

Begum, Shupi

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 15 March 2024 12:31
To: lpaburystreet
Cc: Tastsoglou, Anna
Subject: RE: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC [SG30645]

THIS IS AN EXTERNAL EMAIL

Our Ref: SG30645

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Thursday, March 14, 2024 2:25 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>
Subject: [EXTERNAL] Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

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Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

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

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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LPA Ref: 24/00021/FULEIA and 24/00011/LBC

London City Airport Ref: 2024/LCY/067

Date: 19/03/24

Dear Anna Tastsoglou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests the following condition contained in this letter is applied to any future approval.

| | |
|----------------------|---|
| LPA Reference | 24/00021/FULEIA and 24/00011/LBC |
| Proposal | <p>Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.</p> <p>Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam;</p> |

| | |
|---------------------|--|
| | partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works. |
| Location | 1-4, 31-34 Bury Street, London, EC3A 5AR |
| Borough | City of London |
| Case Officer | Anna Tastsoglou |

London City Airport's response must change to an objection unless this condition is applied to this planning permission.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make the following observations:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height

- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,

Simon Vince
On behalf of London City Airport

Begum, Shupi

From: Active Travel England Planning <planning-consultations@activetravelengland.gov.uk>
Sent: 20 March 2024 08:52
To: lpaburystreet
Subject: LPA Reference: 24/00011/LBC Standing Advice Response

THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00011/LBC

ATE Reference: ATE/24/00380/FULL

Site Address: HOLLAND HOUSE, 1-4 BURY STREET, LONDON, EC3A 5AW

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

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: <https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,



Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)
]]>

[ref:a0zTw0000007FiHIAU;700adc70ab4a894d32d59c518cfe6871:ref]

Begum, Shupi

From: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Sent: 20 March 2024 10:13
To: lpaburystreet
Subject: Re: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, if a crane is needed for installation purposes? We would like to draw your attention to the following:

CAA Crane Notification

where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Vince | Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Reply



Forward

P

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

Sent: 14 March 2024 14:25

To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>

Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>

Subject: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

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Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

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

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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lpaburystreet@cityoflondon.gov.uk

21 March 2024
Crossrail Ref: CRL-IP-3124

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

Dear Anna Tastsoglou,

24/00021/FULEIA : 1-4, 31-34 Bury Street, London, EC3A 5AR

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

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter 14 March 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

.....
The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Anna Tastsoglou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136844/01
Your ref: 24/00021/FULEIA
Date: 26 March 2024

Dear Anna,

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

Demolition of bury house and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of holland house and renown house; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at holland house (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at renown house (36.49m AOD); interconnection of the three buildings; use of the buildings for office (class E(G)), flexible retail/café (class E(A)/E(B)), and flexible community/education/ cultural/amenity (class F2(B)/ F1(A)- (E)/ E(F)/sui generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Thank you for consulting us on the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application, however, please consider the following advice.

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Pre Application Advice

Cont/d..

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNL SustainablePlaces@environment-agency.gov.uk.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you have any questions, please email me at HNL SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNL SustainablePlaces@environment-agency.gov.uk

Telephone: 02030251774



Historic England

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00021/FULEIA
Our Ref: 220218

Contact:
Helen Hawkins



2nd April 2024

Dear Anna,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021

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

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

Recommend Archaeological Conditions

Thank you for your consultation received on 14th March 2024.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001

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The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school.

All three of the current buildings on the site have a basement. The deepest basement appears to be under Holland House although no OD height has been provided for it. Shallower basements appear to be present beneath Bury House and Renown House. The archaeological desk-based assessment (AOC 2023) submitted with the application suggests that the Bury House basement has removed all archaeological deposits to a depth of c 11m OD. No depth for the basement of Renown House has been provided but a similar level of impact may be expected. Remains of the Abbey previously excavated to the east of the site have confirmed that the lower parts of the Abbey remains extend to below 11m OD in places. It is also possible that deeper cut features of Roman date may also survive beneath the current basements. No archaeological evaluation or investigation has been previously carried out on the site to ascertain likely levels of truncation.

The proposed development includes a basement under Bury House that will extend to four levels. This will cause complete truncation of any surviving archaeological deposits. In Holland House, no new basements are proposed but a crane base and new foundation will be inserted into the current lightwell. Renown House will retain its facade, which is likely to need propping. The supports for the propping are likely to extend below the current basement. Underpinning may also be required here.

It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings. The proposed development will have a high impact on these potential remains. It is



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recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be implemented.

A cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. The story of Holy Trinity Priory is of particular interest as little information about this site is available to view within the City.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider archaeological conditions could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching conditions as follows:

Condition 1 No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the



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nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2 Public Engagement .

No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

Informative: Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

Condition 3 Foundation Design ...

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.



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These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Public engagement

Where appropriate, local planning authorities and the developer are advised to make investigative works open to and interpreted for the public and to include that as part of the WSI. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.



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You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



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WINNER | Planning Authority of the Year



From: Bentley, Paul <[REDACTED]>

Sent: Tuesday, April 2, 2024 8:45 AM

To: Tastsoglou, Anna <[REDACTED]>

Subject: RE: Bury Street 24/00021/FULMEIA - air quality

Good morning Anna,

I hope you had a lovely Easter weekend.

I've been through the AQ Positive statement, and it is adequate for the proposed development. No further comments from me aside from those already sent across.

Kind regards,

Paul



Paul Bentley
Air Quality Officer
City of London | Environment Department | Guildhall | London | EC2V 7HH

[REDACTED]
www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

[Air-Aware - Helping raise awareness of local air quality](#)

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APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 24/00021/FULEIA

Development Management Case Officer: Anna Tastsoglou

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

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

Application Received: 8th January 2024

Request for Comment Received: 14th March 2024

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Sustainability Statement (Hoare Lea, October 23)
- Design and Access Statement (Stiff+Trevillion, January 2024)
- Flood Risk Assessment and Drainage Strategy (Thorton Tomasetti, January 2024)
- Outdoor Thermal Comfort Assessment (GIA Chartered Surveyors, October 2023)
- Preliminary Ecological Appraisal and Biodiversity Net Gain Report (Hilson Moran, September 2023)
- Health Impact Assessment (Quod, January 2024)

Overheating and the urban heat island effect

There are no site-specific references to overheating or the urban heat island in the Sustainability Statement, although the report does refer to Policy CR1 in the policy review.

An outdoor thermal comfort assessment was conducted by GIA using high resolution Computational Fluid Dynamics (CFD). The assessment found:

- All ground level conditions were suitable for intended use, or no worse than the baseline conditions
- The proposed development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe
- Conditions for all existing off-site terraces are suitable for the intended use

**Date &
Initials**

APPLICATION COMMENT FORM

- Conditions for all proposed terraces are suitable for the intended use.

Flooding

The proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event.

Water stress

The FRA & DS states that *“roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants.”*

The FRA & DS states that roof drainage will be used for irrigation for the green roofing and green walls.

Biodiversity and pests and diseases

A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed.

The Sustainability Statement **states** *“The project will prioritise native, locally sourced plants (from within the UK) as part of the landscape strategy for the public realm, a decision driven by both responsible procurement and biosecurity considerations.”*

There is no reference to pests and diseases within the Sustainability Statement or PEA.

A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health through:

- New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment;
- Provision of flexible community/education/cultural space meeting an identified need in the area;
- 'City Cycles' – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area;
- A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above);

APPLICATION COMMENT FORM

- Provision of new open space at James' Court and external building terraces providing much needed amenity provision;
- Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
- Inclusivity and accessibility as placemaking principles;
- Building and landscape design considering sustainability and **climate change, with ASHPs and a 'fabric first' approach** significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity;
- The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards
- **BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures**

Food, trade and infrastructure

The Sustainability Statement writes that the project aims to deliver a **'WELL' certified building thereby** incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure.

Recommendation:

The proposed development is not compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2.

The following condition should also be considered to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit:

Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also

EB
03/04/24

APPLICATION COMMENT FORM

demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.



Your ref:
My ref: 24/01716/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: [REDACTED]

Anna Tastsoglou
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

3 April 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/01716/OBS **Application Date:**
Date Received: 14.03.2024 **Date Amended:** 14.03.2024
Plan Nos: Letter from City of London dated 14 March 2024.
Address: Bury House, 31 Bury Street, City Of London, EC3A 5AR
Proposal: Application for planning permission ref. 24/00021/FULEIA:

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

Application for listed building consent ref. 24/00011/LBC:

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

Yours faithfully



Deirdra Armsby
Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Note:

- '3f' The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



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From: Roebuck, Alex <[REDACTED]>
Sent: Wednesday, April 3, 2024 3:52 PM
To: Tastsoglou, Anna <[REDACTED]>
Subject: RE: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Hi Anna, the proposals do not appear to affect any existing trees so no comments to make at this time.

Thanks
Alex



Alex Roebuck

Arbicultural Projects Officer | Gardens and Cleansing
City of London | Environment Department | Guildhall |
London | EC2P 2EJ

Twitter: @CoLCityGdns
www.cityoflondon.gov.uk

From: Tibbetts, Jake <[REDACTED]>
Sent: Thursday, March 21, 2024 9:18 AM
To: Roebuck, Alex <[REDACTED]>
Subject: FW: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC



Jake Tibbetts (he/him)
City Gardens Manager | Gardens and Cleansing
City of London | Environment Department | Guildhall | London | EC2P 2EJ
[REDACTED]
Twitter: @CoLCityGdns
www.cityoflondon.gov.uk
Bob Roberts
Interim Executive Director Environment

From: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Sent: Thursday, March 14, 2024 2:25 PM
To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>
Cc: Tastsoglou, Anna <[REDACTED]>
Subject: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

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

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

Corporation of London Department of Planning & Transportation
PO Box 270 Guildhall London EC2P 2EJ
4 April 2024

Our DTS Ref: 76749 Your Ref:
24/00021/FULEIA

Dear Sir/Madam

Re: 1-4, 33-34 , BURY STREET, LONDON, EC3A 5AR

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your

development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](https://www.thameswater.co.uk/buildingwater).

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://www.thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Yours faithfully

Development Planning Department



It's everyone's water

From: [Location Enquiries](#)
To: [lpaburystreet](#)
Subject: RE: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC
Date: 09 April 2024 13:29:53
Attachments: [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

ref. 24/00021/FULEIA

Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering
Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



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

Sent: 14 March 2024 14:25

To: lpaburystreet <lpaburystreet@cityoflondon.gov.uk>

Cc: Tastsoglou, Anna <Anna.Tastsoglou@cityoflondon.gov.uk>

Subject: Planning Application Consultation: 24/00021/FULEIA and 24/00011/LBC

Dear Consultee/Contributor,

Please see attached consultation for 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) and 24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

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

Kind Regards,

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0013

Date of issue of this decision: 12/04/2024



www.southwark.gov.uk

LBS Reg. No.: 24/OB/0013

Date of Issue of Decision: 12/04/2024

Your Ref No.:

Applicant Ms Anna Tastsoglou
City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

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

And an application for listed building consent for the following works at the above site (ref. 24/00011/LBC):

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

At 1-4, 31-34 Bury Street, London, EC3A 5AR And Holland House, 1-4, 32 Bury Street, London, EC3A

In accordance with your letter received on 15 March 2024 and supporting documents.

Signed: *Stephen Platts*

Director of Planning and Growth

DECISION NOTICE

LBS Registered Number: 24/OB/0013

Date of issue of this decision: 12/04/2024



www.southwark.gov.uk



CONSULTATION RESPONSE: **OBJECT**

Anna Tastsoglou
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

By email to: plans@cityoflondon.gov.uk & anna.tastsoglou@cityoflondon.gov.uk

Our reference: 24025

1st May 2024

Dear Anna Tastsoglou,

24/00021/FULEIA | Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. | Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

SAVE Britain's Heritage strongly objects to the above planning application for Bury House 1-4, 31-34 Bury Street on the grounds that this proposal would cause substantial harm to the Grade I listed Bevis Marks Synagogue and its setting, and the Creechurch Conservation Area which is designated to protect multiple highly listed heritage assets and their character. SAVE also strongly objects to the total demolition of Bury House on climate grounds. We further note that a previous scheme for a 48-storey tower at No. 31 Bury Street was already refused permission in 2022 (ref no. 20/00848/ FULEIA) on the grounds that the development would overbear and overshadow the Bevis Marks synagogue. For these reasons, this application fails to comply with national and local policy for preserving the historic and natural environment of the City of London, and so we call on the Local Planning Authority to refuse planning permission.

Proposal

This application proposes the total demolition of Bury House and construction of a 43-storey building; the partial demolition of Holland House and Renown House; and the erection of roof top extensions on these buildings.

Significance

The application site lies on Bury Street and includes the Grade II* listed Holland House (No. 1-4 and 32 Bury Street), Bury House (No. 31 Bury Street) and Renown House (No. 33-34 Bury Street). It is fully located within the Creechurch Conservation Area, which was newly designated in January 2024.

The site is adjacent to the Grade I listed Bevis Marks Synagogue which is one of England's most important religious buildings and is of exceptional historic and architectural value of the highest significance. Bevis Marks was constructed between 1699-1701 to designs by Joseph Avis. The synagogue's internal fittings, which include benches, an ornately carved echelette and seven brass chandeliers, are recorded by Historic England as being 'remarkably complete and little altered'. Historically, the Bevis Marks Synagogue was home to the Sephardic Jewish Community which first settled in Aldgate in the 18th century. It is the only synagogue in Europe that has been in continuous worship for over 300 years, and so is a building of international importance and outstanding historic value.

The newly created Creechurch Conservation Area (CCA) includes listed buildings of outstanding and exceptional heritage significance. In addition to Bevis Marks, two other buildings within the CCA are of Grade I listed status. These are St Katherine Cree Church (1628-31) and St Botolph's Church (1741-44). Only 2.5% of listed buildings are Grade I.

Holland House, is a Grade II* listed building within the CCA, constructed between 1914-16 to designs by the Dutch architect H.P. Berlage with interiors by Henri van de Velde. The steel-framed building is clad in grey-green faience with a black marble base and doorway. The building's facade has a striking rhythm, brought to life by an alternating pattern of prominent vertical ribs and narrow windows, punctuated by decorative sunk bosses. The building was heralded by Pevsner as being of 'remarkable design', which emphasises this building's architectural importance.

No. 31 Bury Street, Bury House, is a non-designated extension to Holland House by Gotch & Partners in 1967 which is harmonious in scale with Holland House. Its height of five storeys, plus two set-back floors, does not overwhelm the Grade II* listed building nor overshadow the Creechurch Conservation Area.

A number of non-designated heritage assets make further positive and sensitive contributions to the architectural character of the conservation area. Renown House (within the application site) is a handsome Edwardian commercial building, built in 1912 to designs by Delissa Joseph. Located on a corner plot as Bury Street winds into Creechurch Lane, the building defines the corner with its confident neo-French Classical style. Its present scale, massing and materiality is harmonious with the neighbouring Holland House, Bevis Marks Synagogue and wider CCA.

Assessment

1. Substantial harm to Bevis Marks Synagogue

SAVE considers that the proposed 43-storey tower at No. 31 Bury Street will cause substantial harm to the setting of the Grade I listed Bevis Marks Synagogue. The proposal will fundamentally alter the streetscape around this highly designated asset which is of exceptional historic value.

The Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Further to this, Para 206 NPPF (2023) provides that any harm to the significance of a heritage asset, including its setting, requires clear and convincing justification. SAVE contests the applicant's claim in the Heritage, Townscape and Visual Impact Assessment [para 8.134] that "only the immediate setting of the Bevis Marks Synagogue contributes to its significance", to be insufficient to comply with Para 206. Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic Environment (2015) sets out that, "setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage". We consider that the proposed 43-storey tower, which would be visible from within the courtyard of Bevis Marks synagogue, has a direct and substantially harmful impact upon the building's setting and secluded nature. The sky view from within the courtyard has religious importance and allows daylight into the synagogue's interior. We wish to highlight the reason for refusal of application 20/00848/ FULEIA which found that a tall building at No. 31 Bury Street would "affect the setting of the Grade I listed

Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue".

This proposed development contravenes local as well as national policy. Policy CS12(1) City of London Local Plan (adopted 2015) requires that development should safeguard the City's listed buildings and their settings. More specifically, Policy HE1 [Managing Change to the Historic Environment] of the emerging City Plan 2040 recognises that the Bevis Marks Synagogue requires, "special consideration and protection, given their outstanding architectural and historic significance and...the critical contribution of elements of setting to that significance." We call upon the LPA to refuse a planning application which fails to comply with national and local policy and contradicts the emerging City Plan 2040.

2. Substantial harm to the Creechurch Conservation Area (CCA)

The application site, whilst within the City Cluster, is fully within the Creechurch Conservation Area which was newly designated in January 2024. Policy CS14(2) of the City of London Local Plan (2015) states that planning permission for tall buildings will be refused within inappropriate areas, such as conservation areas. Policy S12 [Tall buildings] of the emerging City Plan (2040) elaborates that "tall buildings must have regard to... the significance of heritage assets and their immediate and wider settings".

