepared by Hoare Lea;
- Whole Life Carbon Assessment, prepared by Hoare Lea;
- Circular Economy Statement, prepared by Hoare Lea;
- Ventilation and Extraction Statement, prepared by Hoare Lea;
- Utilities Statement, prepared by Hoare Lea;
- Fire Safety Strategy, prepared by Sweco;
- Flood Risk Assessment and Drainage Strategy, prepared by Thornton Tomasetti;
- Geo-environmental and Geotechnical Phase 1 Desk Study, prepared by Thornton Tomasetti;
- Structural Statement and Basement Impact Assessment, prepared by Thornton Tomasetti;
- Outline Construction Environmental Management Plan, including a detailed Construction Logistics Plan, prepared by Mace; and
- Biodiversity Net Gain Report (including biodiversity net gain assessment), prepared by Schofield.

Reg. 25 submission (Feb 2021)

- Equality Statement, prepared by Quod
- 31 Bury Street: A Building Ecosystem paper
- Public Benefits Statement, prepared by Stiff + Trevillion
- Updated ES Chapter 13, TBHVIA Addendum and ES NTS Update, coordinated by Trium
- Outdoor Thermal Comfort, prepared by RWDI

Reg. 25 Submission (August 2021)

- Radiance Study and Daylight Sunlight and Overshadowing Review prepared by GIA

- Radiance-Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch, prepared by GIA
- Townscape, Built Heritage Visual Impact Assessment (TBHVIA) Addendum 2, prepared by Montagu Evans, and which provides visual material (four moving renders prepared by Vu.City taken from a video, also provided)
- 'Environmental Clarifications and Additional Information' Letter, prepared by Trium
- Statement of Community Involvement Update (August 2021), prepared by Kanda

Responses / Notes

- Response to GLA Stage 1, prepared by DP9 (23 February 2021)
- Energy Strategy Note (and accompanying technical material), responding to detailed comments alongside GLA Stage 1, prepared by Hoare Lea
- Supplementary Views (to TBHVIA) for GLA using massing model, prepared by Cityscape
- Response to Bevis Marks Synagogue, prepared by DP9 (18 February 2021)
- Response to heritage stakeholder comments (including HE, HRP and LBTH), prepared by Montagu Evans (18 February 2021)
- Response to Thames Water, prepared by Thornton Tomasetti (28 January 2021)
- Response to CoL Energy / Sustainability queries, prepared by DP9 with Hoare Lea and S+T input (10 March 2021)

Representations:

Rabbi Dr. Michael Hilton 03.01.2021

Alan Bekhor 28.12.2020

Leon Nahon 27.12.2020

Philip Meir 28.12.2020

Joyce & Lucien Gubbay 31.12.2020

Mr Leslie Morgan OBE 31.12.2020

Rachel Kolsky 31.12.2020

Barbara Graham Collier 13.01.2021

Mrs Lampert Dorothy 29.12.2020

Mr Daniel Zubaida 05.01.2021

Mr Gary Kenton 15.01.2021
Katy Barron 30.01.2021
Dr Annette Lawson 07.01.2021
Mr Joseph Solomons 04.01.2021
Jonathan Ben Garcia 24.12.2020
Barbara Simon 28.12.2020
Adele Leffman 29.12.2020 and 28.02.2021
Michael Yudkin 29.12.2021
Paul Arwas 04.01.2021
Angela Rubens 05.01.2021
Gusti Martin 05.01.2021
Mr Darren Isaacs 07.01.2021
Leslie Morgan 05.01.2021
Richard Cohen 07.01.2021
Ronald Jaffa 07.01.2021
Ulla Thiessen 07.01.2021
Dr. Everett M. Jacobs 08.01.2021
Sasto Daniel 08.01.2021
Mrs Ina Machen 07.01.2021
Mrs Michele Bentata 07.01.2021
Mrs B Averberg 08.01.2021
Raymond Silver 08.01.2021
Rhys Thomas 08.01.2021
Riva Twersky 09.01.2021
Miriam Kramer 13.01.2021
Jacqueline Barnett 10.01.2021

Neil Graham 12.01.2021
Briess Peter 12.01.2021
Ruth Hart 12.01.2021
Daniella Kochavi 13.01.2021
David Cohen 14.01.2021
Catherine Hillman 18.01.2021
Sefton Kwasnik 22.01.2021
Philip Dante 23.01.2021
Anthony Phillips 24.01.2021
Barry C Musikant 25.01.2021
Carole Morganstein 27.01.2021
Howard Martin 28.01.2021
Mr Raymond Sabbah 23.12.2020
Julia Da Waal 29.01.2021
Mr James Martin 23.12.2020
Andrea Rosen - 31.01.2021
Edwin Segall 31.01.2021
Mrs Frances Flaxington 23.12.2020
Mr Mark Hammond 23.12.2020
Mr Frank Martin 23.12.2020
Mrs Vivien Baroukh 24.12.2020
Mr Michael Mocatta 23.12.2020
Dr David Sclar 23.12.2020
Mr Alan Hyman 24.12.2020
Mr Jeff Berger 23.12.2020
Mr Eden Dwek 23.12.2020

Mr David Stern 24.12.2020
Ms Jennifer Bell 25.12.2020
Mr James Pont 23.12.2020
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Mr Edward Ziff 24.12.2020
Mrs Charlotte Green 25.12.2020
Mr Barry Chernoff 23.12.2020
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Mr Johnny Blair 23.12.2020
Mr Martin Collins 24.12.2020
Mr Marc Pereira-Mendoza 28.12.2020
Mr David Isaacs 26.12.2020
Mr Michael Jackson 24.12.2020
Ms Judy Jackson 24.12.2020
Mr Daniel Bloom 24.12.2020
Dr SIMON GABBAY 24.12.2020
Mr ALAN LANGLEY 24.12.2020
Mr Isaac Baroukh 24.12.2020
Mr Michael Baroukh 24.12.2020
Ms ELEANOR LEVY 28.12.2020
Mr Cyril Morgan 25.12.2020
Mrs Jennye Seres 26.12.2020
Ms Patricia Book 26.12.2020
Mr Antoine Guivarch 28.12.2020
Mr Benjy Lebrett 25.12.2020

Ms Sandra Clark 28.12.2020
Mr Maurice Martin 28.12.2020
Mr Allan Lewis 25.12.2020
Mr Martin Ben-Nathan 28.12.2020
Mr Rick Sopher 23.12.2020
Mr clive sanford 23.12.2020
Mr Jason Ozin 29.12.2020
Mr Bensoor Awad 24.12.2020
Mr Anthony Tricot 28.12.2020
Mrs Rita Tricot 28.12.2020
Mrs Jessica Tricot 28.12.2020
Mr Sami Tricot 28.12.2020
Dr Sharon Elishe a Turkington 24.12.2020
Mrs Suzanne Ellul 29.12.2020
Ms Dianne Levitin 25.12.2020
Mr Jonathan Spencer 29.12.2020
Mr Robert Yentob 28.12.2020
Mrs RUTH BASRAWY 28.12.2020
Mr Edwin Birnbaum 28.12.2020
Mr Michael Kuhn 25.12.2020
Mr Russell Donoff 29.12.2020
Mr Derrick Smouha 28.12.2020
Ms Gemma Levy 28.12.2020
Mrs Simone Hillman 28.12.2020
Mr Maurice Moses 29.12.2020
Mrs Caline Chazan 29.12.2020

Lord Peter Levene 28.12.2020 (former Lord Mayor)

Mr Adam Grossman 29.12.2020

Mr Freddie Chazan 29.12.2020

Lord Harry Woolf 29.12.2020

Mr Mark Salem 30.12.2020

Ms Johanna Fredj 28.12.2020

Mr Freddie Chazan 29.12.2020

Mr Daniel Sopher 28.12.2020

David Zubaida 05.01.2021

Mrs linda Dangoor 29.12.2020

Mr Ben Arram 30.12.2020

Mr Michael Dias 29.12.2020

Mr Marcus Gomes da Costa 30.12.2020

Mr Ariel Chazan 29.12.2020

Mr Edward Mocatta 28.12.2020

Mr Simon Rosenberg 30.12.2020

Mrs Esther Shuker 29.12.2020

Mr frank khalastchi 29.12.2020

Ms Daniela Nawi 28.12.2020

Mr Adam Szasz 30.12.2020

Dr Brian and Judith Robinson 30.12.2020

Dr Brian and Robinson 30.12.2020

Dr Brian Judith 30.12.2020

Mr Marcos Chazan 29.12.2020

Mr Noam Attar 30.12.2020

Mr G Field 30.12.2020

Mr Philip Heitlinger 29.12.2020
Mr Anthony Israel 30.12.2020
Mr Daniek Ofer 30.12.2020
Mr Salem Freddy 28.12.2020
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Ms Mary M 27.01.2021
Ms Zelda Star 12.01.2021

Ms Lianne Hitchen 12.01.2021
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Mrs Andrea Leib 12.01.2021
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Mrs Malka Morris 12.01.2021
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Dr Ivri Bunis 12.01.2021
Mrs Sharon Pearlman 12.01.2021
Dr David Bunis 13.01.2021
Miss Victoria Herriott 14.01.2021
Mr Leonidas Adams 21.01.2021
Ms Melanie Getto 22.01.2021
Miss Naomi Phillips 11.02.2021
Dr Royce Mahawatte 11.01.2021

Mr Craig Morrison 12.01.2021
Ms Amelia Cook 12.01.2021
Ms Sian Moseley 13.01.2021
Dr Michael Szpakowski 13.01.2021
Mr Deniz Genc 13.01.2021
Mr David Bloom 14.01.2021
Mr Ivor Richards 14.01.2021
Miss Holly Watling 14.01.2021
Mr Alasdair Black 15.01.2021
Dr Stuart Morganstein 24.01.2021
Ms Ruth Rosen 14.01.2021
Mr Jaime Starr 11.01.2021
Mr Liam Tielemans 11.01.2021
Mr Jesse Balter 11.01.2021
Ms Jules LoVecchio 11.01.2021
Ms Alese Clark 12.01.2021
Ms Elena Colman 13.01.2021
Miss Shelby Shoup 13.01.2021
Mrs Josie Abram 13.01.2021
Mr Jonathan Golan 13.02.2021
Dr John Dickinson 27.01.2021
Mrs Jacqueline Barnett 31.01.2021
Mr Paul Caswell 04.02.2021 and 25.02.2021
Mr Leonard Grant 12.01.2021
Mr PNatali 13.01.2021
Mr Keith Phillips 28.01.2021

Michael Mail 01.02.2021
Ms Melissa Bauman 14.02.2021
Mrs Elaine Avisror 11.01.2021
Mrs Danielle D 12.01.2021
Ms Carolyn Jacks 12.01.2021
Mr Daniel Hershon 21.01.2021
Ms Linda Rosen 31.01.2021
Mrs Kim Press 12.01.2021
Mr Philip Ross 13.01.2021
Miss Lorelei Sellers 13.01.2021
Mr Les Talisman 14.01.2021
Mr David Nunes 19.01.2021
Ms Marion Janner 27.01.2021
Miss Erin Hayes 11.01.2021
Mrs Deborah Talalay 13.01.2021
Mrs Joyce Nunes 19.01.2021
Mrs Pippa Landey 12.01.2021
Mr Robert Winckworth 15.01.2021
Ms Fiona Adler 05.02.2021
Ms Kay Lacey 12.01.2021
Mrs Victoria Azaz 29.01.2021
Ms Barbara Pietrzykowska 11.01.2021
Mr M. Higgins 21.01.2021
Mr Stephen Kramer 11.01.2021
Mr Ian Charles 12.01.2021
Ms Jane Liddell-King 12.01.2021

