

From: 
To: 
Cc: 
Subject: London Tunnels Plc Ref 23/01322/FULMAJ. Objection
Date: 27 December 2023 12:02:39
Attachments: [\[Untitled\].pdf](#)

THIS IS AN EXTERNAL EMAIL

Good Morning Anastasia

As owner & resident of flat 6 35 Furnival St EC4A 1JQ
We strongly wish to object re the proposed planning of
38-39 Furnival St EC4A 1JQ this is a residential area both our block
and 40 Furnival St .

The disruption to the street which is at best already challenged by traffic for
such a small street.

This will effect the Chancery Lane conversation area .

The demolition works rebuilding works the extra footfall noise pollution for then
To have a bar which will encourage night life activities.

The behaviour of London Tunnel PLC have used the time frame posting the
Planning notification on 21-12-23 just as the festive period /shut down to their
advantage shortening the 21 day period .

A large tourist attraction would significantly increase the already congested Chancery Lane /
Holborn area and would severely inconvenience and negatively effect the
Residents of Furnival St.

The interests of the residents should be uppermost in planners minds when
Considering projects of this nature .

A development of this nature ,bringing increased traffic ,congestion and footfall is
Entirely at odds with the character of the Congestion Area and would severely
Negatively impact local residents quality of life.

yours sincerely
Mrs G Birri



Sent from my iPad

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 39 Furnival Street London EC4

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Lidia Zazzera

Address: 43 Swains Lane London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I would like to object to the attached proposed application. Such a development in a quiet, residential conservation area would negatively affect the quiet enjoyment of my property for the following reasons:

- significantly increased foot traffic creating noise, disturbance and dirt;
- a night-time bar is not in keeping with the quiet residential aspect of Furnival Street;
- significant noise and dirt and hours of work and damage during construction in a conservation area; and
- lack of space to accommodate increased traffic.

I request that you reject the application.

Thank you.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 39 Furnival Street London EC4

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Case Officer: Anastasia Tampouridou

Customer Details

Name: Lord John Krebs

Address: 24 Balliol Court Rutherway Oxford

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: Furnival Street and the footways are too narrow to cope with the development as proposed. The development will result in considerable loss of amenity to the residents of Furnival St, where I own a flat. At the moment the street is quiet at night, and if the development goes ahead there should be restrictions on late evening and night time activity.

From:
To:
Subject: 23/01322/FULMAJ
Date: 03 January 2024 14:20:05

THIS IS AN EXTERNAL EMAIL

Ref:

23/01322/FULMAJ

Hi,

I have tried to submit an objection on website. However, I keep getting this error message "403 - Forbidden: Access is denied. You do not have permission to view this directory or page using the credentials that you supplied." My address is flat 11, 35 furnival street.

I would like to object to the above planning proposal for the following reasons:

The furnival street is too narrow to cope with the plan. Currently, the street can not be accessed by car from the north end, which means to get access to 38-39 or 40-41 cars will need to pass my residential property 34-35, causing increasing noise and traffic.

Furthermore, 34-35 is a residential property. The street is quiet at night. If the plan goes ahead it will cause significant noise.

Thank you.

Regards
Leyi Wang

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 39 Furnival Street London EC4

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mrs Nina Keay

Address: Flat 1, 34-35 Furnival St London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: This planning application in the Chancery Lane Conservation Area is a flagrant travesty of the following planning policies:

1. Planning (Listed Buildings and Conservation Areas) Act 1990.
2. The London Plan 2015.
3. City of London Corporation Policy 2015.

Begum, Shupi

From: Lisa [REDACTED]
Sent: 11 January 2024 15:26
To: PLN - Comments
Cc: Tampouridou, Anastasia
Subject: Re: Ref.: 23/01322/FULMAJ

THIS IS AN EXTERNAL EMAIL

Dear Mr Watson,

As requested, here is my current address:

Avenue Slegers,144
1200 Brussels,
Belgium

My interest in the project is because I part-own a property at 35 Furnival St, in which my daughter is currently living; I am planning to occupy it myself in the near future.

Kind regards,

Lisa Zazzera
Sent from my iPhone

> On 11 Jan 2024, at 15:50, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

>
> Hello,
>
> Thank you for your comment. In order for it to be registered, please provide your full address.

> Kind regards,

>
> Davis Watson
> Business Administration Apprentice (Town Planning)

>
> Environment Department
> City of London Corporation

>
> City of London Corporation | PO Box 270|London EC2P 2EJ|

>
> <https://gbr01.safelinks.protect.on.outlook.com/?url=https%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C9cf340f0ded148a51b4a08dc12b9a4be%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638405835748175336%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luZmliLCJBTil6k1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=KskwSoG22xY5sgvI9II3iOd3QydQpjGppklEDGM8hE8%3D&reserved=0>
>
>
>

> -----Original Message-----

> From: zazzera lisa [REDACTED]
> Sent: Thursday, January 4, 2024 4:43 PM

> To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; Tampouridou, Anastasia
<Anastasia.Tampouridou@cityoflondon.gov.uk>
> Subject: Ref.: 23/01322/FULMAJ

>
> THIS IS AN EXTERNAL EMAIL

>
>
> Dear Ms Tampouridou,

>
> In the context of the consultation regarding the above project, I am writing to object to the development of an events venue with entrances in Furnival Street and Fullwood Place.

>
> As the owner of a property in Furnival Street, I feel that the project will inevitably lead to a huge increase in footfall in what is currently a quiet residential street. This will cause disruption and great inconvenience to residents in the street, and will alter the character of the area which, as you are no doubt aware, is part of the Chancery Lane Conservation Area.

>
> The Holborn/Chancery Lane area is already very busy and congested, due to its central location, and residents require their private flats to be a haven to which they can withdraw to escape the general hubbub. This will be completely disrupted if a large tourist attraction, in the shape of an events venue, were to be opened in the middle of Furnival Street.

>
> The profits of development companies need to be balanced against the interests of residents when planning decisions of this kind are considered. Furthermore, the character of the Conservation Area must be preserved against rampant speculation if we are to maintain any quality of life for residents in Central London.

>
> Yours sincerely,

>
> Lisa Zazzera

>
> Sent from my iPad

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From:
To:
Subject: Objection to CoL Planning Reference 23/01322/FULMAJ
Date: 08 January 2024 15:35:54

THIS IS AN EXTERNAL EMAIL

ATTN: Anastasia Tampouridou

RE: CoL Planning Reference 23/01322/FULMAJ

Dear Anastasia,

I am writing to object to the proposed "London Tunnels" tourist attraction being in a conservation area, nearby to historical and listed buildings, and in a neighbourhood with a significant and growing residential population. I believe this development would have a negative impact on the character and appearance of the conservation area and the historical buildings and would be detrimental to the quality of life of the residents and local workers.

Firstly, the proposed development would be out of character with the area and would have a negative visual impact on the landscape and locality. The conservation area is designated to protect the special architectural and historic interest of the area, and the proposed development would be in direct conflict with this objective.

Secondly, the development would have a negative effect on the setting of nearby listed buildings. These are an important heritage asset and any development in the vicinity should be sympathetic to their character and appearance. The proposed development would be out of scale and out of character in terms of appearance and would have a detrimental effect on the setting of the historical buildings.

Thirdly, the development would have a negative impact on the residential and business neighbourhood. The development would result in increased traffic, noise, and disturbance, and would have a significant negative effect on the amenity of the neighbours and the community.

Finally, I believe the planning proposal contains several inconsistencies and incorrect conclusions, just four of which are:

- 1) The facility entrance is much too small to support the estimated average or peak visitor numbers. The lobby size, a single 2 station ticket desk and a single bag scanner could not viably support the design average 560+ visitors/hour (Design Access Statement). Technology to support that throughput in such a small space would exceed that of state of the art installations in major airports. This would result in long outdoor queues that would negatively impact pedestrian traffic, increase noise, disturbance and litter. Additionally, the plans do not adequately describe an adequate method or access for refuse collection from below street level (Furnival Street General arrangement drawing: L00 and B1 plan).
- 2) Furnival Street currently has a contra-flow cycle path and is a generally quiet,

narrow lane that barely allows for service deliveries and refuse/recycling collection by the council. Service companies are already challenged to provide deliveries and services on Furnival street due to limited street width and general lack of parking/access. The Transport Assessment proposes to prioritise pedestrians on Furnival Street, an unproven scheme still under evaluation on Chancery Lane. The plan to remove the existing contra-flow cycle lane would force cycle traffic to larger surrounding roads to contend with more road traffic, resulting in a clear increase in accident risk. No provision for vehicle access by residents and businesses is apparent in the proposal. Loss of vehicle access would be a hardship and detrimental for residents and businesses who rely on service deliveries and building maintenance services. (Transport Assessment)

3) Conversely, the proposal acknowledges that nearly 40 additional taxi journeys per hour will occur on Furnival Street. These taxi journeys are contrary to the pedestrian plan, and yet will result in increased stress to local infrastructure, regardless of whether Furnival Street remains open to traffic or if the lane is pedestrianised and traffic is forced to surrounding roads. (Transport Assessment)

4) The City of London already has a multitude of historical venues for tourists, for school and corporate events and unique pubs. While the proposal has been professionally prepared at obviously considerable cost, it fails to convince the area would benefit from such a tourist attraction, or that there is a demand for such a historical experience, or that another pub is needed to service a declining drinking culture. The planning documents and associated animations themselves could be used for an exhibit at the nearby Museum of London to maintain the historical record.

In conclusion, I strongly object to the proposed development and urge you to reject the planning application. I believe that the proposed development would have a negative impact on the conservation area, the listed building, and the neighbourhood, and would be very detrimental to the quality of life of the residents and local workers.

Sincerely,

Walter Scott

Flat 5, 35 Furnival Street, EC4A 1JQ

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr James Keay

Address: Flat 1 35 Furnival st London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:As a resident of Furnival street I object to the proposal on account of such a dramatic change of character to a quiet residential area. Especially concerning is the increase in traffic to a narrow street, combined with hugely increased pedestrian footfall.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Brian Cotsen

Address: City Therapy Space 33 Furnival Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment:City Therapy Space:

To introduce ourselves, City Therapy Space is the occupier of 33 Furnival Street which is a grade 2 listed 18th Century Townhouse (part of a pair with number 32).

We occupy the building on a long lease and operate as talking therapy rooms, psychotherapy and counselling services.

Our business operates throughout the week and sessions run from 7 am to 10 pm.

Most of our clients arrive by foot along Furnival Street

32 & 33 Furnival Street have listed cellars that run under the road and pavement areas along Furnival Street.

Talking Therapy Work:

The nature of our work is essentially two or three people sitting in a quiet and calm environment holding a conversation. There are times when clients talk quietly or need to sit and contemplate.

I attach a document which will allow me to expand on my concerns regarding the granting of planning for this development and if planning is granted the areas that I feel are of some considerable concern for our business and for the neighbourhood as a whole.

The attached document will cover comments and concerns broken down into:

1. The renovation of and construction and building works to prepare for the Tunnel Experience to open and then
2. The day-to-day running of the Tunnel Experience.

In the attached document I wish to highlight the following areas of concern for both 1 & 2 above:

I have broken down the areas I have most concern over as follows:

- Human safety
- Noise disturbance
- Structural damage
- Business disruption
- Air quality

In the attached document I will also refer to some small number of attached photos to help illustrate or demonstrate the reason for the concern.

I do appreciate that my document is several pages however as I am sure you want a clear understanding of the basis of my concerns, there is a need to explain or describe certain specifics that may not be apparent to anyone who does not know the street from observing it on a daily basis over many years.

Brian Cotsen

City Therapy Space: 33 Furnival Street, London, EC4A 1JQ

To introduce ourselves, City Therapy Space is the occupier of 33 Furnival Street which is a grade 2 listed 18th Century Townhouse (part of a pair with number 32).

We occupy the building on a long lease and operate as talking therapy rooms, psychotherapy and counselling services.

Our business operates throughout the week and sessions run from 7 am to 10 pm.

Most of our clients arrive by foot along Furnival Street

32 & 33 Furnival Street have listed cellars that run under the road and pavement areas along Furnival Street.

Talking Therapy Work:

The nature of our work is essentially two or three people sitting in a quiet and calm environment holding a conversation. There are times when clients talk quietly or need to sit and contemplate.

Outline of the Furnival Street Environment:



- Narrow thoroughfare –
 - Pavement: at its widest is just 1.5 meters and narrowest, outside 32 / 33 Furnival street just 50cm wide.
 - Roadway: at the widest is 4.4 meters wide and narrowest, outside number 40 Furnival street at just 3.3 meters wide.
- Furnival Street has a mix of commercial and residential occupiers. Commercial occupiers are both large organisations and smaller ones, like our business.
- Furnival street carries very little through road traffic, however is remarkably busy with foot traffic. This is both people travelling to and from their work or home where their front entrance is on Furnival street, visitors to those businesses or residences or commuters using Furnival Street as a convenient route to and from High Holborn & Chancery Lane Tube Station, on High Holborn from the southern areas of Fetter Lane / New Square and Chancery Lane
- Most delivery / collection (entrance or exits) are through front entrances that open onto Furnival street, usually onto the pavement,
- Vehicle activity: This tends to be delivery and collection, both of goods and also taxi traffic bringing people to or picking people up from businesses or residences.