We strongly object to this proposal on the grounds that it would cause substantial harm in heritage terms to the special character and appearance of the Creechurch Conservation Area. This harm would fail to meet the duty to preserve the CCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. At 43-storeys, the proposed tower would overshadow a number of highly designated heritage assets, which include three buildings of the highest possible listed status, which the conservation area is designated to protect. We consider the tower, which would be located directly behind Holland House and Renown House, would diminish the primacy and appreciation of these buildings. The drastically increased scale from the present 7-storey Bury House would compound this harm.

In the absence of a formal Appraisal and Management Plan yet to be adopted, we refer to The Proposed Bevis Marks/ Creechurch Conservation Area (2022) draft documentation which recognises that, "despite the proximity to the cluster of tall buildings in the eastern part of the City, the area under consideration has a remarkably consistent and harmonious low-rise scale of building" (p. 3, para 1.02). The erection of a tower within the CCA would erode its low-scale, harmonious townscape. This is unsupported by local policy. Policy CS12(2) of the City of London Local Plan (2015) requires that to conserve the significance of the City's heritage assets, the distinctive character and appearance of the City's conservation areas will be preserved and enhanced, while allowing sympathetic development within them. This proposed application cannot be considered sympathetic development.

3. Substantial Harm to Holland House and Renown House

The works proposed to Renown House and the Grade II* listed Holland house (in the associated application 24/00011/ LBC) are strongly concerning. We recognise that the rooftop alterations to Holland House are later additions, not contemporaneous with the original 1916 building. However, they are sufficiently set back from the building's facade to be considered largely unobtrusive when viewed from the streetscape. The proposed 4-storey roof top extension is an increase in scale and massing which would overwhelm Holland House and detract from an architectural appreciation of the building. The extension of Renown House by a storey, and the realignment of the floor plates to connect with Holland House constitutes further, drastic alteration which, when as read a whole, amounts to substantial harm.

Para 207 NPPF (2023) provides that, "where a proposed development will lead to substantial harm to...a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm". We do not consider that the

purported public benefits from this development can outweigh the cumulative harm caused by these radical rooftop extensions, a harm which is further compounded by the proposed tower at No. 31 Bury Street.

4. Views of the Tower of London

The development would adversely affect the setting of the Tower of London World Heritage Site by causing less than substantial harm to LVMF view 10A.1. Whilst we acknowledge a reduction in height from the previous application 20/00848/FULEIA, we do not consider this sufficient to mitigate the adverse impact on the setting of the Tower of London.

Policy HC4 of the London Plan (2021) notes that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements, also stating that: *"they should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views"*. The scheme cannot be considered in compliance with this policy.

5. Unsustainable development

This application cannot be considered sustainable development. The demolition of No. 31 Bury Street (Bury House) would generate an embodied carbon footprint on a scale that runs counter to Para 157 NPPF (2023) and Policy CS15 of the City of London Local Plan (2015) which provides that the demolition should be avoided through the reuse of existing buildings and their structures.

This development would further contradict emerging policy which recognises the wider benefit in heritage terms of the retrofit first approach. The City of London Corporation is currently consulting on Planning for Sustainability Supplementary Planning Document (SPD). Chapter 3 [Retrofit and Reuse] states that, *"in the City of London context, retrofitting existing buildings contributes to preserving and enhancing the sensitive character of conservation areas, creating an architecturally innovative environment, and contributing towards making the City a leading leisure and culture destination"*. We consider this application fails to meet national and local policy on sustainability grounds and runs counter to emerging guidance on sustainable development.

Conclusion

For the reasons outlined above, SAVE objects to this planning application on heritage and climate grounds, and we call on the Local Planning Authority to refuse planning permission.

I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

Yours sincerely,



Lydia Franklin

Assistant Conservation Officer, SAVE Britain's Heritage



08/05/24

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

LPA Reference: 24/00021/FULEIA & 24/00011/LBC

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

Dear Ms Tastsoglou,

Thank you for consulting the Georgian Group on the above applications for Planning Permission and Listed Building Consent. Based on the information available to date, the Group objects to both applications for the reasons set out within this letter.

The Group objected to two applications within the setting of Bevis Marks Synagogue in 2021, these were for a tower rising to just under 198 metres located at 31 Bury House and a tower rising to just over 93 metres situated at 33 Creechurch Lane. Both these applications, if permitted, would have caused significant harm to the setting and significance of Bevis Marks Synagogue and the Group were vocal in highlighting this threat to the City of London. Since then, the Creechurch Conservation Area has been designated offering greater protection for this internationally significant building.

Summary

The Georgian Group objects to the applications for Planning Permission and Listed Building Consent. The Group's statutory remit is 1700-1840 and it is only buildings within that period referred to in this letter. For buildings outside this period, the Group defers to the expertise of our sister national amenity societies.

The location, height and massing of the proposed development would cause considerable harm to the significance of Bevis Marks, St Botolph's Church and the Creechurch Conservation Area. The proposed development is defined as a tall building and therefore in line with policy CS14 of the existing local plan should not be permitted within a conservation area. Consequently, the development would be contrary to policy D9 of the

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President The Duchess of Argyll
Chairman Paul Zisman
Director David Adshead

London Plan. The height and massing of the building would cause considerable harm to the three heritage assets referenced above and is therefore contrary to legislation as well as national and local policy relating to heritage assets.

The Georgian Group is aware of the consultation on the proposed City Plan 2040 and will be making representations to address specific concerns with the plan.

Significance of Surrounding Heritage Assets and Area

Bevis Marks Synagogue

Bevis Marks is the oldest surviving synagogue in England and is statutorily listed at grade I. It is a rare survival of an extremely well-preserved synagogue which has remained in continual use since its completion in 1701. Externally, the design of the building has drawn comparisons with the city churches of Christopher Wren and the early nonconformist meeting houses – most evidently with their large, arch-headed windows. The interior of Bevis Marks bears a strong resemblance to the building of its mother congregation, the Portuguese great synagogue of Amsterdam designed by Elias Bouwman. Historic fabric linking these important synagogues is present in Bevis Marks, in the form of the great central chandelier which sits over the reader's platform and four lampstands that stand before the Torah shrine.

Whilst the architectural interest of Bevis Marks is exceptional, the contribution the building and its associations make to the historic interest of the surrounding area is of the utmost importance. Bevis Marks is the only survivor of three Jewish places of worship in the vicinity. The first synagogue after the resettlement was situated where the existing Cunard House sits and is commemorated with a historic City Corporation Plaque. Duke's Place was the location of the now demolished Great Synagogue which was constructed to serve the growing congregation in the area but was destroyed by bombing in 1941. Bevis Marks is therefore the last tangible link to the historic Jewish association in this area of London.

The setting of the synagogue not only greatly contributes to the significance of the building as an architectural composition but also to the synagogue's religious workings and function. The provision of light into a synagogue is fundamental to the practices of Judaism and would have been an influential factor in Joseph Avis's designs. Bevis Marks admits natural light through the large windows on the first floor, providing a suitable environment for the reading and reciting of prayers. This is particularly necessary on the eastern wall of the synagogue where the Ehal is located, which, in the case of Bevis Marks, is made up of three ark cupboards divided by pilasters of the Corinthian order. Setting is influenced by environmental factors, as set out within Historic England's guidance document GPA3 The Setting of Heritage Assets. Reducing the amount of light into the synagogue would harm its setting and therefore significance.

Wrapped around the synagogue is an enclosed space which performs a vital liturgical function in the celebrations of festivals and holy days. This space is seen as an extension of the synagogue and is therefore due equal protection. Threats to this functioning space have been posed in recent years and consent has been rightly refused. Now is the time to provide further protection to ensure the courtyard is allowed to continue to perform its integral function.

St Botolph Without Aldgate

St Botolph's church is located on the site of an earlier building thought to date to the 16th century but with earlier origins. The current building was designed by George Dance the Elder and built between 1741-44. Dance was at this time the Clerk of Works for the City of London, a role he held from 1735 until 1765, and during this time was responsible for the Mansion House at Bank. Dance has a great association with the surrounding area, with his son George Dance Jnr taking up the role of Clerk of Works for the City of London in 1767. St Botolph's church possesses exceptional architectural and historic interest.

Externally, the church is laid in Flemish bond with mixed yellow and red brick and stone dressings. Venetian windows are present to the north, east and west elevations along with Gibbsian surrounds and pedimented doorways forming an impressive classical composition. The church is aligned N-S meaning that the tower, which rises from a pediment topping the body of the church, forms a pleasing view from the south and longer views down the Minories. The tower and spire hold prominence in its surroundings giving it a landmark quality.

The classical composition of the tower and northern elevation is appreciated from the Minories, with the buildings on the western and eastern side framing the church when approaching from the south. Their inclusion within the proposed conservation area is encouraged for the benefit of the surrounding character and appearance and setting of St Botolph's Church.

The setting of the St Botolph's greatly contributes to the significance of the church and the prominence the spire has on the surrounding built environment is a key element. The hotel development to the east of the church allows for the spire to appear against a clear skyline when moving along Leadenhall Street onto Aldgate High Street. Whilst development to the rear, notably Irongate House and those buildings between Houndsditch and Bevis Mark's leading to Duke's Place, contribute to the setting of St Botolph's due to their relatively low-rise design. The erection of One Creechurch Place has harmed the setting of St Botolph's church when viewed across Aldgate Square from the east, creating the potential for enhancement with future development.

Creechurch Conservation Area

The Creechurch Conservation Area was officially designated in January 2024. The Georgian Group were vocal in supporting its designation to acknowledge the unique historic and architectural interest associated with this section of the City of London.

The Bevis Marks and Creechurch area has exceptional historic interest relating to the presence of Bevis Marks and those sites where former synagogues were located. The area has important and visible associations with the Jewish community and their resettlement within the City of London during the 17th century. This is a contributing factor to the importance of the proposed conservation area. The presence of Bevis Marks along with the two plaques commemorating the former synagogues within the area represent a unique connection between the area and the Jewish community and for wider Anglo-Jewry relations.

Alongside Bevis Marks Synagogue, two religious' buildings in St Botolph's without Aldgate and St Katherine's Cree create a distinct character of important religious institutions. As stated above, the landmark quality of St Botolph's without Aldgate is a contributing factor to the interest of the conservation area and the prominence of the

spire within the local surroundings contributes to the strong ecclesiastical character of the conservation area.

Proposal

The applicant intends to demolish Bury House and erect a new building comprising four basement levels and ground plus 43 storeys. A full description of the proposals, as well as the listed building consent application, can be found at the head of this letter.

Proposals and Their Impact

Bevis Marks Synagogue

The courtyard wrapped around Bevis Marks should be seen as an extension of the building due to the vital liturgical function it plays in the workings of the synagogue. The courtyard forms the immediate setting of the building and allows visitors to appreciate the unique setting and appearance of the building. The setting of Bevis Marks contributes greatly to the significance of the building, allowing light into the synagogue which is integral to the practices of Judaism.

The proposed development as shown within the submitted HTVIA would be a dominating visual intrusion on the courtyard and setting of the synagogue. Views 45a and 45b show the impact the proposed tall building would have on the setting of Bevis Marks and the synagogue. The height, massing and positioning of the proposed tower would have an overbearing impact on Bevis Marks harming the setting and the ability to experience the building.

Owing to the impact the proposed tall building would have on the setting of Bevis Marks the level of harm would be towards the higher end of Less than substantial due to the importance of the setting and the potential for reduced light.

St Botolph Without Aldgate

The spire of St Botolph's church is prominent within the local environs and views within the Creechurch Conservation Area. It is identified within the City of London Protected Views SPD as being a church with a 'skyline presence'. The prominence of St Botolph's spire can be appreciated from along Aldgate High Street looking West and from the Minories looking North. Kinetic views of St Botolph's and its spire are permitted when moving around the Creechurch Conservation Area and the wider surroundings which all contribute to the significance of the building.

The applicant has provided views towards the church within the submitted HTVIA on pages 189-194 and identified as views 38 and 39. View 38 is situated along Aldgate High Street and shows the proposed development rising above One Creechurch Place, a building which harms the setting of the church and detracts from the interest of the Creechurch Conservation Area. The cumulative view shows the proposed tall building grouped in with 100 Leadenhall Street and 1 Undershaft. The height, massing and proximity would challenge the landmark quality of St Botolph's Church which is more evident within view 39 situated further east along Aldgate High Street. The impact of the towers would be further exacerbated in kinetic views along Aldgate High Street where the proposed development would be visible in the skyline behind the church.

The positioning of the tower in relation to the spire of St Botolph's would challenge its presence on the city skyline and be a distraction in views down Aldgate High Street. Both

the presence of the spire and views towards the church contribute to its significance and therefore the proposed development would cause an element of harm to St Botolph's Church. This harm would be at the low-middle level of less than substantial harm.

Creechurch Conservation Area

Views within the Creechurch Conservation Area contribute considerably towards its significance and allow for the special interest of the area to be appreciated. As referenced above concerning Bevis Marks and St Botolph's, the impact on those individual assets is similarly applicable to the wider character and appearance of the Creechurch Conservation Area which the proposed development would cause harm to.

The special interest associated with the Creechurch Conservation Area is closely related to the three places of worship situated within the area. The proposed development would harm the ability to appreciate two of those in Bevis Marks Synagogue and St Botolph's Church which fall within the Georgian Group's statutory remit. The Group defers to the expertise of our sister National Amenity Societies on buildings which fall outside of our remit.

A further characteristic that contributes to the special interest of the conservation area is the proliferation of historic open spaces including the courtyard of Bevis Marks Synagogue. The proposed development would have a negative impact, as referred to above, on the courtyard of Bevis Marks, and the churchyard of St Botolph's owing to the impact on their setting which in turn would cause harm to the character and appearance of the Creechurch Conservation Area.

It is evident from the views submitted within the HTVIA that the proposed development would pose an incongruous element to the area and would harm the prevailing character and appearance of the Creechurch Conservation Area. The level of harm would be at the upper end of less than substantial harm, bordering on substantial.

Policy and Guidance

Section 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990 makes it a statutory duty for the local authority or Secretary of State, when considering whether to grant listed building consent, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Regarding planning permission, section 66(1) of the Act makes it a statutory duty for decision makers to have special regard to the desirability of preserving listed buildings or their setting. Section 72 of the Act states that special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Guidance on carrying out this statutory duty is set out by the Government within the National Planning Policy Framework (NPPF). Paragraph 205 states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Any harm caused to the significance of a designated heritage asset will need a clear and convincing justification for doing so in line with paragraph 206 of the NPPF.

Planning practice guidance set out by the government requires any harm identified to either be classified as less than substantial or substantial harm. If the harm is identified

as less than substantial, then in line with paragraph 208 of the NPPF this harm should be weighed against the public benefits associated with the proposed scheme.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that 'where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise'.

London Plan Policy HC1 states 'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.'

Policy D9 Tall Buildings within the London Plan requires Development Plans to define what is considered a tall building and for local authorities to determine where they are appropriate and where they are not. It goes on to state that 'Tall buildings should only be developed in locations that are identified as suitable in Development Plans'. The policy concerning heritage assets states that 'proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area'.

The City of London's Local Plan Core Strategic Policy CS12 sets out the City's objective to 'conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors'.

Policy CS13 states the City's objective to 'protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks'.

Core Strategic Policy CS14 states that in relation to tall buildings, planning permission will be refused if they are located within inappropriate areas such as conservation areas. Within the same policy, consideration will also be given to 'the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features'.

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

Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced

by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

The Georgian Group's Recommendation

The proposals would cause harm to the significance of Bevis Mark Synagogue, St Botolph's church and the Creechurch Conservation Area and would therefore be contrary to legislation as well as national and local policy as set out above.

The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority.

In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Yours sincerely,

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

Date: 08 May 2024
Our ref: 470087
Your ref: 24/00021/FULEIA & 24/00011/LBC



City of London

BY EMAIL ONLY

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Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

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

Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

Thank you for your consultation on the above dated 14 March 2024 which was received by Natural England on 14 March 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Helen Churchill
Consultations Team

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

Housing and Regeneration Directorate
Planning and Building Control

Development Management
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

Date: 14 May 2024

Dear Anna Tastsoglou,

CITY OF LONDON REF(S): 24/00021/FULEIA and 24/00011/LBC

TOWER HAMLETS REF: PA/24/00441

ADDRESS: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

PROPOSAL:

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

24/00011/LBC – Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Thank you for your correspondence dated 14th March 2024, informing the London Borough of Tower Hamlets (LBTH) about the City of London's receipt of the aforementioned Planning application and Listed Building Consent.

LBTH previously voiced strong objections to a similar application at Bury House, 31 Bury Street, between 2020-2021 (City of London ref: 20/00848/FULEIA and LBTH refs: PA/20/02417, PA/21/00436, and PA/21/01930). These concerns remain.

While it is noted that the current proposal now includes adjacent Holland House (Grade II*) and Renown House, our primary concerns pertain to the replacement building for Bury House.

Despite minor adjustments, the replacement building maintains its design as a tall, slender tower situated to the southeast of the Gherkin. Although the maximum height has been marginally reduced from 197.94m AOD to 178.7m AOD, and a stepped form introduced to the upper sections, these modifications do little to alleviate the impact on the Tower of London World Heritage Site (WHS).

As illustrated in LVMF View 10A.1 in Figure 5.4 of the Tower of London Heritage Impact Assessment, despite the reduced height and massing, the proposed development would still disrupt the clear sky gap between the City Cluster and the Tower of London, encroaching inappropriately and competing with the iconic White Tower.