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Dr David Watkis 12.01.2021

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Miss Laura Swaffield 13.01.2021
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Mr Paul Richards 15.01.2021
Mr Mark Richards 14.01.2021
Mr Liron Bezalel 14.01.2021
Mr Ronald Schindler 14.01.2021
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Mr Mark Parkinson 14.01.2021
Ms Amy Marks 15.01.2021
Mr Jess O'Sullivan 15.01.2021
Ms Rebecca Abrams 14.01.2021
Mrs Ariane Bankes 14.01.2021
Mr Louis Berk 15.01.2021
Mr David Jacobs 11.01.2021
Ms Grace Miller 11.01.2021
Ms Anya Metzger 11.01.2021
Miss Jessica Tamman 11.01.2021
Miss Zoe Arschavir 11.01.2021
Michele Bentata 08.01.2021
Miss Cassie Histed 13.01.2021
Ms Phoebe Taylor 13.01.2021
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Dr Doreen Shaoul 17.01.2021

Mr Roger Leon 12.01.2021
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Annette Lawson 07.01.2021
Miss Marissa Salad 11.01.2021
Mr Gerald Stern 07.01.2021
Mr Mark Attan 08.01.2021
Dr Hannah Holtschneider 08.01.2021
Dr Alan Mendoza 24.12.2020
Mr Alfred Magnus 24.12.2020
Mrs Nicola Garcia 07.01.2021
Mr Raymond Dinkin 24.12.2020
Mr Michael Mail 24.01.2021
Rabbi Dr. Abraham Levy 19.01.2021
Solomon Green 07.01.2021
Mrs Siena Golan -
Anthony Eskenzi - 31.12.2020
Mrs Henrietta Ferguson 14.01.2021
Mr Scott Lebon 12.02.2021
Mr Christopher Gazzard 12.02.2021

Mr Jimmy Aldrich 13.02.2021

Mr Mandeep Dhaliwal 16.02.2021

Ruth Duston 18.01.2021 - Aldgate Connect BID

Mr Martin Ray 27.02.2021

Mr Edward Smith 16.02.2021

Mr Adam Caddy

Board of Deputies of British Jews 24.02.2021

Jewish Museum London 23.02.2021

Historic Royal Palaces - Bevis Marks Synagogue 24.02.2021

Foundation for Jewish Heritage 1.02.2021

Bevis Marks Synagogue Significance & Community Impact Study (Jonathan Solomons) dated 11 February 2021

Conference of European Rabbis 05.03.2021

Office of the Chief Rabbis (Rabbi Ephraim Mirvis) 3.03.2021

Jewish Historical Society of England (JHSE) (Miri Rubin) 02.03.2021

The Drapers Company (Tim Orchard) 05.05.2021

Jonathan Djanogly MP 19.03.2021

The Furniture History Society (Christopher Rowell, FSA) 17.03.2021

The Worshipful Company of Ironmongers (John Biles) 08.03.2021

Dr W. W. Apedaile Msc PhD Ceng MICE FRSA 10.03.2021

Mrs P K Wilkey 24.03.2021

Edge Plan (on behalf of the London Sephardi Trust and the Spanish & Portuguese Sephardi Community) Chris Maltby 8th February and 12 March 2021 and 17.09.2021

The Friends of the City Churches (Oliver Leigh-Wood) 10.03.2021

The Society for the Protection of Ancient Buildings (Christina Emerson) 02.03.2021

Mr Edward Waller - O; 08.12.2020 and 08.09.2021 - (The Georgian Group)

Rabbi Shalom Morris - O; 02.02.2021 (Rabbi of Bevis Marks Synagogue)

Sefton Kwasnik 22.01.2021

Peter Rose 01.03.2021

Dr. Everett M. Jacobs 08.03.2021

Mr William Carver 03.03.2021

Mr Leon Meyer 10.03.2021

Ms Eileen Hauptman 23.03.2021

Mr Kenneth Robinson 23.03.2021

Mr Stanley Roth 23.03.2021

Mrs Caroline MacDonald-Haig 24.02.2021

The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London 12.03.21

Independent Review of the Daylight, Sunlight, Overshadowing by Delva Patman Redler on Behalf of City of London dated 01.03.2021

Jonathan Lane 04.03.2021

Master Robert Bell – Worshipful Company of Solicitors of the City of London dated 16.03.21

Cardinal Vincent Nichols (Archbishop of Westminster) dated 30.03.21

Carole Hiley - President Institute of Tourist Guiding dated 31.03.21

Tower Hamlets Education Business Partnership 01.04.21

Roger Hoefling - The Honourable Company of Master Mariners dated 07.04.21

Nickie Aiken MP 09.04.21

Jason Smith (on behalf of 12-14 Mitre Street) 12.04.2021

Canon Barnett Primary School 12.04.2021

Deputy Hugh Morris 12.04.2021

LAMAS 06.05.2021 and 21.09.2021

Vivienne Littlechild MBE JP CC 10.05.2021

Dhruv Patel OBE CC dated 16.08.2021

Independent Review of the Daylight, Sunlight, Overshadowing Assessment and the Radiance Based Daylight Assessment by BRE on Behalf of City of London dated 20.09.2021

CONSULTATION RESPONSES

Historic England 11.12.2021 and 25.08.2021

GLA Stage 1 Letter 15.02.2021

Historic Royal Palaces - 31 Bury Street 19.11.2020 and 01.09.2021

Transport for London 22.02.2021 and 16.09.2021

Crossrail Safeguarding 13.11.2020 and 26.02.2021 and 27.08.2021

London Borough Hackney 18.01.2021

London Borough of Tower Hamlets 18.12.2021 and 03.09.2021

London Borough of Islington 19.03.2021

London Borough of Greenwich

London Borough of Lambeth 20.09.2021

Southwark Council 07.01.2021 and 12.05.21

City of Westminster 03.12.2020 and 02.03.2021

London Borough of Camden 26 March 2021

Civil Aviation Authority 15 March 2021

NATS Safeguarding 25.11.2020 and 02.03.2021 and 26.08.2021

Heathrow Airport 13.12.2020 and 28.02.2021 and 24.08.2021

London City Airport 30.11.2021 and 31.08.2021

Environment Agency 26.11.2020 and 4.03.2021 and 27.08.2021

Network Rail 02.03.2021 and 14.09.2021

Thames Water 10.12.2020 and 11.05.2021 and 20.09.2021

Representations received after 23 August 2021

Peter Rose - 24/08/2021

Ms Eileen Hauptman - 01/09/2021

Matt Fidler - 01/09/2021

Mr Rick Sopher - 01/09/2021
Karen Shafron - 02/09/2021
Mr Timothy Motz - 02/09/2021
Mr Harold Shupak - 02/09/2021
Mr Justin Leaderman - 04/09/2021
Mr Mark Wheatley - 04/09/2021
Ida Symons - 05/09/2021
Mr David Mendoza - 05/09/2021
Mr Gareth Williams - 05/09/2021
Dr Natalie Silvey - 05/09/2021
Mr Daniel Mudford - 05/09/2021
Miss Melissa Hall - 05/09/2021
Miss Claire Fitt - 05/09/2021
Mr David Sullivan - 05/09/2021
Ms Zoe Ashpole 05/09/2021
Mr Manuel Androulakakis - 05/09/2021
Miss Eileen Ross - 05/09/2021
Mr Nicholas Gould - 05/09/2021
Mr Richard Ferguson - 05/09/2021
Mr Ben Judah - 05/09/2021
Mr Russell Nash - 05/09/2021
Ms Marika Muller - 05/09/2021
Dr Gordon Woods - 05/09/2021
Mr Jonny Gold - 05/09/2021
Mr Charlie Pullman - 05/09/2021
Miss Sian Richards - 05/09/2021
Mrs Mariska Van Tiel - 05/09/2021
Mrs Ann Carr - 05/09/2021
Mrs Gill Othen - 05/09/2021
Mrs Sarah Meir - 05/09/2021

Mr Nicholas Kociuba - 05/09/2021
Mr Adrian Gladwin - 05/09/2021
Ms Mariya Talib - 05/09/2021
Mr Samuel Danker - 05/09/2021
Mr Jack Rodber - 05/09/2021
Mr Gregory Monk - 05/09/2021
Ms Norma Laming - 05/09/2021
Mr Andrew Craig-Bennett - 05/09/2021
Mr Philip Bell - 05/09/2021
Mr Edward Bourne - 05/09/2021
Mr Christopher Scrivner - 05/09/2021
Dr Brad Karp - 05/09/2021
Mr Philip Bevan - 05/09/2021
Miss Claire Russell - 05/09/2021
Miss Asal Reyhanian - 05/09/2021
Mr Daniel Mcilhiney - 05/09/2021
Mr Cj Patten - 05/09/2021
Mrs Sarah Prior - 05/09/2021
Mr Nicholas Mcburney - 05/09/2021
Mrs Lorna Curry - 05/09/2021
Mrs Chrissie Mclean - 05/09/2021
Mrs Jacky Guter - 05/09/2021
Mrs Victoria Fraser - 05/09/2021
Mr Fernando North - 05/09/2021
Miss Lesley Powell - 05/09/2021
Lord Horst Belfast - 05/09/2021
Dr Christopher Shoop-Worrall - 05/09/2021
Ms Meera Naik - 05/09/2021
Mr Jake Nicholls - 05/09/2021
Dr Simon Webster - 05/09/2021

Dr Peter Williams - 05/09/2021
Mr Niccolo Aliano - 05/09/2021
Miss Danielle Reuben - 05/09/2021
Mr Scott Syrett-Garden - 05/09/2021
Mr Philip Lenthall - 05/09/2021
Dr Seeta Seetharaman - 05/09/2021
Dr Robert Bud - 05/09/2021
Mr David Ellis - 05/09/2021
Mr Robin Burgess - 05/09/2021
Ms Kate Wheeler - 05/09/2021
Mr Ronen Bay - 05/09/2021
Mr Michael Layhe - 05/09/2021
Mrs Esther Shoshan - 05/09/2021
Mr Adam Brown - 05/09/2021
Ms Charlotte Soussan - 05/09/2021
Mr John Byrne - 05/09/2021
Mr Alejandro Barrett Lopez - 05/09/2021
Dr Clare Lappin - 05/09/2021
Ms Anne Applebaum - 05/09/2021
Mr Joshua Lewis - 05/09/2021
Ms Karen Benveniste - 05/09/2021
Ms Julia Martin Wright - 05/09/2021
Mr Stefan Fraczek - 05/09/2021
Miss Kate Stevens - 05/09/2021
Mrs Fiona Rose - 05/09/2021
Miss Diane Pannell - 05/09/2021
Ms Charlotte Gauthier - 05/09/2021
Mr Ethan Corey - 05/09/2021
Mr Simon Motz - 05/09/2021
Dr Michaela Muscat - 05/09/2021

