Planning Applications Sub-Committee 21st July 2023 Addendum

Item 4: 55 Bishopsgate (22/00981/FULEIA)

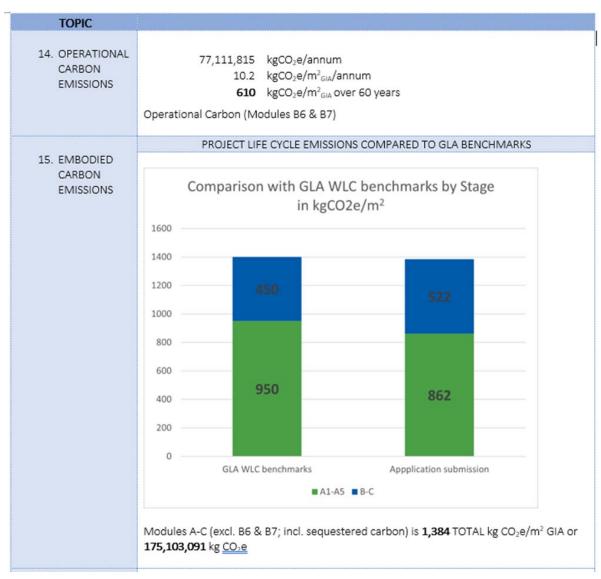
1. Clarification on Application Cover Sheet

Section 3

The proposed development would deliver over 14% Net (17% Gross) of this remaining floorspace target.

Section 14 – 17

The amended figures in the factsheet are now aligned with the figures stated in the report and do not change the conclusions set out in the report



16. WHOLE LIFE 862 496 610 26 CYCLE CARBON EMISSIONS Use End of Op. energy Product and construction (kgCO₂e/m₂ GIA) and Water use Life B1-B5 (incl. A1-A5 sequestered B6-B7 C1-C4 carbon) Modules A-C (incl. sequestered carbon) is 1,994 TOTAL kg CO2e/m2 GIA or 252,214,906 kg CO₂e

17. WHOLE LIFE-CYCLE CARBON OPTIONS

	Minor refurbishment	Major refurbishment + extension	Tall building + façade retention	Tall building	
Gross Internal Area (GIA)	27,481	38,163	113,874	126,497	m²
Net Internal Area (NIA)	17,416	26,624	65,718	73,020	ms
Increase in NIA	0	53	277	319	%
% material retained of existing	90	67	13	0	%
Embodied Carbon (A1-A5)	104	459	854	887	kgCOze/m² GL
Embodied Carbon Total (A1-A5)	2,858	17,518	97,276	112,230	tCO:e
Embodied Carbon (A1-A5, B1-B5, C1-C4)	604	959	1,377	1,410	kgCO ₁₀ m² GI/
Whole building Operational Energy	113	99	94	94	kWh/m²/ <u>x</u> x
Operational Energy (B6) (without decarb)	1,026	899	803	803	kgCOze/m² GL
Operational Energy (B6) (with decarb)	320	280	147	147	kgCO _{ze} /m² GI/
Fuel source	Gas, electricity	Gas, electricity	Electricity	Electricity	
WLC Intensity (without decarb)	1,630	1,981	2,180	2,212	kgCOze/m² GL/
WLC Total (without decarb)	44,807	75,603	248,144	279,862	tCOze.
WLC Intensity (with decarb)	924	1,363	1,524	1,557	kgCOze m² GL
WLC Total (with decarb)	25,399	52,020	173,517	196,943	tCO _{re}

WLC Optioneering aligned with COG PAN guidance.

2. Additional Comments

 Attached is an additional comment from the Surveyor to St Paul's Cathedral maintaining their objecting to the application. This does not raise any new issues.

- Attached are comments from the Georgian Group. The report has
 considered the impact of the development in cumulative scenarios which
 includes consented applications. This has not included 55 Old Broad
 Street or Liverpool Street station as these schemes were at pre-application
 stage when 55 Bishopsgate was submitted. These applications have
 subsequently been submitted but not determined and so included in
 cumulative scenarios. Otherwise, the letter does not raise any new issues.
- Additional comments have been received from TfL, dated: 18/07/2023.
 The applicant has agreed the figures.

The applicant has agreed the figures.

3. Additional Representations Objecting to the Application

Attached are five additional representations objecting to the application, from:

- Max Skjoldebrand dated 12.07.2023
- John Robertson 14.07.2023
- Fred Rodgers dated 17.07.2023
- Stephen King (x2) 05.12.2023 & 17.07.2023

None of these raise any new material planning considerations which aren't already addressed within the committee report.

4. Additional Representation in Support of the Application

Attached is a representation from the EC BID supporting the application, dated 13.07.2023

5. Amendments to paragraphs

Summary, Page 6: Delete reference to Policies S12 and S13

<u>Paragraph 337:</u> of the committee report delete Old War Office and insert Ministry of Defence.

<u>Paragraph 203 & 776:</u> delete reference to public toilets at ground level. (Public toilets are provided at Lower Ground Level)

<u>Paragraph 804:</u> Base Sheffield stands (16 spaces) will be provided within the site at ground floor level.

<u>Paragraph 810:</u> The applicant has agreed to undertake overnight delivery and servicing activity from 22:00 – 07:00, 7 days a week.

<u>Paragraph 889:</u> Overall, given that the affected rooms are living rooms, the effect is considered Major Adverse (significant). However, due to the existing levels of daylight the percentage reduction is disproportionate, and the absolute reduction is limited to between 5% and 7.1% (excluding the first storey refuse storage) and this should be taken into consideration. In this context it is not considered that the proposal would result in an unacceptable impact.

6. Additions to paragraphs

Paragraphs 796 – 801 and 823: TfL have confirmed the temporary pavement widening scheme on Bishopsgate is to made permanent. TBC.

Paragraph 805 - Discussions are ongoing with the applicant and TfL regarding the monitoring and enforcement of the delivery and servicing plan, with particular focus on the number of vehicle trips to the site.

Paragraph 1068 – City's Planning Obligations – an additional Head of Term to be secured:

 Management of the educational use space & flexible use space in the Public Conservatory

7. <u>Deletion to paragraph</u>

Paragraph 1104

• Delete reference to Local Plan Policy DM10.1 (New Development)

8. Additional Conditions:

 Prior to commencement, excluding demolition, detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

REASON: To ensure that Digital Connectivity infrastructure is incorporated into the development before the design is too advanced to make changes.

2. Prior to occupational, details and curation of the digital screen at ground floor level shall be submitted to and approved in writing by the Local Planning Authority. The screen hereby approved shall not be in use between the hours of 10pm and 8am. The level of illumination shall not exceed 300 cd/m2. The screen shall be implemented in accordance with the approved details and retained for the life of the development.

REASON: To ensure a satisfactory visual appearance and to safeguard the amenity of neighbouring premises in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM12.2 and DM21.3.