Standing vehicles: The delivery/collection of goods necessitates most vehicles to park on the road and sometimes up on the pavement.

Other vehicle activity is vehicles exiting Nottingham Street / Fetter Lane on to High Holborn.

Due to the narrowness of Furnival Street, standing vehicles often block the exit of other vehicles traveling from Fetter Lane/Nottingham street.

The street has no trees or planting and is entirely comprised of hard surfaces.

The street is narrow with flat fronted buildings.

Noise reverberates down the street due to the environmental conditions outlined.

The purpose of the next two sections is to briefly outline my observations and concerns for:

1. The renovation of and construction and building works to prepare for the Tunnel Experience to open and then
2. The day to day running of the Tunnel Experience.

1. Construction Phase Concerns & Comments:

We acknowledge that a development of any major attraction will generate noise, disruption and inconvenience to the proposed attraction site's neighbours and that this is part and parcel of living in London and has to be accommodated.

I do feel that there are unique and specific circumstances and factors that need to be taken into account when considering the planning proposal for the Tunnel Experience development works.

I have broken down the areas I have most concern over as follows:

- Human safety
- Noise disturbance
- Structural damage
- Business disruption
- Air quality

Human Safety

I have already outlined the narrow physical nature of Furnival Street, both the narrowness of the pavements and of the actual road width.

The majority of traffic along this street is in fact foot traffic, travelling to and from businesses on the street or other linked streets or as an important route to and from the area south of Furnival Street to High Holborn and beyond.

At present due to the needs of the businesses, delivery/collections necessitate vehicles to temporarily park up on the pavement forcing pedestrians to navigate around vehicles, necessitating walking in the road.

Alternatively, vehicles often mount the pavement to navigate around stationary vehicles parked on the road.



Both pedestrians walking in the road and or vehicles driving onto the pavement to navigate around stationary vehicles puts human lives at risk.

Adding further vehicles carrying goods or heavy building plant machinery will further add to the blockage of traffic along the road and vehicles mounting the pavement to navigate around these stationary vehicles.

Consideration:

I wish for planning to consider how this can be minimalised or eliminated as an issue, possibly only allowing the 'Tunnel Experience' related vehicles to deliver to a site around the corner on High Holborn and any goods or plant machinery then conveyed by trolley or truck to the site location.

Noise Disturbance

Currently Furnival Street has relatively quiet noise levels. Our business has not had any need to introduce secondary glazing to the upper floors of our building, however we did introduce it to the ground floor windows, which has made a considerable difference to the noise disturbance of street activity to the ground floor front room.

Demolition Noise:

I acknowledge that the element of underground refurbishment of the Tunnels will not necessarily cause local residents any significant noise disturbance, however it is inevitably that a project such as this will generate a significant amount of additional noise, during the demolition of 40 Furnival Street and the rebuilding / reworking of the structures at both 39 & 40 Furnival Street.

Traffic Noise:

The noise of large vehicles travelling up Furnival Street, offloading construction materials or loading up waste materials being removed from the demolition of the building (number 40) and any removal of waste from the tunnels will generate

significant noise. Not just the vehicle movement but the rumbling and vibrations that these large vehicles can generate.

Noise disturbance generated from traffic that is blocked or unable to navigate around construction vehicles or deliveries.

At present a considerable amount of noise emanates from vehicles that have found themselves unable to pass standing vehicles parked on Furnival Street. The noise of engines revving, horns blowing and raised voices all add to the levels of noise in the street. This is already a daily issue.

If large construction vehicles are also introduced into the equation then the level of noise disturbance generated from vehicles standing with engine running, horns blowing and raised voices will be intolerable for local residents sited just meters away in their offices and living accommodation.

As I have already outlined, Furnival Street is a very narrow hard surfaced street where noise reverberates and magnifies considerably due to the nature of the street.

Consideration:

I see that very little can be done to eliminate the likely noise disturbance of the demolition and building work however moving the delivery / collection point to High Holborn will reduce the movement of vehicles along Furnival Street during the building / renovation period of the project.

Moving the delivery / collection point for vehicles will also remove the additional blockage element reducing the noise disturbance emanating from vehicles unable to navigate Furnival Street

Premises along the street might find that they will need to consider secondary glazing on the windows facing the street for all of their floors. I would look to the Tunnels Project to consider paying for the installation of these to our premises.

Structural Damage

Number 32 and 33 are grade 2 listed Georgian buildings with cellars/vaults that run under the pavement and road of Furnival Street.



These buildings and foundation were constructed centuries before modern construction methods and the heavy vehicles that carry modern plant and materials to the construction site.

The street is very narrow with vehicles passing withing a couple of meters of our ground and first floor windows and actually passing right over the cellars/vaults of our building.

The potential structural damage to our listed buildings, and no doubt others along the street, is very real.

I would like planning to note and take into account that there is a potential risk of structural damage to our buildings that would have a significant cost to our business but also to the historical structures.

Consideration:

That the Tunnel Experience pay for an independent survey to be carried out on our buildings noting the state of the current structure (vaults / walls / sills / window frames and surrounds / internal plasterwork and that similar surveys are caried out during the project and at the completion of the building project and that any suggested structural reinforcing procedures are paid for e.g. the installation of 'crock supports in the cellars/vaults / repointing of the brickwork of the cellar / vaults / repair of cracks or damage to the walls / sills or frames / plasterwork of our building.

Business Disruption

I have already outlined that our business is 'talking therapies', the nature of our work is essentially two or three people sitting in a quiet and calm environment holding a conversation. There are times when clients talk quietly or need to sit and contemplate. We would be concerned about any long-term intrusive noise during the building works..

It is part of the practice of therapy to 'change the air' in a therapy room by opening windows between therapy sessions or during the session to allow for air circulation. If there is considerable noise in the street this will be a hinderance to our therapist's work

The majority of our clients attend in person and see their therapist in the therapy room setting. Almost 100% of our clients arrive on foot, either from local areas or having used public transport to Chancery Lane or Farrington Station or one of the other nearby stations to north and south.

Their final passage is along Furnival Street to our front door.

Navigating building works traffic and deliveries will also become a barrier to clients attending for therapy.

If building debris, mud and dirt is being removed from the tunnel project location then this increase in dirt will be carried on the shoes of clients and therapists entering our building.

I would like planning to consider how the passage along Furnival Street and surrounding areas can remain unimpeded and clean.

Consideration:

Tunnel project paying for the installation of secondary glazing to the front elevation windows of 33 Furnival Street.

For the Tunnel project to consider paying for the installation of air conditioning to rooms within Furnival Street, to counteract the fact that we will be unable to open windows if there is considerable noise within the street.

The Tunnel project being tasked with keeping the pavements and roads washed clean of building debris and dirt.

Air Quality:

The increase in large vehicle traffic will have an impact on the air quality along Furnival Street.

I would like planning to consider how large vehicles can be brought to site without travelling down Furnival Street.

Consideration:

I wish for planning to consider how this can be minimalised or eliminated as an issue, possibly only allowing the 'Tunnel Experience' related vehicles to deliver to a site around the corner on High Holborn and any goods or plant machinery then conveyed by trolley or truck to the site location.

2. Day to Day Operation Concern and Comments

If planning is granted and if the Tunnel Experience Project is developed then we have a number of concerns about the impact of the operation of the Tunnel Experience on the business and residential occupants and their visitors.

Again I will list these and then make further comments:

Human Safety

Noise Disturbance: Operation noise delivery of goods & removal of waste

Noise Disturbance: Visitors to the attraction

Business Disruption

Human Safety

The comments made earlier around Human Safety are relevant once the Tunnel Experience is in operation.

Not only will the pedestrian numbers by greatly increase along Furnival Street, but the numbers of cars and taxis will increase as some coming to the Tunnel Experience will do so by vehicle.

The Tunnel Experience have indicated that they view one of the target markets for their 'attraction' to be groups of school age children.

Large numbers of children, or indeed any age of visitor, will add further significant numbers to the narrow pavement areas along Furnival street and regardless of the fact that tickets are to be pre booked, the processing of those arriving to enter the attraction will necessitate a certain amount of queueing and congregating on the pavements along Furnival Street.

All of this will push both pedestrians wishing to use Furnival Street as a route to their destination, those attempting to enter or exit their buildings and of course those waiting to enter the attraction, to stand in the roadway and be more vulnerable to passing traffic.

Similar large attractions e.g. Madam Tausauds, The London Eye, The British Museum, all have considerably wider pavements and or forecourts to allow for their visitors to congregate before entering or on leaving the attractions. This is not the case for the Tunnels Experience on Furnival Street.

Consideration:

That the main entrance be sighted on High Holborn and or any queueing take place along High Holborn to reduce the number of 'bodies' standing on pavements along Furnival Street.

If the main entrance is still to be sighted on Furnival Street, to enforce queueing to take place in the direction of High Holborn and not along Furnival street.

Noise Disturbance: Delivery of goods & services / collection of waste

I have already stated that our service, talking therapy, requires a calm and quiet environment.

The day-to-day operation of an attraction will generate deliveries of goods and necessitate the removal of waste.

The vehicles that carry out these deliveries and collections will generate noise along with the actual movement of goods and waste.

Consideration:

It has been indicated that the Tunnel Experience 'bar' and 'catering' will be accessed by the general public via 31 High Holborn. Could all delivery and collections be via this entrance too. This would allow vehicles to park on High Holborn, as do other businesses (Tesco / Marks & Spencer etc), thus reducing the impact on Furnival Street.

Noise Disturbance: Visitors to the attraction

There will be increased numbers of people standing on Furnival street waiting to enter the attraction and this will greatly increase the noise generated by the human voice. People excited and talking with each other, people on their mobile phones etc.

Large groups of school children have a noise level all their own.

The nature of the street environment, hard surfaces with no soft planting, means that the level of noise will reverberate and echo along the hard surfaces of the street.

Noise of people leaving the attraction late on in the evening. We operate our business through the evening with clients being seen until 10pm, there are residential occupiers of Furnival Street at number 34/35 and 36/37.

We are concerned that evening visitors will cause noise disturbance as they exit the attraction.

Consideration:

That the main entrance be sighted on High Holborn and or any queueing take place along High Holborn to reduce the number of 'bodies' standing on pavements along Furnival Street.

If the main entrance is still to be sighted on Furnival Street, to enforce queueing to take place in the direction of High Holborn and not along Furnival street.

Business Disruption:

Large numbers of visitors standing on Furnival Street will hinder the movement of clients wishing to walk down Furnival Street.

If the visitor numbers, that the Tunnel Experience predict, are realised then there will be queues running in front of the front entrances of businesses and private

residences along the street, impeding access to and from those businesses and residences.

Increase in rubbish and general waste along the street

These factors will have an impact on our business and those of other businesses in the Furnival Street area.

Consideration:

That the main entrance be sighted on High Holborn and or any queueing take place along High Holborn to reduce the number of 'bodies' standing on pavements along Furnival Street.

If the main entrance is still to be sighted on Furnival Street, to enforce queueing to take place in the direction of High Holborn and not along Furnival street.

Brian Cotsen & Kate McGeever
City Therapy Space
33 Furnival Street
London
EC4A 1JQ

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: LEYI WANG

Address: Flat 11, 35 Furnival Street, London EC4A 1JQ

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: It would be too noisy for our residential area. And current street is too narrow to cope with the plan.

From:
To:
Subject: PROPOSED DEVELOPMENT 38-39 FURNIVAL STREET EC4
Date: 09 January 2024 19:49:58

THIS IS AN EXTERNAL EMAIL

REFERENCE: 23/01322/FULMAJ

I am writing to strongly object to this development. The disruption to the neighbouring properties in terms of noise and dust, traffic and general disruption will be too great during construction.. This is a quiet residential neighbourhood and this kind of disruption is completely unacceptable. Additionally, the extra pedestrian footfall after completion is also unacceptable. The pavements are narrow and people live there because it is a quiet side street.

Liz Speirs

Owner, Flat 13, 34-35 Furnival Street.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Miss Meihan Dong

Address: 35 Furnival Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment:As a resident of the area I firmly oppose the proposed redevelopment project for the following reasons:

1. Noise pollution: The project may cause noise and light pollution, negatively impacting the peace and quality of life for nearby residents.
2. Street width: The narrow streets are not suitable for the proposed usage after renovation, potentially leading to traffic congestion and further disturbance to local communities.
3. Nightclub operation: The operation of nightclubs at night would significantly disturb the surrounding households, causing noise pollution and negatively affecting their quality of life..

Thank you for your attention and understanding.

Best regards.

Begum, Shupi

Subject: FW: 23/01322/FULMAJ

From: Chloe Nash [REDACTED]
Sent: Thursday, January 11, 2024 3:33 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Cc: Tampouridou, Anastasia <Anastasia.Tampouridou@cityoflondon.gov.uk>
Subject: Re: 23/01322/FULMAJ

THIS IS AN EXTERNAL EMAIL

My home address is St Crispin, the Street, Dockenfield GU104HX.