Consequently, LBTH maintains its objection to the proposals, expressing concerns that, even with amendments, the proposed development would significantly and detrimentally affect the setting of the Grade I listed Tower of London WHS and its townscape views.

These proposals severely risk diminishing the ability to appreciate the Outstanding Universal Value of the Tower of London WHS.

Yours sincerely,

Catarina Cheung

Planning Officer

For and on behalf of The Director of Planning and Building Control
The London Borough of Tower Hamlets



HISTORIC ROYAL PALACES

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

FAO Ms Anna Tastsoglou
By email to lpaburystreet@cityoflondon.gov.uk

13 May 2024

Bury House, Bury Street, London EC3A 5AR
Planning Ref: 24/00021/FULEIA and 24/00011/LBC

Dear Madam

Thank you for your notification letter of 14th March inviting Historic Royal Palaces to submit observations by 15 May 2024.

As guardians of the Tower of London WHS we write to object to the revised proposals for this site. It is evident from the submission material that the proposed development would have a significant damaging visual effect on aspects of the 'Outstanding Universal Value' (OUV) of the Tower WHS. On the basis of the information available on the City's website, our comments on the proposal are set out below and we would ask that these are considered in the Council's determination of the application.

On 19th November 2020 we objected to the previous application for this site (20/00848/FULEIA) for which ICOMOS conducted a Technical Review and for which Planning Permission was refused. In our view, the reduction in the height of the building from 48 storeys to 43 storeys is not sufficient to mitigate the harmful impact on the OUV of the WHS and overcome the previous reason for refusal in this regard. Particularly on the attributes of the Landmark Siting of the Tower of London and on the Physical Dominance of the White Tower.

In the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge it is imperative that adequate visual separation is maintained between the City Cluster and the White Tower silhouette. The proposal retains just a sliver of sky space to separate it, but of course this view, like any other, is not static: move a few metres north and the proposal would appear to rise directly out of the White Tower.

The LVMF guidance for view 10A.1 states that: 'The location enables the fine detail and the layers of history of the Tower of London to be readily

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The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



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understood. This understanding and appreciation is enhanced by the free sky space around the White Tower' Where it has been compromised its visual dominance has been devalued.'

Regarding the background to the Tower, the LVMF guidance notes, 'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site'.

It should be borne in mind that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The new proposal for Bury House, would still inevitably increase the existing compromise of the free space around the White Tower.

In Historic Royal Palaces' view, the damaging visual impacts are also evident in the dynamic journey across Tower Bridge and in the local views from within the inner ward of the Tower identified in our Local Setting Study 2010. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVIA views 22 and 23), increasing the visual intrusion of the modern city skyline into the inner ward.

A key impact of the proposed development would be that it would inevitably extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the burgeoning City. Although there has been a minor decrease in the proposals' height, it still creates an abrupt vertical cliff edge in LVMF 10A.1, rather than a stepping down into the 'foothills' of the Cluster. This is a contradiction in the principles being set out for the Cluster and the proposal is also still high enough to suggest that there should be a further continuation of the downward slope of the Cluster towards the White Tower – which over the years has pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme.

You will note that in their 2022 Technical Review, ICOMOS restated the position from the 2019 Review that "the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional

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challenges to it. Neither is it an acceptable 30 City of London ref: 18/01213/FULEIA 12 approach to allow further negative visual impact on the property's integrity when it is already threatened.” This position still stands for the current application and the impact of the development as proposed would be of significant heritage harm to the setting of the Tower of London and the Outstanding Universal Value of the World Heritage Site. On this basis the proposals are contrary to the policies of the Local Plan, London Plan and NPPF, whilst the scheme does not deliver sufficient public benefits to outweigh the level of harm created.

The Planning Statement submitted with the planning application relies significantly on the draft policies of the City Plan in seeking to justify the excessive height and position of the proposal. However, given that the draft plan remains at an early stage of preparation, having not been submitted or tested through examination, with significant objections remaining to the tall buildings policies and proposals in the draft document, it is evident that limited weight can be attributed to the draft plan in the determination of the application at this stage.

Historic Royal Palaces therefore objects to the proposed development, which would be harmful to the OUV of the Tower of London WHS and we ask the City of London to refuse the application.

Yours faithfully



Adrian Phillips
Palaces & Collections Director



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Our ref: CITY 24/15
Your ref: 24/00021/FULEIA

Transport for London
Borough Planning

Anna Tastsoglou
City of London Corporation

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Stratford, London
E20 1JN
Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

14 May 2024

Dear Anna

1 - 4, 31 - 34 Bury Street, London, EC3A 5AR City of London E1W 2BX– Tfl's Detailed comments

Thank you for consulting TfL about this referable planning application. It is understood that the proposal includes the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.

These comments follow the Mayor's recent consideration of the case at stage 1. TfL is in receipt of the Transport Assessment, dated January 2024, Planning Statement, dated January 2024; and other associated document. These form the basis of the response below.

Site location

The site is bounded by Bury Street to northwest and south; and Creechurch Lane to the south-east. The nearest part of the Transport for London Road Network (TLRN) is the A10 Bishopsgate, 200m to the west.

The site is served numerous London Underground, DLR and National rail services within walking distance, including Liverpool Street Rail and Underground Station, Bank Underground Station, Aldgate Underground Station, Aldgate East Underground Station, Tower Hill Underground Station, Tower Gateway DLR Station, and Fenchurch Street Rail Station. The site is also served by numerous bus services with bus stops within a short walking distance. As such, the site records an excellent public transport access level (PTAL) of 6B, which 0 is the lowest and 6b is the highest.

The Cycleway CS2 is located approximately 400m east of the site. A southern extension of Cycleway 1 (C1) through Bank, past Liverpool Street station, along Eldon Street and

then along London Wall and Bevis Marks gyratory was recently funded through the latest City of London Local transport Implementation Plan.

In addition, there are three TfL Cycle hire docking stations locating within 200m of site which are St Mary's Axe, Houndsditch, and Jewry Street cycle hire docking stations.

Access and parking

Pedestrian Access

It is proposed that the proposed development will enable access through James' Court (to the south) and also through Heneage Place (to the north) as part of new public route through the building (7am – 11pm). Office access 'out of hours' will be via the Creechurch Lane entrance (to the east). Public and retail uses are accessible wrapping around to the west directly to Renown House and Holland House. This will significantly improve permeability of the site and increase the overall space available for pedestrian movement between Heneage Place and Bury Street and along Creechurch Lane; which is welcomed in line with London Plan policy T2 Heathy Street.

A Pedestrian Comfort Level analysis has been undertaken for 13 section of local streets in the vicinity of the site. It is considered that the streets to be used as the main route for access would be able to accommodate the additional footfall and without adverse impacting the PCLS with B+ rating maintained, while the narrower minor routes would not see any notable increase in footway nevertheless.

Cycle and vehicle Access

Cycle parking access will be via Creechurch Lane at the north-east corner of the building. The entrance provided is dedicated for cyclists which is separated from the pedestrian entrance. The entrance is equipped with a sliding door and stairs with a wheeling channel to access basement B1 and B1 Mezzanine. An alternative cycle access is provided via a lift to the basement within the north core for those not wanting to use the staircases. In addition, A secondary access for cycle parking is provided via the eastern Holland House entrance, off James' Court, via lift or stair, this welcomed.

Vehicle Access

TfL welcomes that an off-street servicing area at the north west corner of the site is provided to serve Bury House, Holland House and Renown House, in line with London Plan Policy T7 Delivery & Servicing, and is accessed directly via Heneage Lane. Having said that, Stage 1 Road Safety audit is required to support its acceptability in highway safety terms.

Cycle Parking

A total of 667 cycle parking spaces will be provided, of which 585 spaces will be for long stay spaces, and 85 short stay spaces.

It is also proposed that 5% (29 spaces) will be provided the form of adaptable spaces to accommodate users of larger / unconventional cycles and those with mobility impairments. The remaining spaces will be in the form of Sheffield

Stands (87spaces), and Fold bike lockers (58) and 1 High Density solution type space.

Alongside with long stay cycle space, the short stay spaces will be provided within the basement level 1 (B1) and B1 mezzanine level accessed via the Creechurch Lane cycle entrances. All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5 Cycling and London Plan cycle parking standards.

Car Parking

TfL welcomes that no on-site car parking has been proposed as the proposal will be 'car free'. As per current, on-street blue badge parking spaces are available on Creechurch Lane and Mitre Street.

Healthy Street & Vision Zero

An Active Travel Zone assessment (ATZ) has been undertaken and seven routes has been reviewed. The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc.

Since part of the land use of the proposed development would be for flexible community/education/ cultural/amenity use; therefore TfL considers that an Night-time ATZ shall also be carried out to assess routes for darker hours, ensuring safety and security for vulnerable users.

TfL is developing safety improvement proposal for the A10 Bishopsgate, the estimate cost of the project is currently £1.5m, therefore a partial contribution of £350K is sought from this proposal toward the project, the amount of contributions is based on common approach adopted for proposed developments in the area.

The City Corporation is encouraged to secure necessary improvements for work on its highway network accordingly.

Trip generation

The submitted TA expected that the proposal would generate a total of 966 two-way trips are forecasted in the AM Peak (08:00-09:00) and 955 two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 690 two-way persons trips during the peaks compare with the existing offices. This assessment is considered robust and is therefore accepted. A lower level of trips is also expected for the proposed retail use, which is not considered significant.

Mode share

It is also predicted that vast majority of the trips to/ from the proposal will be by sustainable transport modes. Of those, nearly 10%% of trips will be by bike or on foot, and 7% will be by bus, 38% by tube and 47% by rail (including Elizabeth Line); and the level of car and taxi trips are negligible.

Public Transport service

The site is already with a very high level of public transport services; it is therefore considered that the proposal would not give rise to significant adverse impact to existing London Underground and local bus services in City area.

London Cycle Hire

It is estimated that the proposal would generate an additional 309 two-ways cycle trips over the current proposal, which means additional demand for cycle hire services. A financial contribution of £100K and land to construct additional docking station on footprint or as close to it as possible is therefore sought. The applicant is urged to identify a mutually agreeable location that would be accepted by the City Corporation and TfL

Delivery & Servicing

It is welcomed that at at-grade off-street on-site service yard will be provided for servicing, access from Heneage Place. A draft Delivery and Servicing Plan (DSP) has been submitted, which outlines the servicing arrangement for the proposal, includes consolidation and restricting servicing vehicle size of goods vehicle of up to 7.5T with 8m maximum length, this is due to the restricted width of Heneage Lane and the vehicle weight limit. However, the DSP shall also promote the use of cycle servicing to reduce goods vehicle traffic in the City and be more sustainable; as well as enabling night-time servicing to reduce traffic impact during normal business hours. The DSP should therefore be revised the comments above, and the final detailed DSP should be secured by pre-occupation condition.

Construction Logistics

A Detailed Construction Logistics Plan (DSP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition.

Travel Planning

A Framework Travel Plan have been submitted which is welcomed. It is considered that the 5 years mode shift targets to walking and cycling should be more ambitious to achieve the Mayors' long terms aspiration for 80% sustainable travel by 2041.

The Travel Plan should therefore be revised to reflect the comments above, and the finalised Plan should be secured by s106 planning obligation.

Community Infrastructure Levy

The MCIL2 rate for City of London is £80 per square metre.

Summary

The following matters should be resolved before the application can be considered in line with the transport policies of London Plan;

1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreement'
2. Undertake Stage 1 Road Safety Audit for the proposed servicing access
3. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ.

4. Secure a partial financial contribution of £100K for TfL toward proposed A10 Bishopsgate improvement.
5. Secure the submission and approval of cycle parking details by condition.
6. Secure £100K (index linked) financial contribution toward enhancing local cycle hire services.
7. Revise the DSP in light of comments, and secure approval of both DSP and CLP by conditions.
8. Revise the Travel Plan, and ensure that the Plan would contribute positively toward the Mayor's sustainable travel goal and secure them by s106 agreement; and
9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.

I trust that these comments are of assistance. If you have any further queries, please let me know.

Yours sincerely,

PakLim Wong

Planner

Email: [REDACTED]

From: Christina Emerson <[REDACTED]>
Sent: Tuesday, May 14, 2024 5:41 PM
To: Tastsoglou, Anna <[REDACTED]>
Subject: Bury House, 31 Bury Street, City of London, EC31 5AR 24/00021/FULEIA

THIS IS AN EXTERNAL EMAIL

Your ref: 24/00021/FULEIA
Our ref: 193045

Bury House, 31 Bury Street, City of London, EC31 5AR
Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings

Dear Ms Tastsoglou,

The SPAB has been made aware of the above application and is writing to register its strong objection on the basis of the serious harm that would be caused to the Bevis Marks Synagogue and the Creechurch Conservation area.

The proposal for a 45 storey office block at 31 Bury Street bears striking similarities to the highly controversial scheme which was refused by your authority in 2022. The major area of difference would appear to be the justification offered by the applicant for the scheme. Much is made of the new building's sustainability credentials, the economic benefits that would flow from it, and the provision of space for a variety of community uses. In our view, these arguments are tenuous at best and do not provide adequate justification for the substantial harm that would be caused to the Synagogue and the conservation area.

Any new building of the type proposed would be expected to demonstrate solid sustainability credentials, so this cannot be considered as a determining factor when weighing justification against harm to an exceptional heritage asset. Also, and quite simply, the most sustainable building is one that already exists and we cannot see that the applicant has fully understood or explained the total carbon lifecycle cost of the proposed development.

We are also not convinced that there is a requirement for community usage on the scale envisaged by the applicants, and indeed the location of our own offices in the City of London allows us to witness on a daily basis the many underused and often cavernous 'community' spaces that now occupy the ground floor of tall buildings at the expense of genuinely useful and affordable small scale businesses and community premises.

The previous application was rightly refused by your Planning Committee based on the serious harm that would have been caused to the Synagogue. To that harm must now be added the very damaging impact on the newly designated Creechurch Conservation Area that would result if the application were granted. The height, scale, and mass of the proposed tower would overwhelm the Conservation Area and cause a high level of harm to key views. We cannot think of any precedent that would support your Authority in granting a permission that would be so clearly in contravention of the requirement of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that special attention must be paid to the desirability of preserving or enhancing the character or appearance of the area. Indeed, doing so would set a very damaging precedent.

The SPAB urges that the application be refused by your local authority.

With best wishes

Christina Emerson
Head of Casework



The Society for the Protection of Ancient Buildings (SPAB)
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Charity no: 111 3753 Scottish charity no: SC 039244 Registered in Ireland 20158736 Company no: 5743962

Anna Tatsoglou
Development Division
City of London
Sent via email only

15 April 2024

Dear Anna,

Letter of Planning Application Response: 1-4, 31-34 Bury Street (ref. 24/00021/FULEIA and ref. 24/00011/LBC)

Introduction

Further to a review of the submission documents, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposals for a new tall building at the above site.

Background

We would here note that we have not been approached for pre-application discussion regarding this project. The Cathedral always welcomes the opportunity to provide constructive feedback on emerging proposals within the setting of St Paul's. We regret that this did not occur.

We note that this application was subject to an Environmental Impact Assessment. At the time of writing we are not aware that we were consulted on the scoping report for that EIA. As will be apparent in our comments which follow, we are not altogether content with aspects of the applicant's documentation and impact evaluation, which might have been addressed by the EIA scoping assessment.

Comment

The proposals involve the construction of a new tall building to Bury Street, on the eastern end of the cluster.

Whilst the development site is separated visually from the Cathedral by the bulk of the Cluster, the proposals will still be appreciable in key views of St Paul's (as identified within the *Heritage, Townscape and Visual Impact Assessment - HTVIA*) and thus form part of its setting. We would therefore query why an assessment of the significance of the Cathedral (including the

Surveyor to the Fabric

contribution made by its setting) and subsequent heritage impact assessment was not explicitly included in the application documents, either within the HTVIA prepared by The Townscape Consultancy or the Heritage Statement prepared by KM Heritage. We would suggest that such assessment should be included in the submission documentation as a matter of due course given the exceptional significance of the Grade I listed building and the evolving nature of its setting. If this assessment is not included, we consider that explicit mention should be made of why the Cathedral was scoped out of assessment in order to fully understand the extent of potential heritage impact.

We do, however welcome the inclusion of key views of the Cathedral outlined in the 'Visual Assessment' section of the HTVIA. Whilst we understand that the proposals are located on the eastern side of the cluster and a 'partial' ZTV is included as an appendix to the HTVIA, the inclusion of a ZTV that covers a wider area would be of great assistance in understanding the extents of potential visual impact, and why certain strategic views (such as view 15B.2) were not taken forward for assessment.

Fleet Street views are not included within the HTVIA. However, the Processional Way along Fleet Street is an incredibly sensitive area of the setting of the Cathedral in terms of potential heritage and visual impact. We would therefore also seek to be assured that there is absolutely no visual intrusion within views of the Cathedral from Fleet Street.

Wider Considerations: Bevis Marks

We have confined our observations on this application to our primary locus (ie concern for the heritage and setting of St Paul's) and our well established planning application review methodology. However we also feel we would be remiss in not making mention of the evident impacts that this major development proposal has on both the Tower of London (WHS) and Bevis Marks Synagogue.