- 3. Insert to Condition 25(f) public staircase to lower ground level
- 4. Amendment to condition 59

No servicing of the premises shall be carried out other than between the hours of 22:00 on one day and 07:00 on the following day. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.



Surveyor to the Fabric The Chapter House St Paul's Cathedral St Paul's Churchyard London EC4M 8AD

Tel:

Catherine Evans
Development Division
Corporation of the City of London

Sent via email only

4 July 2023

Dear Catherine,

55 Bishopsgate London EC2N 3AS (22/00981/FULEIA)

Further to a review of the additional information provided on the application noted above, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the revised scheme for a tall building at 55 Bishopsgate.

Background to this Letter

The Cathedral previously issued a letter of comment regarding the submission proposals for this scheme, which had in turn followed preapplication consultation. In summary, we had concerns over the height and massing of the proposals in relation to key views to the Cathedral. There are concerns about the evident and real impact of the proposal on the visual prominence of the Grade I listed building and its value as a Strategically Important Landmark and urged the halting of the planning process.

Comment on Revised Scheme

We welcome that time has been taken to reconsider the scheme, in dialogue with Officers at the City. However, as the massing and height of the proposals remains the same, our previously expressed concerns still stand. It is evident that this application has been rushed and submitted prematurely. The need to undertake major design changes which have been submitted indicates this weakness. Nevertheless, we must express our significant disappointment that the applicant clearly has in their power to make changes to the design, but does not consider the merits of removing harm to St Paul's as worthy of consideration. We still feel that these issues should be given great weight in the decision making process, as NPPF and City planning policy demands.



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Many of the revisions to the scheme lie outside the locus of comment of St Paul's, relating closely to the ground floor offering, landscaping, and detail design in these areas. It remains for Officers to decide on the weight of their public benefit. Our view is that, whilst there are merits that one can discern in relation to the 'Destination City' agenda, these are not benefits that can be objectively shown to offset the harm to the City skyline and thus the setting and significance of St Paul's by any proportionate weighting exercise.

The revised scheme also includes an updated cultural offering as part of a drive towards delivering a cultural benefit. As an active participant in the City's cultural landscape, it is within our scope to provide comment on this element. We are mindful of rejuvenating the vibrancy of the Square Mile's cultural offering, and are aware of the 'Destination City' initiative that seeks to reinvigorate aspects of the City.

While public benefits are of course an important driver to all development, we would also urge caution with regard to ensuring the longevity of any proposed cultural offering – and the real weight of its public benefit and long term social value it would deliver. This is not to denigrate the work undertaken by the applicant as part of their Cultural Plan, but to ensure that the wording of any approval and S106 agreement ensures it is deliverable for the entire lifetime of the development. We would seek assurances that the proposed cultural programme is achievable, measureable and quantifiable, actively monitored, and long lived. It lies with Officers to secure this as part of the planning process. Unfortunately, too often cultural programming is used to promote the benefits of a scheme, whilst it eventually is diluted, or at worst, undeliverable. The Cultural Plan appears to aspire to deliver space and a relationship for programming in support of NLA in the long-term, but is quiet on the detail of funding for that programme into the future. We understand that NLA are the cultural partner currently identified by the applicant, but the plan also lacks detail on how a similar level of cultural benefit would be delivered in future if the arrangement with NLA proves un-sustainable or breaks down.

Conclusions

This short response seeks to reiterate our previous standpoint – the Cathedral still harbours concerns over the height and massing of the proposals and the effect this will have on St Paul's. We again would note the weight that this should be given in decision making. We do not recognise



Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269 the proposed changes as in any way satisfactorily addressing these concerns.

However, we also seek to engage constructively with the planning process and understand that we play an active role in the cultural landscape of the City. Our aims, the aims of the Corporation, and the ultimate aims of the cultural programming within this application are the same, to ensure the City is a thriving place to live, work, and visit. If the applicant or their proposed operators would like to engage further with St Paul's on common themes of interpretation and outreach to enrich the visitor experience, we will be glad to hear more.

Yours sincerely,



Oliver Caroe Surveyor to the Fabric On behalf of St Paul's Cathedral Chapter.

cc Ben Eley: Assistant Director (Design).

Director:

Oliver Caroe RIBA AABC Mark Hammond RIBA SCA AABC

Associates and Designers: Touseer Ahmad Andrew Senior

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Application: Demolition of the existing building and the erection of a part-63 storey (284.68 AOD) and part-22 storey (112.30 AOD) building plus basement, including office use (Class E); a publicly accessible multi-purpose space at ground floor level, part Level 02 and part Level 03 for a flexible use including: retail, food and beverage, drinking establishment, learning, community use, exhibition and/or performance space (Sui Generis); a public viewing gallery (Sui Generis), public realm improvements, cycle parking, servicing, vehicle lifts, refuse facilities and other works associated with the development including access and highways works.

LPA ID: 22/00981/FULEIA

Address: 55 Bishopsgate, London, EC2N 3AS

Dear Catherine,

Thank you for consulting the Georgian Group on the above application for Planning Permission. Based on the information available to date, the Group objects to this application and recommends your local authority refuse consent.

Significance of Surrounding Heritage Assets

This letter will highlight the significance of only those buildings that fall within The Georgian Group's remit (1700-1840), this does not mean that any building I do not describe will not be harmed by the proposed development. The Group defers to other amenity societies on buildings falling under their expertise.

Celebrations to mark the tercentenary (2023) of the death of Sir Christopher Wren, architect of St Paul's, are now underway and the landmark role that the cathedral's great dome and supporting drum have played in London's skyline for the past three centuries is of great public interest. St Paul's Cathedral is Wren's masterpiece, and its dome became an obsession. As part of plans to repair and rejuvenate Old St Paul's, before its destruction in The Great Fire, Wren proposed the introduction of a new domed crossing to the medieval building. The idea of the dome ran through all his subsequent designs for the new cathedral and was finally executed in the form we see today. Ever since its completion, St Paul's has dominated London's skyline and has both provided the stage for great national events and been depicted in innumerable works of art. The role and contribution of St Paul's Cathedral to London's skyline is recognised within the London View Management Framework.

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St James's Park is a grade I listed park and garden with its formation occurring in the early 16th century and layout and appearance we see today owing much to the architect John Nash. Nash's involvement in the park and wider metropolitan improvements undertaken concurrently owe much to his close relationship with the prince Regent, later George IV and saw the creation of St James's Park as a public park. During its inception, there was close consideration to encroachment on the park to create a space suitable for public use, avoiding impact on space and air. Views out of the park from the earliest designs were considered and where opportunity arose to create positive views they were grasped upon. The success of the park made it an exemplar in landscape design and the picturesque elements provide an important example of design influences during the early 19th century. The parks' role within wider metropolitan improvements at the time and association with one of the most important architects of the 19th century is of particular interest.