Mrs Sue Boulding - 05/09/2021
Dr Oscar Perea-Rodriguez - 05/09/2021
Mrs Yael Glanvill - 05/09/2021
Mr Richard Kurth - 05/09/2021
Mrs Julia Huber - 05/09/2021
Mr Philip Aspin - 05/09/2021
Mrs Victoria Ferguson - 05/09/2021
Mr Gavin Webb - 05/09/2021
Miss Louise Burrows - 05/09/2021
Mr Ranjit Saimbi - 05/09/2021
Miss Amy Richardson - 05/09/2021
Dr Henry Midgley - 05/09/2021
Mr Ian Gow - 05/09/2021
Ms Sarah Davis - 05/09/2021
Mr Christopher Whyte - 05/09/2021
Miss Karen Duck - 05/09/2021
Mr Robin Fellerman - 05/09/2021
Mr Volodymyr Kovalskiy - 05/09/2021
Mr Joseph Kaz - 05/09/2021
Dr Graham Evans - 06/09/2021
Mr Scott Lebon - 06/09/2021
Mr Imran Pervez - 06/09/2021
Mr Tab Urke - 06/09/2021
Mr Ian Webb - 06/09/2021
Mrs Andree Piriou - 06/09/2021
Mr Matthew Hudson - 06/09/2021
Mr Chris Hobbs - 06/09/2021
Mr Josh Cass - 06/09/2021
Paula Campbell 06/09/2021
Miss Charlotte Nathan - 06/09/2021

Ms Sophie Martin. - 06/09/2021
Ms Rhona Levene - 06/09/2021
Mrs Daniela Greiber - 06/09/2021
Mr John Humphries - 06/09/2021
Miss Katie Hutley - 06/09/2021
Mr Nicholas Levine - 06/09/2021
Ms Nicola Carr - 06/09/2021
Mr Ben Fried - 06/09/2021
Mrs Jill Wilkinson - 06/09/2021
Mrs Fiona Metcalfe - 06/09/2021
Mrs Janet Spink - 06/09/2021
Dr Ralph Negrine - 06/09/2021
Mr David Woolfman - 06/09/2021
Mr Bhaven Patel - 06/09/2021
Miss Piya Khanna - 06/09/2021
Mrs Jennie Kreser - 06/09/2021
Mr Marcus Walker - 06/09/2021
Mr Shai Franklin - 06/09/2021
Mr Henry Cohn - 06/09/2021
Mr Ben Milne - 06/09/2021
Mr Daniel Freeman - 06/09/2021
Mr Thomas Dalby - 06/09/2021
Mr Emanuel Cohen - 06/09/2021
Mr Malkitzedek Zirkind - 06/09/2021
Dr Katy Cairns - 06/09/2021
Ms Claire Landon - 06/09/2021
Ms R D Abrams - 06/09/2021
Ms Helen Brander - 06/09/2021
Ms Charlotte Highmore - 06/09/2021
Ms Katherine Evans - 06/09/2021

Ms Sarah Shaw - 06/09/2021
Mr Dan Carey - 06/09/2021
Mr Tylah Webb-Pinnock - 06/09/2021
Mr David Peat - 06/09/2021
Mr James Chance - 06/09/2021
Mr Peter Kershaw - 06/09/2021
Dr Jacob Smith - 06/09/2021
Dr Erika Mackin - 06/09/2021
Dr Philip Hodes - 06/09/2021
Dr Ahmed Hussain - 06/09/2021
Ms Susan Rooney - 06/09/2021
Mrs Tanya Sinclair - 06/09/2021
Mr Alex Shaw - 06/09/2021
Miss Niamh Cunningham - 06/09/2021
Mr Andrew Lees - 06/09/2021
Ms Lea Michaels - 06/09/2021
Mr Richard Normington - 06/09/2021
Mr Eliot Beer - 06/09/2021
Mr Dominic Pratt - 06/09/2021
Mr Laurent Ruseckas - 06/09/2021
Miss Christine Harrison - 06/09/2021
Mrs Isobel Klein Geltink - 06/09/2021
Mr Charlie Jones - 06/09/2021
Mr Patrick Regan - 06/09/2021
Mr David Moran Y Lasierra - 06/09/2021
Mr John Thorpe - 06/09/2021
Mr Benjamin Pindar - 06/09/2021
Ms Isabel Schmidt - 06/09/2021
Mr Mark Collins - 06/09/2021
Miss Catriona Ritchie - 06/09/2021

Mr Zachary Bates Fisher - 06/09/2021
Mr Adam Jenner - 06/09/2021
Ms Karen Steadman - 06/09/2021
Mr Matthew Scott - 06/09/2021
Mr Thomas Bergman - 06/09/2021
Mr Andrew Packman - 06/09/2021
Mr Finn Vijayakar - 06/09/2021
Mr Dan Susman - 06/09/2021
Dr Lauren Ackerman -06/09/2021
Ms Anna Gavurin - 06/09/2021
Mr William Franciscy - 06/09/2021
Mr Alexis Flynn - 06/09/2021
Ms Mary Gilchrist - 06/09/2021
Mr Joshua Morris - 06/09/2021
Mr John Johnston - 06/09/2021
Mrs Shoshannah Besterman - 06/09/2021
Dr Craig Clunas - 06/09/2021
Mr Alexander Raubo - 06/09/2021
Miss Rachel Martin -06/09/2021
Mrs Rachelle Shintag - 06/09/2021
Mr Lewis Lockwood - 06/09/2021
Mr Oliver Cohen - 06/09/2021
Mr Mark O'neill - 06/09/2021
Mr Dominic Olins - 06/09/2021
Mr Adam Dant - 06/09/2021
Dr Rose Levinson - 06/09/2021
Mr Adrian Levy - 06/09/2021
Mr Richard Ferris - 06/09/2021
Mr Horatio Mortimer - 06/09/2021
Mr Steve Horowitz - 06/09/2021

Mr Gary Hill - 06/09/2021
Mrs Octavia Waley-Cohen - 06/09/2021
Mr Charles Carnow - 06/09/2021
Mrs Jem Cairney - 06/09/2021
Mr Ethan Sabourin - 06/09/2021
Mr Simon Stanley - 06/09/2021
Mr Seb Schmoller - 06/09/2021
Mr Hugh Mccallion - 06/09/2021
Dr Maria Abreu - 06/09/2021
Mr Patrick Marber - 06/09/2021
Dr Darron Cullen - 06/09/2021
Ms Maggie Richens - 06/09/2021
Mr Mark Taylor - 06/09/2021
Ms Delia McNally - 06/09/2021
Mr Tom Ford - 06/09/2021
Mr Laurence Ross - 06/09/2021
Mr Alex Tenenbaum - 06/09/2021
Mr Benedict Armitage - 06/09/2021
Mr Brendan Trodden - 06/09/2021
Mr Averon D'costa - 06/09/2021
Ms Ruth Taylor - 06/09/2021
Dr Sara Moller - 06/09/2021
Mr Connor Upcott - 06/09/2021
Ms Krisztina Csorstea - 06/09/2021
Mr Gary Mohan - 06/09/2021
Ms Debra Band - 06/09/2021
Miss Naomi Reiter - 06/09/2021
Mr Giles Macdonogh - 06/09/2021
Miss Jennie Wood - 06/09/2021
Ms Ceri White - 06/09/2021

Miss Tessa Micklethwait - 06/09/2021
Mr Thomas Hart - 06/09/2021
Ms Anna Halford - O 06/09/2021
Miss Alyx Bernstein - O 06/09/2021
Mr Yitzchak Freeman - 06/09/2021
Mr Joel Brackenbury - 06/09/2021
Ms Tara Fernando - 06/09/2021
Mr Stephane Amoyel - 06/09/2021
Mr Anthony Adams - 06/09/2021
Mr Simon Kantor - 06/09/2021
Mr Mark Sullivan - 06/09/2021
Ms Lauren Collins - 06/09/2021
Miss Gwenllian Rhys - 06/09/2021
Ms Elizabeth Steven - 06/09/2021
Mrs Sara Stephens-White - 06/09/2021
Ms Celia Smith - 06/09/2021
Mr Aaron Wright - 06/09/2021
Mr Toby Saul - 06/09/2021
Mr Milan Czerny - 06/09/2021
Miss Maoliosa Smyth - 06/09/2021
Dr Gregory Scott - 06/09/2021
Mr Joshua Yule - 06/09/2021
Mr Jack Renner - 06/09/2021
Mr Toby Davis - 06/09/2021
Mr Alex Maskill - 06/09/2021
Mr Sapandeep Singh Maini-Thompson - 06/09/2021
Mrs Jan Keating - 06/09/2021
Mr Orla Gill - 06/09/2021
Mrs Janet Pike - 06/09/2021
Mr Maxim Dillon - 06/09/2021

Miss Andrea Fairhurst - 06/09/2021
Dr Mohamed El Dahshan - 06/09/2021
Mr Asher Kessler - 06/09/2021
Miss Anneliese Mondchein 06/09/2021
Mrs Cathy Davey - 06/09/2021
Mr Ollie Spero - 06/09/2021
Miss Claire Palmer - 06/09/2021
Ms Crystal-Lee Simpson - 06/09/2021
Mr Mathew Kidwell - 06/09/2021
Mr Howard Elgot - 06/09/2021
Mr Jamie Mearns - 06/09/2021
Mr Tom Milson - 06/09/2021
Mr David Squier - 06/09/2021
Mr Tim Barnett - 06/09/2021
Mrs Genene Collins - 06/09/2021
Ms Patricia Devereaux - 06/09/2021
Ms Nadine Patefield -06/09/2021
Mr Daniel Grabiner - 06/09/2021
Mrs Suzanne Schillaci - 06/09/2021
Mr Ray Maxwell - 06/09/2021
Mr James Drury - 06/09/2021
Miss T Hall-Turner - 06/09/2021
Miss Lorna Roden - 06/09/2021
Mr Adam Zinkin - 06/09/2021
Dr Daniel Laydon - 06/09/2021
Mr Jamie Mcleod - 06/09/2021
Mr David Sladen - 06/09/2021
Miss Rachel Harris - 06/09/2021
Mrs Fiona Calvert - 06/09/2021
Mr Eli Carlebach - 06/09/2021

Mr Alex Reidegeld - 06/09/2021
Mr David Ward - 06/09/2021
Mr Benjamin Schwarzmann -06/09/2021
Ms Susanna Davidson - 06/09/2021
Mr Gordon Macfarlane - 06/09/2021
Mr Yussef Robinson - 06/09/2021
Mr D Samuel - 06/09/2021
Miss Lucie Wright - 06/09/2021
Mr Samuel Glanville - 06/09/2021
Ms Ruth Singer - 06/09/2021
Mr Kristian Marr - 06/09/2021
Ms Cassia Rowland - 06/09/2021
Miss Emily Mcquade - 06/09/2021
Mr Andrew Edwards - 06/09/2021
Miss Rose Ann-Marie Slavin - 06/09/2021
Mr Jaime Marshall - 06/09/2021
Mr Thomas Irvén - 06/09/2021
Ms Heather Wentworth - 06/09/2021
Mr Jacob Marrache - 06/09/2021
Mr Justin Balcombe - 06/09/2021
Ms Danielle Harte - 06/09/2021
Mrs Rosalind Littlejohn -06/09/2021
Mr Adam Redland - 06/09/2021
Ms Sarah Stanton - 06/09/2021
Ms Hazel Johnson - 06/09/2021
Mr Danny Caro - 06/09/2021
Mr Eli Lever -06/09/2021
Mr William Beston - 06/09/2021
Ms Iona Smith - 06/09/2021
Mr James Dixon - 06/09/2021