The City Planning and Transportation Committee refused consent for an earlier proposal – which, to most observers, is more or less similar to the current application. The committee determined that the impact on the heritage and setting of two highly significant and sensitive Grade 1 listed heritage assets were found to be unacceptable.

Accepting that other commentators and critics, including Historic England, will be better placed to advise Planning Committee on the methodology and evaluation of impacts of this development on Bevis Marks especially: the main observation that we wish to add to our comments here is in relation to the definition and understanding of 'setting'. There is very good guidance from HE on evaluation and consideration of managing significance, which includes 'setting' in GPA 1 and 2. We feel that it is important to note that, whilst the Tower and St Paul's are (in different ways) privileged with specific heritage management policies that broadly recognise these internationally significant heritage assets, Bevis Marks has to argue a case for 'Protection, Preservation and Celebration' within the rubric of the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990.

All participants will rightly be concerned with seeking a better and shared understanding of the heritage setting of the Synagogue and, to date, it would appear that the regulators and proposers of this scheme have not yet arrived at a shared understanding of setting and the significance thereof. This important consideration might have been addressed by EIA Scoping.

Where the interests of St Paul's and those of Bevis Marks intersect, we suggest and as noted above, is that this application before committee does not appear to be supported by sufficient or proportionate evidence and expertise in relation to the full and correct evaluation of the heritage context into which this major project intrudes. We would therefore urge officers and Committee to allow for these necessary data to emerge to inform any determination.

Conclusion

We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward. We would happy to review any additional information submitted to better understand potential impacts.

Yours sincerely,



Surveyor to the Fabric

cc: Tom Nancollas, Deputy Director (Design), City of London
Rebecca Thompson, Director of Property, St Paul's Cathedral

Directors:

Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:

Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

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Historic England

Ms Anna Tastsoglou
City of London Corporation
Environment Department
PO Box 270, Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: L01574353

15 May 2024

Dear Ms Tastsoglou

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOLLAND HOUSE 1 - 4, 32 BURY STREET LONDON EC3A 5AW
Application Nos 24/00011/LBC & 24/00021/FULEIA**

Thank you for your letters of 14 March 2024 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Summary

In 2021 your authority considered a similar scheme for the replacement of Bury House with a 48-storey tower. That application was refused, which we welcomed. This was because the proposals would have harmed the Outstanding Universal Value of the Tower of London World Heritage Site. The application was also refused because the proposed tall building would have harmed the Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard.

The current proposal, an amended scheme on a larger site, would not overcome either of the previous reasons for refusal in our view. Indeed, further harm caused by the proposed alterations to Holland House and the development's impact on the Creechurch Conservation Area mean that this scheme is worse than that refused from a heritage perspective.

Historic England objects strongly to the applications and recommends they should be withdrawn or refused.



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Historic England Advice

Significance of the heritage assets

a) Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value as an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. They reflect the Tower's role as the setting of many significant episodes of European history and as one of the best surviving examples of a medieval fortress palace in the world. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. The World Heritage Site (WHS) is located approximately 550m south-east of the development site.

The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The physical relationship of the Tower with the City as viewed from the river is central to understanding its Outstanding Universal Value (OUV). The Statement of OUV adopted by the World Heritage Committee, in the section relating to integrity, notes that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.'

The view from the north bastion of Tower Bridge towards the Tower of London, View 10A.1 in the London View Management Framework (LVMF), is historically important as a long-established picture post card view. It forms part of a kinetic experience of the Tower and wider London skyline along the bridge. Views of the Tower from this location showcase the Tower's attributes as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance.

These attributes were considered in detail during the Tulip public inquiry. The Inspector found that they 'rely to a great extent on its setting' (IR 14.25) and, of the latter three attributes, 'the sky space component...is central to its OUV' (IR 14.29).

The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London.

b) Bevis Marks Synagogue (Grade I listed)

Bevis Marks Synagogue is the oldest surviving synagogue in the United Kingdom. It was built between 1699-1701 for a growing Sephardi community in the City of London,



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following the Resettlement of the Jews in England in the 1650s. The synagogue has been described as the 'Cathedral' Synagogue to Anglo Jewry, such is its stature and symbolic importance.

The synagogue is a key part of the history of British Judaism and is of international importance, particularly given its roots in the Sephardi diaspora created by the expulsion of Jews from the Iberian Peninsula in 1492. The synagogue continues the traditions of those communities who travelled to the Low Countries and is now one of the oldest continually functioning synagogues in Europe.

The synagogue is remarkably little altered. Its architectural and historic significance, including its communal value is clearly exceptional and it is Grade I listed for that reason. Its setting, whilst somewhat compromised by the evolving City around it, continues to make an important contribution to its architectural and historic significance and the ability to appreciate that significance.

The premier example of early synagogue architecture in England, Bevis Marks Synagogue was built by the master craftsman Joseph Avis who worked closely with both Sir Christopher Wren and Robert Hooke elsewhere in the City. It is a simple, well-proportioned classical building executed in brick and shares much in common with the style preferred for public buildings and churches, designed by the likes of Wren, at the time.

Perhaps the most striking way that the synagogue is externally distinguishable from these places of worship is by its discrete siting away from the street in a small courtyard. Its hidden away location suggests a degree of caution, or limitation, for a place of worship (particularly when compared to the near contemporary Sephardi synagogue in Amsterdam). Nevertheless, the high-quality architecture was a demonstration of their faith and an investment which suggests the congregation were confident that they would remain welcome in London. In this way architecture was used by the Sephardi community to establish a positive identity, and permanence, within society.

Historically, the synagogue formed part of a wider estate with lower rise community buildings encircling it. Despite modern development largely replacing the former one and two storey ranges, the form of the courtyard remains, and the enclosure continues to provide separation from the outside world. The synagogue is the pre-eminent feature of the space, reflecting its function and status. It is currently seen with a largely clear sky backdrop which enhances its presence.

The adopted Conservation Management Plan (CMP 2019) for the synagogue notes that the courtyard represents an arresting point of departure from the modern world into what is palpably a historic place. It states that 'views across and out of the courtyard, as well as visibility of the sky are important contributors to the setting of the

synagogue, as well as the courtyard's amenity value.' We note that the synagogue has liturgical practices which include interactions with the sky and celestial bodies. The CMP further explains the communal significance of the courtyard as a place where people gather before and after services and other events, including weddings. It therefore has a key role in supporting the customs and traditions of the synagogue.

Modern development, including tall buildings, is increasingly visible in the wider setting of the synagogue. Where tall buildings encroach into the skyspace around the courtyard and have windows facing into it, they reduce its special sense of privacy and openness to the sky. This makes elements of the setting particularly sensitive to further erosion or loss. The synagogue nevertheless continues to benefit from a large amount of clear sky making a strong positive contribution to the buildings setting and significance, and the ability to appreciate these.

c) The site - Holland House (Grade II* listed), Renown House and Bury House

Holland House was designed as the London headquarters of W.M. Müller & Co by the preeminent Dutch architect H.P. Berlage, from 1913-16. It is a highly original office design and the only example of his work in the country. This building is now prominently sited, following the construction of the Gherkin and the creation of the public space around it which has enhanced the ability to appreciate its significance.

It is an important building particularly because of its pioneering approach to rational façade design. The primary elevation has a regular grid without any apparent hierarchy - radical for its time. The realised design was unprecedented in London, reflecting Berlage's interest in contemporary American architecture and his own progressive ideas. The building is of more than special interest which is reflected by its Grade II* designation.

Holland House wraps around the slightly earlier 33-34 Bury St (Renown House) to the south, a good quality but unlisted commercial building of 1912 (designed by the architect Delissa Joseph). It contributes positively to the setting of Holland House. Despite being separated by only a few years, the traditional architectural language of Renown House, including the hierarchical arrangement of its floor levels as expressed in its composition, contrasts unmistakably with the radical approach to façade design pursued at Holland House. This juxtaposition enhances the appreciation of the latter's significance.

31 Bury Street (Bury House) is a late 60's office building. While its design is of no particular merit, it is sympathetic in scale to its historic neighbours. Bury House is physically connected to Holland House, which also has alterations and extensions contemporary with the former that detract from the listed building's significance.

d) Creechurch Conservation Area



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Recently designated for its special architectural and historic interest, the Creechurch Conservation Area's character is embodied in three exceptional Grade I listed places of worship: Bevis Marks Synagogue, the churches of St Katherine Cree and St Botolph-without Aldgate. Alongside these are high quality commercial buildings and warehouses from the late-nineteenth and early-twentieth centuries. Subsequent modern development is generally sympathetic to the historic scale, resulting in a clearly defined character worthy of preservation. The tall building at 1 Creechurch Place is an outlier which detracts considerably from the area's qualities.

Holland House, Renown House and Bevis Marks Synagogue make a strong positive contribution to the conservation area's special architectural and historic interest. Although Bury House may not make a distinct positive contribution, its perceived scale is sympathetic to its neighbours and the area more broadly. The loss of James Court and the southern part of Heneage Lane caused by its construction has interrupted the historic urban grain to a small extent.

Impact of the proposals

The proposals are for the replacement of Bury House with a new 44 storey building (178.7m AOD) and the alteration and extension of Holland House and Renown House.

a) Tower of London World Heritage Site

The current proposals show a modest reduction in height and a chamfering of the massing at the uppermost part of the building, compared to the refused scheme. The proposed tower would, though, be slightly wider than the previous scheme in its middle section. We conclude the proposals would cause a similar level of harm to OUV as the previously refused scheme.

While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower's turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height.

Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed cladding material. The additional height that would be introduced at its eastern edge, would result in a striking upward step in scale directly beside the White Tower, creating much more of a cliff edge than the current situation.



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It would therefore present a greater distraction and harm the Tower's attributes of OUV as a symbol of Norman power, its landmark siting and its physical dominance, and so harming the integrity of the WHS. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above.

The experience from Tower Bridge is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it.

The proposals would introduce a comparable scale and mass to the Gherkin, evident notably closer to the Tower, leaving less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City and its silhouette would be further compromised when compared to the existing situation, adding to the harm to the attributes of OUV we have identified above.

The proposed development would also be visible within the Tower of London Inner Ward. At different points it would appear above the roofline of the Chapel Royal of St. Peter ad Vincula and 2 Tower Green (both Grade I listed), adding further to the visual intrusions of various tall buildings in the City. Consequently, it would further diminish the self-contained ensemble of historic buildings and spaces, distracting from the Tower's remarkable sense of place.

b) Bevis Marks Synagogue

The proposed development would harm the significance of the synagogue, intruding directly behind it when viewed from its courtyard. The new tower would appear closer to the synagogue than any other existing tall building development, greatly reducing the clear sky backdrop, resulting in a worse scenario than the previously refused application proposals.

The ability to appreciate the architectural interest of the synagogue would consequently be diminished. Its precedence would be all but lost with a roofline that would become framed against distracting modern development of a very large scale. The new tall building would become a dominant feature of the courtyard at the expense of the synagogue, diminishing the latter's role as the focal point of the space.

The special historic character of the place and the deliberate sense of separation from the outside world would be further diminished. The ability to see clear sky from the courtyard would also be lost, breaking the visual link between the space and celestial bodies.



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Such harm needs to be considered in a cumulative context, with existing and consented tall buildings already having a damaging impact. These proposals would cause a greater degree of harm than those schemes, because of the location of the development site relative to the synagogue, evident immediately upon entering the courtyard.

c) Holland House and Renown House

Holland and Renown House would be altered in order to combine them with the proposed tall building on the site of Bury House. We note as heritage benefits the conservation works and proposed increased access, which would improve the ability to appreciate the significance of Holland House. However, the alterations would include the demolition of party walls in order to provide better connectivity and to enable a shared core. The light well in Holland House would be extended and subdivided. These alterations would result in harm to Holland House by compromising the legibility of its historic design.

Both Holland House and Renown House would be extended upwards which would result in a greater level of harm to the listed building and to the conservation area. In the case of Holland House, the addition of attic levels which do not reflect the order or proportions of the original design intent would be particularly harmful to the appreciation of its significance by appearing overbearing.

The scale of the proposed roof level and dormer windows to Renown House do not reflect the hierarchy of the building. As such, the extension would compromise its positive contribution to Holland House and the conservation area through increases to its height.

The proposed tall building would appear to tower over Holland House distracting from an appreciation of its high architectural interest, causing further harm.

d) Creechurch Conservation Area

The proposals would similarly harm the conservation area by reducing the positive contribution made to it by these buildings. The scale of the proposed tall building would detract from a relatively consistent historic scale and become the dominant form.

We note proposals offer modest enhancement to the character and appearance of the area by reinstating the southern part of Heneage Lane as a route through, which would be a small heritage benefit.

Legislation, policy and guidance considerations



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We note the salient points of law, policy and relevant guidance here.

a) The Planning (Listed Buildings and Conservation Areas) Act 1990

Section 16 (2) and 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the statutory duty on local planning authorities to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Section 72 (1) of the Act also requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

b) The City of London Plan 2015 - 2026

The Local Plan context affords considerable protection to the Tower of London and Bevis Marks Synagogue, befitting their status as heritage assets of the highest significance.

According to the City of London's adopted Local Plan, the site is within the broad area identified for tall buildings in the Cluster. This is set out in the adopted Plan in Core Strategic Policy CS7: Eastern Cluster, which seeks the provision of high quality tall commercial buildings within the cluster area on appropriate sites and adhere to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views. This policy therefore recognises that not all sites within the Cluster area are suitable for tall buildings.

Policy CS12: Historic Environment, seeks the "safeguarding [of] the City's listed buildings and their settings" and "Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value...of the Tower of London World Heritage Site and its local setting." It states that "development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area"

Policy CS13: Protected Views, aims "to protect and enhance significant City and London views of important buildings, townscape and skylines...by...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV."



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Policy CS14: Tall Buildings, states that such development will only be permitted on sites that are considered suitable, having regard to the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features. The policy indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

c) The London Plan 2021

London Plan Policy HC1 Heritage conservation and growth requires development proposals affecting heritage assets and their settings to conserve their significance. It further requires the cumulative impacts of incremental change to be actively managed.

London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

London Plan Policy D3 requires all development to follow a design-led approach that optimises the capacity of sites, including consideration of design options to determine the most appropriate form of development that responds to a site's context.

London Plan Policy D9 Tall Buildings requires that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification. Where the proposals concern the setting of a World Heritage Site, the policy reserves the strongest protection, stating that new tall buildings "must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it".

The Tower of London is identified in the London Plan as one of three Strategically Important Landmarks for London, and the importance of managing its setting is recognised in the strategic views policies HC3 and HC4, and the London View Management Framework (LVMF Supplementary Planning Guidance, 2012).

The LVMF supplementary planning guidance, in relation to view 10A, states that this location "enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised, its visual dominance has been devalued" (para. 182).



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It requires that “the Tower of London should not be dominated by new development close to it” (para. 183) and that “some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background” (para. 186).

d) The National Planning Policy Framework

The National Planning Policy Framework (NPPF) requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 195 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Paragraphs 200-201).

Any finding of harm is a consideration to which the decision-maker must give “considerable importance and weight” and “less than substantial harm” in NPPF terms does not imply “a less than substantial objection”.

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 193 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.



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e) The Tower of London World Heritage Site Management Plan 2016

The management plan states that “the greatest challenge to the WHS... remains the impact on its setting of development and tall buildings” (p.4). Key elements of the Tower’s setting that are sensitive for the management of its OUV are highlighted in paragraphs 7.3.17-18 (p.99) and 7.3.27 (p.101), namely the potential of new development to change the relative scale of the Tower in views, and the degree to which the Tower’s relationship with the City can be understood by the sky space around the White Tower.

f) The Tower of London Local Setting Study (2010)

The Local Setting Study supports the management plan policies. In relation to the view from Tower Bridge, it notes that the existing Cluster buildings appear to move closer to the White Tower, ‘towering’ over it, which reduces its apparent prominence and scale. It states that the White Tower should not become ‘lost’ in the City and that additional buildings in the backdrop (‘behind’ or ‘close’) could further diminish its perceived scale.

g) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3)

The Setting of Heritage Assets recommends a staged approach to understanding impacts on setting. Step 2 of that guidance is an assessment of the degree to which settings and views contribute to significance or allow it to be appreciated. This includes consideration of ‘the asset’s intangible associations with its surroundings, and patterns of use’; a further non-exhaustive checklist of possible attributes of setting is also provided. Those that may be applicable in this case, relate to the experience of the asset, including the following:

- § Intentional intervisibility with other historic and natural features
- § Visual dominance, prominence or role as focal point
- § Sense of enclosure, seclusion, intimacy or privacy
- § Rarity of comparable survivals of setting
- § Traditions

Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- § Proximity to asset
- § Position in relation to key views to, from and across
- § Prominence, dominance or conspicuousness



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- § Competition with or distraction from the asset
- § Change to skyline, silhouette
- § Lighting effects and 'light spill'

Historic England's position

Historic England objects strongly to the current proposals. We consider they would harm designated heritage assets of the highest possible significance, contrary to planning legislation, policy and guidance. We do not support the development of a building of scale proposed in this location due to the inevitable harmful impact it would have on the historic environment.

The reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard.

a) The Tower of London World Heritage Site

The previously refused application was subject to a Technical Review by ICOMOS, one of the Advisory Bodies to UNESCO's World Heritage Committee, in July 2022. Given the similarities between the current scheme and the refused one, we consider that ICOMOS' previous advice remains relevant to the current application and should similarly be taken into consideration. ICOMOS considered that the proposals would harm the integrity of the WHS as well as the significance it derives from attributes conveying its OUV.

This harm remains in the current planning application. In the case of the World Heritage Site, a small reduction in height of the proposed tall building (without an apparent loss of deliverable office floor space) causes a similar impact. The same attributes of OUV (as a symbol of Norman power, its landmark siting and its physical dominance) and so the integrity of the WHS, would be harmed.

The submitted Heritage Impact Assessment for the Tower does not consider the potential for negative impacts on OUV and we disagree strongly with its conclusion of a minor and beneficial impact in LVMF View 10A.1. It does not adequately consider the impact on the important kinetic experience of the viewpoint either. In their technical review, on this point ICOMOS stated that 'the work to maintain a separateness from the Tower is completely unsuccessful'. The same is true of these proposals.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of



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the Tower. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

We consider that, despite the changes to the scheme, a high level of harm would be caused to the same attributes of the WHS' OUV. For the purposes of the NPPF, we find that the harm would be in the middle of the less than substantial range to the World Heritage Site. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals.

Notwithstanding our view that the advice received from ICOMOS on the previous scheme for this site remains relevant, the Department for Culture, Media & Sport (DCMS), representing the UK State Party to the World Heritage Convention, has decided to notify the current case to UNESCO. We consider that any decision on this application would benefit from knowing the position of the World Heritage Centre and/or further advice of ICOMOS. We note that we have received request from the World Heritage Centre to produce a State of Conservation Report for the Tower of London this year, indicating that UNESCO has serious concerns about the impacts of development on the setting of this WHS and its OUV.

b) Bevis Marks Synagogue

Our understanding of the significance of the synagogue has developed since the previous application. Clear harm would be caused to multiple aspects of the synagogue's significance by blocking the open sky in its backdrop - noting in particular the considerations set out in GPA3 and the assessment of significance in the adopted CMP. We defer to the expertise of the Sephardi community on the aspects of significance that are associated with their religious customs and traditions that may be impacted by the current proposals.

We think that the harm arising from the proposals would be greater than we previously identified. The harm would fall in the middle of the less than substantial range, which represents a considerable impact to a building and setting of exceptional significance and rarity, which are sensitive to change.

The submitted Heritage and Townscape Visual Impact Assessment presents a limited understanding of the significance of the synagogue, and the contribution made by setting to that significance. It does not explain why a different understanding to the adopted CMP has been reached with regard to the value of the sky. We consider that the application fails to meet the requirements of Paragraph 200 of the NPPF, as the level of detail is not sufficient.

c) Holland House, Renown House and Creechurch Conservation Area



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New additional harmful impacts to the historic environment arise through the present applications in the case of Holland House and the newly designated Creechurch Conservation Area, as described above. The proposed roof extensions have not been resolved in a way which avoids or minimises harm in accordance with the requirements of the NPPF. Given its importance as a pioneering building, we think that such harm is difficult to justify.

The introduction of a tall building within the conservation area would harm its character and is at odds with the provisions of Local Plan Policy CS12 and CS14. The latter indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

d) Design and heritage benefits

We are not convinced that sufficient steps have been taken to minimise or avoid conflicts between the conservation of all of the designated heritage assets referred to above, as required by the NPPF.

As context (including the historic environment, as set out in the NDG) is a fundamental aspect of good design, we find that the design quality is poor in this respect. Similarly, the proposals do not appear to comply with the design-led approach required by London Plan Policy D3, as the site's capacity has not been optimised with regard to the site's context and capacity for growth, including the setting of such exceptional heritage assets, which are an important consideration.

The heritage benefits arising from the scheme are limited and could be achieved in less harmful ways. We afford them little weight and consider them incapable of outweighing the identified harm.

Recommendation

Historic England strongly objects to these applications. We recommend that they are refused or withdrawn.

We would welcome further discussion with your authority before considering our position in regard to our power of direction for the Listed Building Consent.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:



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<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas
London & South East Region



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Email: lpaburystreet@cityoflondon.gov.uk

17 May 2024

Dear Anna Tastsoglou,

SITE: Holland House 1-4, 32 Bury Street, City of London EC3A 5AW

REF: 24/00011/LBC & 24/00021/FULEIA

The Twentieth Century Society has been consulted on the above applications for alterations and extension to Holland House and the redevelopment of the Bury House site. These applications were reviewed by the Society's advisory Casework Committee of experts on Monday 13th May and the comments below reflect the committee's response. The Society strongly objects to the proposals on account of the harm that would be caused to the significance of the Grade II* listed Holland House and Creechurch Conservation Area.

Holland House was completed in 1916 to designs by the Dutch architect Hendrik Petrus Berlage for WH Müller & Co, a shipping, steel and mining company. The clients were the company heads, the German couple Anton Kröller and Helene Müller who had employed Berlage on projects in the Netherlands where their company was based and became important patrons of his work. Berlage was a major architect in the Netherlands and Holland House was a rare commission in England. WH Müller's London offices were built from steel to showcase the company's trade and impress in its modernity. Berlage had travelled to the US in 1911 and experienced its steel high-rises which he published in *Amerikaansche reisherinneringen* ('Memories of my American trip') in 1913. The Holland House offices was an early innovator in England for its adoption of a steel frame in construction. It is clad in hand-made glazed terracotta manufactured by the Royal Dutch Delftware Factory in Delft and imported to London on Müller's ships during WWI. The elevations have a strong vertical emphasis created through closely spaced full-height mullions set on a regular grid and chamfered to emphasise their slenderness. Ceramic spandrels, each with a central square boss, mark the floor levels. Black granite clads the building's plinth and entrances, and forms a relief carving of a steamship by Joseph Mendes da Costa at the corner of the return elevation to Bury Street. Key interior spaces were richly finished.

Policy

Holland House is Grade II* listed, placing it in the top 8% of listed buildings in England. Its conservation is therefore of the utmost importance. The local authority should be mindful of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which state that, in the decision-making process on applications affecting listed buildings, "the local

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planning authority [...] shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

The site is also located within the very recently designated Creechurch Conservation Area. The local authority therefore needs to bear in mind section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires that “In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

The application needs to be assessed in relation to paragraph 205 of the NPPF which requires that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation...”

In addition, paragraph 206 of the NPPF requires that “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. Substantial harm to or loss of [...] assets of the highest significance [...] grade I and II* listed buildings [...] should be wholly exceptional”.

Paragraph 207 states that: “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

Assessment

It is the view of the Society’s Casework Committee that the proposed 3-storey extension to the roof of Holland House would seriously harm the significance of the Grade II* Holland House. The 3 additional storeys would add considerable heaviness and bulkiness to the building’s roofline. This extension would change the building’s proportions and upset its balance, making it appear top heavy. While stepped back, it would still remain highly visible and impactful. This is illustrated in the applicant’s HTVIA views 42, 43 and 60. The proposed extension would also have a harmful impact on the building’s fabric and on the character of its interior spaces, namely through the infilling of its lightwell.

The Society also has serious concerns about the proposed ground plus 43-storey office tower development to Bury House and its impact on the significance of Holland House. The proposed redevelopment would physically impact on the fabric of Holland House. Original rear floor slab and wall would be lost to connect Holland House with the proposed development. This part of Holland House has already suffered fabric loss as a result of the Bury House development in the 1960s and

we are concerned that even more fabric would be removed as part of the current application. We are also concerned about the proposed insertion of a large stair to connect the ground and first floor levels and its impact on the interiors here. We have concerns about the cumulative impact of previous and proposed changes on the significance of this Grade II* listed building. The proposed ground plus 43-storey office would also clearly impact on the setting of Holland House – it would rise up directly behind the building and would appear to overshadow it. This is illustrated in the applicant's illustrative CGIs and views within its HTVIA. We accept that the proposed height of the office has been reduced from the previous application (which proposed a ground plus 48 storey tower) but a reduction of five storeys has done little to reduce its impact on the surrounding built environment. It was on account of this impact on heritage that the previous scheme was refused. The planning/heritage context has also changed since the previous application. This area has very recently been designated the Creechurch Conservation Area which makes the site even more sensitive to change and even harder to justify such tall development here.

These aspects of the scheme would majorly harm the significance of Holland House. We do not feel that this harm is mitigated by the few positive interventions proposed as part of the scheme, which includes restoring the elevations, replacing non-original windows with units closer to the originals, reinstating the blocked-in Bury Street entrance and conserving original interior finishes. These benefits could be delivered through a scheme which has a much less harmful impact on the site's heritage. We would seriously challenge the applicant's claim that remedial work to the elevations (which has already been approved by the local authority) could only be delivered through the wider redevelopment of the site (we refer to paragraph 2.32 of the planning statement).

For the reasons outlined in this letter, the Society strongly objects to the proposals and recommends that the local authority refuses these damaging applications. We do not object to adapting Holland House for office use nor to the redevelopment of the Bury House site in principle but take issue with the approach proposed and would like to see a more conservation-led scheme come forward.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on this application.

Yours sincerely,



Coco Whittaker

Head of Casework

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70 Cowcross Street

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

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THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

lpaburystreet@cityoflondon.gov.uk

Your reference: 24/00011/LBC &
Our reference: 193172

17 May 2024

Dear Anna Tastsoglou,

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

Thank you for consulting the Victorian Society about this application. We **strongly object** to the proposed scheme.

Significance and Harm

Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage. It is considered a key transitional building between the Art Nouveau and Art Deco styles, noted for its faience cladding, its sculpted corner resembling the bow of a ship, and its elaborately tiled entrance lobby. The heritage asset also forms a key building within the newly established Creechurch Conservation Area.

Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building positively contributes to the immediate setting of Holland House and the Creechurch Conservation Area.

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The four-storey extension to both Holland House and Renown House is excessive and top-heavy, disrupting the careful architectural proportions of both buildings. The extension would also result in the loss of historic fabric, including the loss of stone chimney stacks on Renown House and the complete removal of the top floor of Holland House, causing less than substantial harm.

To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including the rear wall, the insertion of a large new staircase, and the enclosure of a light well. Listing applies to all the building's fabric; the cumulative effect of these changes would heavily reduce the integrity of this heritage asset.

Renown House will lose all its interiors, roof mansard, and stone chimney stacks. New floor levels inserted to accommodate the connection with the proposed tower at 31 Bury Street and Holland House would not align with existing windows. The proposed interventions aggressively attack the integrity and design of this non-designated heritage asset.

The construction of a 43-storey building at 31 Bury Street would negatively impact the surroundings in which these heritage assets are experienced. The scale of the proposal would have the effect of overpowering the assets by absorbing them into the wider proposal, affecting the ability to appreciate the individual significance of both Holland House and Renown House.

Creechurch Conservation Area

The proposed scale and design of the development would have a far-reaching effect on the appearance and special architectural and historic character of the Creechurch Conservation Area, defined by intricate lanes and medium-rise buildings. This proposal would compromise this character by introducing an inappropriate scale and materiality, affecting the predominant setting of a number of designated and undesignated heritage assets, causing less than substantial harm to this conservation area, and damaging one of the key aspects of its significance.

Policy

National Planning Policy Framework (NPPF):

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

Para 206' Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

b) assets of the highest significance...grade I and II* listed buildings...should be wholly exceptional'

The NPPF outlines the test for justifying harm to grade II* listed buildings as wholly exceptional. This application woefully fails to provide a clear or adequate justification that the scale and bulk of the proposed development, and that the subsequent substantial harm to a grade II* listed building, are absolutely necessary to unlock public benefits or to demonstrate that these benefits are indeed substantial, let alone wholly exceptional.

City of London's Adopted Local Plan (2015):

The Core Strategic Policy CS10: Design requires "that the bulk, scale, massing and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces" and CS14: Tall buildings "Refusing planning permission for tall buildings within inappropriate areas, comprising of conservation areas" The proposed site sits within the Creechurch conservation area characterised by a mixture of low-rise and medium-height buildings. The approval of this scheme would directly contradict the extant local plan by introducing a building of bulk, scale, massing and height inappropriate for this area. We ask whether the City of London can confirm whether it intends to abide by policies set out in its extant local plan?

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

It is difficult to see how this proposal could possibly enhance or 'better reveal' the significance of this conservation area.

1990 Planning (Listed Buildings and Conservation Areas) Act:

Section 16(2): Decision-makers must give 'special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest.'

Section 72(1): 'Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.'

The application simply fails to adequately preserve a building of special architectural and historic interest due to the loss of historic fabric, disruptive additions, and the compromise of its immediate setting, in addition to the wider negative impact on a conservation area.

I would be grateful if you could inform the Victorian Society of your decision in due course.

Yours sincerely,

Guy Newton

Conservation Adviser

ICOMOS Technical Review

| | |
|----------------------------|---|
| Property | Tower of London |
| State Party | United Kingdom of Great Britain and Northern Ireland |
| Property ID | 488 |
| Date of inscription | 1988 |
| Criteria | (ii)(iv) |
| Project | Bury House development |

On 9 February 2021, ICOMOS received information from the State Party, via the World Heritage Centre, regarding a development proposal at 31 Bury Street. There are 392 documents associated with this planning application.

The project proposal is as follows: Demolition of Bury House, 31 Bury Street, London and construction of a newbuilding comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

This Technical Review assesses the impact of the proposed development on the Outstanding Universal Value (OUV) of the Tower of London World Heritage property. The proposed development is located approximately 550 m northwest of the property. The proposed development at Bury Street is adjacent to London's 'Eastern Cluster'¹ of high-rise developments.

Summary of this Technical Review

The proposed development in its current form would result in harm to the authenticity and integrity of the Outstanding Universal Value (OUV) of the Tower of London World Heritage property. Neither is it wholly exceptional, nor is the harm justified or redressed by the public benefits to the proposal. The cumulative effect of existing buildings planning proposals that are pending and proposals that have received consent but are not yet built is already severe, and the proposed development would cause harm to the setting of the Tower of London World Heritage property, contrary to the Visual Management Guidance in the LVMF. The development proposal is not in accord with the Management Plan 2015. Separation of the White Tower retaining the clear view of the sky in its backdrop has not been successfully achieved. The Environmental Assessment accepts that the judgment in relation to the attributes of the Tower of London is a finely balanced one, but the Tower must remain the dominant building, separated from the City and respected by new developments.

The Advisory Body provides its detailed comments on the project below.

Background information relating to the property

Joint World Heritage Centre / ICOMOS Reactive Monitoring missions took place in 2006 and 2011, to address concerns in relation to the Tower of London World Heritage property. Technical Reviews carried out by ICOMOS in March 2019 and July 2020 further highlighted threats to the property. The

¹Covered by the London Central Activities Zone (CAZ), this area is home to 30 St Mary Axe (the Gherkin, located approx. 50 m west of the site), the Leadenhall Building (the Cheesegrater, located approx. 170 m west of the site) and 52-54 Lime Street (the Scalpel, located approx. 10 m southwest of the site), plus emerging schemes such as 1 Undershaft, located approx. 125 m west of the site) and 100 Leadenhall Street. The area is responsible for close to 10% of the economic output of the UK.

retrospective Statement of Outstanding Universal Value (SOUV) for this property, adopted by the World Heritage Committee in 2013, notes in its section on management issues that there are threats and challenges to the property because of the urban development pressure in its close vicinity, and the potential negative impact of this process on integrity is indicated.

The 2006 Reactive Monitoring mission reviewed both approved and proposed development projects around the property, and in particular their possible impacts on significance, setting and views to and from the World Heritage property. It was accepted that the setting had been compromised since the 1960s due to the construction of several tall buildings around the City of London. These included the planning applications for the Minerva Tower (Houndsditch, 216 m) and the London Bridge Tower ("Shard of Glass", 303 m), due to a lack of adequate tools to assess visual impacts on qualities and values of cultural heritage, and thus (visual) damage to the setting.

The Mission noted that each new planning application is considered in isolation, notwithstanding the fact that several new developments taken together can have a magnified impact on the deterioration of cultural values. The 2006 Mission advised that finalisation of the Management Plan for the Tower of London and its environs was key and that Supplementary Planning Guidance should be provided to statutorily protect the remaining iconic views of the Tower, being from the south and south-west, both over the River Thames. The Mission also advised that the views to and from the property are critical for maintaining the property's integrity and for fully appreciating its setting. At that time, the Mission recommended that any tall buildings planned should not exceed the height by which they would become visible above the on-site historic buildings that are part of the Tower complex. The Mission was of the view that development of more tall buildings that would become visible would have a significantly negative visual impact on the integrity and seriously damage the Tower's OUV, possibly beyond repair.² Looking to future development, the Mission advocated the need for tight co-operation between the Borough Planning Authority, English Heritage and designers on planned development.

The second Reactive Monitoring mission took place in 2011 to review and discuss with national and local authorities the state of conservation of the property in its urban context, particularly its integrity in terms of visual impact; to review progress with the recommendations of the earlier mission; to assess how incremental changes as well as current and proposed major development projects in the immediate and wider setting of the property impact adversely or might impact adversely on its OUV; to discuss how in the absence of a buffer zone the immediate and wider setting of the property might be defined as a basis for evaluating the impact of proposed development on OUV and putting in place appropriate, specific protection; and to review the mechanisms and those under development for protecting the property and its setting.