With reference to the London View Management Framework the importance of view 26A.1 relates to the visible landmark buildings the user can witness from the footbridge across the lake. The lake itself was undertaken by Nash who expanded the existing canal on the site. When located on the bridge it is possible to see a number of important buildings located on Whitehall which creates a unique character to the area, enhancing the significance of the park and views out.

Horse Guards is located to the east of St James's Park and is grade I listed. The earlier structure was demolished due to its deteriorating condition with William Kent commissioned to design the building we see today. The former building on the site had a close relationship with St James's Park with views being afforded from the park itself towards the western elevation which can be seen in Kip's Prospect. The Kent building historically, and today has a close relationship with the park with important views existing between the two enhancing their interest and contributing to their setting. The western elevation is a particularly notable example of Palladian design and one of the most important public buildings constructed under the reign of George II, with views available towards the elevation from within St James's Park.

Proposal

The applicant intends to redevelop the subject site by demolishing the existing building and erect a part 63 storey and part 22 storey building in its place. As part of the application documentation, there a number of public benefits proposed which are noted.

The Georgian Group's advice

The three heritage assets referred to above are amongst the most important landscape and built projects undertake during the 18th and 19th century and are rightly afforded the highest grading. The proposed development at 55 Bishopsgate would cause harm to each of these heritage assets.

St Paul's Cathedral and its prominence on the London skyline is well appreciated from the protected view 15B within the London View Management Framework. Within this view there is a clear division between the city cluster and St Paul's allowing the user to appreciate the silhouette of St Paul's along with the historic and

architectural interest associated with this grade I heritage asset. The setting of St Paul's makes a strong contribution to the significance of the building, something the proposed development would encroach on. The location of the proposed building away from the centre of the eastern cluster would impact the protected view 15B within the LVMF. Due to its height and massing it would compete with the prominence of St Paul's creating a visual distraction, therefore harming the significance of St Paul's and the protected view. The existing view and formation of the cluster creates a gradient stepping down to the dome of St Paul's allowing the focus to be on the great building.

The impact of no.55 Bishopsgate on St Paul's should be considered alongside present and future applications in order for the cumulative impact to be assessed. Current live applications include proposals at 55 & 65 Old Broad Street which would introduce a 24 Storey tower visible in line the peristyle of St Paul's Cathedral. The redevelopment of Liverpool Street Station, which the Group understands has not yet been submitted to the City of London would again impact views towards St Paul's from view 15B within the LVMF. The accumulation of these separate application has the potential to raise the level of harm caused to the significance of St Pauls and the City of London should consider the cumulative impact during its decision making.

St James's Park is largely as it was planned in the early 19th century when the conscious design of John Nash focused on avoiding encroachment on the newly formed public park as to enhance the visitors experience. The setting of the park contributes considerably to its significance and certain views out towards the surrounding London townscape are notable. Nash's wider metropolitan improvements on going at the time show the contribution and harmonious role St James's Park plays within the wider built environment.

The impact of the 63-storey tower on the setting of St James's Park and view 26A.1 is evident in the visualisations provided as part of the TVHIA. Due to the height and massing of the tower it would stand out clearly in views contrasting with the existing roofscape of the Horse Guards and other landmark buildings on Whitehall. This would have a negative impact on the ability to appreciate this historic parkland in its setting and would compete with the existing built form and be contrary to the guidance set out within the LVMF SPG. Therefore, there would be an element of harm caused to the significance of St James's Park, Horse Guards and the protected view 26A.1 within the LVMF.

Recommendation

The application in its current form would cause less than substantial harm to the significance of St Paul's Cathedral, St James's Park, and Horse Guards.

Paragraph 199 of the NPPF reinforces the need to give great weight to the conservation of heritage assets, and the more important an asset, the greater the weight should be. The three heritage assets referred to above are all grade I and should be afforded the highest level of weight.

The following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'.

With relevance to view 26A.1, the LVMF guidance states 'Development in the background of this view should be of a scale, mass or form that does not dominate, overpower or compete with either of the existing two groups of built form or the landscape elements between and either side of them'.

The LVMF guidance on view 15B gives various points to be considered when managing change and new development within the view. Paragraph 266 states 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect'.

As the application causes less than substantial harm to the significance of three separate heritage assets, this harm will have to be weighed against the public benefits of the proposed scheme, in line with paragraph 202 of the NPPF. The public benefits put forward by the applicant would not outweigh the heritage harm caused by this application.

The Georgian Group recommends this application for Planning Permission in its current form is refused consent. The application would cause less than substantial harm to the three heritage assets of the highest significance, as well as being contrary to the guidance set out within the LVMF.

As the decision maker, your local authority should take these comments on board when undertaking the balancing act set out within paragraph 202 of the NPPF. Additionally, the statutory duty set out within section 66(1) of the Planning (Listed Building and Conservation Area) Act 1990. Within the Act, it states that special regard should be given to the desirability of preserving a building or its setting or any features of special architectural or historic interest which it possesses.

Your authority should take these representations into account when determining this application.

Yours sincerely,

Edward Waller (Conservation Advisor for South East England and London)

Response to 65200814-SWE-XX-XX-T-TP-0005-P01.03-TfL Tracker (received 14th July 2023) – 55 Bishopsgate 18.07.2023

Thank you for providing the additional response to TfL Spatial Planning. The detail is much appreciated at this stage of the planning process. Please take it that most of the response is noted with the exception of the following items.

Transport modelling and impact on highways

As highlighted on multiple occasions, the applicant has failed to carry out any strategic modelling which would usually be expected given the size and scale of the development, which will be reflected in the Stage 2 comments to the GLA.

However, it is noted that the decision is imminent. The City Corporation's Committee Report in considering the impacts on the transport network (para 800) concludes that. 'Where necessary, works to widen pavements and improve pedestrian crossings will be secured through a S278 agreement and s106 obligations and financial contributions with TfL'.

Although the proposals are not supported by modelling, we remain of the view that a contribution of £1.5million for highway mitigation is reasonable and necessary. We hope that the applicant can agree this and we welcome confirmation as such. As you are aware, the scale and content of any obligations is a material planning consideration which members of the Committee should be able to take into account – clarity on this matter would therefore be appreciated.

Cycle Parking

TfL would not regard cycle parking in the lower ground floor as short stay cycle parking. Cycle parking needs to be designed for the user and in the case of short stay, convenience and quick access is paramount. Having the parking in the basement defeats this and immediately creates barriers to cycling which is not supported.

That said, TfL does acknowledge the competing pressures for the ground floor space and public realm. The applicant is therefore urged to explore all reasonable alternatives, this might mean reallocating ground floor space. If this does not prove possible, our stage 2 comments to the Mayor will have to reflect this.

TfL are taking the approach that the cycle parking in the lower ground floor basement is in addition to the minimum standards set out in the London Plan (2021).