Ms Hannah Morris - 06/09/2021
Mr Barney Pell Scholes - 06/09/2021
Mr Joshua M Katz - 06/09/2021
Mr Conor Lyne - 06/09/2021
Mrs Zena Ford - 06/09/2021
Dr Gillian Cross - 06/09/2021
Mr Joseph Levy Brown - 06/09/2021
Dr Anna Marie Roos - 06/09/2021
Mr Michel Ehrlich - 06/09/2021
Miss Claudia Allan - 06/09/2021
Ms Keren Simons - 06/09/2021
Mrs Jo Burbidge - 06/09/2021
Mrs Joy Reynolds - 06/09/2021
Ms Kaye Bowsher - 06/09/2021
Mr Richard Peralta - 06/09/2021
Ms Janet Walker - 06/09/2021
Mr Eoin McDonnell - 06/09/2021
Mr Christopher Hammer - 06/09/2021
Mr Tim Harrison - 06/09/2021
Ms Anya Osen - 06/09/2021
Mr Guy Domb - 06/09/2021
Mr Stephane J Giusti - 06/09/2021
Mr Jacob Turner - 06/09/2021
Miss Pippa Crawford - 06/09/2021
Mr Simon Smith - 06/09/2021
Ms Eleanor Burton - 06/09/2021
Mr Alex Miller - 06/09/2021
Miss Astrid Nord - 06/09/2021
Mr Jonty Leibowitz - 06/09/2021
Dr Adrian Perry - 06/09/2021

Mr Joshua Glancy - 06/09/2021
Mr Nick Eden - 06/09/2021
Ms Teresa Ankin - 06/09/2021
Mr James Montgomery - 06/09/2021
Dr Christopher Hilton - 06/09/2021
Ms Elizabeth Dobinson - 06/09/2021
Mr Simon Ashley - 06/09/2021
Mr Graham Spero - 06/09/2021
Ms Catrin Richards - 06/09/2021
Ms Hannah Merritt - 06/09/2021
Ms Emer Delaney - 06/09/2021
Dr Mira Vogel - 06/09/2021
Ms Helein Treuhaft - 06/09/2021
Mrs Rosie Andrews - 06/09/2021
Mrs Laura Evans - 06/09/2021
Mr James Morris - 06/09/2021
Mr Julian Glover - 06/09/2021
Ms Mary Moultrie - 06/09/2021
Mr Benjamin Miller - 06/09/2021
Mr Andrew Short - 06/09/2021
Mr Chris Wilson - 06/09/2021
Dr Katie Hill - 06/09/2021
Mr Nathan Kunin - 06/09/2021
Ms Eleanor Ross - 06/09/2021
Mr Darren Mclean - 06/09/2021
Mr Max Glover - 06/09/2021
Ms Hannah Jaenicke - 06/09/2021
Ms Claire Napier - 06/09/2021
Ms Anastasia Patrikiou - 06/09/2021
Mr Matthew Minsk - 06/09/2021

Mr Tom Burkitt - 06/09/2021
Mr Robert Cohen - 06/09/2021
Mr Richard Sayeed - 06/09/2021
Mr Edward Sanders - 06/09/2021
Mr Benjamin Lazarus - 06/09/2021
Mr David Neil - 06/09/2021
Dr Sara Godfrey - 06/09/2021
Mr Jonathan Ford - 06/09/2021
Mr Warren Ladd - 06/09/2021
Mr Richard Allman-Brown - 06/09/2021
Mr Ross Markham - 06/09/2021
Mr Edward Green - 06/09/2021
Mr Philip Gardner - 06/09/2021
Mr Benjamin Salmon - 06/09/2021
Miss Alice Brewer - 06/09/2021
Ms Kholood Khair - 06/09/2021
Mr Will Todd - 06/09/2021
Mr Stephen Clark - 06/09/2021
Mrs Angela Levine - 06/09/2021
Ms Elle Bower - 06/09/2021
Ms Astrid Bryce - 06/09/2021
Mr John Wood - 06/09/2021
Mr Don Mackeen - 06/09/2021
Dr Bryn Harris - 06/09/2021
Dr Leonora Arditti - 06/09/2021
Mr Jonathan Freedland - 06/09/2021
Mr Guy Dabby-Joory - 06/09/2021
Mr Stephen Harding - 06/09/2021
Ms Dahlia Cuby - 06/09/2021
Mr Nick Miller - 06/09/2021

Ms Rhiannon Lewis - 06/09/2021
Mr Joel Dwek - 06/09/2021
Miss Dawn Maycock - 06/09/2021
Ms Emily Zinkin - 06/09/2021
Dr Diane Coyle - 06/09/2021
Dr Melissa Wood - 06/09/2021
Ms Felicity Davidson - 06/09/2021
Mr Hugh Annett - 06/09/2021
Dr Daniel Green - 06/09/2021
Miss Grace Lieberman - 06/09/2021
Ms Margaret Aird - 06/09/2021
Mrs Sophie Degraft-Johnson - 06/09/2021
Ms Jane Haberlin - 06/09/2021
Mr Christopher Jenkins - 06/09/2021
Mrs Jennifer Bier - 06/09/2021
Ms Sonia Gallego - 06/09/2021
Mr Tim Hucker - 06/09/2021
Mr Tom Hunt - 06/09/2021
Dr Janet Abrams - 06/09/2021
Ms Valerie Hyman - 06/09/2021
Ms Sue Brandrick - 06/09/2021
Mrs Lucy Jenkins - 06/09/2021
Mr Toby Nangle - 06/09/2021
Mr Paul Kelly - 06/09/2021
Mr Brian Storer-Goldstein - 06/09/2021
Mr Dominic Quennell - 06/09/2021
Ms Helen Jones - 06/09/2021
Ms Ana Avalon - 06/09/2021
Miss Katherine Pearce - 06/09/2021
Ms Rhian Chilcott - 06/09/2021

Mrs Theresa Everard - 06/09/2021
Ms Sharon Lukom - 06/09/2021
Mr Aaron Bastani - 06/09/2021
Dr John Lewis - 06/09/2021
Ms Karen Cooper - 06/09/2021
Dr William Booth - 06/09/2021
Mr Jack Evans - 06/09/2021
Mr Rory Maclean - 06/09/2021
Ms Jennifer Frazer – 06/09/2021
Ms Alison Baily - 06/09/2021
Mr Mark Billing - 06/09/2021
Ms Alyssa Milem - 06/09/2021
Dr Jeremy Smilg - 06/09/2021
Mr Malcolm Lowe - 06/09/2021
Mr Gareth Hollis - 06/09/2021
Mr Stephen Silman - 06/09/2021
Mr Marc Nohr - 06/09/2021
Ms Elaine Sutton - 06/09/2021
Mr Aaron Reid - 06/09/2021
Mr Tomas Collis - 06/09/2021
Mr Andrew Ward - 06/09/2021
Ms Lara Vassallo - 06/09/2021
Ms Katharine Isaacs - 06/09/2021
Mrs Rachel Firth - 06/09/2021
Ms Georgina Morley - 06/09/2021
Mr John Aslet - 06/09/2021
Mr Richard Brooke - 06/09/2021
Mrs Doreen Berger - 06/09/2021
Mrs Martha Cossey - 06/09/2021
Mr Daniel Korski - 06/09/2021

Ms Elizabeth Acheson - 06/09/2021
Mr James Bilefield - 06/09/2021
Mr Daniel Simpson - 06/09/2021
Ms Liz Clutterbuck - 06/09/2021
Mr Florian Kobisch - 06/09/2021
Mr Warren Czapa - 06/09/2021
Dr William Wyeth - 06/09/2021
Ms Lisa McMullin - 06/09/2021
Mr Ricky Feeney - 06/09/2021
Mr Chris Fallon - 06/09/2021
Ms Anna Conrad - 06/09/2021
Mr Luke Bevan - 06/09/2021
Ms Daisy Pell Scholes - 06/09/2021
Mr Matt Lewis - 06/09/2021
Miss Deanna Turnbull - 06/09/2021
Mr Edward Clarke - 06/09/2021
Ms Janet Pell - 06/09/2021
Mr Hugh Collins - 06/09/2021
Ms Stefania Ghiandoni - 06/09/2021
Dr Peter Abbott - 06/09/2021
Ms Amanda Osullivan - 06/09/2021
Mr Eoin Hughes - 06/09/2021
Mr Jason Clampet - 06/09/2021
Ms Agnes Crawford - 06/09/2021
Dr Andrew Fleming - 06/09/2021
Ms Rebecca Bell - 06/09/2021
Mr Jonathan Schutz - 06/09/2021
Mr Guy Fairbank - 06/09/2021
Mr Matthew Winbow - 06/09/2021
Mr Arnold De Vries -06/09/2021

Mrs Alexandra Watson - 06/09/2021
Mr James Preston - 06/09/2021
Mr Carl Moss - 06/09/2021
Mr Ruth Shlovsky - 06/09/2021
Dr Helen Clark - 06/09/2021
Mrs Lisa Schulze - 06/09/2021
Mr Maurice Gran - 06/09/2021
Mr Louis Huglin - 06/09/2021
Mr Josh Spero - 06/09/2021
Ms Elizabeth Mackie - 06/09/2021
Mr Michael Foster - 06/09/2021
Mr Daniel Shintag - 06/09/2021
Mrs Phillipa Hasenson - 06/09/2021
Mr Andre Madeira Filipe - 06/09/2021
Ms Elizabeth Halliday - 06/09/2021
Mr Joe Grabiner - 06/09/2021
Mr Tyrone Duarte - 06/09/2021
Ms Saoirse Cowley - 06/09/2021
Mr William Lloyd - 06/09/2021
Miss Laura Gilbert - 06/09/2021
Mr Mike Usiskin - 06/09/2021
Ms Constance Craig Smith - 06/09/2021
Mr Andrew Powell - 06/09/2021
Mr Thomas Everest-Dine - 06/09/2021
Ms Alexandra Thompson 06/09/2021
Mr Julian Cable 06/09/2021
Mr Miklos Collinson 06/09/2021
Dr Françoise Pommaret 06/09/2021
Mrs Julie Richardson 06/09/2021
Dr Nicholas Taylor-Collins 06/09/2021

Ms Nicola Jones - 06/09/2021
Mr Samuel Percival - 06/09/2021
Dr Joshua Schwartz - 06/09/2021
Mr Mordechai Lightstone - 06/09/2021
Mr Jonathan Max - 06/09/2021
Mr Jeremy Jacobs - 06/09/2021
Lord Manuel Chavez - 06/09/2021
Miss Miss Catherine Williams - 06/09/2021
Mr Matthew Morgan - 06/09/2021
Mrs Manuella Jessop - 06/09/2021
Mr Christopher Chiu-Tabet - 06/09/2021
Mr J Mahon - 06/09/2021
Ms Georgina Hicks - 06/09/2021
Mr Campbell Reid - 06/09/2021
Mr Samuel Freedman - 06/09/2021
Mr Gregory Baker - 06/09/2021
Dr David K. O'hara - 06/09/2021
Ms Gen Rodriguez - 06/09/2021
Mr Louis Goss - 06/09/2021
Dr Anne Lacey - 06/09/2021
Ms Frances Mace - 06/09/2021
Miss Rebecca Filer - 06/09/2021
Mr Will Sorrell - 06/09/2021
Ms Rachel Stafler - 06/09/2021
Mr Matthew Parsfield - 06/09/2021
Mr Alan M Gavurin - 06/09/2021
Mr Andrew Baisley - 06/09/2021
Mr Sean Boyle - 06/09/2021
Mr Benjamin Leaver - 06/09/2021
Dr Jonathan Denfhy - 06/09/2021