My flat is Flat 3, 34 Furnival St, London EC4A1JQ

I do not consent to giving out this personal information publicly unless this is required to accept my objection.

Kind regards
Chloe
Sent from my iPhone

On 11 Jan 2024, at 14:50, PLN - Comments <plncomments@cityoflondon.gov.uk> wrote:

Hello,
Thank you for your comment. In order for it to be registered, please provide your full address.

Kind regards,

Davis Watson
Business Administration Apprentice (Town Planning)

Environment Department
City of London Corporation

<image001.png> City of London Corporation| PO Box
270|London EC2P 2EJ|
www.cityoflondon.gov.uk

From: Chloe Nash [REDACTED]
Sent: Wednesday, January 10, 2024 4:46 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 23/01322/FULMAJ

THIS IS AN EXTERNAL EMAIL

Please find attached my objection to the above application. Please acknowledge receipt.

Kind regards
Chloe

Sent from my iPhone

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OBJECTION to proposed major development on Furnival St, EC4A

The text immediately below in blue is taken from a Practical law practice note to highlight that this objection is in line with planning law and only considers matters that are considered material to the application. Insertions in bold and the text after this section are my words.

Background note

Under section 70(2)(c) of the TCPA 1990, an LPA is required to have regard to all considerations that are material to an application. To be material, the matters must be planning considerations.

The TCPA 1990 offers no further guidance, however, as to what considerations might be regarded as material. It has therefore fallen to the courts to interpret the term. The starting point is the judgment of Cooke J in Stringer v Minister of Housing and Local Government [1971] 1 All ER 65 at 77:

"In principle, it seems to me that any consideration which relates to the use and development of land is capable of being a planning consideration. Whether a particular consideration falling within that broad class is material in any given case will depend on the circumstances."

The courts have subsequently held that the following matters are capable of being a material consideration for the purposes of section 70(2)(c) of the TCPA 1990:

The protection of private interests: as a matter of general principle, planning is concerned with land use from the point of view of the public interest and is not concerned with private rights. It is also well established, however, that the public interest may require that the interests and amenity of individual occupiers should be considered (Stringer v Minister of Housing and Local Government [1971] 1 All ER 65)

There is a public interest in respecting the private interests of local residents because of the precedent this major development would have on this conservation area. The design statement states that, *"Both of the proposed entrances, 31-33 High Holborn and 38-41 Furnival Street, are situated in areas predominantly occupied by offices. This offers the City of London an opportunity to implement a cultural use scheme that can draw people during off-peak hours and weekends when offices are typically closed."* **This overlooks the many local residents and the importance of peace and quiet at weekends for the local residents who are accustomed to enjoyment of the city at its quietest at the weekend.**

Matters regulated by other statutory codes: provided a matter is material in planning terms, the LPA is entitled to have regard to it under section 70(2)(c) notwithstanding that other legislation or provisions may exist for its regulation (Esdell Caravan Parks Ltd v Hemel Hempstead Rural District Council [1966] 1 QB 895).

Central government policies: for example the NPPF and the PPG (Carpets of Worth Ltd v Wyre Forest DC (1991) 62 P & CR 334).

Please see below detailed consideration of the application of the current local plan to this development.

Previous appeal decisions concerning the same application site (North Wiltshire DC v Secretary of State for the Environment (1992) 65 P & CR 137).

No information has been made available about previous decision on the same application.

Creation of a precedent that might adversely affect the planning of an area (Poundstretcher v Secretary of State for the Environment [1988]).

This application if accepted would undoubtedly create a significant precedent for major developments that affected the settlement and character of a conservation area. It is an audacious application that if accepted would have profound consequences for local residents and for the amenity and character of the area. In particular allowing a cheap looking glass cubed frontage in a primarily stone and brick street with character, and allowing thousands of vehicles and millions of pedestrians to enter this quiet narrow one way street with resulting traffic chaos and safety issues.

The planning history of site: including previous grants and refusals of planning permission (North Wiltshire District council v Secretary of State for the Environment [1993] 65 P & CR 137).

It states in the design statement that “*The Tunnels originally included a number of additional entrances, such as Took’s Court and Staples Inn. These have been blocked or limited within recent developments, which makes them currently unusable*”. This would suggest there may be a history of refusal of planning consent for development of the tunnels and that the barristers Chambers and residential accommodation in Staples Inn were successful in resisting such applications – information on planning history should be made accessible to affected residents and planners so that the planning authority can carefully consider the application of previous decisions and reasoning.

Existence of alternative sites: Where there are clear planning objections to development on a particular site then it may well be relevant and necessary to consider whether there is a more appropriate alternative site elsewhere (Trusthouse Forte Hotels Ltd v Secretary of State for the Environment (1986) 53 P & CR 293).

Has consideration been given to whether alternative sites that are in more spacious locations and not ONE WAY streets may be preferable? It is considered that the entrance to the Bar at Fulwood Place is a more realistic entrance/exit point except for emergencies because Furnival St is narrow and one way and cannot accommodate any more traffic or people.

Development plan documents in the course of preparation are only a material consideration and do not have statutory weight for the purpose of section 38(6) of the PCPA 2004 until it is adopted.

Application of Local Plan 2015

The provisions of the local plan require the following:

1. This building should be preserved or used as office space and not made into a leisure facility.

The application involves demolition of existing office space, which is not in line with the Local Plan's ambition to preserve office space. It only includes limited office space at 2 and 3rd levels.

The following local Plan provisions are engaged: 3.1 Offices 31 CS1 Offices 33 DM 1.1 Protection of office accommodation 34 DM 1.2 Assembly and protection of large office development sites 35 DM 1.3 Small and medium sized business units 36 DM 1.4 Temporary alternative use of vacant office buildings and sites 36 DM 1.5 Mixed uses in commercial areas 37

2. Significant security and safety concerns at this location make this an unacceptable development that should be refused.

Furnival St is a ONE WAY, narrow street with limited access. At one end is a cul de sac, at the other is a busy main road with a tube station and only one side street providing access, Norwich St, which is constrained and difficult to access from Fetter lane as lots of building work, high rise offices and narrow roads. There isn't capacity for millions of people, or any vehicles to pass down Furnival St. It would lead to hoards of people congregating or queueing outside neighbouring flats and offices, possibly spreading down to the Tube station and causing congestion and chaos.

Furnival St is currently a very quiet street and is an oasis, so is not designed for a huge venue and there are no planning conditions that could overcome the security or safety considerations that apply.

The night time use of the venue would cause significant noise and other disturbance to local residents.

The crowding and traffic management issues are unsurmountable. There is a reference in the design statement to the evacuation strategy refers to access for "goods access". This highlights that heavy goods vehicles would need to pass down Furnival St to deliver goods to the venue, which would completely block the street and cause gridlock. This is a very narrow one way street so there is no room for goods access even if there weren't hoards of visitors clogging up the street. The combination of visitors and goods vehicles presents a serious safety issue. The statement in the design statement is patently untrue and unrealistic, "*The development is proposed to be accessed from the primary access point at No.39 and No.40 Furnival Street which will be repurposed to accommodate visitors within the curtilage of the site, without causing any pedestrian queues on to the highway*". It is impossible to imagine how this

venue could operate without pedestrian queues and there is absolutely no space for this.

This statement is also untrue and unrealistic: *“in line with local and regional policy, it is proposed that the development will be car free with the exception of the retention of the single bluebadge car parking space on Furnival Street. In accordance with London Plan standards, secure and covered cycle parking for staff been provided within Furnival Street with short stay visitor parking provided in the nearby public open realm”*. The existing blue badge car parking space is needed for existing residents and office workers and cannot be given up to this development, and would be completely inadequate to accommodate the number of disabled visitors who may need to park there to attend the attraction. The planning authority must give consideration to the Equality Act 2010 and to the need to make reasonable adjustments to ensure this doesn't have a disproportionate impact on disabled residents and visitors.

It is impossible to see how there could be space for visitor and staff cycle parking on Furnival Street or surrounding areas. Is it being suggested that Furnival St becomes a car free zone as that would affect everyone in surrounding streets and should be thoroughly consulted upon. If not, this is a narrow one way street with cars and pedestrians, without adequate space for the numbers of either that would be generated by the development. It is admitted in the design plan that coaches are expected to bring visitors to the venue, but there is no provision for them. It states coaches will drop off on High Holborn but there is no parking space for them, so that will block the bus lane/road and this will create gridlock. Likewise, taxis are expected to pick up and drop off on furnival st but there is no way for them to stop on this one way street and no room for cars to pass if they do stop.

The use of underground tunnels would raise serious security concerns, particularly with regards to terrorist threats to the City of London.

The design statement states that, “Shafts and associated lobbies will be pressurised.” This raises concerns about explosion risks and needs to be thoroughly investigated and opined on by an independent expert.

The visual representation of the proposed Furnival St entrance is misleading as it makes it appear as if the pavement and road are much wider than they are. The pavement narrows in places and is the minimum width, only enough for one person to pass.

The following statement in the design plan is symptomatic of how ill-thought through and unrealistic this proposal is, and shows that the plan lacks credibility:

“Due to the above ground land constraints, all servicing will occur on carriageway, with Furnival Street proposed as the key servicing location away from the A40 (Holborn). No dedicated bay has been provided, as servicing vehicles can wait on the single yellow lines currently present on Furnival Street. Delivery and servicing vehicle movements will be managed by the Delivery and Servicing Plan.” There isn't space for any cars to stop on Furnival St. If cars stop for servicing it will block the street.

Similarly, this statement lacks any credibility and shows this plan is risible: *“The trip generation shows that the development may create up to 1,500 two-way total person trips/hour in the busy design day scenario. On this basis a PCL analysis and Chancery Lane station Legion model was produced. • The PCL sensitivity results which include testing the local footways with an additional 100% of development trips, indicate no significant impact on the level of footway crowding in both the 2023 and 2041 scenarios.”*

There wouldn't be space for emergency vehicles to attend and it would be life-threatening for someone who is trapped in the tunnel or who gets ill whilst underground and then can't be given prompt medical attention. An ambulance would struggle to reach the venue and would need to go around and down Norwich St in order to park outside but there is absolutely no parking outside so it would block the street/ there may be other vehicle or people were already blocking it.

The removal of asbestos onto Furnival St is of grave concern to local residents who won't be protected from the airborne particles as they pass by.

The following local Plan provisions are engaged:

3.3 Security and Safety 46 CS3 Security and Safety 47 DM 3.1 Self-containment in mixed use developments 48 DM 3.2 Security measures in new development and around existing buildings 48 DM 3.3 Crowded places 49 DM 3.4 Traffic management 50 DM 3.5 Night-time entertainment

3. The tunnels are a significant historical and cultural asset and may also be required for national security. They should be preserved and not turned into a tourist attraction.

The following local Plan provisions are engaged:

3.12 Historic Environment 107 CS12 Historic Environment 108 DM 12.1 Managing change affecting all heritage assets and spaces 109 DM 12.2 Development in conservation areas 110 DM 12.3 Listed buildings 111 DM 12.4 Ancient monuments and archaeology 112 DM 12.5 Historic parks and gardens 113

4. Environmental considerations

This site continually smells of sewage and there are clearly below ground drainage and ventilation issues. The development of this site would expose and exacerbate those issues so a detailed assessment would be required before this application could be properly considered.

The emissions caused by the development in this confined space and the impact on air quality and noise pollution would exceed allowable levels. An independent professional report should be prepared to assess this.

The following local Plan provisions are engaged:

3.15 Sustainable Development and Climate Change 124 CS15 Sustainable Development and Climate Change 125 DM 15.1 Sustainability requirements 126 DM

15.2 Energy and CO2 emissions assessments 127 DM 15.3 Low and zero carbon technologies 128 DM 15.4 Offsetting of carbon emissions 129 DM 15.5 Climate change resilience and adaptation 130 DM 15.6 Air quality 130 DM 15.7 Noise and light pollution 131 DM 15.8 Contaminated land and water quality 132

5. There is no space for walkways as the pavement narrows at various points and the road and pavement are not wide enough to accommodate the level of human and other traffic that would be caused by the development. There is no scope for widening road or pavement due to tall rise offices and flats either side. The proposed entrance at Furnival St fails to take account of the extremely limited space and access on this street. The use of Furnival St by so many visitors would block cars trying to travel one way down Furnival St, leading to gridlock on Norwich Street and potentially also Fetter Lane and High Holborn. If this development is allowed the entrance could only be on High Holborn as there isn't space on Furnival St.

Public parking is extremely limited in this area, with only a permanently full and very small NCP car park locally (10 mins walk away) (as far as I am aware).

The following local Plan provisions are engaged:

3.16 Public Transport, Streets and Walkways 135 CS16 Public Transport, Streets and Walkways 137 DM 16.1 Transport impacts of development 138 DM 16.2 Pedestrian movement 139 DM 16.3 Cycle parking 140 DM 16.4 Facilities to encourage active travel 141 DM 16.5 Parking and servicing standards 141 DM 16.6 Public car parks

6. There is absolutely no scope for further rubbish disposal on Furnival st, especially not on the scale that would be required by this major development.