Cycle Hire

Your point that a reasonable location for a docking station needs to be identified is agreed. TfL is therefore willing to work with the City of London to find a suitable Cycle Hire Docking Station location and request that the contribution of £220k is paid to TfL on the basis that can be achieved. A section 106 obligation drafted on that basis would be welcomed.

Delivery and Servicing

In terms of the impact of the servicing lifts on the public realm, we regret that we have not been able to see a working example in London. Your advice that TfL will be consulted on the design of the public realm is welcomed. If this could be included in the wording of any condition imposed by the City Corporation that would be helpful. Similarly, TfL would welcome wording that ensures the approval of any delivery and servicing plan will only be given in consultation with TfL.

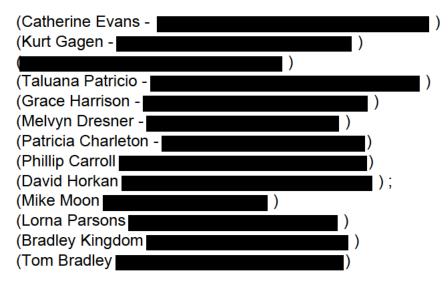
On street loading bay – for clarity we agree; please remove this.

Delivery and Servicing Plan Contribution – welcome that this is accepted in principle. A further example of this can be found for Bishopsgate Goodsyard in the London Boroughs of Hackney/Tower Hamlets. Please see schedule 10 of the S106 Bishopsgate Goodsyard public hearing | London City Hall.

Demolition and Construction Impact

Please can you show that 3.25m running lane does not exist as highlighted in the tracker comments.

Copied to the following:



Max Skjoldebrand

Catherine Evans
Development Division
Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

By email to:



12 July 2023

Planning Application 22/00981/FULEIA

Address: 55 Bishopsgate, London, EC2N 3AS

Applicant: 55 BG Unit Trust

Max Skjoldebrand Letter of Objection 12/07/2023

I was a senior member of the project team working with John Robertson at Fitzroy Robinson Partnership during the design and construction of the current building at 55 Bishopsgate. I was also the lead project architect (also at Fitzroy Robinson Partnership) for the reconstruction of 55 Bishopsgate 1993-1994 after it was severely damaged in the IRA Terrorist Bishopsgate bomb blast in 1993.

I am writing to object to the planning application for 55 Bishopsgate for the following reasons:

- The existing building designed by Fitzroy Robinson Partnership should not be demolished because it is an integral part the townscape of Bishopsgate and is of a scale and proportion which is respectful of Mewes and Davis's 52-68 Bishopsgate (1928) opposite. Please see my comments under 7 below.
- 2. The design carefully respects and responds to Mewes and Davis' Grade II listed Hudson Bay House (Nos 52-68 Bishopsgate) opposite. In accordance with the City's plot ratio restrictions at the time, 55 was kept to 5 principal storeys above ground and its two upper storeys step back in loggias and balconies so that the

design does not overshadow its neighbours. It incorporates a subtle curve into its plan to mirror the slight bow in the elevation of Hudson Bay House, across the street. This subtle bow also strengthens this narrow point in Bishopsgate and minimize the visual impact of the building on the St Helens Place conservation area opposite. Please see, also, my comment under 8 below.

- 3. The existing building was designed as a flexible loose fit, long life structure which can be easily refurbished. No justification has been provided to explain why it is not viable to retrofit the existing building.
- 4. The existing building received favourable reviews when it was featured in Architecture Today (February 1992) in which the writer and critic John Worthington notes "55 Bishopsgate is an asset to the City of London. It brings a dignity back to Bishopsgate, provides a continuity of streetscape and offers both framed vistas and enjoyable fragmentary details. It succeeds as cityscape and has a quality of detailing and robustness that should outlast fashion".
- 5. The existing building is also recognized in Pevsner The Buildings of England, London 1: The City of London. "No 55 also by Fitzroy Robinson Partnership was originally built between in 1988-91. Very long, gently curved stone-faced front, horizontally divided into dark stone podium, four upper storeys of square recessed windows in two sizes, then set backs. Big inset bow, set off-centre. The paraphrased classical detail echoes Otto Wagner here and there."
- 6. 55 Bishopsgate is an important City of London building and is very much part of the architectural history of real estate development in the City from 1986 to 1992.
- 7. The site, whilst not within a conservation area, is surrounded by Conservation Areas on nearly all sides (Volume 2: Built Heritage, Townscape and Visual Impact Assessment Part 1: The Heritage Asset Plan, page 37). The application must be considered in this overall context.
 - Two buildings directly opposite 55 Bishopsgate are within the St. Helen's Place Conservation Area: 46 Bishopsgate (listed grade II) (#45 on The Heritage Plan) and 52-68 Bishopsgate (listed grade II) (#46 on The Heritage Asset Plan). The Heritage Value of 52-68 Bishopsgate provided on page 50 is described as follows: "The building derives historic interest as a well-preserved example of an early 20th century commercial building, built in the Neo-Classical style. It articulated the period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. The building derives architectural interest owing to the survival of its grand, extensive principal facade and entranceway which is a high-quality example of Neo-Classical commercial architecture."

Please note that this description, with some amendments, can also be applied to the existing building at 55 Bishopsgate:

Very much contrary to the description of 55 Bishopsgate in its current form under "Contribution of Setting to Heritage Value" for both 52-68 Bishopsgate and 46 Bishopsgate as "an uninteresting, mediocre piece of architecture" (pages 49 and 50), 55 Bishopsgate derives historic interest as a well-preserved example of a late 20th century commercial building, built in the 'contextual civic modernism' style, enhancing the period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. The building derives architectural interest because 'It brings dignity ... to Bishopsgate, provides a continuity of streetscape and offers both framed vistas and enjoyable fragmentary details' and because 'It succeeds as cityscape and has a quality of detailing and robustness that should outlast fashion.' (John Worthington, Architecture Today, February 1992). Therefore, it is simply not true to contend that the site of 55 Bishopsgate currently is "an undistinguished element in the setting of this listed building" (referring to both 52-68 Bishopsgate and 46 Bishopsgate) as stated under "Full Assessment of the Proposed Development on the Heritage Receptor" (pages 49 and 50).