Mr Charles Hecker - 06/09/2021
Mr Russell Walker - 06/09/2021
Mrs Shula Sinclair - 06/09/2021
Ms N. Gracias - 06/09/2021
Mrs Katherine Hale - 06/09/2021
Miss Sonia Celi - 07/09/2021
Mr Del Lyons - 07/09/2021
Mr Nick Rochford - 07/09/2021
Miss Al Kennedy - 07/09/2021
Mr Oliver Conde - 07/09/2021
Dr Devorah Baum - 07/09/2021
Ms Sarah Plumer - 07/09/2021
Mrs Lainie Hanan - 07/09/2021
Miss Hannah Brosh - 07/09/2021
Mr Martin Chivers - 07/09/2021
Mrs Clare Risman - 07/09/2021
Dr Aries Moross - 07/09/2021
Mr Ben Oldfield - 07/09/2021
Mr Neil Feingold - 07/09/2021
Mr Joshua Aroesti - 07/09/2021
Mr Ben Haddock - 07/09/2021
Mr Stefan Corre - 07/09/2021
Mr Sam Layton - 07/09/2021
Ms Angie Fullman - 07/09/2021
Miss Bethany Gisbey - 07/09/2021
Mr Tony Scott - 07/09/2021
Mr Chris Carling - 07/09/2021
Ms Rosie Clifford - 07/09/2021
Mr David Valentine - 07/09/2021
Mr Tony Piper - 07/09/2021

Mrs Carina Spence-Stokes - 07/09/2021
Ms Charlotte Goodhart - 07/09/2021
Mr Joseph Waters - 07/09/2021
Mrs Karen Watson - 07/09/2021
Mrs Lucy Seager - 07/09/2021
Mr Richard O'callaghan - 07/09/2021
Ms Deborah Creedy - 07/09/2021
Dr Emma Gilmour - 07/09/2021
Mr Max Nye - 07/09/2021
Mr Nicholas Hytner - 07/09/2021
Mr Adir Bar Yohanan - 07/09/2021
Dr Dion Georgiou - 07/09/2021
Dr Lisa Tannahill - 07/09/2021
Miss Ursula Servis - 07/09/2021
Mr Chris Beauchamp - 07/09/2021
Mrs Sally Annett - 07/09/2021
Mr Toby Baker - 07/09/2021
Mrs Louise Tughan - 07/09/2021
Mr Josh Harvey - 07/09/2021
Mrs Monica Cornforth - 07/09/2021
Mrs Julia Clarke - 07/09/2021
Miss Gaby Morris - 07/09/2021
Ms Amy Feldman-Hursthouse - 07/09/2021
Ms Kate Pass - 07/09/2021
Mrs Clare Ogburn - 07/09/2021
Ms Clare Williams - 07/09/2021
Mr Laith Alkhalaf - 07/09/2021
Ms Morenike Adebayo - 07/09/2021
Mrs G Watts - 07/09/2021
Mrs Lucy Fox - 07/09/2021

Ms Jennifer Majka - 07/09/2021
Mr Lynn Saunders - 07/09/2021
Miss Yasmine Ali - 07/09/2021
Mr David Labi - 07/09/2021
Mr Brian Balkin - 07/09/2021
Mr Daniel Morris - 07/09/2021
Ms Anna Stopes - 07/09/2021
Mr Simon Feldman - 07/09/2021
Mr Joseph Baverstock-Poppy - 07/09/2021
Dr Simon Sebag-Montefiore - 07/09/2021
Ms Fiona Halliday - 07/09/2021
Mrs Valerie Strachan - 07/09/2021
Mr George Olver - 07/09/2021
Mrs P Dymock - 07/09/2021
Ms E Lower - 07/09/2021
Dr Caroline Gonda - 07/09/2021
Mr Thomas Coady - 07/09/2021
Ms Mila Griebel - 07/09/2021
Mr Kevin Matthews - 07/09/2021
Mr Ezra Zekaria - 07/09/2021
Miss Kate Early - 07/09/2021
Ms Susan Cunningham - 07/09/2021
Mr Edward Banister - 07/09/2021
Mr Noah Angell - 07/09/2021
Miss Neve Van Den Bron - 07/09/2021
Miss Bella Saltiel - 07/09/2021
Mr Janet Sutton - 07/09/2021
Dr Jonathan Kenny - 07/09/2021
Mr Ben Ludlow - 07/09/2021
Mr Caspian Dennis -07/09/2021

Mr Jack Falkingham - 07/09/2021
Mrs Camilla Wood - 07/09/2021
Mr Chris Booth - 07/09/2021
Ms Eleanor Smith - 07/09/2021
Ms Rachel Rymer - 07/09/2021
Ms Michaela Costello - 07/09/2021
Mr Brian Saffer - 07/09/2021
Mr Mohamed Hussein Iman -07/09/2021
Dr Nicole Martin - 07/09/2021
Mr Inocencio Lobo - 07/09/2021
Miss Amy Sabin - 07/09/2021
Mr Lee Gage - 07/09/2021
Dr George Severs - 07/09/2021
Mrs Phoebe Warren - 07/09/2021
Mr Joel Seager - 07/09/2021
Mr Jeremy Harris - 07/09/2021
Ms Vanessa Woolf Hoyle - 07/09/2021
Mr Mark Engel - 07/09/2021
Miss Ciara Gavurin - 07/09/2021
Mr Stuart Loveless - 07/09/2021
Miss Rachel Martin - 07/09/2021
Ms Laura Jorgensen - 07/09/2021
Mr Craig Mcmillan - 07/09/2021
Mrs Caroline Turnbull-Hall - 07/09/2021
Mr Luke Clark - 07/09/2021
Dr Lauren Elkin - 07/09/2021
Mr Chris Cook - 07/09/2021
Mr Nicolas Webb - 07/09/2021
Mr Jeffrey Jones - 07/09/2021
Dr Tom Cordiner - 07/09/2021

Ms Catherine Tonge - 07/09/2021
Dr Jean Seaton - 07/09/2021
Ms Bethany Summerfield - 07/09/2021
Ms Mary Crisp - 07/09/2021
Dr Marc Baer - 07/09/2021
Mr Chris Worsfold - 07/09/2021
Ms Ann Hayes - 07/09/2021
Mr Richard Wisnia - 07/09/2021
Miss Claire Puce - 07/09/2021
Dr Simeon Burke - 07/09/2021
Dr Suzannah Lant - 07/09/2021
Mr Duncan Mirams -07/09/2021
Dr Joshua Meyers - 07/09/2021
Mr Tom Gilbert - 07/09/2021
Ms Bethany Rutter - 07/09/2021
Ms Brydie Lee-Kennedy - 07/09/2021
Mr Joseph Menezes - 07/09/2021
Mr Jeremy Brier - 07/09/2021
Dr Ginette Anderson - 07/09/2021
Miss Katharina Beniers - 07/09/2021
Ms Nichola Evans - 07/09/2021
Dr Natalie Thomlinson - 07/09/2021
Ms Saskia Neibig - 07/09/2021
Dr Tom Cordiner - 07/09/2021
Ms Elizabeth Cooper - 07/09/2021
Mr Michael Heffernan - 07/09/2021
Mr Stuart Bailey - 07/09/2021
Mr Alex Brownlee-Stokes - 07/09/2021
Ms Marie-Claire Eylott - 07/09/2021
Mr Mark Pearson - 07/09/2021

Mr Valour Nicholas - 07/09/2021
Dr Hannah Mirfin - 07/09/2021
Mr Michael Woodcock - 07/09/2021
Miss Geeta Sanker - 07/09/2021
Dr Mandeep Grewal - 07/09/2021
Mrs Sue Christensen - 07/09/2021
Miss Francesca Galea - 07/09/2021
Mr Fabrizio Gallozzi - 07/09/2021
Mr Matthew Roberts - 07/09/2021
Mr Daniel Rooke - 07/09/2021
Mrs Meg Nicol - 07/09/2021
Ms Orla Hilton - 07/09/2021
Mrs Gaby Laws - 07/09/2021
Mrs Sally Hinkley - 07/09/2021
Ms Madison Smith - 07/09/2021
Mr Stephen Date - 07/09/2021
Mr James Hallwood - 07/09/2021
Dr Matthew Kidd - 07/09/2021
Mr Jonny Friedman - 07/09/2021
Mr Ben Leech - 07/09/2021
Mr Leo Hochberg - 07/09/2021
Dr Jenny Watts - 07/09/2021
Miss Natalie Arney - 07/09/2021
Miss Jacqueline Bond - 07/09/2021
Mr Stephen Waley-Cohen - 07/09/2021
Mr Ian Marsden - 07/09/2021
Ms Annabel O'docherty - 07/09/2021
Mr Turi Munthe - 07/09/2021
Mr Daniel Suissa - 07/09/2021
Mrs Angela Labi - 07/09/2021

Miss Debs Rinkoff - 07/09/2021
Mrs Esther Rinkoff - 07/09/2021
Ms Zena Woodley - 07/09/2021
Mr Adam Lovatt - 07/09/2021
Dr Alan Marsh - 07/09/2021
Mr Will Frost - 07/09/2021
Dr Gwyneth Lonergan - 07/09/2021
Ms Rebecca Collins - 07/09/2021
Mr Tom Murray - 07/09/2021
Mr John Brookes - 07/09/2021
Mr Matt Hill - 07/09/2021
Mr Matthew Clarke - 07/09/2021
Miss Reece Lyons - 07/09/2021
Mr Adam Wartski-Ben-Or - 07/09/2021
Miss Anna Fleischer - 07/09/2021
Miss Sophie Saunders - 07/09/2021
Mr Tim Figures - 07/09/2021
Mr Robin Craig - 07/09/2021
Ms Judith Melby - 07/09/2021
Mr Ben Brind - 07/09/2021
Mrs Helen Sims-Williams - 07/09/2021
Mr Adam Wilson - 07/09/2021
Dr Nicholas Heavens - 07/09/2021
Mrs Anne Wightman - 07/09/2021
Mrs Jennifer Maxwell - 07/09/2021
Dr Abigail Green - 07/09/2021
Miss Lucy Powell - 07/09/2021
Mr Josh Richards - 07/09/2021
Ms Lydia Lewison - 07/09/2021
Mr Thomas Phelps - 07/09/2021