The 2011 Mission reviewed the standards for World Heritage protection through the planning system and through the development of a system of management in Development Plans and Management Plans, and indicated that the "*Tower of London Local Setting Study*" constituted an important step towards the protection of the property's setting.³ The management of the Tower of London and its setting is facilitated through that study. The Mission reiterated the advice to tightly regulate the construction of tall buildings in the vicinity of the property to maintain the property's integrity and to protect its OUV. It was noted that the incremental developments around the Tower over the past five years⁴ had resulted in adverse visual impacts on its integrity. The World Heritage Committee requested the State Party "to evaluate the impact of proposed changes to the visual setting of the property on

² The Mission referred to a 38 storey high building under construction in the financial district, the 20 Fenchurch project, which it indicated would have a cumulative negative visual impact on the integrity of the Tower of London World Heritage property.

³ prepared for the Tower World Heritage Site Consultative Committee in August 2010.

⁴ Since the 2006 Reactive Monitoring mission.

its Outstanding Universal Value, and to develop and apply effective mechanisms for the protection of the setting as a matter of urgency” (Decision 35 COM 7B.114).

The Technical Review carried out by ICOMOS in March 2019 responded to information received from the State Party via the World Heritage Centre concerning a high rise ‘landmark’ development project named “*The Tulip*” to be constructed within the setting of the World Heritage property. The ICOMOS Technical Review of July 2020 followed the reception of information from the State Party via the World Heritage Centre regarding the development of a tall office building of 262 m at 100-107 Leadenhall Street, London. For each of those proposed developments within the London City area, more precisely called the “*Eastern Cluster*”, the conclusions of those Technical Reviews indicated that the proposed developments were not compatible with the preservation of the integrity of the Tower of London World Heritage property. Their findings expand concerns about the impact of development on setting.

Key attributes that express the OUV of the Property

The retrospective Statement of Outstanding Universal Value (SOUV) for the property was adopted in 2013 (Decision 37 COM 8E).

The SOUV notes that the Tower of London is an internationally famous iconic complex, “the most complete example of an 11th century fortress palace remaining in Europe”, and “a rare survival of a continuously developing ensemble of royal buildings”. It was strategically sited on the river Thames acting as “a symbol of Norman power”. It further states that “The Tower’s landmark siting and visual dominance on the edge of the River Thames, and the impression of great height it once gave are all key aspects of its significance”. The Tower “helped shape the story of the Reformation in England” and the ensemble is “a major reference for medieval military architecture”. The ensemble “has strong associations with State institutions” that “incorporated such fundamental roles as the nation’s defence, its records and its coinage” and was “a major repository for official documents and precious goods owned by the Crown”. In terms of integrity, it is noted that the strategic siting lends itself to “the Tower’s historic physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. Such proposals could limit the ability to perceive the Tower as being slightly apart from the City, or may have an adverse impact on its skyline as viewed from the river”. These aspects of significance “have to some extent been eroded by tall new buildings in the eastern part of the City of London, some of which predate inscription”.

Management Plan 2016

The current Management Plan for the Tower of London World Heritage property was published in 2016 by Historic Royal Palaces. It articulates that the greatest challenge to the property is the impact of development on its setting and tall buildings. In terms of authenticity, the form, design and materials of the property remain intact and legible but its strategic siting and historic relationship with the City of London is considered to be vulnerable to proposals for development that do not respect its context and setting.

Legal and Policy Framework

The State Party meets its obligations under the World Heritage Convention through the National Planning Policy Framework (NPPF), National Legislation and other Guidance.

Paragraph 189 of the NPPF (2021) states that: “*Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally*

recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.” In accordance with the NPPF, it is the applicant who is required to describe the significance of any heritage assets affected including any contribution made by their setting. This in effect provides a basis for Heritage Impact Assessment (HIA) reports and decisions being taken on an informed basis.^{5,6}

Paragraph 193 of the NPPF indicates that: *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.*

Paragraph 200 states that: *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”.* It suggests that substantial harm to or loss of *“assets of the highest significance, notably [...] World Heritage Sites, should be wholly exceptional”.* And Paragraph 202 states that: *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*

The National Planning Practice Guidance (NPPG), 2019, provides detailed information on how the NPPF should be implemented in practice and on protection of World Heritage.⁷ The NPPG includes detailed advice on protection of setting and refers to the Operational Guidelines for the Implementation of the World Heritage Convention in terms of the protection of important views or attributes that are functionally important as a support to the property. The ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011, is referenced.⁸ The precautionary principle is confirmed as being appropriate and applies to World Heritage properties’ attributes; so that levels of harmful change may be reviewed and justifications for it may be turned down.

The Greater London Authority (GLA) has the obligation to produce and keep under review a spatial development strategy which is known as the London Plan.⁹ The current ‘New London Plan’ dates from 2021 (LonP 2021) and forms part of an integrated policy framework of protection for World Heritage

⁵ Paragraph 194: *“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting”.*

⁶ Paragraph 195: *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal”.*

⁷ Paragraph 32 of the guidance on historic environment states: *“In line with the National Planning Policy Framework, plans, at all levels, should conserve the Outstanding Universal Value, integrity and authenticity [...] of each World Heritage Site and its setting, including any buffer zone or equivalent.”* Requirements for policies to protect and enhance World Heritage properties should aim at *“protecting the World Heritage Site and its setting, including any buffer zone, from inappropriate development; striking a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the World Heritage Site in its setting, including any buffer zone; protecting a World Heritage Site and its setting from the effect of changes which are relatively minor but which, on a cumulative basis, could have a significant effect”.*

⁸ The NPPG indicates that proposals that would result in harm to the authenticity and integrity of the OUV should be wholly exceptional; that less than substantial harm must be justified, and that proposals causing harm will be weighed against the substantial public benefits of the proposal and whether it has been demonstrated that all reasonable efforts have been made to mitigate the extent of the harm.

⁹ A strategic social, economic, transport and environmental framework for London’s future development over 20-25 years.

in the city.¹⁰ Policy HC2 within the plan, on ‘World Heritage Sites’¹¹ indicates that “boroughs with World Heritage Sites, and those which are neighbours to authorities with World Heritage Sites” should work together to protect the OUV; and that the obligations concerning development proposals “in World Heritage Sites and their settings, including any buffer zones”¹² should not compromise the ability to appreciate their OUV or the authenticity of their attributes. The need to support development proposals by Heritage Impact Assessments; the need for up-to-date World Heritage Site Management Plans; and the need to give that Management Plan appropriate weight is emphasised.¹³

Policy HC3 of the LonP 2021 relates to strategic and local views and commits to identifying and protecting “aspects of views that contribute to a viewer’s ability to recognise and appreciate a World Heritage Site’s authenticity, integrity, and the attributes of Outstanding Universal Value. This includes the identification of protected silhouettes or key features in a World Heritage Site” and the setting of London’s World Heritage Sites, considered to be “the surroundings in which they are experienced”. It indicates that “the consideration of views is part of understanding potential impacts on setting”.

The ‘London View Management Framework, Supplementary Planning Guidance, 2012’¹⁴ (LVMF SPG), indicates views where proposed development has potential to have an impact on this World Heritage property.¹⁵ The purpose of that document is to explain in detail a policy approach so that boroughs, applicants and other statutory authorities can assess a proposal’s compliance with the LonP 2021.¹⁶ The LVMF SPG document provides a robust basis for the protection of identified views, vistas and silhouettes.¹⁷ It also requires that development that might affect views identified by other statutory authorities should, where relevant, be assessed to determine its potential effect on those views.¹⁸ It stipulates that these should be set out in the World Heritage Site Management Plan and should be

¹⁰ It contains policies to protect and enhance the historic environment in general and World Heritage properties in particular.

¹¹ “Boroughs with World Heritage Sites, and those which are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World heritage sites, which includes the authenticity and integrity of their attributes and their management.”

¹² “Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection.”

¹³ The LonP 2021 indicates that “development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments” as well as the need for “up-to-date World Heritage Site Management Plans”; and that “when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan”.

¹⁴ The LVMF SPG as adopted, prepared for the Greater London Authority, remains operative in the implementation of the LonP 2021.

¹⁵ There are three types of Strategic Views designated in the New London Plan 2021: “London Panoramas, River Prospects, and Townscape Views (including Linear Views). Each view can be considered in three parts; the foreground, middle ground and background”. ‘Protected Vistas’ towards Strategically-Important Landmarks are composed of two parts: a Landmark Viewing Corridor and a Wider Setting Consultation Area. The Mayor, through the LVMF SPG, has indicated that he “will seek to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development can make a positive contribution to the views and this should be encouraged, but where development is likely to compromise the setting or visibility of a key landmark it should be resisted”.

¹⁶ In the LVMF SPG, in relation to all designated views, visual management guidance is given, landmarks are identified, and incremental change must contribute positively to the view or it will not be considered. Careful considerations should be made concerning tall buildings which will need to “preserve or enhance the setting of key landmarks and to relate to and strengthen the composition of the emerging clusters of tall buildings”. The importance of not altering the protected silhouette is strongly flagged.

¹⁷ While many views have been addressed in the LVMF SPG, it is important to realise that once the attributes (in the context of the Management Plan) have been considered, it is likely that additional views within and looking towards or from the World Heritage property may need to be considered. The LVMF SPG does not seek to give guidance on every aspect of visual impact assessment.

¹⁸ The LVMF SPG gives further technical information in an appendix covering the selection of appropriate field of view for each “Accurate Visual Representation” (AVR) and it recommends a procedure to be followed to indicate the location of a proposed development as accurately as possible; “it may also indicate the degree to which a development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure so that it can be relied on by assessors to represent fairly the visual properties of a proposed development”.

supported by using accurate 3D modelling and other best practice techniques. Critically, the LVMF SPG states that local Planning Authorities should incorporate the principles of the LonP 2021 and the LVMF SPG into development plans and should monitor any potential changes to the designated views and their effect on the quality of the view. It goes on to highlight that development plan documents must support the setting of the World Heritage property. An assessment process is described for planning applications with proposals that could affect designated views.¹⁹

Two views identified in the LVMF SPG are relevant to this Technical Review: View No. 10 – ‘River prospect Tower Bridge’, and View No 25A.1-3 - Townscape View - ‘The Queen’s Walk to Tower of London’. View No. 10 has a viewing location from the North Bastion on Tower Bridge upstream. From the assessment point 10A.1, there is a deep and wide panorama where, as described in the LVMF SPG, *“The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued.”* The Visual Management Guidance in the LVMF SPG states that *“The Tower of London should not be dominated by new development close to it.”*²⁰ It states in relation to the background that *“Development proposals likely to affect the World Heritage Site should pay regard to the guidance set out in the Tower of London World Heritage Site Management Plan published by Historic Royal Palaces (HRP) [...] It is recommended that HRP and English Heritage²¹ are consulted on all relevant proposals at an early stage.”*²²

Paragraph 407 of the LVMF SPG relates to the view from the Queen’s Walk to the Tower of London from the South Bank with a viewing location, No. 25A, close to the river. Paragraph 409 of the LVMF SPG indicates that three Assessment Points (numbered 25A.1, 25A.2 and 25A.3) are placed in this location. They provide good views of the Tower of London, and *“the relatively clear background setting of the White Tower, in particular”*. A Protected Vista is included from Assessment Point number 25A.1 and *“a Protected Silhouette is applied to the White Tower”* between Assessment Points numbers 25A.2 and 25A.3.

Paragraph 411 of the LVMF SPG indicates that *“The Tower of London was built to dominate the City, and to control the river at its entrance. The City has now grown to encompass the World Heritage Site, the latter retaining only its essential historical relationship with the river and a clear backdrop silhouette to the White Tower from the south-west.”*

Paragraph 412 of the LVMF SPG states that *“This view [from assessment point No. 25A.1] provides the greatest understanding of the World Heritage Site ensemble where there are clear views of the southern and western faces of the White Tower down to the roof of the Waterloo Block. The clear view of the sky in the backdrop of the White Tower is an important attribute.”*

In terms of visual management guidance, paragraph 415 of the LVMF SPG sets out that *“New development should respect the setting of the Tower of London and should not dominate the World Heritage Site – especially the White Tower. Consideration should be given to advice set out in the Tower of London World Heritage Site Management Plan, published by Historic Royal Palaces (HRP).”*

‘London’s World Heritage Sites – Guidance on Settings, Supplementary Planning Guidance, 2012,’ (LonWHS SPG) provides information on World Heritage properties and their settings; information on the elements that contribute to a property’s OUV, so as to ensure these are conserved and enhanced

¹⁹ It should be accompanied by *“an analysis that explains, evaluates and justifies any visual impact on the view. The analysis will demonstrate that the proposal is consistent with the relevant London Plan policies, including 7.10 World Heritage Sites, 7.11 London View Management Framework and 7.12 Implementing London View Management Framework”*.

²⁰ LVMF SPG, Paragraph 183, p. 100.

²¹ Now Historic England.

²² LVMF SPG, Paragraph 184, p. 100.

by developers, policy makers and other stakeholders; and guidance for assessing the effect of potential development on London's World Heritage properties and their settings.²³ The LonWHS SPG does not address the specific setting for each individual World Heritage property, but states that this is more appropriately done through the Steering Groups and Supplementary Committees established for each property.²⁴ The LonWHS SPG goes on to address Local Development Framework (LDF) preparation where it indicates that LDFs should contain policies to protect, promote, interpret and conserve the historic significance of World Heritage properties and their OUV, integrity and authenticity. They should safeguard, and where appropriate, enhance them and their settings. The LonWHS SPG indicates that, where available, World Heritage Site Management Plans should be used to inform the plan-making process.

Locally, the Tower of London falls within the London Borough of Tower Hamlets and is adjoined by the City of London and the London Borough of Southwark. Each of these local planning authorities has a Local Development Plan, which provides a framework of policies to protect and promote the Tower of London World Heritage property.

Documentation from the Applicant

A Townscape, Built Heritage and Visual Impact Assessment ('TBHVIA') was prepared as part of the planning application submitted to the City of London in October 2020, which formed Volume 2 of the Environmental Statement. This considers the impact of the proposed development upon all heritage receptors which are given a value. In addition to the TBHVIA, at the request of the City of London, a separate and freestanding Heritage Impact Assessment (HIA) was prepared outlining the effect of the proposed development on the OUV of the Tower of London World Heritage property. The HIA considers the impact of the proposed development on important views and concludes that the proposed development does not harm the OUV of the World Heritage property. The HIA also notes that "some commentators may form a different judgement and find that the Proposed Development causes harm to the Outstanding Universal Value" of the property. A Design and Access Statement was also prepared.

A matrix has been used by the Applicant to review the magnitude of effects based on the value of the heritage receptors. The TBHVIA acknowledges that professional judgment is required to determine significant likely effects. When cumulative effects are being considered, the TBHVIA states that the 2011 ICOMOS Guidance does not have a specific section on cumulative effects. However, it states that those effects have been considered. The approach taken by the Applicant has been to focus on additional effects of the development over and above the cumulative baseline. This is an acknowledgment that cumulative effects may be complex in an urban environment. The assessment refers to the 'Tower of London Setting Study, 2010', which concluded that the Tower must remain the dominant building, separated from the City and respected by new developments.

The TBHVIA accepts that the judgment in relation to the Tower of London is a finely balanced one, which considers the separating distance between the World Heritage property and the proposed development, the skyline composition, and the slender appearance of the tallest element. It suggests there is no impact on the silhouette of the Tower of London World Heritage property in strategic views. It states that the proposed pantone blue colour palette will soften the appearance of the building against the skyline and the matt materials will reduce potential glare. It goes on to state that "if this

²³ Setting is described in that document as "the surroundings in which an asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

²⁴ The intention of the LonWHS SPG is to "ensure a more consistent interpretation of settings and an understanding of their importance in contributing to an appreciation of OUV to help support consistency in decision making to conserve the World Heritage Sites' Outstanding Universal Value, integrity, authenticity and significance".

judgment is formed then we consider that the harm identified must be 'less than substantial' in the terms of paragraph 196 of the National Planning Policy Framework and, on a sliding scale, at the very bottom of that spectrum. We would invite the decision maker to consider the level of harm against the significant package of public benefits generated by the Proposed Development".

The Applicant indicates that the proposed development would be visible in River Prospect views identified in the LVMF SPG, including view 10A.1, which looks from the north bastion viewing area of Tower Bridge towards the Tower of London. The proposed development would also be visible in Townscape view 25A.1-3 identified in the LVMF SPG (Queen's Walk to Tower of London), which looks to the Tower of London from the south of the river. The Design and Access Statement suggests that the proposed development has been sensitive to these views. The HIA, concerning view 10A.1, states that the *"Proposed Development would have a Negligible magnitude of Impact on the setting of the WHS in this view. This would give rise to a Slight Adverse effect"*. In the cumulative view, the finding is the same. It concludes that the proposed development does not harm the significance of the Tower of London World Heritage property.