- 8. 'The scale of the proposed building and its low level treatment will', indeed, (to quote from Full Assessment of the Proposed Development on the Heritage Receptor, pages 49 and 50) 'cause a change to the character of the urban realm immediately opposite the site' but NOT for the better. The contextual relationship between architecturally significant buildings on either side of Bishopsgate at this location will be destroyed by the new development at 55 Bishopsgate.
- 9. The bulk and massing of the proposed 63 storey tower will have a serious impact on the important townscape views from the nearby Bank, St Helens Place, Finsbury Square and Bunfield Fields conservation areas.
- 10. It is clear, from a review of the photo-montage views available in the Built Heritage, Townscape and Visual Impact Assessment (BHTVIA), that the following townscape views will be significantly harmed by this application:
 - BHTVIA: view 11/Page 201, Golden Jubilee/Hungerford Footbridges: Downstream – Crossing the Westminster Bank
 - BHTVIA: view 12/Page 205, Golden Jubilee/Hungerford Footbridges: Downstream – Close to the Westminster Bank
 - 3. BHTVIA: View 13/ Page 209, Waterloo Bridge: Downstream close to the Westminster Bank

- 4. BHTVIA: Views 14 & 14.1/ Pages 213 & 217, Waterloo Bridge: Downstream at the centre of the Bridge
- 5. BHTVIA: View 15/ Page 221, the South Bank, Gabriel's Wharf viewing platform centre of North-east rail. In views 13, 14 & 15, the gradual massing of the existing tall buildings in which the tallest are in the center of the group and the lower buildings are on the periphery will be destroyed by the proposed development. The proposed development will also impinge on the views of St. Paul's from these locations.
- 6. BHTVIA: View 33/ Page 293, London Wall, corner of Fore Street Avenue.
- 7. BHTVIA: View 34/ Page 297, Finsbury Circus, adjacent to Britannic House.
- 8. BHTVIA: View 42/ Page 329, Bank Junction
- 9. BHTVIA: View 43/ Page 333, Bartholomew Lane looking east along Throgmorton Avenue.
- 10. BHTVIA: View 44/Page 337, Copthall Avenue looking along Austin Friars.
- 11. BHTVIA: View 45/Page 341, Liverpool Street, looking South along Old Broad Street
- 12. BHTVIA: View 46/ Page 345, London Wall corner with Old Broad Street (please note the CGI does not show the full impact of the tower on the view).
- 13. BHTVIA: View 47/ Page 349, Bishopsgate, corner with Middlesex Street
- 14. BHTVIA: View 49/ Page 356, Bishopsgate, junction with Cornhill, Leadenhall street (Please note the townscape view of Bishopsgate as a City Street as a result of the impact of the tower.
- 15. BHTVIA: View 50/Page 361, St Helen's Place. The conservation will be completely overwhelmed and overshadowed by the visual impact of the tower. The view included the HTVIA only shows the lower portion of the tower. The important view of the silhouette of Mewes and Davis's Grade II listed 50-68 Bishopsgate will be very significantly harmed in this view.
- 11. The Twentieth Century Society has also objected to the demolition of the existing building, their objection letter dated 03 July 2023 refers.

Regards,



Catherine Evans Department of the Built Environment City of London P0 Box 270 Guildhall London EC2P 2EJ

By Email

14th July 2023

John Robertson Architects

111 Southwark Street London SE1 0JF

E enquiries@jra.co.uk T 020 7633 5100 W jra.co.uk

Dear Sirs. Planning Application - 22/00981/FULEIA 55 Bishopsgate, London EC2N 3AS

Thank you for your letter of 15th June 2023 advising me that you are reconsulting due to design amendments and submission of additional information in relation to the Proposed Development. I can confirm that I have reviewed this information and the amendments are insubstantial and relate mainly to the base of the building.

However, regarding the additional information, we strongly disagree with Montagu Evan's assessment of the existing building's quality and contribution to the streetscape in the City of London as presented in ES HTVIA Addendum (June 2023). No. 55 Bishopsgate is considered to make a positive contribution to the City of London and the setting of Mewes & Davis' Grade II 1920's Hudson Bay House opposite (No's 52-68 Bishopsgate). I refer you to the article in Architecture Today (February 1992, copy attached) which declared "55 Bishopsgate is an asset to the City of London. It brings dignity back to Bishopsgate, provides a continuity of streetscape and offers framed vistas and enjoyable fragmentary details.... it succeeds as cityscape and has a quality of detailing and robustness that will outlast fashion."

As noted in my previous objection letter of 1st December 2022, the Proposed Development does not take account of the character of the surroundings, notably the prevailing scale of development in the St Helen's Conservation Area and 52-68 Bishopsgate.

I strongly object to this redevelopment proposal which will cause irreparable damage to the townscape views in the City of London and to the St Helen's conservation area.

Yours faithfully,



Founder and Senior Advisor John Robertson Architects

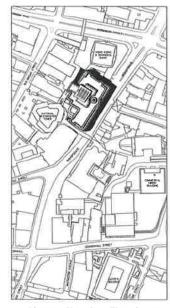
Encls: Architecture Today, February 1992.

ARCHITECTURE TODAY



URBANISM Twentieth century palazzo: Fitzroy Robinson in Bishopsgate

John Worthington on a major new addition to the City of London. Photos: Martin Charles and Peter Cook.



Above Site plan. The planners were sympathetic to the idea of mending part of the City that had been damaged by successive post-war developments. Below Elevation to Bishopsgate with adjacent Seifert office towers.

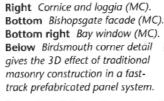
A combination of the Luftwaffe and three first phases of Broadgate brought a new postwar development booms have shat- quality standard. The philosophy was that tered the urban fabric of the City of the quality of space and external environ-London. The traces of the historical curment was as important as mere proximity tilage of the city was irradiated with the to the Bank of England. Efficiency was no comprehensive redevelopment scheme longer seen as sequencing the maximum for London Wall in the first office boom square footage on a site with no regard to of the 60s. The result was a faceless traffice the left-over corners. drain at ground floor and empty Westminster Bank tower.

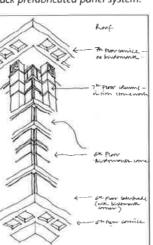
tive brought in foreign investors and new type for the City of London'. contracting methods and design profes-

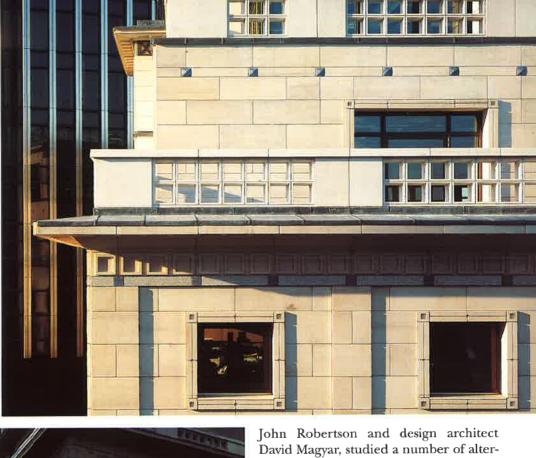
The Fitzroy Robinson Partnership's 55 windswept pedestrian walkways above. Bishopsgate is a post-Big Bang project. It Development in the 70s culminating in is a large (£56 million) shell-and-core financial deregulation served the City lit- development which uncompromisingly tle better as developers and their investors aims to provide floor space for offices and fought to shoe-horn valuable square feet dealing functions. The developer is onto pocket handkerchief sites, as most Japanese construction company Kumagai famously with Seifert's National Gumi and the building is part-occupied by the Long Term Credit Bank of Japan. The 80s heralded a major opportunity The site, previously occupied by three to recreate an urban dignity. The Big buildings with lightwells, is sandwiched Bang for the financial services sector between two office towers, the National resulted in an exposure to international Westminster Bank and the Hongkong & ideas, with IT becoming central and the Shanghai Bank, with an important amalgamation of firms creating a demand frontage to Bishopsgate. Here it directly for much larger single buildings, which faces the elegant facade of Mewès & new forms of bank loan were able to fund. Davis' Hudson Bay House of 1928, which The size of many developments increased Edward Jones and Christopher tenfold, with a similar increase in servic- Woodward in The Architecture of ing complexity. The new global perspec- London rightly describe as 'an exemplary