The following local Plan provisions are engaged:

3.17 Waste 145 CS17 Waste

Visual appearance

The visual appearance of the glass façade is hideous and out of keeping with the brick and stone structures in the rest of the street. This glass façade is an affront to the cultural heritage of this site. This is a conservation area and the appearance of the building should be in keeping with the rest of the area.

Local engagement

The level of local engagement has been grossly exaggerated. This is highlighted by the level of correspondence mentioned in the design statement- "47 emails and calls received". As far as I am aware local residents were given one opportunity to attend one evening. This was not a real invitation if it involved going down into the very polluted tunnels as they are a major health hazard due to the sewage fumes and air pollution/it wasn't clear how residents could engage. The surveys etc that claim

support for the proposal but they were not open to local residents/ local residents were unaware of this opportunity to comment.

Furnival St Entrance

If this development goes ahead it needs to avoid Furnival St as an entrance or visitor access /exit point because it is completely unsuited to accommodating any more cars or people than it currently does. It is a very narrow, one way street with limited pavement and high rise buildings either side, and it is conservation area so needs to retain its peaceful character and not have a huge glass fronted atrocity with millions of tourists deposited on it.

Judicial Review

This proposed development is next to two blocks of flats, one of which has been residential accommodation since at least 1999. These blocks are very quiet residential accommodation. The severe disruption that would undoubtedly be caused to the peaceful enjoyment of these flats would amount to a breach of the owner-occupiers' human right to peaceful enjoyment of property. As such a decision to accept this application is not in the public interest and could be susceptible to a successful judicial review on this and other grounds.

At present the basement flats can hear and feel slight vibration from tube trains that run from Chancery lane to Holborn. If noise and vibration can be felt from this relatively far away tube line, the vibration caused by the Works and the ultimate occupation of the neighbouring basement by hoards of tourists would reach unlawful levels of disturbance.

The design statement states, "*It is intended that The London Tunnels will attract modern innovative content via a convergence of digital art and immersive technology through a new inhouse initiative to be called 'T-LAB'.*" It appears likely that there would be significant noise not just from years of construction but from the operation of the attraction, and the proposed bar, particularly if it is also used as a night time venue. This would lead to nuisance to local residents who would not be able to sleep due to the noise levels. It is certain that noise and vibration levels will be well in excess of what is stated in the design statement as current noise and trains from tube trains far away can be felt, albeit only very slightly, but this gives an indication of how noise and vibration travels underground. A detailed assessment by an independent expert would need to be carried out to assess the impact on local residents.

I object to this proposed development.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: C Murphy

Address: Flat 15 34-35 Furnival Street London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am not against the idea of opening the tunnels to visitors but the current plans are prohibitively detrimental to Furnival Street which is residential and the application should be refused.

My main Concerns are:

- TRAFFIC and associated disruption: Furnival St as the main delivery point during the Operational working is unworkable. There is no parking allowed for, the idea that drivers will be required to turn off engines etc highlights the fact the street will be blocked whilst deliveries are made with long Transits - this is estimated to be 16 times a day and avoids "peak hours" so more in off-peak hours, plus 36 taxis/peak hour in Furnival Street. Blocking the street and the noise associated with so many taxis/deliveries/service vehicles eg waste collection cannot be acceptable in a residential

street. There's only one Blue Badge space at the moment and no more are planned. Blue Badge holders not visiting the attraction will effectively lose that space, impacting business and residential activities.

- Hours of working, noise, disruption during both Construction and Operations MUST recognise the residential nature of the Furnival Street. In addition to the visitor attraction opening hours of 10am-10pm, deliveries/service vehicles will operate outside of peak hours and visitor opening hours. There are some words about Noise in the application but these appear to be mostly about machinery and vibration and 6.152 of the Planning Statement even suggests there won't be any change. The visitor exit in Furnival Street is a concern, particularly after an event, when the visitors will leave in an uncontrolled manner close to the residential buildings: 10pm and later on Sundays is completely unacceptable, as it is on other days of the week. The application does not recognise that at 34-35 Furnival Street, not only are bedrooms at street level, but the flats extend under the private area of the pavement with the pavement with vulnerable pavement lights.

OBJECTION to proposed major development on Furnival St, EC4A

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- The protection of private interests: as a matter of general principle, planning is concerned with land use from the point of view of the public interest and is not concerned with private rights. It is also well established, however, that the public interest may require that the interests and amenity of individual occupiers should be considered (Stringer v Minister of Housing and Local Government [1971] 1 All ER 65)*

There is a public interest in respecting the private interests of local residents because of the precedent this major development would have on this conservation area. The design statement states that, "Both of the proposed entrances, 31-33 High Holborn and 38-41 Furnival Street, are situated in areas predominantly occupied by offices. This offers the City of London an opportunity to implement a cultural use scheme that can draw people during off-peak hours and weekends when offices are typically closed." This not just overlooks but completely ignores the many local residents and the importance of peace and quiet at weekends for the local residents who are accustomed to enjoyment of the city at its quietest at the weekend.

- Matters regulated by other statutory codes: provided a matter is material in planning terms, the LPA is entitled to have regard to it under section 70(2)(c) notwithstanding that other legislation or provisions may exist for its regulation (Esdell Caravan Parks Ltd v Hemel Hempstead Rural District Council [1966] 1 QB 895).*
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Please see below detailed consideration of the application of the current local plan to this development.

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This application if accepted would undoubtedly create a significant precedent for major developments that affect the settlement and character of a conservation area. It is an audacious application that if accepted would have profound consequences for local residents and for the amenity and character of the area. In particular allowing a cheap looking glass cubed frontage in a primarily stone and brick street with character, and allowing thousands of vehicles and millions of pedestrians to enter this quiet narrow one way street with resulting traffic chaos and safety issues.

- *The planning history of site: including previous grants and refusals of planning permission (North Wiltshire District council v Secretary of State for the Environment [1993] 65 P & CR 137).*

It states in the design statement that “The Tunnels originally included several additional entrances, such as Tooke’s Court and Staples Inn. These have been blocked or limited within recent developments, which makes them currently unusable”. This would suggest there may be a history of refusal of planning consent for development of the tunnels and that the barristers Chambers and residential accommodation in Staples Inn were successful in resisting such applications. Complete and total information on planning history should be made accessible to affected residents and planners so that the planning authority can carefully consider the application of previous decisions and reasoning.

- *Existence of alternative sites: Where there are clear planning objections to development on a particular site then it may well be relevant and necessary to consider whether there is a more appropriate alternative site elsewhere (Trusthouse Forte Hotels Ltd v Secretary of State for the Environment (1986) 53 P & CR 293).*

Has consideration been given to whether alternative sites that are in more spacious locations and not ONE WAY streets may be preferable? It is proposed/suggested that the entrance to the Bar at Fulwood Place is a more realistic entrance/exit point except for emergencies because Furnival St is narrow and one way and cannot accommodate any more traffic or people.

Development plan documents in the course of preparation are only a material consideration and do not have statutory weight for the purpose of section 38(6) of the PCPA 2004 until it is adopted.

Application of Local Plan 2015

The provisions of the local plan require the following:

1. This building should be preserved or used as office space and not made into a leisure facility.

The application involves demolition of existing office space, which is not in line with the Local Plan's ambition to preserve office space. It only includes limited office space at 2 and 3rd levels.

The following local Plan provisions are engaged: 3.1 Offices 31 CS1 Offices 33 DM 1.1 *Protection of office accommodation* 34 DM 1.2 *Assembly and protection of large office development sites* 35 DM 1.3 *Small and medium sized business units* 36 DM 1.4 *Temporary alternative use of vacant office buildings and sites* 36 DM 1.5 *Mixed uses in commercial areas* 37

2. Significant security and safety concerns at this location make this an unacceptable development that should be refused.

Furnival St is a ONE WAY, narrow street with limited access. At one end is a cul de sac, at the other is a busy main road with a tube station and only one side street providing access, Norwich St, which is constrained and difficult to access from Fetter lane as lots of building work, high rise offices and narrow roads. There isn't capacity for millions of people, or any vehicles to pass down Furnival St. It would lead to hoards of people congregating or queueing outside neighbouring flats and offices, possibly spreading down to the Tube station and causing congestion and chaos.

Furnival St is currently a very quiet street and is an oasis, so is not designed for a huge venue and there are no planning conditions that could overcome the security or safety considerations that apply.

The night time use of the venue would cause significant noise and other disturbance to local residents.

The crowding and traffic management issues are unsurmountable. There is a reference in the design statement to the evacuation strategy refers to access for "goods access". This highlights that heavy goods vehicles would need to pass down Furnival St to deliver goods to the venue, which would completely block the street and cause gridlock. This is a very narrow one way street so there is no room for goods access even if there weren't hoards of visitors clogging up the street. The combination of visitors and goods vehicles presents a serious safety issue. The statement in the design statement is patently untrue and unrealistic, "*The development is proposed to be accessed from the primary access point at No.39 and No.40 Furnival Street which will be repurposed to accommodate visitors within the curtilage of the site, without causing any pedestrian queues on to the highway*". It is impossible to imagine how this

venue could operate without pedestrian queues and there is absolutely no space for this.

The following statement is also untrue and unrealistic: *“in line with local and regional policy, it is proposed that the development will be car free with the exception of the retention of the single bluebadge car parking space on Furnival Street. In accordance with London Plan standards, secure and covered cycle parking for staff has been provided within Furnival Street with short stay visitor parking provided in the nearby public open realm”*. The existing blue badge car parking space is needed for existing residents and office workers and cannot be given up to this development, and would be completely inadequate to accommodate the number of disabled visitors who may need to park there to attend the attraction. The planning authority must give consideration to the Equality Act 2010 and to the need to make reasonable adjustments to ensure this doesn't have a disproportionate impact on disabled residents and visitors.

It is impossible to see how there could be space for visitor and staff cycle parking on Furnival Street or surrounding areas. Is it being suggested that Furnival St becomes a car free zone as that would affect everyone in surrounding streets and should be thoroughly consulted upon. If not, this is a narrow one way street with cars and pedestrians, without adequate space for the numbers of either that would be generated by the development. It is admitted in the design plan that coaches are expected to bring visitors to the venue, but there is no provision for them. It states coaches will drop off on High Holborn but there is no parking space for them, so that will block the bus lane/road and this will create gridlock. Likewise, taxis are expected to pick up and drop off on Furnival St but there is no way for them to stop on this one way street and no room for cars to pass if they do stop.

The use of underground tunnels would raise serious security concerns, particularly with regards to terrorist threats to the City of London.

The design statement states that, “Shafts and associated lobbies will be pressurised.” This raises concerns about explosion risks and needs to be thoroughly investigated and opined on by an independent expert.

The visual representation of the proposed Furnival St entrance is misleading as it makes it appear as if the pavement and road are much wider than they are. The pavement narrows in places and is the minimum width, only enough for one person to pass.

The following statement in the design plan is symptomatic of how ill-thought through and unrealistic this proposal is, and shows that the plan lacks credibility:

“Due to the above ground land constraints, all servicing will occur on carriageway, with Furnival Street proposed as the key servicing location away from the A40 (Holborn). No dedicated bay has been provided, as servicing vehicles can wait on the single yellow lines currently present on Furnival Street. Delivery and servicing vehicle movements will be managed by the Delivery and Servicing Plan.” There isn't space for any cars to stop on Furnival St. If cars stop for servicing it will block the street.

Similarly, this statement lacks any credibility and shows this plan is risible: “The trip generation shows that the development may create up to 1,500 two-way total person trips/hour in the busy design day scenario. On this basis a PCL analysis and Chancery Lane station Legion model was produced. • The PCL sensitivity results which include testing the local footways with an additional 100% of development trips, indicate no significant impact on the level of footway crowding in both the 2023 and 2041 scenarios.”

There wouldn't be space for emergency vehicles to attend and it would be life-threatening for someone who is trapped in the tunnel or who gets ill whilst underground and then can't be given prompt medical attention. An ambulance would struggle to reach the venue and would need to go around and down Norwich St in order to park outside but there is absolutely no parking outside so it would block the street/ there may be other vehicle or people were already blocking it.

The removal of asbestos onto Furnival St is of grave concern to local residents who won't be protected from the airborne particles as they pass by.

The following local Plan provisions are engaged:

3.3 Security and Safety 46 CS3 Security and Safety 47 DM 3.1 Self-containment in mixed use developments 48 DM 3.2 Security measures in new development and around existing buildings 48 DM 3.3 Crowded places 49 DM 3.4 Traffic management 50 DM 3.5 Night-time entertainment

3. The tunnels are a significant historical and cultural asset and may also be required for national security. They should be preserved and not turned into a tourist attraction.

The following local Plan provisions are engaged:

3.12 Historic Environment 107 CS12 Historic Environment 108 DM 12.1 Managing change affecting all heritage assets and spaces 109 DM 12.2 Development in conservation areas 110 DM 12.3 Listed buildings 111 DM 12.4 Ancient monuments and archaeology 112 DM 12.5 Historic parks and gardens 113

4. Environmental considerations

This site continually smells of sewage and there are clearly below ground drainage and ventilation issues. The development of this site would expose and exacerbate those issues so a detailed assessment would be required before this application could be properly considered.