The Eastern Cluster Zone contains a high density of businesses and jobs and, in the future, this area will contain even more tall and large buildings.²⁵ A key vision for this area according to the draft City Plan includes increasing the provision of world class buildings, delivering tall buildings that make a positive contribution to the City's skyline, enhancing the public realm to improve pedestrian connectivity, and providing a range of complimentary land uses ensuring active frontages at ground level. The application describes the potential benefits of the development.²⁶ The Design and Access Statement refers to the surrounding context and suggests that the proposal provides an elegant form in the setting of the Eastern Cluster from strategic views.

On the issue of height, the Design and Access Statement suggests that the team has worked to design a building of appropriate height in its context as part of the eastern cluster but with awareness or sensitivity towards important heritage assets including the World Heritage property. The massing analysis in the Design and Access Statement suggests that the scale and form of the proposed development has been informed first²⁷ by consideration of the setting of the Tower of London, World Heritage property, particularly as described in the Management Plan (2016), and as seen in River Prospect 10A.1 and Townscape View 25A.1-3 of the LVMF SPG (2012); second, by the shape of the existing and emerging Eastern Cluster in the City of London; and third, the appearance and proportion of the proposed building as a piece of architecture in its own right. It goes on to indicate that the starting point for the proposed massing is driven by three key factors which include maintaining visual separation from the Tower of London silhouette between London Tower and One Bishopsgate Plaza; the shoulder line datum; and the exploration zone of the potential increased height. It is also suggested in the Design and Access Statement that the design takes into account maintenance of visual separation from the Tower of London silhouette by keeping the primary massing of the form to shoulder height and keeping the structure above the shoulder line as a slender element in order to respect the visible sky component around the silhouette.

²⁵ According to the City of London Local Plan, the majority of new office space will be built in the Eastern Cluster Zone accounting for 50-60% of all projected City office space. Furthermore, within the draft City Plan 2036, the site lies within 'The City Cluster Key Area of Change'.

²⁶ to include publicly accessible internal amenity space and community space; a new covered pedestrian route reintroducing an historic route in the city and enhancing permeability; a new pocket park; prioritisation of pedestrian and cycle accessibility; provision of small and flexible retail space; activated spaces at street level; creation of high quality office space; provision of flexible affordable workspace to meet local demand; introduction of a high quality tall building as part of the "Eastern City Cluster"; acting as a positive catalyst for investment in London; building on the accessible location to integrate with public transport; delivering a sustainable development; incorporation of innovative technologies reducing carbon emissions; a fossil fuel free building; extensive greening; and new and improved public realm.

²⁷ Design Access Statement, Part 1, p. 66.

Documents submitted by Consultees and others

Historic Royal Palaces' (HRP) submission as guardians of the Tower of London World Heritage Property asserts that the proposed development would have a damaging visual effect on aspects of the Outstanding Universal Value of the World Heritage property.²⁸ Their response indicates that while they recognise that the design approach of the applicant sought to cut back at a high level the upper part of the proposed tower in order to maintain some visual separation from the White Tower silhouette protected in the LVMF SPG, view number 10A.1, this approach will allow only a sliver of sky space separating the proposed structure from the Tower of London, and notes that the proposal will not really achieve the desired strength of the silhouette. Also, HRP notes that this view is not static and suggests that with movement the proposed spire loses even that tiny degree of separation.

The submission of HRP acknowledges that the designer has tried to address the concerns about the Tower's dominance, but states that the effect of the proposal would be to compromise the free space around the White Tower. In pre-application discussions, HRP had suggested that *"a different approach might see a lower, broader building that is not so intrusive in the local views and would not extend the eastern shoulder so definitively, providing that it would not rise above the turrets of the White Tower in LVMF view 10A.1"*. HRP also cites further damaging visual effects in the dynamic journey across Tower Bridge and in local views identified in the Local Setting Study 2010. Historic Royal Palaces' submission on the applicant's proposal concluded that it would cause harm to the OUV of the Tower of London.

Historic England's submission on the Applicants development proposal indicates that it would cause harm to the OUV of the World Heritage property principally because of *"the visual impact presented by the proposed development in the view from the North Bastion of Tower Bridge (LVMF View 10A.1) which would reduce the ability to appreciate the Tower of London's strategic and dominant position along the river, set apart from the mercantile city."* Historic England asserts that they *"have not seen clear and convincing justification for this harm or evidence that this harm would be outweighed by public benefits."* Thus Historic England's submission recommends *"that a significant reduction in height is explored so the proposals would no longer affect the setting of the World Heritage Site from this viewpoint, avoiding the harm identified."*

The submission of Historic England considers the tension between the juxta-positioning of the Tower in relation to the river and the city as fortress and gateway and its wider setting including long views, which *"will continue to be threatened by proposals for new development that is inappropriate to the context."* It is their view that *"such development could limit the ability to perceive the tower as being slightly apart from the City, or have an adverse impact on its skyline."*

According to Historic England, the proposal would be particularly noticeable in LVMF view 10A.1. It would diminish the visual dominance of the Tower, one of three Strategically-Important Landmarks for London, exceeding the height of its corner turrets. It would erode the appreciation of the Tower of London's strategic siting on the river set apart from the mercantile city by blocking part of the skyline between the eastern cluster and the White Tower. This would harm an attribute of the OUV.

²⁸ The LVMF SPG for view 10A.1 states that *"The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the white tower. Where it has been compromised its visual dominance has been devalued."* Regarding the background to the Tower, the LVMF SPG notes state *"views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site."*

Historic England also states that it considers the impact on the cross river views (LVMF views 25A.2-3) from the Queen's Walk at City Hall to be relatively minor in this view. Historic England indicates, however, that the proposed development would also be visible within the Tower of London Inner Ward, and particularly noticeable in the view towards the Grade 1 Listed Chapel Royal of St Peter ad Vincula and would be an intrusion into the self-contained ensemble of historic buildings.

The submission concludes that in relation to tall buildings, policy requires that buildings in the setting of a World Heritage property must preserve and not harm the OUV of the property nor the ability to appreciate it. Historic England is of the view that the proposed development in its current form would harm the integrity of the World Heritage property and that the public benefits of the proposal do not outweigh the harm. In conclusion, Historic England states that the proposed development would give rise to substantial harm to the significance of the World Heritage property and is not in accord with the Management Plan.

ICOMOS' Observations and Conclusions

ICOMOS considers that the most significant challenges lie in managing the environs of the Tower of London World Heritage property so as to protect its OUV and setting. At a strategic level, these challenges are generally recognised and a series of documents form a framework of policies aimed at conserving, protecting and enhancing the OUV of the Tower and its setting. The challenges are also identified in the Management Plan, which defines the local setting of the Tower and key views within and from it.²⁹ The proposed development is not in accord with the Management Plan. It would harm the integrity of the Tower of London World Heritage property and it would harm the significance of the property.

From the framework of protection for World Heritage in London, it is recognised that proposals that would result in harm to the authenticity and integrity of the Outstanding Universal Value should be wholly exceptional; that less than substantial harm must be justified; and that any harm will be weighed against the substantial public benefits of the proposal. It must also be shown that all reasonable efforts have been made to mitigate the extent of the harm. The public benefits from the proposal would not justify the granting of planning permission when weighed against the harm that would be caused to the setting of the Tower of London World Heritage property. There are, in practice, numerous examples of proposals involving less than substantial harm to the OUV of a World Heritage property having been refused on the basis that the benefits do not justify the harm to a World Heritage property, as a heritage asset of the highest significance.

The application describes the potential benefits of the development and asserts that the development would cause "*Negligible magnitude of impact on the setting of the WHS [...] This would give rise to a Slight Adverse effect*". The arguments put forward on behalf of the Applicant admit that there will be some change to the setting of the World Heritage property. However, they appear to consider the proposed development as a way of improving the setting and to weigh this potential impact more highly as a positive contribution. This approach is not balanced in terms of the consideration that is given to the proposed development's potential negative impact on the OUV of the Tower of London World Heritage property and its supporting attributes. The NPPF highlights "*the surroundings in which a heritage asset is experienced*" and indicate that "*its extent is not fixed and may change as the asset and its surroundings evolve.*"

²⁹ The Management Plan states that "Objectives in the Management Plan to address the challenges are being implemented (for example, through a local setting study that informed understanding of the immediate setting of the property, and through work on the property's attributes), although pressures remain significant, particularly in the wider setting".

The Applicant suggests that there is no clarity in submissions received from consultees about which attributes are harmed by the proposal. Regarding the interaction of the property with the Eastern Cluster, it suggests that *“the management guidance in LVMF 10A.1 does not identify the White Tower’s silhouette as a geometrically protected threshold; it is simply a point of sensitivity to test and assess”*. Finally, it states that the proposed development will *“make it clearly part of the composition of the Eastern Cluster”* whilst helping *“to mediate between the very tall recently consented” schemes and the Tower”*. It relies on an interpretation of View 10A as being static and geometrically defined. This interpretation is not correct, and the LVMF SPG and associated guidance was never intended to exclude further important ways of appreciating the attributes which support OUV from being referenced. The LVMF SPG, written over a decade ago, is a tool, but the views experienced are not finite and they do not exclude other ways of experiencing the OUV from being protected. The proposed development will narrow the gap between the Eastern Cluster and the Tower and will reduce the separation of the Tower from the City. It has been acknowledged in the Management Plan and elsewhere that the OUV of the Tower of London World Heritage property has been compromised, but it cannot be argued that other structures impacting on OUV mean that the impact of a new proposal impacting negatively is to be tolerated.

Both Historic England and Historic Royal Palaces in pre-application discussions advocated for caution in relation to the potential impact of development on the attributes of the World Heritage property. This advice was not adopted. Similarly, neither the pragmatic proposal of Historic England for height reduction, nor that of HRP for a wider lower building, were taken up. While it is clear that attempts have been made on behalf of the Applicant to consider the visual separation of the White Tower, in terms of adjustment of the massing, form and materials, this Technical Review does not find that separation of the White Tower has been successfully achieved. The *“clear backdrop silhouette to the Tower from the south-west”* will be breached by the proposed development and there will be an impact on *“the clear view of the sky in the backdrop to White Tower [which] is an important attribute”*. When that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. It is considered that the harm to the setting of the Tower of London World Heritage property should be given very considerable weight against the proposal.

The degree of separation of the Eastern Cluster to the Tower is compromised as the proposed development would mark a further extension of the city eastwards, reducing the visual separation between the City and the Tower of London World Heritage property. The prominence of the proposed development would draw increased attention towards the City cluster. This would distract from the prominence of the Tower and would affect the sense of intended enclosure at the concentric defences which culminate in the White Tower. It would also impact negatively on the property’s attributes, namely the physical prominence of the White Tower, its strategic and landmark setting, and its iconic monumental status.

The cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe, and the proposed development would cause harm to the setting of the Tower of London World Heritage property, contrary to the Visual Management Guidance in the LVMF. ICOMOS in its March 2019 Technical Review of an earlier application for a tall structure at land adjacent to Bury Street³⁰ stated that *“the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable*

³⁰ City of London ref: 18/01213/FULEIA

approach to allow further negative visual impact on the property's integrity when it is already threatened." This argument is maintained.

ICOMOS advises that the State Party consider:

- utilising the findings of the earlier Reactive Monitoring missions and the ICOMOS Technical Reviews of March 2019 and July 2020 concerning proposed development in the setting of the World Heritage property;
- appreciating that where change occurs to setting it needs to be considered in a manner that relates it more directly to the supporting attributes of the property;
- reviewing the proposed project and recommending adjustments such as height reduction that would ensure it does not impact on the Outstanding Universal Value or on any of its supporting attributes, all of which are equally important;
- availing of additional more recent technologies and tools to understand three dimensionally and kinetically the potential impact of proposed changes on the Outstanding Universal Value of the property and its setting and the attributes which support it.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton le Pont
July 2022.

Application ref: 2024/1064/P
Contact: Jennifer Walsh
Tel: [REDACTED]
Email: [REDACTED]
Date: 25 June 2024

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: [REDACTED]

planning@camden.gov.uk
www.camden.gov.uk/planning

City of London
Guildhall
PO Box 270
London
EC2P 2EJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:

1-4

31-34 Bury Street

London

EC3A 5AR (for 24/00021/FULEIA) and

Holland House

1 - 4

32 Bury Street

London

EC3A 5AW (for 24/00011/LBC)

Proposals:

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

24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell,

reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.

Drawing Nos: City of London Cover Letter Dated 14th March 2024.

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

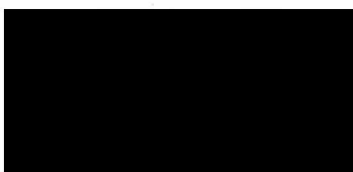
Informative(s):

1 Reason for raising no objection:

The proposal includes the demolition subsequent redevelopment of the whole site as outlined in the description of development. The application for planning permission is an EIA application.

The application site is a significant distance from the London Borough of Camden boundary. The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental, or ecological conditions. The London Borough of Camden therefore raises no objections to the application.

Yours faithfully



Daniel Pope
Chief Planning Officer

APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 24/00021/FULEIA

Development Management Case Officer: Anna Tastsoglou

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

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

Application Received: 8th January 2024

Request for Comment Received: 14th March 2024, updated CCRSS received on 22nd August 2024

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Climate Change Resilience Sustainability Statement (Hoare Lea, August 2024)
- Sustainability Statement (Hoare Lea, October 23)
- Design and Access Statement (Stiff+Trevillion, January 2024)
- Flood Risk Assessment and Drainage Strategy (Thorton Tomasetti, January 2024)
- Outdoor Thermal Comfort Assessment (GIA Chartered Surveyors, October 2023)
- Preliminary Ecological Appraisal and Biodiversity Net Gain Report (Hilson Moran, September 2023)
- Health Impact Assessment (Quod, January 2024)

Overheating and the urban heat island effect

Section 8.3 within the CCRSS covers the risk of heat stress and assesses the following hazards:

- Increase in temperature may result in a risk of overheating and reduction in building user health and comfort levels within their internal environment (High Risk)
- Increased in temperature may result in reduction in building user comfort within the external environment (Moderate Risk)
- Increased temperatures will have a direct impact of the urban heat island effect (Moderate Risk)

**Date &
Initials**

APPLICATION COMMENT FORM

- High levels of sun exposure may cause UV damage to building fabric and reduction in material durability and robustness (Moderate Risk)
- Increased risk of dust and damage results in increased repairs and maintenance (Moderate Risk)
- Building degrading, subsidence and reduced robustness due to dry and hot conditions (Moderate / Low Risk)
- Increased risk of damage to building materials (Moderate Risk)

To manage the above risks, the CCRSS states that the following design features and techniques will be included:

- Mechanical ventilation installed with heat recovery mechanisms and plant located away from pollution sources
- Facade and building services have been designed with a fan coil cooling solution
- Dynamic thermal modelling using TM49 DSYs has been conducted to demonstrate the Proposed Development is not at risk of overheating against the criteria of CIBSE TM52 and justify the inclusion of active cooling
- An external (outdoor) thermal comfort assessment has been completed (using high resolution Computational Fluid Dynamics - CFD) to evaluate external thermal comfort conditions based on the design proposals. The assessment concluded that:
 - o All ground level conditions were suitable for intended use, or no worse than the baseline conditions.
 - o The Proposed Development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe.
 - o Conditions for all existing off-site terraces are suitable for the intended use.
 - o Conditions for all proposed terraces are suitable for the intended use
- Air source heat pumps will be located at roof level, minimising the amount of heat being rejected to the external environment at low level, where heat absorbing surfaces are present
- Building maintenance strategy will be implemented to check and treat materials for UV damage
- Materials on exposed areas will be designed and installed to weather effectively
- Structural foundations and frame have been designed to accommodate a range of soil stiffness values

All heat stress hazards residual risks have been assessed as Low.

Flooding

Section 8.1 of the CCRSS includes the risk assessment for flooding and includes the following hazards:

- Rising sea levels could increase the risk of flooding to the building and the surrounding area (High risk)

APPLICATION COMMENT FORM

- Increased duration of prolonged rainfall could cause an increased risk of surface water flooding (Very High risk)
- Increased risk of flooding causing significant damage to the development and requirements for weather proofing (Moderate risk)

The CCRSS states that the proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event. Based on the above, the CCRSS assesses the residual risk for flooding to the proposed development to be Moderate/low.

Water stress

Section 8.2 of the CCRSS includes the risk assessment for water stress and includes the following hazards:

- Increased risk of drought (Moderate risk)
- Increased duration of prolonged rainfall could cause impacts on structural stability within the building (Moderate risk)
- Risk of material degradation due to extended exposure of building materials to increased moisture levels (Moderate/ low risk)
- Increased risk of extended duration of water stress and high water costs (Moderate risk)

In terms of risk management, the CCRSS states that the following design features and techniques will be incorporated to adapt and mitigate for the above risks:

- Project will prioritise native, locally sourced plants for the public realm landscape strategy
- Landscape strategy supported by ecologists and landscape architect's recommendations such as appropriate species which are resilient to periods of water scarcity
- Roof drainage will be used for irrigation of green walls and roofing
- SuDS in the form of blue roofs and tanks will attenuate rainfall
- Site is not at risk from groundwater flooding
- Lowest level basement slab will be designed for Grade 3 waterproofing which will protect against future risk
- Internal linings proposed in retained basements
- Efficient water fittings installed to reduce water consumption

All water stress hazards' residual risks have been assessed as Low.