The Fitzroy Robinson Partnership sionals. Stuart Lipton and Godfrey were appointed as architects in 1987. The Bradman with Finsbury Avenue and the design team, led by partner in charge

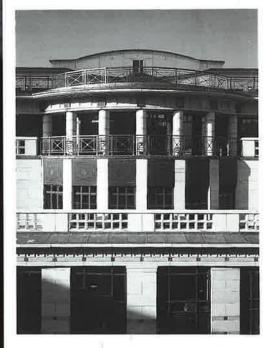


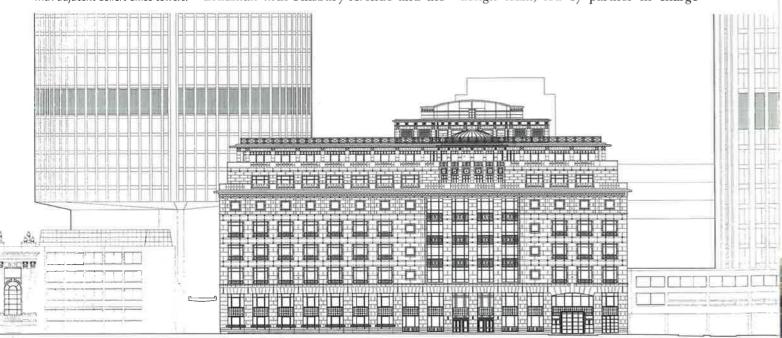


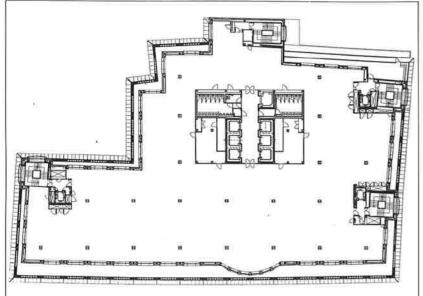


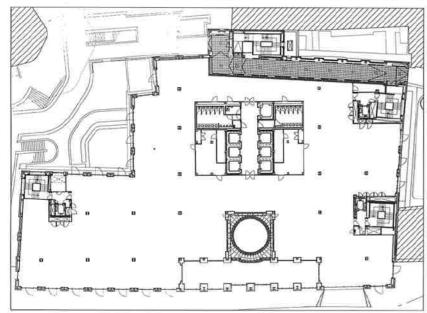


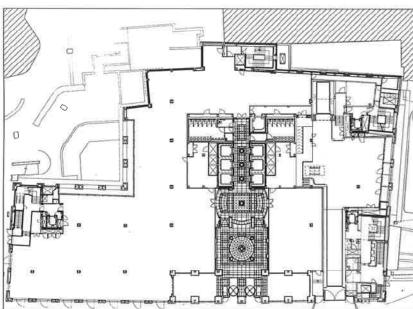
native strategies for the site. They saw little point in adding to the skyline of towers and jumble of unattractive pedestrian plazas. Instead they wanted to recreate Bishopsgate as a street, paying homage to the quality of architecture opposite. Their intervention successfully ties Bishopsgate together at this point and begins to frame











Above Plans at ground, first and sixth floor showing the 9x9m structural grid. Above right Prefabricated concrete panels being applied to the steel frame. To comply with the fast-track programme, the building was largely constructed of prefabricated components. The precast concrete panels, manufactured by Partek Ergon in Belgium, are faced with a variety of stone, including French limestone and polished Zimbabwe black granite.

vistas to the buildings around. A subtle curve in plan, based on a 2km radius circle, mirrors a similar bulge in the Mewès & Davis building and draws the eye to this point in the street.

The elevation relates the building to its neighbours. The two-storey base of flametextured blue pearl granite ties in with the podium massing of the adjacent Hongkong & Shanghai Bank. The polished black granite plinth reflects that of the Mewès & Davis building opposite, as does the cornice, with two floors above stepping back with balconies and loggias to reduce the mass. The street facade provides a horizontal rhythm of rectilinear recessed windows punched into a stone panel facade, with a vertical shallow baywindow articulating the entrance.

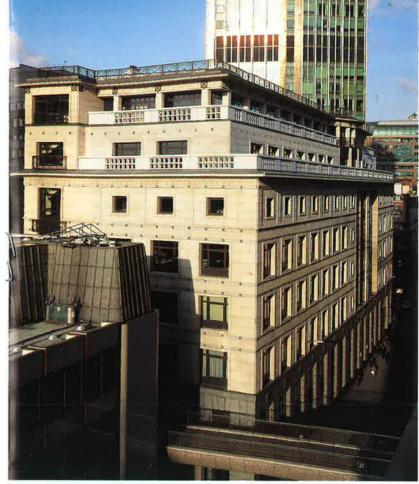
The design successfully recreates the urban qualities of dignified elevations, framed vistas and details which work when seen as fragments from street corners and pedestrian walkthroughs. In keeping with modern fast track construction the structure is a steel frame, but unlike so many

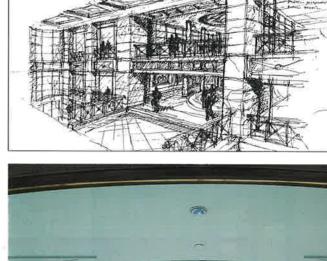


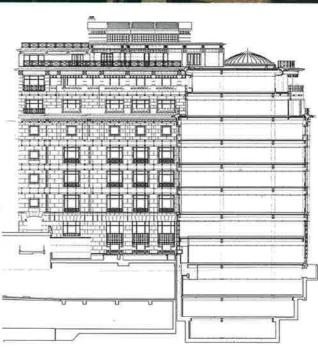
current City buildings which have the paper-thin character of clip-on panels, the building has a feeling of solidity achieved by thoughtful detailing. The architects have concentrated on a language of panels and joints which is reminiscent of building in blockwork, with the window apertures punched into the mass. The initial development sketches show a concern for crafting details and establishing a human scale and, particularly compared to nearby Broadgate, the end result has a scale in keeping with the best of prewar City architecture.