The emissions caused by the development in this confined space and the impact on air quality and noise pollution would exceed allowable levels. An independent professional report should be prepared to assess this.

The following local Plan provisions are engaged:

3.15 Sustainable Development and Climate Change 124 CS15 Sustainable Development and Climate Change 125 DM 15.1 Sustainability requirements 126 DM

15.2 Energy and CO2 emissions assessments 127 DM 15.3 Low and zero carbon technologies 128 DM 15.4 Offsetting of carbon emissions 129 DM 15.5 Climate change resilience and adaptation 130 DM 15.6 Air quality 130 DM 15.7 Noise and light pollution 131 DM 15.8 Contaminated land and water quality 132

5. There is no space for walkways as the pavement narrows at various points and the road and pavement are not wide enough to accommodate the level of human and other traffic that would be caused by the development. There is no scope for widening road or pavement due to tall rise offices and flats either side. The proposed entrance at Furnival St fails to take account of the extremely limited space and access on this street. The use of Furnival St by so many visitors would block cars trying to travel one way down Furnival St, leading to gridlock on Norwich Street and potentially also Fetter Lane and High Holborn. If this development is allowed the entrance could only be on High Holborn as there isn't space on Furnival St.

Public parking is extremely limited in this area, with only a permanently full and very small NCP car park locally (10 mins walk away) (as far as I am aware).

The following local Plan provisions are engaged:

3.16 Public Transport, Streets and Walkways 135 CS16 Public Transport, Streets and Walkways 137 DM 16.1 Transport impacts of development 138 DM 16.2 Pedestrian movement 139 DM 16.3 Cycle parking 140 DM 16.4 Facilities to encourage active travel 141 DM 16.5 Parking and servicing standards 141 DM 16.6 Public car parks

6. There is absolutely no scope for further rubbish disposal on Furnival st, especially not on the scale that would be required by this major development.

The following local Plan provisions are engaged:

3.17 Waste 145 CS17 Waste

Visual appearance

The visual appearance of the glass façade is hideous and out of keeping with the brick and stone structures in the rest of the street. This glass façade is an affront to the cultural heritage of this site. This is a conservation area and the appearance of the building should be in keeping with the rest of the area.

Local engagement

The level of local engagement has been grossly exaggerated. This is highlighted by the level of correspondence mentioned in the design statement- "47 emails and calls received". As far as I am aware local residents were given one opportunity to attend one evening. This was not a real invitation if it involved going down into the very polluted tunnels as they are a major health hazard due to the sewage fumes and air pollution/it wasn't clear how residents could engage. The surveys etc that claim

support for the proposal but they were not open to local residents/ local residents were unaware of this opportunity to comment.

Furnival St Entrance

If this development goes ahead it needs to avoid Furnival St as an entrance or visitor access /exit point because it is completely unsuited to accommodating any more cars or people than it currently does. It is a very narrow, one way street with limited pavement and high rise buildings either side, and it is conservation area so needs to retain its peaceful character and not have a huge glass fronted atrocity with millions of tourists deposited on it.

Judicial Review

This proposed development is next to two blocks of flats, one of which has been residential accommodation since at least 1999. These blocks are very quiet residential accommodation. The severe disruption that would undoubtedly be caused to the peaceful enjoyment of these flats would amount to a breach of the owner-occupiers' human right to peaceful enjoyment of property. As such a decision to accept this application is not in the public interest and could be susceptible to a successful judicial review on this and other grounds.

At present the basement flats can hear and feel slight vibration from tube trains that run from Chancery lane to Holborn. If noise and vibration can be felt from this relatively far away tube line, the vibration caused by the Works and the ultimate occupation of the neighbouring basement by hoards of tourists would reach unlawful levels of disturbance.

The design statement states, "*It is intended that The London Tunnels will attract modern innovative content via a convergence of digital art and immersive technology through a new inhouse initiative to be called 'T-LAB'.*" It appears likely that there would be significant noise not just from years of construction but from the operation of the attraction, and the proposed bar, particularly if it is also used as a nighttime venue. This would lead to nuisance to local residents who would not be able to sleep due to the noise levels. It is certain that noise and vibration levels will be well in excess of what is stated in the design statement as current noise and trains from tube trains far away can be felt, albeit only very slightly, but this gives an indication of how noise and vibration travels underground. A detailed assessment by an independent expert would need to be carried out to assess the impact on local residents.

No Compensation Proposed

The proposed design and plan do not consider any compensation for local residents for the loss of their enjoyment and peace to the reside in their homes, nor for the loss of income to those owners who rely on rental income as part of their retirement plans. The value of the properties in the area will surely be impacted by years of noise and disruption due to the construction.

I object to this proposed development.

[REDACTED]

[REDACTED]

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Jack Watkins

Address: 3 kitwood drive Lower earley Reading

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The project looks to largely destroy the original fabric and historical integrity of a largely intact cold war telephone exchange. The project is not empathetic enough to this. This is the last of the 3 used by BT in the cold war that remains in a preserved state like this, the other 2 are largely stripped.

Adjei, William

From: PLN - Comments
Subject: FW: CoL Planning Reference 23/01322/FULMAJ

From: Susan Scott
Sent: Sunday, January 14, 2024 7:47 PM
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: CoL Planning Reference 23/01322/FULMAJ

THIS IS AN EXTERNAL EMAIL

ATTN: Anastasia Tampouridou

RE: CoL Planning Reference 23/01322/FULMAJ

Dear Anastasia,

I am writing to object to the above planning application on the following grounds:

1. The proposed development is out of character with the conservation area, existing buildings and their designated use. The development would have a negative impact on the character and appearance of the area, and would be detrimental to the local environment.
2. The proposed development will result in increased noise, traffic and pollution. Furnival Street is a narrow street with a cycle path and the significant increase in traffic will not only cause congestion but also pollution. The development would have a negative impact on the quality of life of local residents and businesses, and would be detrimental to the health and well-being of the community.
3. The proposed development will be detrimental to the lives of local residents and businesses. Furnival Street is home to a significantly sized residential community relative to the main streets nearby and it is unreasonable to add a further licensed premise and event venue in such a context. The businesses located on this street provide forms of professional service (e.g. legal, counselling) The development would have a negative impact on the local economy and would be detrimental to the social fabric of the community.

The planning application's emphasis on the historic significance of these tunnels seems wholly spurious. I fear this is an attempt to get an events venue approved under the guise of a contribution to cultural heritage. In my view, it would be more appropriate to make an audio-visual exhibit about the tunnels for the Museum of London.

I would like to request that the planning application be refused on the grounds outlined above.

Yours faithfully,
Professor Susan V. Scott

Flat 5, 35 Furnival Street, London EC4A 1JQ

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Colin Matthews

Address: 7 Oxted Court Milton Portsmouth

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I think we should save as much of our history as possible, so much is being destroyed by development.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Philip Nash

Address: 34 Leyton Green Towers Leyton Green Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think this estimated £140 million into restoring the Tunnels, to preserve the part they played in history and give them a renewed sense of public purpose as an open-to-all experience is an amazing thing to do and will provide a new lens on some of the important history of the country.

I understand that this would also reinstate the deepest licensed bar in London, as an existing feature of the Tunnels dating back to the 1980s which would be an attraction in and of itself.

On top of this the economic benefits to an area still rebuilding from the pandemic would be huge.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Oscar Li

Address: 7 High Holborn London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I support this proposal in principle, subject to the following concerns being mitigated.

1. Construction traffic - Furnival street is narrow and the road must not be closed for an extensive period of time. Furthermore, the access and egress of construction traffic would add traffic flow to High Holborn which is an already congestion main carriageway. This has to be addressed.

2. Number of visitors - despite the location has an adequate level of Underground, Train, Bus, Taxi coverage. There is a lack of parking space in the area. I am concerned that there will be an increasing number of cars parking illegally. Blocking the bus lane at High Holborn. Given the pedestrian walkway is narrow I am also worried about the crowd management. Sufficient mitigation should be in place to reduce the congested visitors.

3. The historical feature of the tunnel should be kept in their original shape and conditions. I am concerned that the proposal would remove the existing features in the tunnel. Making the tunnel a 'tunnel themed' bar.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Susan Smith

Address: Vesage Court, 58, 8a leather lane ec1n7re 58 London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I feel this project needs to be supported. To bring a part of history back to life that young & old can enjoy & learn from is something to be encouraged.

Also the area has suffered drastically since covid with so many empty premises it has made a once vibrant location seem depressing. This project will help to add life to the area & hopefully more footfall & revenue for all

36-37 Furnival Street,
London,
EC4A 1JQ

29/01/2024

Dear Sir/Madam,

Representation from Furnival Management Limited

We, as the freeholder of Aston House, 36-37 Furnival Street, would like to oppose the proposed planning application at 38-39 and 40-41 Furnival Street (with reference 23/01322/FULMAJ).

36-37 Furnival Street is a block of residential apartments, immediately adjacent to 38-39 Furnival Street, being the subject of the planning application.

The reasons for our objection are as follows:

Construction Phase

1. The construction phase of the proposed planning application will result in very heavy disturbance for our residents. Given the opening of the prospective museum is planned for 2027, the construction phase will mean at least 3 years of construction work, and probably longer due to the usual delays experienced in such development works.
2. Our building is exactly adjacent to 38-39 Furnival Street, and is residential. The amount of noise and disturbance of such a heavy development to our residents will result in (1) very high inconvenience for the residential owners occupying their flat and (2) very high difficulty to rent for residential owners renting their flat.
3. There may be potential structural damages to our building as a result of the construction works envisaged by the planning application given that our building, located at 36-37 Furnival Street, is immediately adjacent to 38-39 Furnival Street. We understand that the planning application includes the excavation of additional basement levels at both 38-39 and 40-41 Furnival Street, which may lead to structural impacts to our own building's foundations.

Operational Phase

4. Furnival Street is a small and narrow street, not at all designed or equipped to accommodate the entrance of a museum, which, understanding the developer's plans, is to receive in excess of 1 million visitors per year. Professionals and utility companies, including for emergencies, already experience difficulties accessing our building when we need them, so this planned development can only worsen the situation given the amount of additional traffic and volume of tourists such a museum would bring in our street.
5. The entrance of a museum like this one will come with many more disturbances, such as loitering and large groups of people waiting or having meeting points in the street. This will attract pickpockets targeting tourists, since these groups will likely be crowded, given that Furnival Street is a very narrow street.

Based on the considerations above, we would like to oppose the planning application at 38-39 and 40-41 Furnival Street (with reference 23/01322/FULMAJ).

Yours faithfully,

.....


Duly authorised for and on behalf of:
Furnival Management Limited
Aston House
36-37 Furnival Street
London
EC4A 1JQ

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mrs Robyn Brook

Address: Stone Cottage Main Street Slawston

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support the development of the tunnels. They are steeped in history that I feel is important to share and learn about. It will attract tourism and bring income into the city.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr James Loxton

Address: 50 Stapleton Hall Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Dear Sirs,

As a born and bred Londoner, I am fully in support of this Project. My reasons are below -

1. As a huge fan of architecture it is satisfying to see that this project will not require the demolishing of any buildings, nor detract from the fine views in the City, or cause any light restrictions.

2. My Grandfather (Bill Loxton) was one of "the few" flying spitfires in the Battle of Britain and so any opportunity to remind today's generation of the sacrifices made by the men and women of Britain in those dark days is very important to me - whether pilots in the air, or ARP Wardens on the ground - all had a role to play in this hugely important part of our history.

3. London needs to compete with other Global Capitals who constantly open new attractions and

showcase their existing heritage. The last major attraction opened in London was the London Eye over 20 years ago. Tourism contributes to over 10% of the GDP of the UK.

4. The Project will invest an estimated £140 million into restoring the Tunnels; this money will help a large group of London based Firms, supporting jobs during the construction process.

5. It will also help reinvigorate an area still reeling from the Pandemic, where many firms have reduced their footprint, or have workers only coming in Tuesday-Thursday. It will do this by increasing local spending by between £60M-£80M a year and make 40 full time jobs on site.

6. It will create opportunities for people of all ages, backgrounds and abilities to learn about London's history and also educational content on nature and the arts.

7. It will also reinstate the deepest licensed bar in London, which was an existing feature of the Tunnels dating back to the 1980s.

8. It should also raise the income of the Council who use this income to support the community. At a time when Council Income is severely stretched and services are at risk of being cut back, any additional income is essential.

Please approve this hugely important Project.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr KENNETH GOLBY

Address: 292 Hamstead Road Great Barr Birmingham

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I would like to submit my statement in support of the London Tunnels project and its inherent benefits.

I have taken the time to visit the site and a tour of the tunnel site and believe it is in the interest of many parties to allow this to move forward. For me the benefits are many.

The tunnel is already there and stable and will reanimate the historical site with all its heritage, which does tell the very important history of the sacrifice made by many persons during WW2, rather than have to accommodate a new site.

The proposed investment of an estimated £140 million is a major next step after waiting 20 years since the London Eye opened and will surely attract a large contingent of tourists, especially being so close to a lot of other major and popular attractions.