Ms Rebecca Hart - 07/09/2021
Dr Fiona Macnaught - 07/09/2021
Mrs The Revd Charlotte Smith - 07/09/2021
Mr Peter Walker - 07/09/2021
Mr Andrew Studdert-Kennedy - 07/09/2021
Ms Rachael Vickerman - 07/09/2021
Mr Patrick Cullen - 07/09/2021
Mr Humphry Smith - 07/09/2021
Mr Stephen Roberts - 07/09/2021
Miss Beverley Kershaw - 07/09/2021
Miss Bethan Roberts - 07/09/2021
Mr James Dix - 07/09/2021
Ms Alexis Calice - 07/09/2021
Ms Katie Mcgaughey - 07/09/2021
Mr Callum Prentice - 07/09/2021
Miss Seona Bell - 07/09/2021
Mrs Victoria Cahill - 07/09/2021
Dr Lena Wahlgren-Smith - 07/09/2021
Mr David Ellis - 07/09/2021
Dr Anna Maria Barry -07/09/2021
Ms Zoe Abrahams - 07/09/2021
Miss Laura Bellamy - 07/09/2021
Dr Christian Clarkson -07/09/2021
Ms Jo Thomas - 07/09/2021
Ms Dina Rider - 07/09/2021
Miss Sophie Agrell - 07/09/2021
Miss Kim Hanson - 07/09/2021
Mr Kevin Rosenthal - 07/09/2021
Mr Andrew Coghill - 07/09/2021
Miss Sally Mumby-Croft - 07/09/2021

Mr Jonathan Scovell - 07/09/2021
Mr P Taylor - 07/09/2021
Mr Jeff Harris - 07/09/2021
Mr Adam Levy - 07/09/2021
Miss Liz Hetherington - 07/09/2021
Mr John Murphy - 07/09/2021
Ms Nancy Kelley - 07/09/2021
Mr George Highton - 07/09/2021
Miss Elizabeth Casey - 07/09/2021
Ms Emily Oram - 07/09/2021
Dr Leon Lagnado - 07/09/2021
Mr Michael Maxwell - 07/09/2021
Dr Ronald Atkin - 07/09/2021
Mr Jim Kelleher - 07/09/2021
Ms Natasha Petrou - 07/09/2021
Ms Andrea Pocock - 07/09/2021
Mr Steve Tittensor - 07/09/2021
Mr Thomas Stratton - 07/09/2021
Vivienne Littlechild Mbe Jp - 08/09/2021
Mr David Loyn - 08/09/2021
Ms Barbara Levy - 08/09/2021
Ms Rio O'toole - 08/09/2021
Mr Jack Benson - 08/09/2021
Miss Georgia Boroda - 08/09/2021
Ms Stephanie Davenport - 08/09/2021
Mr Patrick Ferguson - 08/09/2021
Mr Stuart Lanceman - 08/09/2021
Mr Lorin Bell-Cross - 08/09/2021
Ms Leia-Janine Bromfield-Peltier - 08/09/2021
Mr Warren Grynberg - 08/09/2021

Mrs Janet Phillips - 08/09/2021
Mrs Samantha Lingham - 08/09/2021
Mrs Ruth Leveson - 08/09/2021
Mr Stephen West - 08/09/2021
Mrs Bernadette Cawley - 08/09/2021
Dr Michelle Haynes - 08/09/2021
Mr David Collard - 08/09/2021
Mr Oliver Romain - 08/09/2021
Mrs Karen Sumpter - 08/09/2021
Dr Nancy Highcock - 08/09/2021
Ms Susan Nicholson - 08/09/2021
Mr Michael Yates - 08/09/2021
Mr Michael Hodgson - 08/09/2021
Mr Stuart Ballen - 08/09/2021
Mr Steven Malies - 08/09/2021
Ms Natalie Greenberg - 08/09/2021
Ms Lea Hernandez - 08/09/2021
Mr David Moses - 08/09/2021
Ms Angie Elfassi - 08/09/2021
Mr Matt Hatton - 08/09/2021
Dr Elizabeth Marcus - 08/09/2021
Mrs Jessica Isaacs - 08/09/2021
Mr Christian Benson - 08/09/2021
Ms Mandy Morton - 08/09/2021
Mr Dan Wolff - 08/09/2021
Mr Giacomo Shimmings - 08/09/2021
Ms Marina Nieto - 08/09/2021
Miss Lena Carey - 08/09/2021
Dr Yehudah Mirsky - 08/09/2021
Mr Martin Ashton - 08/09/2021

Mr Zvi Solomons - 08/09/2021
Ms Susan Mason - 08/09/2021
Mr Laurence Epstein - 08/09/2021
Mr Harry Tennison - 08/09/2021
Mr Michael Jordan - 08/09/2021
Ms Sarah Purser - 08/09/2021
Mr Paul Amodia - 08/09/2021
Dr Phillip Kirby 08.09.2021
Ally- 09.09.2021
Mr James Coen - 09/09/2021
Mr Ben Silverstone - 09/09/2021
Ms Elizabeth Fleming - 09/09/2021
Ms Janet Bryan - 09/09/2021
Ms Stephanie Clay - 09/09/2021
Dr Kevin Fallon - 09/09/2021
Ms Laura Sheed - 09/09/2021
Mr Oliver Lister - 09/09/2021
Dr Robert Davis - 09/09/2021
Miss Gina Abraham - 09/09/2021
Mr John Russell - 09/09/2021
Miss Anna Hughes - 09/09/2021
Miss Elizabeth Carruthers - 09/09/2021
Mr Richard Ridge - 09/09/2021
Dr Alan Ferris - 09/09/2021
Ms Kate Evans - 09/09/2021
Ms Pernille Ahlstrom - 09/09/2021
Mrs Jane Ball - 09/09/2021
Mrs Beverley Lawrence - 09/09/2021
Dr Alice Bloch - 09/09/2021
Ms Ellie Vincent - 09/09/2021

Mr Joe Moed - 09/09/2021
Mrs Annone Butler - 09/09/2021
Mrs Harriet Jodelka - 09/09/2021
Mr Oliver Frey - 09/09/2021
Ms Claire Jarvis - 09/09/2021
Mrs Helen Sultman - 09/09/2021
Mrs Jill Browning - 09/09/2021
Mrs Anne Crisp - 09/09/2021
Mr Jonathan Shenken - 09/09/2021
Miss Gillian Norgan - 09/09/2021
Mr Anthony Sylvester - 09/09/2021
Ms Clare Templeman - 09/09/2021
Mrs Linda Tenenbaum - 09/09/2021
Mr Benjiman Angwin - 09/09/2021
Mr Allan Lewis - 10/09/2021
Adam Osen - 10/09/2021
Mr Gavin Plumley - 10/09/2021
Ms Gabrielle Epstein - 10/09/2021
Mrs Christine Hall - 10/09/2021
Miss Alison Lieberman - 10/09/2021
Ms Camila Montagni - 10/09/2021
Mr Amos Schonfield - 10/09/2021
Mr Andrew Marnham - 10/09/2021
Dr Justin Elliott - 10/09/2021
Ms Tatiana Dubinsky - 10/09/2021
Mr Ethan Frieze - 10/09/2021
Dr Anne Goldgar - 10/09/2021
Miss Maryan Abdi - 10/09/2021
Ms Marina Ellerington - 10/09/2021
Mrs Sara Ferrier - 10/09/2021

Mr Michael Rubie - 10/09/2021
Mr Ben Mitchell - 10/09/2021
Dr Thomas Wynn - 10/09/2021
Miss Laura Silverman - 10/09/2021
Mr Graeme Leslie - 10/09/2021
Mr James Widdicks - 10/09/2021
Mr Gianmarco Sciortino - 10/09/2021
Ms Judith Osorio - 10/09/2021
Mr Naphtali Torrance - 10/09/2021
Dr Claire Pickard - 10/09/2021
Mr Renato Labi - 10/09/2021
Mr Philip Adsetts - 10/09/2021
Mr Jonathan Courtenay Grimwood - 10/09/2021
Ms Anna Simons - 10/09/2021
Mr Julian Rowlands - 10/09/2021
Ms Alison Arellano - 10/09/2021
Bernard Kricheski 10.09.2021
Thelma Epstein 10.09.2021
Marlena Schmool 10.09.2021
Fiona Smallcorn 10.09.2021
John Comaroff 10.09.2021
Emma Sinclair 11.09.2021
Elizabeth Jacobi 11.09.2021
Cee Ye 11.09.2021
Jonny Geller 11.09.2021
Eileen Ross 11.09.2021
Charles Oppenheim 11.09.2021
Daniel Cohen 11.09.2021
Mr Spencer Batiste - 11/09/2021
Miss Tracy Cowan - 11/09/2021

Miss Karen Proctor - 11/09/2021
Miss Elizabeth Trescher - 11/09/2021
Dr Susan Howard - 11/09/2021
Dr Catherine Mcglynn - 11/09/2021
Mrs Angela Goldstein - 11/09/2021
Mr Aidan Mcneil - 11/09/2021
Mr James Lester - 11/09/2021
Mr Alan Penn - 11/09/2021
Mr Samuel Whiteley - 12/09/2021
Mr Scott Goldstein - 12/09/2021
Mr Josh Fijten - 12/09/2021
Mr Daniel Reid - 12/09/2021
Miss Annie Fendrich - 12/09/2021
Mr Max Fendrich - 12/09/2021
Mr Howard Davis - 12/09/2021
Mr Harry Robson - 12/09/2021
Ms Vivien Fijten - 12/09/2021
Ms Emma Sinclair - 12/09/2021
Ms Viv Levy - 12/09/2021
Dr Eva Kleeman - 12/09/2021
Dr Peter Leckstein 12.09.2021
Dr Judith Cohen 13.09.2021
Eve Bloom 13.09.2021
Seth Grossman 13.09.2021
Miriam Alvarez 13.09.2021
Barendina Smedley 13.09.2021
Nachshon Rodrigues Pereira 13.09.2021
Bendor Grosvenor 13.09.2021
Clyde Lester 13.09.2021
Ellen Murphy 13.09.2021

Mrs Flora Frank 13.09.2021
Olivia Threlkeld 13.09.2021
Vikas Kapil 13.09.2021
Susan Wilkin 13.09.2021
Mrs Marian Mackay 13.09.2021
Lisa Salem 13.09.2021
Kathleen Andersson 13.09.2021
Dr C.M. Murray 13.09.2021
John Gouk 13.09.2021
John Gouk 13.09.2021
Henrietta Morgan 13.09.2021
Aaron Kerben 13.09.2021
Adam Shipway 13.09.2021
Beverly Mcfarlane 13.09.2021
Diego Richardson Nishikuni 13.09.2021
Oliver Levy 13.09.2021
Antony Goldfine 13.09.2021
Joanna Young 13.09.2021
Daniel Benzenou 13.09.2021
Bb Cooper 13.09.2021
Michael Mail 13.09.2021
Dan Field 13.09.2021
Sara Patience 13.09.2021
Alison Lee 13.09.2021
Pascal Dubois-Pèlerin 13.09.2021
Denise Owen 13.09.2021
Daniel Halfon 13.09.2021
Graham Bell 13.09.2021
James Wilson-Undy Mbe 13.09.2021
Rowena Willard-Wright 13.09.2021