The Fitzroy Robinson Partnership have a long tradition of office design and pride themselves on their position as Architects to the City of London. At their best they have a lineage of buildings such as the Banque Nationale De Paris and Robert Fleming that have added dignity to the City. 55 Bishopsgate follows this tradition.

But at the very highest standards has it succeeded? Walk across the road through









an alleyway and one can stand on the space, with the external cores taking up plaza of Commercial Union with Richard the irregularities of the site and creating Rogers' Lloyds Corporation opposite. an exciting streetscape that ties in with the Gollins Melvin Ward's Commercial Union surrounding pedestrian scale. Plaza, a well-proportioned void within the city grain, was an uncompromising re-

By these standards 55 Bishopsgate is flawed. The traditional commercial presenactment of the best of 50s North sure of maximizing floorspace perhaps American cityscape. Opposite, Richard has dominated. Working closely with the Rogers' Lloyds building follows an infill City planning office, the architects conapproach similar to that adopted for 55 ceived the form of the building primarily Bishopsgate. The Lloyds site is tight, in terms of massing. The original site had hemmed-in by the small streets of a plot ratio of 5.5:1. The City guidelines Leadenhall Market behind: the design of call for a plot ratio of 5:1 or whatever floor a doughnut-shaped rectilinear building space is appropriate within an agreed provides clean, legible and usable office envelope. By taking the existing building

Top left View along Bishopsgate towards Broadgate (MC). Due to the site configuration there are no 90° angles in the building. Top right Sketch section and perspective of entrance spaces. A triple-height vestibule (allowing light into the lower ground floor) leads to a double-height entrance hall and a single-height lobby. Left Cross section and elevation to National Westminster plaza. Right Entrance hall (PC), Italian marbles and fiddle-back anigre veneer are offset by stainless steel and polished brass.









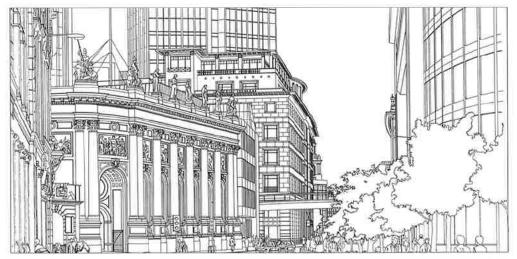
Left above Lift lobby in Long Term Credit Bank of Japan fit-out (PC). Above LTCBJ dealing floor (PC). Left Photo and sketch of the LTCBJ dining room with specially designed dining table (PC). Below Perspective from south.

envelope, infilling the lightwells and stepping back the upper floors to provide a bulk only one floor higher than existing, they agreed an overall envelope which yielded a plot ratio of 6.89:1 and an increase in lettable floor area from 16,200 square metres of usable accommodation to 19,000 square metres of lettable space.

In urban design terms the result is unquestionably a success, but less pressure to squeeze the last square metre from the site would have allowed both a clearer internal layout and greater articulation of the facade, presenting a more human scale to the street. Compared to the Lloyds or Broadgate floorplate, core locations seem to be an intrusion rather than a stimulant to effective office planning.

55 Bishopsgate is an asset to the City of London. It brings a dignity back to Bishopsgate, provides a continuity of streetscape and offers both framed vistas and enjoyable fragmentary details. If in its enthusiasm for Big Bang real estate thinking it has lost some clarity of floorplan, it succeeds as cityscape and has a quality of detailing and robustness that should outlast fashion.

John Worthington is a director of DEGW Group and a former president of the Urban Design Group.



Project team

55 Bishopsgate The Fitzroy Robinson Partnership (John Robertson, David Magyar, Tim Collier, Max Skjoldebrand, R Mazuch, Peter Harding, Dinesh Mistry, David Humphreys); project manager: Arnold Project Services; structure: Waterman Partnership; services: FC Foreman & Ptnrs; qs: MDA; management contractor: Bovis; client: Kurnagai Guml UK.
LTCBJ fit-out The Fitzroy Robinson Partnership; services: YRME; IT consultant: Telemet International; construction manager: Kurnagai Guml UK.

Selected subcontractors and suppliers 55 Bishopsgate Cladding: Partek Ergon; windows: Metalbau Fruh; external stone: Nigel Cox; lifts: Express Lifts; structural steel: Booth Steelwork; roof covering: Coverite; internal stone: WE Grant & Co; demolition: H Smith; substructure/drainage: CJ Pearce; joinery: RD Peppiatt; architectural metalwork: Wessex Guild; drylining: BDL; window cleaning: Lalesse Gelvelliften; dome roof: John Hirn Construction; fibrous plaster: Gillespie (UK). LTCBJ fit-out Raised floors: Tate Access Floors; suspended ceilings: Clarke & Fenn; decora-tion: Collins Contractors; drylining: HL Smith; joinery: Colin Cheesman Joinery; toi-let fit-out: Wilson Fitting-Out; kitchen fit-out: Berkeley Food Equipment; security installation: Estdale Integrated Systems; electrical: TC Clarke; bms: Berkeley Environmental Services; commissioning: Commtech; a/v equipment: IMC Compak; builderswork: Alldersbrook Construction; metal stair: Booth Engineering; carpets/vinyl flooring: Tyndale Carpets; storage equipment: Bruynzeel Storage Systems; floor/wall tiling: Crest Flooring; architectural metalwork: Borough Engineering; curtains/blinds: Hunter-Douglas; signage: All Metal Engraving/ Ambrosesigns; executive desks, conference tables: Casa; seminar room chairs: Castelli; filing cabinets: Cityspace; executive desks/chairs, reception chairs: Facility Group; office desks: Gesika; office chairs: Girsberger, dining chairs: OUI; conference chairs, sofas: Palm Interiors; seminar room tables: SKS International; dining table: Osiris; meeting room tables: Geiger

From: Fred Rodgers

Sent: Monday, July 17, 2023 9:45 pm

To: Richards, Gwyn

Subject: 55 Bishopsgate - 22/00981/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Mr Richards,

Following your response to the failure to obtain an independent review of the submitted Ecological Impact Assessment for phase 2 of the Barbican Podium renewal, I note that a paper has been submitted to tomorrow's P&TC meeting. It's more than a pity though that no evidence has been submitted in support of the decision not to require an independent review.

As the approved policy in the draft City Plan 2036 may not apply to third party applications, it must be the case that the requirement to meet the 0.3% UGF doesn't either. No matter, the submitted EIA for 55 Bishopsgate has the same defects as the Barbican one. The Barbican Wildlife Group (BWG) is one of a number groups in the City submitting weekly records of sightings to GiGL.

The information from GiGL in the submitted EIA suggests that the last sighting of a frog in the subject area was in 2018. Upwards of 12 frogs have seen in a single weekly session by BWG members and reported to GiGL. Also, there have been similar regular sightings - and reporting - over a number of years. These comments also apply to some of the other species referred to in the EIA.