The project would enhance experiences related to the history of the tunnels and would it to be

shared by all ages and areas of interest, whilst also reinstating the deepest licensed bar in London, which dates back over 40 years.

It is also pertinent about the creation of employment opportunities in the City of London and Camden along with educational opportunities, especially for children.

I fully support this unique development in an otherwise unused space.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr George Harris

Address: 1 Bembridge Crescent Portsmouth

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: The last major attraction to be opened in London was the London Eye over 20 years ago, therefore I think this idea to re-use existing infrastructure, built underground, to create a major new attraction in Central London is brilliant!

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Max Tobias

Address: 51 ADLEY STREET London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This example of adaptive reuse is, in today's respectful and informed manner, a brilliant way of generating tourism dollars. As London competes for relevance and aims to be an open and attractive destination, innovation like this helps to set it apart.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr peter conniff

Address: 337 RACETRACK RD Ho Ho Kus

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:What a great way to highlight an important part of British history. Giving visitors a first-hand view of what it was like to be under ground in London during the blitz. It seems like a well thought out project with a beautiful design. On my personal and business trips to London, this would be high on my list of must do's.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr William Morris

Address: Barrow View Farm Broad Oak Dorset

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:What an AMAZING contribution towards increasing tourism in London; especially to supporting the local business' situated in Holborn.

I am fully in support of this project. Not only for the boost in footfall through tourism. It also is a fantastic project that will fascinate many because of its true British history.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Miss Lisa Dickenson

Address: Flat 9 ,35 Furnival Street, London London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:Hi

I have been a resident in Furnival Street for over 16 years.

As a long time resident, I do support any new ideas that will bring finance into London and new experiences - absolutely.

However, I would encourage the Planning Committee to simply visit Furnival Street to see immediately the plan as it stands cannot go ahead and would be dangerous to residents and the public.

As has been mentioned previously, Furnival St is a narrow, single one way side street with

buildings on both sides.

In the construction phase there would be no way for the large construction vehicles get into Furnival Street from Norwich Street the turning is very sharp. If they backed in from High Holborn that would be extremely dangerous and would create traffic chaos on a main London thoroughfare.

Offices are directly opposite the planned construction entrance, with workers in and out down the narrow street all of the time.

Consequently, it would be a Health and safety nightmare. No amount of mitigation would negate the huge risk. Large Construction vehicles and people in close proximity simply do not mix.

If the experience was to go ahead the Construction and Commercial entrance will have to be elsewhere - A visit to Furnival Street will immediately and absolutely illustrate this huge Health and Safety risk.

There are many other serious issues which a number of the other objectors have outlined which also have to be taken into consideration. The experience is positive and interesting, the construction and commercial entrance as it stands is a huge risk and is absolutely not suitable.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Stuart Perl

Address: 79 Fairview Road Headley Down Bordon

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Possibly the most exciting tourist attraction planned for London to open since the London Eye, the London Tunnels experience will offer something for visitors and locals of all ages:

history, culture, economic growth in the local economy, employment, increasing tourism's percentage of GDP and the regeneration of an area that has a declining population of office workers with very little else to warrant it as a destination.

Through their historical significance and cultural diversity, the London Tunnels will augment London's positioning as one of the world's greatest cities to visit for domestic and international visitors alike.

To my mind, the benefits generated by this development significantly outweigh the costs and I pledge my wholehearted support to this planning application.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Andrew Raca

Address: Flat 39 9 Albert Embankment London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I fully support the application. The project will result in a fantastic visitor attraction in Central London increasing tourism and creating many new jobs for local people. In addition there will be a very positive knock on effect economically for businesses and jobs in the local community.

It will also be a great attraction that will be easily accessible on foot or by public transport and, when operational, will have no real impact on the surrounding environment as most of it is underground.

It is important that London's history is preserved and this will be a great way of educating people about the Second World War and the Cold War period.

Date
13 February 2024

Anastasia Tampouridou
City of London Corporation
Guildhall
PO Box 270
London
EC2P 2EJ

By Post

Dear Sir / Madam

23/01322/FULMAJ **Comments submitted on behalf of Chancery Exchange**

Daniel Watney LLP has been instructed by the owners of Chancery Exchange to review the planning application submission 23/01322/FULMAJ, known as 'The Tunnels', submitted to the City of London (alongside a replica application submitted to Camden Council).

Chancery Exchange (formerly home to the Patent Office) is a prominent, statutory Grade II* listed building sited on Furnival Street. Behind the retained historic façade, the building provides high quality office accommodation let on a multi-tenanted basis.

The principal office entrance is sited on Furnival Street, almost directly opposite to the proposed visitor entrance to The London Tunnels. Figure 1 below captures the proximity of this relationship.

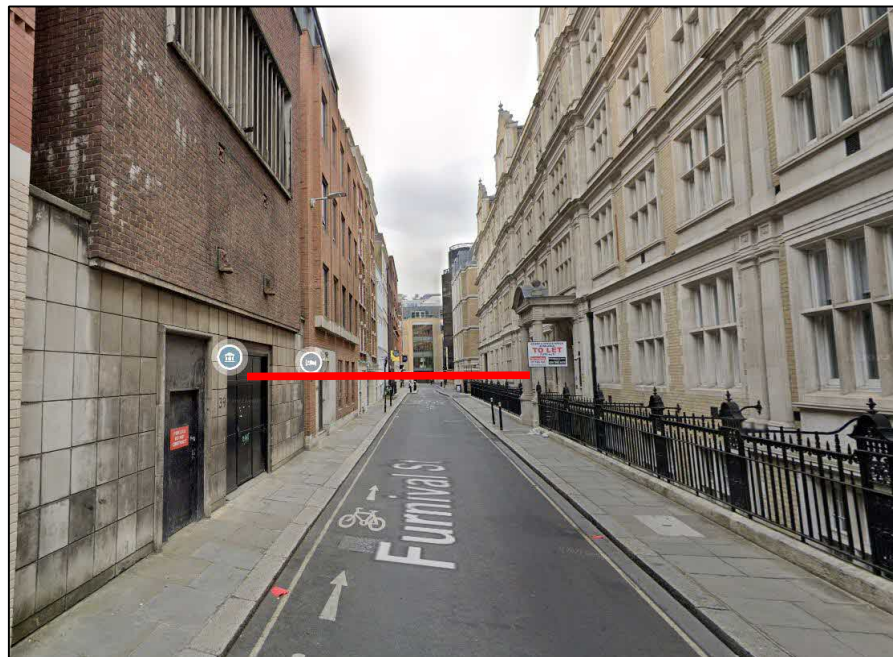


Figure 1: Relationship between Chancery Exchange and the proposed main entrance

Whilst the opportunity presented by The London Tunnels project is recognised as an innovative use of extant infrastructure to support the vitality and viability of this part of London, it is not considered that Furnival Street is the most appropriate location for the principal visitor entrance to the experience. This is due to the inherent constraints of a narrow, one-way road, with narrow existing pavements, which already serve a high-density mixed-use environment. In terms of character, Furnival Street benefits a quieter setting, forming part of a tight network of streets that sit between High Holborn and Fleet Street / Strand. A significant increase in pedestrian and vehicular movements (including servicing) is proposed, and it is not considered that the potential adverse impacts on vehicular movements, the pedestrian experience and character of Furnival Street have been fully considered.

We understand that nos. 31-33 High Holborn is proposed as the secondary visitor access entrance. High Holborn has a very different function and character to Furnival Street. As a key thoroughfare and link between the City and the West End, it achieves a width that supports four lanes of traffic, benefits from far wider pavements and already comprises a mix of uses which would sit comfortably alongside the concept of the London Tunnels. This is in strong contrast to Furnival Street which, as described, is characterised by its intimacy and relative quiet as a narrow road and pedestrian route between the more heavily trafficked roads to the north and south.

Aside from the character of High Holborn, this location would be more suitable for servicing (on the presumption that the existing and numerous commercial occupiers enjoy existing servicing arrangements on-street), would benefit from direct access to public transport including London bus routes and Chancery Lane underground station, and can accommodate taxi drop offs without obstructing the highway.

Having reviewed the application submission, it does not appear that a specific assessment has been undertaken to consider the appropriateness of Furnival Street as the principal visitor entrance and servicing location over High Holborn. Whilst the on-road constraints of High Holborn are identified as a reason to resist servicing in this location (again, notwithstanding the concentration of commercial uses along High Holborn which presumably benefit from existing servicing arrangements, and we would highlight that it is proposed that coach drop offs occur from this location), the impact to Furnival Street of vehicles stopping and blocking the highway entirely due to it being a single lane is not acknowledged. The impact on the quieter character and existing pedestrian experience along Furnival Street, including those of existing and future residential and commercial occupiers, has similarly not been scrutinised within the current planning application.

We consider that the appropriateness of Furnival Street to accommodate the principal visitor entrance, taxi and car drop offs, bicycle movements and servicing in comparison to the High Holborn location must be assessed as part of this application.

Furthermore, Royal Haskoning has been instructed to review the transport material submitted as part of this planning application. Their findings are appended to this covering letter, and conclude that a number of further assessments are required as to the potential impact to Furnival Street.

Finally, on behalf of Chancery Exchange a daylight and sunlight assessment has been undertaken and is submitted alongside this covering letter. We would refer to this letter for a summary of the potential impacts against the context of BRE guidance.

Conclusion

In conclusion, whilst the opportunity presented by the London Tunnels project is recognised, the owners of Chancery Exchange are concerned that the scale of impacts arising from the proposed development to 38-39 and 40-41 Furnival Street have not been fully assessed.

Arguably the proposed entrance to High Holborn is demonstrably better placed to accommodate the level of pedestrian and vehicular movements anticipated, alongside being of a character that is more suited to comprising a main visitor entrance.

Yours faithfully



Daniel Watney
Planning

Encs. Royal Haskoning Transport Review
Joel Michael Reynolds Daylight and Sunlight Review

Note / Memo

**HaskoningDHV UK Ltd.
Mobility & Infrastructure**

To: City of London
From: Phil Marshall
Date: 5 February 2024
Copy: Hugh Holt - Frederick Holt & Company Ltd
Charlotte Goodrum - Daniel Watney
Zoe Trower - RHDHV
Our reference: PC5840-RHD-XX-ZZ-ME-R-0001
Classification: Project related
Checked by: Phil Marshall

Subject: Transport Considerations of London Tunnels application

Royal HaskoningDHV has been instructed to undertake a review of the London Tunnels planning application from a transport and highways perspective. The Applicant's Transport Assessment (TA) and supporting transport documents have been considered as part of this review.

There are considerable concerns regarding the traffic impact arising from the proposals and the cumulative impact when considered alongside existing users in the immediate vicinity, including the neighbouring occupiers and businesses.

From an initial review of the TA, comments on the Applicant's submitted information are provided in relation to the summary / conclusions reached, are as follows:

- The overriding conclusion is that the TA provides **no quantification of the likely intensification of use resulting from the proposals**. The TA refers to existing pedestrian surveys being undertaken in connection to the Pedestrian Comfort Level (PCL) considerations. However, no evidential data has been submitted to enable the existing use of Furnival Street (or Fulwood Place) to be identified. The TA only refers to new pedestrian trips, no assessment has been included that quantifies all existing movements, covering vehicles and cycles. In the absence of any evidence on which to quantify the impact of the development, it would be reasonable to conclude that the development could result in a **severe impact** on the operation of Furnival Street (and Fulwood Place).
- The TA provides a summary that concludes the new pedestrian site access to be created on Furnival Street, will not generate queuing on the highway. The information submitted does not provide sufficient detail to support this statement. Furnival Street is a narrow road, with narrow footways (around 1.2m) on either side and a contra-flow cycle lane on the carriageway. The analysis undertaken only considers the direct area fronting Furnival Street, and not the full extent of impact of visitor arrivals along Furnival Street, from Holborn. Furthermore, no account appears to have been taken of any visitors waiting for friends or family outside the venue, or the impact of the 38 taxis per hour dropping passengers directly outside the venue. Without understanding the assumptions contained within the presented Legion model, the results presented must be treated with caution and are likely to be overestimating the extent of space available to accommodate visitor arrivals without impacting the highway. It is considered that the TA fails to identify the full extents of the impact of the development, contrary the London Plan policy T4.
- The application refers to use of the site as an underground bar and provision for school visits. These activities are advised as taking place on Fulwood Place. No analysis of the impact of these movements has been presented in the TA. Whilst an Active Travel Zone assessment has been

undertaken for some routes, this should be extended to take into consideration routes to identified coach parking locations to ensure these routes are suitable for use by large groups.