Aditi Mittal 13.09.2021
Curzon Tussaud 13.09.2021
Susan Frances Jones 13.09.2021
Louise Gilbert 13.09.2021
Louise Gilbert (Different Comment) 13.09.2021
Rosemarie Brooks 13.09.2021
David Hayeem 13.09.2021
Sir Simon Schama 13.09.2021
Pat Hodgson 13.09.2021
Glenn Wilhide 13.09.2021
Frances Hayeem 13.09.2021
Simon Sebag Montefior 13.09.2021
Rogan Clark 13.09.2021
Abigail Green 13.09.2021
Graham Campbell 13.09.2021
Elizabeth Kerri Mahon 13.09.2021
Howard De Lestre 13.09.2021
Rebecca Jolliffe 13.09.2021
Mr Daniel John Albert 13.09.2021
Natasha Isaac 13.09.2021
David Evans 13.09.2021
Susan Stone 13.09.2021
Annie Henderson-Begg 13.09.2021
Keith Leslie 13.09.2021
Ann Lewisohn 13.09.2021
Dr Andrew Roach - 13/09/2021
Jeremy Frankel 13/09/2021
Martine Banou- 13/09/2021
Mrs. Diana Krief - 13/09/2021
Mrs Deborah Lithman - 13/09/2021

Ms Alex Echakowitz - 13/09/2021
Ms Davina Rudie - 13/09/2021
Mrs Joanna Dresdner - 13/09/2021
Mr Sam Freiburger - 13/09/2021
Mr Daniel Roth - 13/09/2021
Ms Kat Kahnert-Wolchak - 13/09/2021
Dr Judith Flanders - 13/09/2021
Mr Emanuel Mond - 13/09/2021
Mr Charles De Boissezon - 13/09/2021
Mr Pascal Dubois-Pelerin - 13/09/2021
Miss Natasha Randhawa - 13/09/2021
Ms Tina Lazarus - 13/09/2021
Ms Viola Japaul - 13/09/2021
Mr Rogan Clark - 13/09/2021
Mr Jack Holmes - 13/09/2021
Mr Nicholas Coleman - 13/09/2021
Mr A Gerrard - 13/09/2021
Mrs Karen Levy - 13/09/2021
Dr Niall Goulding - 13/09/2021
Mr A Dhilon - 13/09/2021
Mr Robert Connell - 13/09/2021
Mr D Mehta - 13/09/2021
Mr Lee Moreland - 13/09/2021
Ms Jane Firth - 14/09/2021
Mr Benjamin Coxon -14/09/2021
Mr Ashley Katz - 14/09/2021
Ms Diana Jeffery - 14/09/2021
Mr Daniel Silverstone - 14/09/2021
Mr Simon Halfon - 14/09/2021
Mrs Marion Moses - 14/09/2021

Dr Mark Alexander Campbell - 14/09/2021
Ms J Goffe - 14/09/2021
Mrs Barbara Richards - 14/09/2021
Miss Dhruti Pabari - 14/09/2021
Ms Sarah Evans - 14/09/2021
Mr Anthony Landau - 14/09/2021
Miriam Khasidy 14.09.2021
Paul Lynn 14.09.2021
Nikki 14.09.2021
Nana Taylor 14.09.2021
Yasmin Jones-Henry 14.09.2021
Edward Fryer 14.09.2021
Paul Cm 14.09.2021
Lia Van Bekhoven 14.09.2021
Jestyn Thirkell-White 14.09.2021
Dr. David Jonathan Grant 14.09.2021
Tom Stammers 14.09.2021
Alexandra Kroeger 14.09.2021
Graham Dallas 14.09.2021
Lyndon Jones 14.09.2021
Daniel Margolin 14.09.2021
Russell Ballen 14.09.2021
Daniel Monk 14.09.2021
Ann Fine 14.09.2021
Rachel Garfield 14.09.2021
Debra Brock 14.09.2021
Francis Treuherz 14.09.2021
Moirra Jenkins 14.09.2021
Oliver Webb Carter 14.09.2021
Silvia Davoli 14.09.2021

Simon Bernholt 14.09.2021
Richard Del Monte 14.09.2021
Aleks Milton 14.09.2021
Patricia Whorton 14.09.2021
Jonathan Blair 14.09.2021
Richard Izon 14.09.2021
Martin Francis 14.09.021
Carol Frankish 14.09.2021
Ruth Simmons 14.09.2021
Anita 14.09.2021
Angela Veysey 14.09.2021
Sally Mitchell 14.09.2021
Michael Newman 14.09.2021
Max Norman 14.09.2021
V. Greig 14.09.2021
Naim Peress 14.09.2021
Matthew Dyer 14.09.2021
Aaron Bailey-Athias 14.09.2021
Jozef Amado 15.09.2021
Judith Joslin 15.09.2021
Debra Davidson-Smith 15.09.2021
Diana Wilkins 15.09.2021
Annabel Sebag-Montefiore 15.09.2021
Sandra 15.09.2021
Heather Copley 15.09.2021
Miss Liz Tray - 15/09/2021
Mrs Francesca O'Neill - 15.09.2021
Robin Makin - 15.09.2021
John Cohen - 15.09.2021
Pamela Shabi - 15.09.2021

Mrs Debra Davidson-Smith - 15.09.2021
Dr Michael Baffsky - 16.09.2021
Mrs Michelle Christie - 16.09.2021
Mr Peter Tompkins - 16.09.2021
Ms Linda Baharier - 16.09.2021
Paula Campbell - 16.09.2021
Ayla Lepine 16.09.2021
Lisanne Stock 16.09.2021
Anthony Eskenzi Cbe 16.09.2021
Dr Peter Claus 17.09.2021
Lyn Davis 17.09.2021
Rachel Sloan 17.09.2021
Linda Stone 17.09.2021
David Pereira-Mendoza 17.09.2021
Sara Jackson 17.09.2021
Julia Phillips Cohen 17.09.2021
Freddy Salem 17.09.2021
Mr Martyn Woolf 17.09.2021
A John Curtis 17.09.2021
Mark Levy 17.09.2021
Lindsay Wakeman 17.09.2021
Gust Martin 17.09.2021
Maurice Martin 17.09.2021
Professor Jane Gerber 17.09.2021
Anna Koritz 17.09.2021
Richard Wake-Walker 17.09.2021
Johnny Blair 17.09.2021
Kathryn Forro 17.09.2021
Mr J Goodman - 17.09.2021
Dr Danielle Sanderson - 17.09.2021

Mr Oscar Gowar - 17.09.2021
Mr Joel Bonnet - 17.09.2021
Chris Maltby - 17.09.2021
Mr Richard Wake-Walker - 17.09.2021
Mr Daniel Baharier - 17.09.2021
Miss Holly Cooper - 17.09.2021
Mrs Brenda Szlesinger - 18.09.2021
Mr Richard Martin - 18.09.2021
Carol Wise 18.09.2021
David And Ella Raz-Rhodes 18.09.2021
Tom Brewer 19.09.2021
Marilyn Greene 19.09.2021
Alison 19.09.2021
Denis Vandervelde 19.09.2021
Mrs Rachel Fink - 19.09.2021
Mr Mark Szlesinger - 19.09.2021
Ms Antonina Szlesinger - 19.09.2021
Ms Miriam Pollock - 19.09.2021
Mr Stuart Fink - 19.09.2021
Mrs Alison Barnes - 19.09.2021
Mr David Olesker - 19.09.2021
Mrs Deanna Kaye - 19.09.2021
Miss Sheila Graham - 19.09.2021
Dr Bin Goldman - 19.09.2021
Mrs Debbie Carp - 19.09.2021
Mr Jon Carp - 19.09.2021
Mrs Irina Rohvarger - 19.09.2021
Mr Max Keisler - 19.09.2021
Mrs Aviva Kaufmann - 20.09.2021
Ms Max Levene - 20.09.2021

Mrs Sophie Frost - 20.09.2021
Mr Martin Hizer - 20.09.2021
Mr Samuel Ebert - 20.09.2021
Miss Jessica Cohen - 20.09.2021
Miss Sharna Kinsley - 20.09.2021
Mrs J Gersh - 20.09.2021
Mr Darren Cooper - 20.09.2021
Ms Madeline Cooper - 20.09.2021
Mr Geoffrey Ben-Nathan - 20.09.2021
Mr Brian Peters - 20.09.2021
Mrs Bernice Freedman - 20.09.2021
Mrs Helen Stengel - 20.09.2021
Mrs Barbara Sherling - 20.09.2021
Miss Florence Shaul - 20.09.2021
Mr Alexander Baker - 20.09.2021
Vicki Fox - 21.09.2021
Mr Steve Green - 20.09.2021
Mr Lincoln Ramcharan - 20.09.2021
Mr Chris Harrup - 20.09.2021
John Jackson 20.09.2021
R L Frankel 21.09.2021
Mr Michael Lee - 21.09.2021
Mr Harvey Kutner - 21.09.2021

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that the Environmental Statement refers to uses defined under the categories of the Town and Country Planning (Use Classes) Order 1987. The description of development refers to the same types of uses but as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses. Therefore, it is stated that the City of London need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of Townscape, Built Heritage Visual Impact Assessment (TBHVIA) Addendum, Updated parts of the Environmental Statement, comprising 'ES Volume 1, Chapter 13: Effect Interactions', and the ES Non-Technical Summary (NTS) and Energy Strategy Note (and accompanying technical material). It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and a community facility. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change

to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide:

- 27, 815 sq.m. (GEA) of office floorspace (Class E);

- 62 sq.m. (GEA) flexible retail use (Class E)

and

- 1,006 sq.m (GEA) of Publicly accessible amenity and community floorspace (Class Sui Generis)

REASON: To ensure the development is carried out in accordance with the approved plans.

2. Not less than 60 sq. m (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business floorspace hereby approved to be provided at Ground Floor shall be used for purposes within Class E (a), (b), (c) under Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning(Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.'

REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2

3. The areas shown on the approved drawings above ground floor as offices including internal amenity space and external terraces (at levels 20 and 21) and as set out in Condition 66 of this decision notice, shall be used for Class E office use only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

4. The areas shown on the approved drawings as offices (Class E), flexible retail use (Class E), and community use (Class Sui Generis) (including external terrace at level 1), and as set out in Condition 66 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Sui Generis as appropriate) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in

the Environmental Statement and that public benefits within the development are secured for the life of the development

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Vehicle Lift Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures at the ground floor level. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

APPENDIX B

Relevant London Plan Policies

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy GG2 (Making the best use of land) supports the prioritisation of well-connected sites for development including intensifying the use of land to support, amongst other things, workspaces, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG3 (Creating a healthy city) seeks to *"ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold"* and to *"promote more active and healthy lives for all Londoners and enable them to make healthy choices."*

Policy GGS (Growing a good economy) recognises the strategic aim to *"promote the strength and potential of the wider city region"*, including the support and promotion of *"sufficient employment and industrial space in the right locations to support economic development and regeneration."*

Policy SD4 (The Central Activities Zone (CAZ)) states that *"the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values"*

Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that *"offices and other CAZ strategic functions are to be given greater weight relative to new residential development."*

Policy D4 states that *"design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."*

Policy D5 (Inclusive Design) seeks to achieve the highest standard of accessible and inclusive design across new developments.

Policy D8 (Public Realm) establishes criteria for proposals which include public realm space. These criteria include making public realm "well-designed, safe, accessible, *inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.* Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution."