The problem is not with GiGL though but the fact that it naturally requires payment for its up to date monitoring data, so developers simply rely on GiGL's published data. That may be acceptable to you but it's hardly accurate and gives no comfort that submitted EIAs can be relied on as being accurate.

I appreciate the draft City Plan policy is to ensure the accuracy of submitted EIAs in the absence of City Corporation employing its own ecologist. But, in the meantime, it would be comforting if the were any evidence that submitted EIAs are being scrutinised by City Corporation.

As mentioned above, no such evidence was produced for the Barbican application, even though there was an overriding obligation to obtain an independent review. That suggests my concern will fall on deaf ears.

The EIA isn't the only submitted document that should have been challenged though. I haven't been able to find any comment on the fact that Townsend Landscape Architecture's submitted planting strategy claims:

The proposed planting will be designed to enhance the character and identity of each space. Species will be chosen that can thrive together in shaded environments under the building and planting mixes will ensure year around seasonal interest and enhanced biodiversity.

as a total of 23 plant varieties are mentioned in 5.0 and 7,0 under "planting strategy" but, while examples of all 23 can be purchased from the RHS, only three seem to be claimed by it as being pollinator friendly. Again, it would be comforting if there were any evidence that the submitted had been scrutinised by City Corporation.

Finally, if approved and implemented, the scheme's embodied carbon is estimated to be 112,230 tCo 2e .

How can this be acceptable?

Best regards,

Fred Rodgers



From:
To:
Subject: Fw: Failure Notice
Date: 14 December 2022 13:57:50

THIS IS AN EXTERNAL EMAIL

Was unable to reach you on the PLNCComments email address printed in the newspaper.

Could someone get back to me please.

Thanks, Stephen

---- Forwarded message -----

From: To:

Sent: Tuesday, 13 December 2022 at 19:41:59 GMT

Subject: Failure Notice

Sorry, we were unable to deliver your message to the following address.

550: 5.4.1 Recipient address rejected: Access denied. AS(201806281) [CWLGBR01FT034.eop-gbr01.prod.protection.outlook.com]

------ Forwarded message ------

Ref: 22/00981/FULEIA

Dear Mr Richards

Forgive my not initially emailing you previously at the above address. I am learning having never contacted the Corporation of London Planning Department before.

Please thus treat my enquiry as being within the twenty one days limit for consideration.

I would like to know if proposals to demolish 55 Bishopsgate contain provision for the reuse/upcycling or recovery of woods within the structure?

Luxury properties of this kind may well have been fitted out in certain areas with expensive hardwoods that can be recovered and reused.

Thank you for your help with my enquiry.

Yours sincerely

Stephen King

---- Forwarded message -----

From:

To:

Sent: Monday, 5 December 2022 at 16:07:29 GMT

Subject: Recycling materials ~ wood

Glyn Richards, Director Of Planning, City of London

Dear Mr Richards

The Corporation of London's Legal & Public Notices, City AM 15 November lists a

number of properties due for refurbishment or demolition.

I have been making picture frames from reclaimed wood at Camden Town Shed for some time and am constantly searching for hard wood door frames etc. for my work.

Please would you be able to help me contact the building's owners and contractors for me to obtain wood that may otherwise be wasted.

With best wishes,

Stephen King



From: stephen king

Sent: Monday, July 17, 2023 7:22 PM

To: PLN - Comments

Subject: Re: Application Consultation (22/00981/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Ms Evans

Thank you for including me in the planning proposal 22/00981/FULEIA, 55 Bishopsgate.

Kindly accept my apologies for my late reply as I have been away.

Please may I reiterate Historic England's letter, Michael Dunn, Principal Inspector 29 November 2022 where he says "The demolition of the existing building will, nonetheless, result in the loss of its embodied carbon" as he better explains my own request concerning wood from the interior. How can I be enabled to access this material to recycle it in my work?

Kindly note Hatch June 2023 Cultural Plan, 3 Cultural Context's map doesn't appear to include the new Museum of London at Smithfield or Bishopsgate Institute. What other omissions are there even though it's described as a 'interim document'. Thus I question the claimed public benefits of the scheme [however skateboarders may like it].

The architecture referred to as being of the 'highest calibre', a military term and smaller 'satellite building' south of the main tower looks more like apartment block.

Regarding DP9 Ltd's unsigned letter 2 June 2023, "The cycle stair access, showers and lockers has been reconfigured at lower ground level, and cycle parking provided." How does the management of this facility propose preventing homeless people from taking showers?

Please could the Planning committee require Schroders better explain how they intend to dispose of the existing structure, steelwork, wood and [beautiful] two coloured stone exterior cladding?

I would like to attend the planning meeting if possible.

With kind regards.

Stephen King

On Thursday, 15 June 2023 at 15:07:24 BST, wrote:

Dear Sir/Madam

Please see attached consultation letter for planning application 22/00981/FULEIA (55 Bishopsgate London EC2N 3AS).

Kind Regards

Planning Administration Environment Department City of London

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Gwyn Richards
City of London Corporation
Guildhall
Aldermanbury
London
EC2V 7HH

13th July 2023

Re. 55 Bishopsgate planning application

Dear Gwyn,

On behalf of the Eastern City Business Improvement District (BID), I would like to confirm our support for the planning application for 55 Bishopsgate, presented by Schroders, which will be put before committee on the 21st July.

The proposed scheme will make a significant contribution to the future shape of the Eastern City area, providing a new world-class office-led building, pushing sustainability standards and also providing crucial publicly accessible amenity space. We are pleased to see that the scheme includes education and events areas, a conservatory garden and an open-air public viewing platform at the top of the building. This is in keeping with the City's policy-led initiative to see developers deliver high quality public roof gardens and viewing galleries.

For us at the BID we welcome the creation of these new areas of public space, and schemes such as this one are thinking creatively about how to use these spaces to encourage greater public interaction with the City and truly celebrate the Square Mile's iconic tall buildings.

The scheme also incorporates a new home for New London Architecture (NLA), with multiple opportunities to attract visitors and provides a stunning backdrop for the NLA to showcase the best the capital has to offer in terms of the built environment. There is no better place for this than in the heart of the Eastern City.

As the City continues to evolve - attracting new investment, new visitors and seeing more workers returning to the office - schemes like 55 Bishopsgate have an important role to play. They are creating new and innovative opportunities to engage with visitors, helping to attract the best talent and maintaining the City's global competitive edge.

We hope that the application is successful and look forward to working with the City Corporation, the developers Schroders and their development partner Stanhope as this proposed scheme moves forward. We are keen to play our part in ensuring this scheme and others are woven together, enhancing the overall experience of working in and visiting the Eastern City and maximising the positive impact these schemes can have on the area.

Yours sincerely,

Nick Carty Chair, EC BID