- As the TA has not been prepared in accordance with the London Plan requirements, it cannot be relied upon to be presenting a true impact of the development on the surrounding area. The analysis presented has not detailed the impact of the proposal on the existing arrangement, in the absence of this analysis there is no supporting evidence as to what has informed the proposed mitigation of the kerb build out along the site frontage. With the lack of any presented evidence, the impact of the proposed kerb-build on other roads users does not appear to have been taken into consideration, including the loss of the contra-flow cycle lane. Without sufficient evidence presented to support the assumptions, the full impact of the proposal, with the main visitor attraction access located on Furnival Street, is being considerably underestimated. The approach adopted within the TA is considered contrary to the London Plan T4 and City of London Local Plan policy DM 16.1.
- It is noted that the development is offered as 'car-free' and no general car parking would be provided. However, reference is made to Blue Badge car parking being provided which then refers to 'retaining' a single Blue Badge parking space. It appears as if the applicant is referring to an existing on-street Blue Badge, which is available for users of the wider area and is not connected to the development. This is contrary to the City of London Local Plan policy DM 16.5 and the London Plan T6.5, as this states a designated Blue Badge bay, within the development.
- Although a trip generation analysis has been submitted, to inform a 'busy' day, it is not clear as to whether the trip generation exercise includes school visit numbers and people accessing the bar. The trip generation consideration has been utilised to inform a PCL analysis, as set out above, no evidence has been submitted that enables the analysis to be quantified as no base survey data has been detailed. In terms of the PCL analysis, it is noted that reference to impact of the increased visitor movements on Furnival Street (or Fulwood Place) are not referred to, as these remain at a Level of Service 'F', classified as a complete breakdown in traffic flow with many stoppages. As such it is not considered that a comprehensive TA has been presented, that takes account of all movements, contrary to the City of London Local Plan DM 16.1.
- It is noted that reference is being made to the provision of cycle parking, but only for staff on-site, there is no provision on-site for short-stay visitor cycle parking. The suggestion of increasing parking within the central reserve of Holborn would increase the barrier to pedestrian movement across the street. The proposal is thus contrary to City of London Local Plan policy DM 16.3 and DM 16.4 and London Plan policy T5.
- It is not considered that the impacts of the proposed servicing arrangements on Furnival Street have been fully assessed. The analysis identifies that there would be 16 servicing trips per day, which would all be on-street. No surveys have been undertaken of the existing situation, no analysis has been submitted to identify whether the significantly increased demand for kerb side space and footway use generated by the proposed visitor attraction can be accommodated safely. No consideration has been given to whether the impact of the considerable intensification of trips by large vehicles, at the same time as the intensification of use by taxis and pedestrians will be safe or significantly inconvenience existing occupants of Furnival Street. Furthermore, the impact on cycle safety of the aforementioned intensification of vehicular activity at the same time as removing the existing contra-flow cycle lane. The approach being set out for servicing, a new purpose built visitor attraction, is considered to be contrary to the City of London Local Plan policy DM 16.5 and the London Plan policy T7.

In the absence of evidence regarding the existing conditions, it must be concluded that the submitted TA cannot assess the impact of the development on the surrounding area.

In summary, the TA cannot be supported, especially in relation to the perceived impact that the increased demand for visitor arrivals/departures can be accommodated on Furnival Street. The TA as currently presented fails to demonstrate that the key principles of NPPF paragraph 115. *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”* have been met.

Further comments may follow once clarifications are received from the Applicant.

Our ref: DR/RM/Fu03

D'Aguilar Property Holdings Limited
c/o Frederick Holt & Company Limited
4 Pratt Walk
Lambeth
London
SE11 6AS

539 Linen Hall
162-168 Regent Street
London W1B 5TF
020 3633 0010

FAO Hugh Holt

31 January 2024

Dear Sir/Madam

Planning Reference 23/01322/FULMAJ

**Proposed Development at 38-39 and 40-41 Furnival Street, London EC4A 1JQ
Opposite to Chancery Exchange, 10 Furnival Street, EC4A 1AB**

We have been instructed to advise D'Aguilar Property Holdings Limited, the freehold owners of Chancery Exchange, 10 Furnival Street in relation to potential daylight, sunlight, rights of light and other neighbourly matters relating to the proposed redevelopment of 38-39 and 40-41 Furnival Street by The London Tunnels PLC. The property faces onto Furnival Street and is Grade II* Listed (formerly home to The Patent Office). It accommodates office spaces over six storeys including the lower ground floor.

The submitted proposals for redevelopment of the site "*seeks to refurbish and infill part of 39 Furnival Street to match the height and general floor plate of 40 Furnival Street, reaching a height of 36 metres on 39 Furnival Street. There is also a small proposed increase in height of c. 2 metres to the existing building on 40 Furnival Street*". This raises significant concerns with regard to substantial loss of light to the front offices in Furnival Street. These are modular offices opposite 38-39 and 40-41 Furnival Street and development proposals will significantly reduce natural light to the premises up to the second floor which is beneficial to the use, and enjoyment of the occupants.

In particular, the proposal will fill up the gap between 40-41 and 36-37 Furnival Street, which solely allows for natural light to reach our client's premises in a narrow street such as Furnival Street.

As part of the planning submission Gordon Ingram Associated (GIA) have produced a daylight and sunlight report reference 19449 dated 13 and 30 November 2023. The report considers, assesses and provides the results of their findings of the impacts that Wilkinson Eyre proposal have only on the neighbouring residential properties at 1-3 Dyers Building to the rear. No assessment has been carried out on our client's property due to its non-residential use, although the BRE Guidance states in paragraph 2.2.2 "*The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices*".

Continued...



Further, we recommend:

- D'Aguilar Property Holdings Limited place on record the significant loss of light and in no way do they consent, or acquiesce to the interference with their easement of light over 38-39 and 40-41 Furnival Street.
- D'Aguilar Property Holdings Limited, fully reserve their position in respect of taking all necessary action to preserve their position and maintain their right to light to their property, on the presumption that the proposals for 38-39 and 40-41 Furnival Street are granted consent as currently proposed, will lose all light to all offices that currently face 38-39 and 40-41 Furnival Street.

Yours sincerely



For and on behalf of Joel Michaels Reynolds

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Andrew Raca

Address: Flat 39 9 Albert Embankment London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I wish to add my support to the planning application for the London Tunnels.

This will be a world class attraction which will enhance the locality greatly internationally.

This will be a very exciting and important visitor attraction in central London that will encourage more visitors and contribute to the prosperity of the area through the creation of direct jobs and by visitors spending money on shops and businesses nearby.

The attraction will showcase an important part of London's history, from the blitz in the Second World War, the work of the Special Operations Executive and also the Cold War period. In this respect, it will complement the existing Cabinet War Rooms as an attractive venue providing important education on London in the 20th Century. It will also be an attractive destination for more modern attractions and given that the facility will be below ground, it will have very little impact on the streets above. Its location means that most visitors will come either on foot, or by

public transport.

In addition, there will be important revenues for the council locally that will benefit the community more generally.

Comments for Planning Application 23/01322/FULMAJ

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Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Wendy Lyons

Address: 28 High Street Selsey Chichester

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I think this is a fantastic project, that will benefit the whole of London and keep our heritage alive. Amazing.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Charles Parry

Address: FLAT 40 DRUM MEAD Petersfield Petersfield

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support the project.

This is clearly a fascinating and educational way to boost tourism and educate simultaneously. The way in which British history and culture will be shown is both extremely exciting innovative.

In addition, the benefits to the local economy and employment will be fantastic.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Charles Parry

Address: FLAT 40 DRUM MEAD Petersfield Petersfield

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I fully support the project.

This is clearly a fascinating and educational way to boost tourism and educate simultaneously. The way in which British history and culture will be shown is both extremely exciting innovative.

In addition, the benefits to the local economy and employment will be fantastic.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Miss Chelsea Cooper

Address: Nicola Jane House 2nd Floor Terminus Road Chichester

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Looking forward to going with my friends and family

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Thomas Seabourne

Address: 44 Elmwood Avenue Bognor Regis

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I am in full support for this project, what a way to reuse existing infrastructure in the heart of London. The history is fascinating for what these tunnels have been used for and will make a brilliant addition to the existing tourist attraction situated in London.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Miss Angela Dunning

Address: 320 High Holborn London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Happy for this to go ahead as long as there is no disruption to our store

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mrs Sue Macdiarmid

Address: 23 Park Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:Imaginative use of historical urban landscape.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Graham Wingham

Address: 3 Holborn London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment:As a shop (Sanford Brothers Limited) that has been here for nearly 100 years, we have always known about the tunnels (even when supposedly secret as we saw them being dug!!). This is a wonderful idea to create a fantastic tourist attraction in an area that is desperate for it - there are a number of empty shops in the area & an influx of visitors will help to fill these up & basically, give the whole area a much needed boost.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Angela Epps

Address: 21 Alexandra Gardens London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I support these proposals. As a Londoner I think that the proposals preserve and improve access to our heritage, are sympathetic to the surrounding area and a brilliant idea.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Caroline Gallagher

Address: 17a London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: My father spent years of his life working on these and other tunnels, to think I and his grandchildren could 1 time see what he did would be amazing

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Neil Emberson

Address: 3 gorse lane Farnham

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Can't wait to visit the tunnels and live the experience they will be creating. What a marvellous idea that only good Al'Blighty can bring to the public !

Of course an Gin n Tonic at the "deepest bar" would certainly be the topic of conversation!

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr DEREK OWEN

Address: 94 TACHBROOK STREET London London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Patrick Ralph

Address: 14 heydale rd Liverpool

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Fantastic historic experience and will bring jobs and prosperity to the area

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mrs Sandra Murphy

Address: 32 Park Road Burwell

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:Excellent idea!

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Dr GABRIEL GOLDMAN

Address: BULEVAR ARTIGAS 220 3rd floor Montevideo

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: This is a great project. It will enhance the tourism in London

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr PAUL SCOTT

Address: 22 Great Hall, 96 Battersea Park Road 96 Battersea Park Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Having studied the proposal closely, and given the current largely unknown historical significance of these tunnels, I believe this will make a wonderful attraction, bringing many visitors from all over the World, to a part of London that frankly needs it.

At weekends, many restaurants and local businesses remain closed, as the City of London is a little quiet, the potential foot traffic this attraction will bring to the area, I believe will bring these restaurants, pubs and shops back to life at the weekends, as well as weekdays.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Jp Ralph

Address: 14 heydale rd Liverpool

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:What a brilliant idea! Will be a great addition to the city

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Stephen Luderman

Address: 39 Castle Avenue Rainham

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I believe this would be a great addition to the area for historical reasons.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Justin Manley-Cooper

Address: Ayot Court Farnham Lane Haslemere

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Fantastic idea what a huge contribution to the local community. All the local businesses and the local economy will benefit

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Nick Finegold

Address: Flat 402 4 Farm lane London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:What a fabulous idea for the use of redundant space that will have minimal impact on the lives of those above ground , whilst helping provide yet another landmark tourist attraction for the capital .

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Funnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Funnival Street; redevelopment of 40-41 Funnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Funnival Street and 38-39 Funnival Street, and widening of lift shaft at 38-39 Funnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Adam Fayed

Address: Al Reem 2 Dubai

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I am British and I live abroad. I would like this project to go ahead.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Gregory Jones KC

Address: Francis Taylor Building Temple London

Comment Details

Commenter Type: Alderman

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This is a hugely ambitious scheme to bring a forgotten asset back into beneficial use. If successful it will create an iconic visitor destination supportive of the City's destination City vision. I'm aware of any grounds of objection and support the proposal.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr David Brown

Address: PO Box 31252, 30 Napsa Complex, Nyumba Yanga Lusaka, Zambia

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I think this will be a very suitable addition to the London tourist scene and will dramatically enhance the Holborn area, with a profound and positive effect on neighbouring businesses and the general community. The increase in footfall in the area should help create additional jobs and provide opportunities for neighbouring businesses to increase profits and generally provide a more stable and certain future for those running them.

In addition, as most of the project is using existing infrastructure, the normal disruption of a complete new build project should be lessened, with lower traffic disturbance.

The project itself will give new life to a valuable asset which is currently not being used and also create a significant number of new jobs.

I totally support the development and look forward to being a visitor once it is opened.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Alex Hayes-Griffin

Address: 38 Bedford Place London

Comment Details

Commenter Type: Neighbour

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: My family lives very close to the proposed development. We would welcome the planned investment to enhance the area and generate growth and support for the local community and retailers.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr chris sullivan

Address: 157 LEVITA HOUSE CHALTON STREET london

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Repurposing the Kingsway Telephone Exchange into a visitor and cultural attraction represents a visionary initiative that can bring numerous benefits to the community and the region:

Historical Significance: The Kingsway Telephone Exchange likely holds historical significance as a key component of the region's telecommunications infrastructure. Converting it into a visitor attraction provides an opportunity to preserve and showcase its history, allowing visitors to learn about the evolution of communication technology and its impact on society.

Community Engagement: By transforming the exchange into a cultural destination, it becomes a focal point for community engagement and social interaction. Residents and visitors alike can gather to explore exhibitions, attend events, and participate in educational programs, fostering a sense of belonging and community pride.

Tourism and Economic Growth: A well-curated visitor attraction has the potential to attract tourists,

generating economic benefits for the local economy. Visitors spending on accommodations, dining, and shopping can inject revenue into the community, supporting local businesses and creating job opportunities in the hospitality and tourism sectors.

Educational Opportunities: The Kingsway Telephone Exchange can serve as an educational resource, offering insights into the history of telecommunications and technological innovation. Interactive exhibits, guided tours, and educational workshops provide visitors of all ages with opportunities to learn and engage with the material, fostering a culture of lifelong learning.