Policy D9 (Tall Buildings) sets out criteria where tall and large buildings will be considered acceptable, in principle. This includes the need to "*incorporate the highest standards of architecture and materials, including sustainable design and construction practices...[to]...have ground floor activities that provide a positive relationship to the surrounding streets ... [to] ... contribute to improving the permeability of the site and wider area, where possible ... [and to] ... make a significant contribution to local regeneration*". There is also a requirement for proposed tall buildings to be assessed in terms of potential adverse effects on their surroundings in terms of microclimate, wind turbulence, overshadowing and noise.

Policy D11 (Safety, security and resilience to emergency) states that "*development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that - in proportion to the risk - deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.*"

Policy D12 (Fire Safety) encourages proposals to achieve the highest standards of fire safety and ensure that they: "*1) identify suitably positioned unobstructed outside space for fire appliances to be positioned on and which is appropriate for use as an evacuation assembly point; 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.*"

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and

minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Policy EI (Offices) explicitly supports increases in the current office stock, noting that *"improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development."*

Policy E2 (Providing suitable business space) states that Boroughs should seek to *"support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand."* The policy also states that *"development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."*

Policy E3 (Affordable workspace) outlines the requirement for affordable workspace. It is noted that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with submarket rents

Policy E9 (Retail, markets and hot food takeaways) states that development proposals should enhance local and neighbourhood shopping facilities and prevent the loss of retail. Proposals should also bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres.

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values

of sites or areas and their relationship with their surroundings."

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment."

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy G1 (Green infrastructure) states that "development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network."

Policy G4 (Open space) identifies that "development proposals should 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

Policy GS (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Policy G6 (Biodiversity and access to nature) states that "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

Policy SI1 (Improving air quality) states that "development proposals should not: a) lead to further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; c) create unacceptable risk of high levels of exposure to poor air quality."

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Policy SI3 (Energy infrastructure) states that "development proposals should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure; 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks."

Policy SI4 (Managing heat risk) identifies that "development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure." The policy also states that "major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems."

Policy SI7 (Reducing waste and supporting the circular economy) identifies that "referable applications should promote circular economy outcomes and aim to be net zero-waste."

Policy SI13 (Sustainable drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features.

Policy SI12 (Flood risk management) requires development proposals to "ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses."

Policy SI13 (Sustainable drainage) states that "development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible."

Policy TI (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." Development that promotes walking through improved public realm is also supported.

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

Policy T3 (Transport capacity, connectivity and safeguarding) states that "development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."

Policy T4 (Assessing and mitigating transport impacts) notes that "where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."

Policy TS (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.

Policy T6 (Car parking) sets out parking standards which need to be complied with and that "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport."

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments."

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

Policy HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
Policy VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Eastcheap Conservation Area Character Summary and Management Strategy
SPD 2013

Leadenhall Market Conservation Area Character Summary and Management
Strategy SPD 2017

Bank Conservation Area Character Summary and Management Strategy
SPD2012

Other

Tower of London World Heritage Site Management Plan

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;
- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.2 Protection of large office sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;

- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
 - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS7 Meet challenges of Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;

- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall buildings in suitable places

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the

character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

- c) where on-site carbon emission reduction is unviable, offsetting of residual CO₂ emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise

conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision

for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their

waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- a) all sites within the City Flood Risk Area as shown on the Policies Map; and
- b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS20 Improve retail facilities

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1

units near residential areas, unless it is demonstrated that they are no longer needed.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

SCHEDULE

APPLICATION: 20/00848/FULEIA

Bury House 31 Bury Street London

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

(30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

- 2 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition and construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition and construction shall not be carried out other than in accordance with the approved scheme.
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to

demolition in order that the impact on amenities is minimised from the time that development starts.

- 3 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 4 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
- 5 Prior to the commencement of development a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved

survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 6 Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and long-term structural and non-structural implications for the listed buildings Holland House (Grade I) and Bevis Marks Synagogue (Grade I), including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and those relevant works carried out in accordance with the approved details.

REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House and Bevis Marks Synagogue in accordance with the following policies of the Local Plan: CS12, DM12.1.

- 7 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 8 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 9 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
- 10 No works of excavation beyond the existing basement shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 11 Prior to the commencement of the development an update to the approved Circular Economy Strategy shall be submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

- 12 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at ZeroCarbonPlanning@london.gov.uk and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.
REASON : To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.
- 13 Prior to the commencement of the development (other than demolition) details of incorporating natural ventilation into the design of the buildings' envelope and the proposed buildings' services system must be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
REASON: To comply with Local Plan Policy DM 15.5 (Climate change resilience and adaptation) and to demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 14 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to

prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

- 15 Prior to the commencement of the development (other than demolition), an updated energy strategy shall be submitted to and approved in writing by the Local Planning Authority, providing details on how the development would reduce carbon emissions in particular from passive design measures and from the incorporation of roof and facade mounted PV panels if identified as an effective measure to reduce carbon emissions.

REASON: To demonstrate that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 16 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 17 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the

construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 18 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 19 No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 20 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the Local Planning Authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 21 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, pumps, green roof systems, green walls, rainwater harvesting systems including the irrigation system, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.4l/s from the existing sewer connection, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 53m³;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(s) Evidence that Thames Water have been consulted and consider the proposed discharge rate to the satisfactory; and
(d) Clarification on whether the attenuation tank will discharge via a pumped or gravity fed system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3
- 22 Before the shell and core of the building is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Local Lead Floor Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- a full description of how the system would work, its aims and objections and the flow control arrangements
- A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

- 23 No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. If any of the proposed cranes are infringing London City Airport's Obstacle Limitation Surfaces, they must be assessed against LCY's Instrument Flight procedures (IFPs) by a CAA approved procedure designer.
Reason: The use of cranes or tall equipment in this area has the potential to impact LCY operations, therefore they must be assessed before construction.
- 24 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
 - (b) details of the proposed new facade(s) including typical details of the fenestration and entrances;
 - (c) details of a typical bay of the upper floors of the development;
 - (d) details of the ground floor triple order and cornice;
 - (e) details of the internal elevations of the Heneage Arcade including the entrances, shopfronts, soffits, walls, lighting, paving and any infrastructure required to deliver programming and varied uses;
 - (f) details of the Community Space at Level Mezzanine and Level 1 (Creechurch Hall) including details of external and internal level ground to first floor including: all elevations: entrances: fenestration; internal circulation and fit out; planters; fixed seating; fixed lighting; signage; and any infrastructure required to deliver the Sui Generis use;
 - (g) details of the proposed programme of public art throughout the external surfaces and faces of the building;
 - (h) details of the urban greening proposed throughout the external surfaces and faces of the building;
 - (i) details of the proposed external lighting scheme proposed throughout the external surfaces and faces of the building;
 - (j) details of James Court, including elevations, planters, seating, lighting, wind mitigation measures, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
 - (l) details of junctions with adjoining buildings;

(m) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level

(n) details of the integration of cleaning equipment, cradles and the garaging thereof;

(o) details of plant and ductwork to serve the Class E use(s); -

(p) details of ventilation and air-conditioning for the Class E use(s);

(q) details of all ground level surfaces including materials to be used;

(r) details of external surfaces within the site boundary including hard and soft landscaping;

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 25 Before the works thereby affected are begun, sample panels of agreed sections of the faience facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2

- 26 Prior to implementation, details shall be submitted to and approved in writing by the local planning authority to demonstrate that a minimum target of 0.3 urban greening factor can be achieved. The development shall be carried out in accordance with those approved details and a minimum urban greening factor target of 0.3 shall be maintained for the life of the development unless otherwise approved by the local planning authority. The development shall be carried out in accordance with those approved details and maintained as approved for the lifetime of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 27 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works to install such green wall(s)/roof(s) are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in

accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 28 All unbuilt surfaces, forming part of the development, shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 29 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 30 Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 31 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 32 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
- 33 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
- 34 Prior to any plant being installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6
- 35 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 36 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 37 No live or recorded music that can be heard outside the premises shall be played.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 38 No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 39 The roof terraces on level 1 hereby permitted shall not be used or accessed between the hours of 23.00hrs on one day and 07.00 hrs on the following day, other than in the case of emergency.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3

- 40 No cooking shall take place within any Class E use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 41 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- 42 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of

light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

- 43 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036
- 44 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 45 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 46 No part of the development shall be occupied until confirmation has been provided and agreed with the Local Authority in consultation with Thames Water that either:
(a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or

(b) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.

Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning

47 No part of the development shall be occupied until confirmation has been provided that either:

(a) Waste Water Capacity exists off site to serve the development, or

(b) A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or

(c) All wastewater network upgrades required to accommodate the additional flows from the development have been completed.

REASON: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

48 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

49 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at:

ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

- 50 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

- 51 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.

REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

- 52 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 443 long stay pedal cycle spaces, and a minimum of 26 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

- 53 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, ItP London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.

- 54 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in

consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.

REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: T5

- 55 443 lockers and 46 showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

- 56 A clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.

REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.

- 57 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.

REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

- 58 A minimum of 1 electric charging point within the delivery and servicing area must be provided.

REASON: to further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS 16 and draft Local Plan 2036 Policy VT2.

- 59 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

- 60 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.

REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

- 61 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 62 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 63 Prior to construction (excluding any works of demolition) the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) including details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority (after consultation with the London Fire Brigade, Building Control Health and Safety Team) and the strategy shall remain in place thereafter. The development shall be carried out in accordance with the approved Fire and Emergency Escape Strategy details.
REASON: In the interests of the safety of occupants of the buildings in the event of a fire or emergency in accordance with City of London Local Plan policy CS3.
- 64 The areas shown on the approved drawings as offices (Class E), flexible retail use (Class E), and community use (Class Sui Generis) (including external terrace at level 1), and as set out in Condition 66 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Sui Generis as appropriate) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.
- 65 The areas shown on the approved drawings above ground floor as offices including internal amenity space and external terraces (at levels 20 and 21) and as set out in Condition 66 of this decision notice, shall be used for Class E office use only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

- 66 Not less than 60 sq m (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business floorspace hereby approved to be provided at Ground Floor shall be used for purposes within Class E (a), (b), (c) under Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2

- 67 The development shall provide:
- 27, 815 sq.m. (GEA) of office floorspace (Class E);
- 62 sq.m. (GEA) flexible retail use (Class E)
and
- 1,006 sq.m (GEA) of Publicly accessible amenity and community floorspace (Class Sui Generis)

REASON: To ensure the development is carried out in accordance with the approved plans.

- 68 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:

ST-PR[01]001
ST-PR[01]002
ST-PR[02]098
ST-PR[02]098M
ST-PR[02]099
ST-PR[02]099M
ST-PR[02]100
ST-PR[02]100M
ST-PR[02]101
ST-PR[02]102_107
ST-PR[02]108_111
ST-PR[02]112_119
ST-PR[02]120
ST-PR[02]121
ST-PR[02]122_143
ST-PR[02]144
ST-PR[02]144M
ST-PR[02]RoofPlant
ST-PR[02]RoofTop
ST-PR[02]Roof

ST-PR[03]001
ST-PR[03]002
ST-PR[03]003
ST-PR[03]004
ST-PR[03]101
ST-PR[03]102
ST-PR[04]101
ST-PR[04]201
ST-PR[31]201
ST-PR[31]202

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sq.m
Retail £165 sq.m
Hotel £140 sq.m
All other uses £80 per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 3 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 4 The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.