Cultural Enrichment: Converting the exchange into a cultural attraction enriches the cultural landscape of the region, providing a platform for artistic expression and cultural exchange. Art installations, performances, and exhibitions can showcase local talent while celebrating diversity and promoting cross-cultural understanding.

Adaptive Reuse and Sustainability: Repurposing existing infrastructure like the Kingsway Telephone Exchange promotes sustainable development by minimizing waste and conserving resources. Adaptive reuse reduces the need for new construction and preserves the architectural heritage of the building, contributing to the overall sustainability of the built environment.

Public-Private Partnerships: Collaboration between public agencies, private investors, and community organizations is essential for the successful transformation of the exchange into a cultural attraction. By pooling resources, expertise, and networks, stakeholders can leverage their strengths to develop and sustain a vibrant cultural destination for generations to come.

In conclusion, repurposing the Kingsway Telephone Exchange into a visitor and cultural attraction offers a multitude of benefits, including historical preservation, community engagement, economic growth, educational opportunities, cultural enrichment, sustainability, and collaboration. By embracing this transformational project, stakeholders can create a lasting legacy that celebrates the past while shaping the future of the community and region.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Daniel van Vuuren

Address: Plot 62154 Gaborone

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Allowing the people of London and the world explore, engage and appreciate the history and heritage of the tunnels would most definitely add to the global cultural dynamic and historical preservation initiatives.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Luis Esguevillas

Address: ABR London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:Excellent initiative. The Promoters should get all the help they need for repurposing this piece of history and creating jobs. London needs these initiatives.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr win man

Address: Gerrard street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Residential Amenity

Comment:It's s great idea

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr David EH Yeoh

Address: 299-18-01, Menara Bangsar Jalan Maarof, Bukit Bandaraya Kuala Lumpur

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I support preservation of this iconic structure and converting it into a tourism project supporting history. This project will also support the growth of other industries thus stimulating the economic growth of London

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Guy Brook

Address: Stone Cottage Main Street MARKET HARBOROUGH

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This is an outstanding proposal. Its well thought through, visionary and given the chance, could become an iconic London attraction.

The Promoters should get all the help they need for repurposing these iconic tunnels. It will also boost the economy, creating jobs in a challenged area of the capital and do much to promote the capital.

London needs these initiatives to continue being perceived as a world class city

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Miss Heidi Bryant

Address: 5 Ploughmans Way Boxley Downs

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I support this planning application. A great way to reinvigorate these tunnels, create much needed new jobs and create a new attraction for residents and tourists alike

Thank you

Heidi Bryant

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Helen McDowell

Address: 52 Carysfort Rd London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: The area has suffered greatly since covid/hybrid working - this would bring visitors in and boost the local economy. And a fantastic historical site which should be preserved.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Michael Brown

Address: 24 PYOTTS COPSE, Old Basing, Basingstoke RG24 8WE

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: In an era when it's easy to be jaded and where everything claims to be unique or special, The Tunnels really can stake the claim that it would become a Global one-of-a-kind immersive venue with some authority. For anyone who revels at the prospect of being entertained, The Tunnels is a huge development by any benchmark, putting it at the very forefront of venues anywhere in the world. And to think its sitting under our feet, steeped in history and soon (I hope) to be shared with the world.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Dr Geoff Ferreira

Address: 9 Wakelins End Cookham Maidenhead

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Although I don't live in the area I very much support the application of The London Tunnels to preserve and develop the series of tunnels under High Holborn. I would certainly want to visit and I feel it would become a popular tourist destination. It will preserve and open to the public this historic and unusual location. There will be a financial benefit to the locality and access is easy with existing public transport.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Adam Pollock

Address: 18 Camberwell Grove London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I am a massive fan of this development which I have personally visited so speak from a position of knowledge as well as having been a lifelong resident of Greater London.

London is heavily reliant on tourists to keep its economy buoyed and to that end needs to provide new and exciting attractions.

London Tunnels will provide a major attraction in a part of London that is light on such amenities.

Not only will the immediate area in Holborn benefit, but also that of wider London.

I urge the Committee to vote in favour of this excellent project along with all its associated development requirements.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Lawrence Yew

Address: 95, Jalan SG 9/2, Taman Sri Gombak Batu Caves

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: It is a great idea to have something redundant made into an asset that is good for visitors of London to understand some of the history left behind by the tunnel.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Maggie Lai

Address: KL KL KL

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Good idea to attract more tourist

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Dr Lai Meng Looi

Address: 111 Jalan 12/14 Petaling jaya Petaling Jaya

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This will be an iconic historical landmark. Both locals and tourists would love it.

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Alistair Sommerlad

Address: Museum of Military Intelligence Shefford

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: The Military Intelligence Museum Trust wholeheartedly supports this application. It is a rare opportunity to preserve an important and currently invisible record of the history of 20C London and the efforts of civilians and servicemen alike to defend the UK, from WW2 through the Cold War. The proposal places due weight on the importance of commemoration, heritage and education, and the potential for this heritage to be made available in an imaginative and sustainable way to millions of visitors is inspiring. If the plans are delivered as proposed London will acquire a heritage attraction of international significance. The Military Intelligence Museum Trust houses the National and official collections and archive. We would be pleased to support this application with practical advice and historical evidence.

Comments for Planning Application 23/01322/FULMAJ

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Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Stephan Fels

Address: 801 S Financial Pl Apt 3312 Chicago

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Noise

Comment: I would like to know more about the specifications of the following equipment planned on Furnival Street:

REINSTATED PRECAST CONCRETE VENT WITH ACOUSTIC LOUVRE BEHND

More specifically, what is the expected noise level (in decibels)?

Thanks,

Stephan Fels

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Case Officer: Anastasia Tampouridou

Customer Details

Name: Ms Maria Nieves Garcia Somoza

Address: Bierbaumstraße 1, 81243 München Munich

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:supporting this amazing project to become a reality as soon as possible!

Adjei, William

From: PLN - Comments
Subject: FW: London Tunnels Plc ref 23/01322/FULMAJ. New notice posted 18.04.24 My Repeat Ojection

From: Julie Birri
Sent: Saturday, April 20, 2024 9:06 AM
To: Tampouridou, Anastasia <Anastasia.Tampouridou@cityoflondon.gov.uk>; PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: London Tunnels Plc ref 23/01322/FULMAJ. New notice posted 18.04.24 My Repeat Ojection

THIS IS AN EXTERNAL EMAIL

Good morning Anastasia

2ND Objection

Having seen the NEW notice posted in Furnival At on 18.4.24 .
I wish to voice my strong objection to the planning permission request .
As resident in flat 6 35 Furnival Street this would greatly impact our quality of life noise extra footfall in such a small street with limited pavement width .
The thought of the demolish and works would be cause immense stress for all residence .
Let alone the access to tunnels fire escape hazards etc.
As stated in the notice this would also affect the settling of listed buildings and character of conservation Area Chancery Lane .
We are adamant that this would not benefit the area in any way in fact it would have a detrimental impact.
Please ensure my objection is noted and confirm receipt of my email.

Mr & Mrs Birri
Flat 6
35 Furnival Street
EC4A 1JQ

Comments for Planning Application 23/01322/FULMAJ

Application Summary

Application Number: 23/01322/FULMAJ

Address: 38 - 41 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (Use Class F1(b)(c)), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Re-consultation: Due to amended details

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Andrew Green

Address: CoL London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Other

Comment: TEST COMMENT - PLEASE IGNORE

36-37 Furnival Street,
London,
EC4A 1JQ

27/04/2024

Dear Sir/Madam,

Representation from Furnival Management Limited

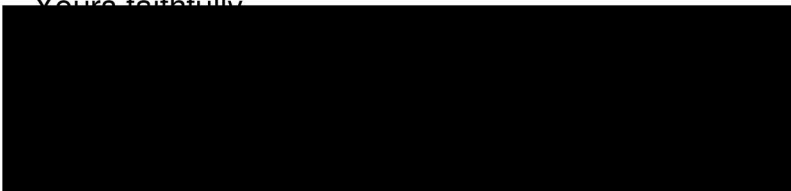
We refer to the Re-consultation published on 23/04/2024 in respect of the planning application at 38-39 and 40-41 Furnival Street (with reference 23/01322/FULMAJ).

The new amended details do not address any of the issues we outlined in our objection dated 29 January 2024.

We therefore reiterate our objection to this planning application for the same reasons outlined in our letter submitted on 29 January 2024.

Separately, we note a number of supporting comments received towards this application, coming from people from very remote places (e.g. Dubai, Belgium, etc.). Obviously, these supporting comments come from people who do not live in the direct vicinity of the proposed project, and would therefore not suffer from the adverse consequences of living close to such a project (with regards to noise, traffic, access, potential structural damages to adjacent buildings).

Yours faithfully,

A large black rectangular redaction box covers the signature area. A dotted line extends from the right side of the redaction box.

Duly authorised for and on behalf of:
Furnival Management Limited
Aston House
36-37 Furnival Street
London
EC4A 1JQ

Comments for Planning Application 23/01322/FULMAJ

Application Summary

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Re-consultation: Due to amended details

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr James Hacking

Address: 42 Micklethwaite Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: It's high time there was something in Holborn to help re-ignite the area and this is a wonderful project and all below ground so no eyesores.

Comments for Planning Application 23/01322/FULMAJ

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Re-consultation: Due to amended details

Case Officer: Anastasia Tampouridou

Customer Details

Name: Coralie Murphy

Address: Flat 15 34-35 Furnival St London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: My objection of 11/01/24 remains, please include the text in this one in this one. I have tried to read the updated documents on-line but they are causing by browser to hang.

My primary objection is the deliveries, I've managed to read some of the amended Delivery & Service Plan and I note that there is still:

Up to 14 vans expected in Furnival Street between the hours of 20:00-22:00 and 07:00-08:00 during exhibition setting up etc. This is not acceptable because of the noise to the residents, the potential for blocking the road, the queuing which will be outside the bedrooms in 34-35 Furnival St. These numbers suggest a delivery every 12 mins assuming they are evenly spaced which they will not be. These hours are not allowed during Construction normally but they are proposed for Operations !

The Delivery and Servicing Plan 3.3.5 suggests vans will be 5.8m long which is not a standard van length (6-6.4m). Even sec 5.42 of that documents refers van length of 6.43m

Sam Fitzpatrick
Planning Officer
By email: [REDACTED]

02 February 2024

REF: 2023/5103/P

Dear Sam,

RE: Support for the London Tunnels Project and the Fulwood Place Scheme

I am writing on behalf of Central District Alliance to express our full support for the ambitious London Tunnels project, including the integral Fulwood Place Scheme at 31-33 High Holborn. This project represents a significant opportunity for economic, cultural, and historical enrichment within our community. By opening up the mile-long WWII tunnels, we anticipate a rejuvenation of local business, increased tourism, and educational engagement, projecting an economic uplift of £60-£80 million annually for the area.

The Fulwood Place Scheme is pivotal to this vision. It proposes a thoughtful restoration and enhancement of the building's façades, respecting its historical significance while addressing current needs for functionality and public interaction. This scheme specifically targets the revitalisation of the High Holborn façade, an area that has seen various modifications over the years, to restore its architectural integrity and visual appeal. The focus on technical feasibility, particularly the strategic enhancement of the alleyway and rear façades, ensures the London Tunnels project's success by integrating modern requirements with heritage preservation.

Moreover, the scheme aims to reinstate lost heritage details and declutter the façade from non-original additions, thereby improving the visual cohesion across High Holborn. Such meticulous attention to detail not only enhances the area's aesthetic but also aligns with Camden Council's planning policies on sustainable development and cultural heritage conservation.

We urge the Camden Council to recognise the transformative potential of the London Tunnels project and the Fulwood Place Scheme. Together, they promise to bring lasting benefits to our district, fostering a vibrant, culturally rich, and economically robust community.

Thank you for considering our support. We are committed to collaborating with all stakeholders to realise this project's full potential for High Holborn and the wider Camden community.

Yours sincerely,

[REDACTED]

Debbie Akehurst
Chief Executive

Comments for Planning Application 23/01322/FULMAJ

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Re-consultation: Due to amended details

Case Officer: Anastasia Tampouridou

Customer Details

Name: Mr Mike Fairmaner

Address: Fleet Street Quarter 160 Fleet Street London

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I am writing in support of the above application to convert the disused tunnels under Holborn and Kingsway into a major visitor attraction.

The proposal brings into use a long under-used asset and provides a brand new visitor attraction to a part of London that suffers from being overlooked by its more famous neighbouring attractions such as St Paul's Cathedral and Covent Garden. It will also provide a much needed new offer for people working in the area to socialise after work, and help make the area more attractive as an office location.

Along with the proposed Museum of London opening in 2026, the combination of the two will really put the area on the map as a visitor attraction worthy as a full day out, rather than lose visitors to other destinations.

We understand that likely visitor numbers could average 5,000 per day and this will strengthen the retail offer along Holborn and support the other retail businesses, as well as boosting the weekend business that is much needed.