The FRA & DS states that *"roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants."*

Biodiversity and pests and diseases

APPLICATION COMMENT FORM

Section 8.4 of the CCRSS assesses the risk to natural capital and includes the following hazard:

- Risk of loss of biodiversity and high quality green space (Moderate Risk)

The CCRSS states this risk will be managed through:

- Introducing increased vegetation on site, in green roofing, terrace planting and public realm planting
- Habitat infrastructure such as bird and insect boxes to be installed
- Project will prioritise native, locally sourced plants for the landscape strategy

The CCRSS classes the residual risk as Low.

Section 8.5 of the CCRSS assesses the risk of pests and diseases and assesses the following hazards:

- Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to humans (Moderate Risk)
- Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to plants (Moderate Risk)

The CCRSS states this risk will be managed through:

- Implementation of a pest management plan or implementation of an accredited Pest Management program
- Regular monitoring and maintenance of ventilation systems
- Consideration of new warm-climate pests will be factored into final species selection for planting

The CCRSS assesses the residual risk to be Moderate /Low.

A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed.

A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health through:

- New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment;
- Provision of flexible community/education/cultural space meeting an identified need in the area;
- 'City Cycles' – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area;

APPLICATION COMMENT FORM

- A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above);
- Provision of new open space at James' Court and external building terraces providing much needed amenity provision;
- Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
- Inclusivity and accessibility as placemaking principles;
- Building and landscape design considering sustainability and climate change, with ASHPs and a 'fabric first' approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity;
- The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards
- BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures

Food, trade and infrastructure

The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure.

Recommendation:

The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.

EB
30/08/24



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 7 October 2024

Our Ref DS/SUDS24/0056

Your Ref PT_A T/24/00021/FULEIA

Subject Bury House 1-4 31-34 Bury Street London EC3A 5AR

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed submitted information for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s. Provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 123 m³;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

From: [REDACTED]
To: [REDACTED]
Subject: RE: Consultation in relation to Accessible Dwellings (24/00021/FULEIA)
Date: 08 October 2024 12:24:52

Anna,

The legislation is such that Planning policy sets the number of each type of accessible dwelling and Building Regulations enforces the standard.

In this regard, I do not believe you need to do more than set the requirement.

If you do wish advice on accessibility matters I would suggest you contact Harriet as this is her role.

Mark

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Tuesday, October 8, 2024 11:34 AM
To: District.Surveyor <[REDACTED]>
Subject: Consultation in relation to Accessible Dwellings (24/00021/FULEIA)

Dear Sir/Madam

Please see attached request for advice in relation to accessible dwellings for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .

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

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

From: [London ePlanning](#)
To: [PLN - Comments](#); [Tastsoglou, Anna](#)
Subject: RE: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date: 08 October 2024 15:36:34

THIS IS AN EXTERNAL EMAIL

Dear Anna,

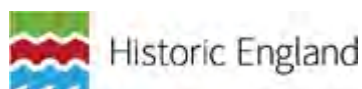
Thanks for re-consulting us.

Please refer to our objection letter dated 15 May 2024.

Best wishes,
Charlotte

Charlotte Cartwright (she/her)
Business Officer
Historic England | 4th floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Phone: 020 7973 3764

*Please note I do not work Fridays



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:32
To: London ePlanning <e-london@historicengland.org.uk>
Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works affecting the setting of a Listed Building.

The application and associated documents are available for viewing at <http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6YBENFHH1E00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou
Anna.Tastsoglou@cityoflondon.gov.uk
020 7332

Details

OUR REF: 24/00021/FULEIA

ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (Grid Reference: 533373, 181207)

PROPOSAL: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD) **THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED.**

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Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [REDACTED]
Email [REDACTED]

Date 09 October 2024
Our Ref 24
Your Ref 24/00021/FULEIA

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

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

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent :

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

The office terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency. The public terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer

Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to construction in order that the impact on amenities is minimised from the time that the construction starts.

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Throughout the duration of the demolition and construction works the site shall be fitted with live noise, dust and vibration monitoring equipment. The numbers and locations of monitoring equipment shall be agreed with the City of London Pollution Control Team prior to installation. The City of London Pollution Control Team shall be provided with live access to all monitoring data throughout the works.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used to demonstrate that noise levels from the proposed Rehearsal & event space/Sports facilities area shall not exceed the existing background level (lowest $L_{A90(15min)}$) at 1m from the nearest noise sensitive receptor. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the proposed café use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

Reason: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 

From: [Active Travel England Planning](#)
To: [lpaburystreet](#)
Subject: LPA Reference: 24/00021/FULEIA Standing Advice Response
Date: 09 October 2024 14:50:55

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00021/FULEIA

ATE Reference: ATE/24/00379/FULL

Site Address: BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

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

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

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]]>

[ref:a0zTw0000007FTIIAM;4ddaa967bcb592e9beefb3a8386623ab:ref]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date: 10 October 2024 14:00:35
Attachments: [ufm42_English_Heritage_Consultation_Email.pdf](#)
[Bury House and Holland House rec cond 220218.docx](#)
[Bury House and Holland House rec cond 220218.pdf](#)

THIS IS AN EXTERNAL EMAIL

Hi Anna

Thank you for reconsulting me. The additional information does not affect my original advice, which I have reattached for information

Regards

Helen

Helen Hawkins MCIFA

Archaeology Adviser, City of London

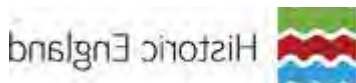
Greater London Archaeology Advisory Service (GLAAS)

[REDACTED]
Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill. London EC4R 2YA

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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

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

Sent: 08 October 2024 11:31

To: E-Glaas [REDACTED] >

Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at <http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6YBENFHH1E00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou
[REDACTED]

020 7332

Details

OUR REF: 24/00021/FULEIA

ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (Grid Reference: 533373, 181207)

PROPOSAL: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD) THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED.

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PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

11 October 2024
Crossrail Ref: CRL-IP-3294

Dear Anna Tastsoglou,

24/00021/FULEIA : Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

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

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 08 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

.....
The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).



Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 14 October 2024

Our Ref DS/FS24/0048

Your Ref 24/00021/FULEIA

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

In response to your request for comments in relation to the application the District Surveyors Office has the following comments to make:

I have reviewed the submitted fire statement and have no comments.

I consider that policies D5 and D12 have been met.



LPA Ref: 24/00021/FULEIA

London City Airport Ref: 2024/LCY/230

Date: 15/10/2024

Dear Anna Tastsoglou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests the following condition contained in this letter is applied to any future approval.

| | |
|----------------------|---|
| LPA Reference | 24/00021/FULEIA |
| Proposal | Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. |
| Location | Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR |
| Borough | City of London |
| Case Officer | Anna Tastsoglou |

London City Airport's response must change to an objection unless this condition is applied to this planning permission.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make the following observations:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale

On behalf of London City Airport

Memo

To Assistant Director (Development Management)
Environment Department
Email plnccomments@cityoflondon.gov.uk



From Paul Bentley
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 16/10/24

Your Ref: 24/00021/FULEIA

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

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

The proposed development will be car free and heating/cooling will be through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Secondary power is proposed to be supplied by a second mains connection, and it has been confirmed there is to be no backup generator installed.

Particulate filtration has been proposed as part of the full mechanical ventilation strategy. Due to the majority of predicted NO₂ annual mean concentrations being within 10% of the annual mean objective, and the uncertainty value of the modelling being >10% NO_x filtration will also be required.

Should the development be approved please attach the following conditions:

Generators

There shall be no installation of diesel generators to the building hereby approved.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Filtration

Prior to occupation evidence that an appropriate NO_x and Particulate filtration system has been installed as part of the ventilation strategy, and a detailed mechanism to secure maintenance of this system should be submitted and approved in writing.

Reason

To ensure that future occupants of the proposed development are not subject to elevated levels of air pollution that have been predicted in the local ambient atmosphere.

Condition M32 NRMM

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason

To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Anna Tastsoglou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136844/02
Your ref: 24/00021/FULEIA
Date: 18 October 2024

Dear Anna,

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

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

Thank you for consulting us on the above application on 8 October 2024.

Environment Agency Position

Having reviewed the additional information submitted we have **no further comments** to our original response NE/2024/136844/01 sent on 26 March 2024.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Elizabeth Clements
Sustainable Places Planning Advisor

E-mail: HNL SustainablePlaces@environment-agency.gov.uk | Tel: 02077644285

From: [REDACTED]
To: [REDACTED]
Subject: Applications: 24/00021/FULEIA & 24/00011/LBC
Date: 24 October 2024 10:14:08

THIS IS AN EXTERNAL EMAIL

Dear Ms Tastsoglou,

Thank you for notifying the Group of the additional documentation submitted in regard to the above applications for Planning Permission and Listed Building Consent.

I have reviewed the additional documentation which does not address any of our original comments on the two applications. The Group therefore reinforces our objections to the scheme.

Kind regards,

Eddie Waller IHBC
Conservation Adviser
London and South East England



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PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

25 October 2024
Crossrail Ref: CRL-IP-3302

Dear Anastasia Tampouridou,

24/00743/FULEIA : Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments..

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 22 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

.....
The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).



Your ref:
My ref: 24/07072/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: [REDACTED]

Anna Tastsoglou
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

25 October 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/07072/OBS **Application Date:**
Date Received: 08.10.2024 **Date Amended:** 08.10.2024

Plan Nos: Letter from City of London dated 8 October 2024.

Address: Bury House, 31 Bury Street, City Of London, EC3A 5AR

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

Yours faithfully

[REDACTED]
Deirdra Armsby
Director of Town Planning & Building Control

Note:

- '3f' The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



From: [Active Travel England Planning](#)
To: [lpaburystreet](#)
Subject: LPA Reference: 24/00021/FULEIA Standing Advice Response
Date: 30 October 2024 15:18:58

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THIS IS AN EXTERNAL EMAIL

LPA Reference: 24/00021/FULEIA

ATE Reference: ATE/24/00379/FULL

Site Address: BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

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

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,



Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ref:a0zTw0000007FTIIAM;c56a80f3b2eecacb31a928cd5ce33117:ref]

From: plnc@cityoflondon.gov.uk
To: plnc@cityoflondon.gov.uk
Date: 21 October 2024, 14:52
Attachments:

THIS IS AN EXTENSION EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30–32 of DfT/QDPM Circular 012003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

where a crane is 100m or higher, crane operators are advised to notify the CAA (propag@caa.co.uk) and Defence Geographic Centre (dgcc@mod.gov.uk) via Crane notification (Civil Aviation Authority (caa.co.uk))

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Kind regards

Simon Wiles (Airport Planning Manager)
On behalf of Heathrow Airport Ltd.



From: PLNComments@cityoflondon.gov.uk - PLNComments@cityoflondon.gov.uk

Sent: 20 October 2024, 14:52

To: AirportSafeguarding@CAA.safeguarding@heathrow.com

Subject: Planning Application Consultation: 24/0002/1/01EA

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR.
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tomczyk

Environment Department

City of London

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COMPANY PARTICULARS: For particulars of Heathrow Airport, please visit <http://www.heathrowairport.com/about-us>. For information about Heathrow Airport, please visit www.heathrowairport.com

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PLNComments@cityoflondon.gov.uk

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

01 November 2024
Crossrail Ref: CRL-IP-3311

Dear Anna Tastsoglou,

24/00021/FULEIA : Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

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

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 29 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
.....

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).



LPA Ref: 24/00021/FULEIA

London City Airport Ref: 2024/LCY/250

Date: 01/11/24

Dear Anna Tastsoglou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found to have the potential to conflict with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests the following condition contained in this letter is applied to any future approval.

| | |
|---------------|--|
| LPA Reference | 24/00021/FULEIA |
| Proposal | Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. RE-CONSULTATION due to the submission of additional information and revised drawings |
| Location | 1-4, 31-34 Bury Street, London, EC3A 5AR |
| Borough | City of London |

Case Officer

Anna Tastsoglou

London City Airport's response must change to an objection unless this condition is applied to this planning permission.

Building Obstacle Lighting Condition

Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make the following observations:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,

Simon Vince
On behalf of London City Airport

From: [SM-NE-Consultations \(NE\)](#)
To: [PLN - Comments](#)
Subject: NE Response - 492545 24/00021/FULEIA
Date: 04 November 2024 12:17:54
Attachments: [image001.png](#)
[ufm24_Standard_Consultation_Email.pdf](#)
[24_00021_FULEIA-COMMENTS - NATURAL ENGLAND-1528366.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear Ms. Tastsoglou,

Our ref: **492545**

Your ref: **24/00021/FULEIA**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **08 May 2024**, our reference number **470087** (attached).

The advice provided in our previous response applies equally to this **amendment**. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

Joseph Cutler

Operations Delivery

Admin Support Advisor

Natural England

Consultation Service

Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england



We strongly recommend using the [SSSI Impact Risk Zones \(SSSI IRZs\)](#) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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

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

Sent: 08 October 2024 11:29

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: 490304 Planning Application Consultation: 24/00021/FULEIA

[You don't often get email from plncomments@cityoflondon.gov.uk. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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7f1102%7C0%7C0%7C638639803404119861%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I6k1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=R8%2F4WhVpYgP5o5s5BgeV8WgsCCgmrVMT6q5H1z02EcG%3D&reserved=0

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From: [REDACTED]
To: [REDACTED]
Subject: Bury House, 31 Bury Street, City of London EC31 5AR 24/00021/FULEIA
Date: 06 November 2024 09:49:54

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THIS IS AN EXTERNAL EMAIL

F.A.O Anna Tastsoglou

Our ref 199453

Your ref 24/00021/FULEIA

Bury House, 31 Bury Street, City of London EC31 5AR

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

Dear Anna

Thank you for notifying the SPAB of the additional information provided in support of the above application.

We refer to our objection dated 14 May 2024 which has been registered incorrectly as a representation rather than a consultation response, as a result our response has not been included within the Response to Comments on Matters relating to Heritage, Townscape and Visual Impact of 16 October 2024. We request that this error be corrected promptly.

We also wish to reiterate our objection, particularly concerning the harm that the tall building would cause to the Bevis Marks Synagogue. The overbearing structure and the overshadowing of the courtyard constitute an unacceptable level of harm to the historic interest of the asset.

Additionally, the application fails to demonstrate that the proposals would enhance the Creechurch Conservation Area or provide any Heritage Benefit.

We therefore strongly object to the application and recommend that permission is refused.

We hope these comments are helpful to you.

Best wishes

Gill

Gill Pedler
Casework Officer

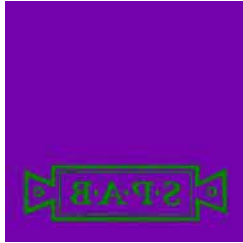
[REDACTED]
Part-time hours: Monday to Wednesday

Please send all notifications of listed building consent applications, faculty applications or requests for pre-

application advice to casework@jcnas.org.uk

The Society for the Protection of Ancient Buildings (SPAB)
37 Spital Square, London E1 6DY | 020 7377 1644 | spab.org.uk
Follow @spab1877 on [Instagram](#) | [Facebook](#) | [Twitter/X](#) | [LinkedIn](#)

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CONSULTATION RESPONSE: OBJECT

Anna Tastsoglou
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

By email to: [REDACTED]

Our reference: 24025

6th November 2024

Dear Anna Tastsoglou,

24/00021/FULEIA | Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House and three storey extension resulting in ground plus 5 storeys at Renown House | Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

Thank you for reconsulting SAVE Britain's Heritage on the above planning application following the submission of revised planning documentation. Following careful assessment of the amended documentation, we wish to reiterate our strong objection on the heritage and climate grounds set out in our previous detailed letter dated 1st May 2024, which this letter should be read alongside.

The revisions submitted by the applicant do not alter the fundamental nature of the application. We maintain our view that the proposed ground plus 43-storey tower at No. 31 Bury Street would cause substantial harm to the Grade I listed Bevis Marks Synagogue and its setting, and the Creechurch Conservation Area within which the application site is fully located. The vastly increased scale of Bury House would overshadow a number of highly designated heritage assets which the conservation area is designated to protect. A building of this height would be visible from within the courtyard of Bevis Marks Synagogue, one of England's most important religious buildings of the highest significance, and would cause substantial harm to the building's setting and secluded nature. The sky view from within the courtyard has religious importance and allows daylight into the synagogue's interior.

The works proposed to Renown House and the Grade II* listed Holland House (in the associated application 24/00011/LBC) remain strongly concerning. We reiterate our view that the proposed scale and massing of a 4-storey rooftop extension to Holland House would be substantially harmful to this designated heritage asset.

This planning application has received over 1,300 objections. The government's own heritage advisor, Historic England, has strongly objected to the proposals, and five other national heritage bodies including Historic Royal Palaces, Georgian Group, Victorian Society, Twentieth Century Society and Historic Buildings and Places have registered their objections to the scheme. We consider this high-level of opposition adds considerable weight to SAVE's call that the Local Planning Authority refuse planning permission.

If your authority proposes to determine the applications in their current form and is minded to grant consent, we will request them to be called in for determination by the Secretary of State.

I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

Yours sincerely,



Lydia Franklin,
Conservation Officer

From:
To:
Cc:
Subject: FW: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR
Date: 07 November 2024 14:06:55
Attachments:

THIS IS AN EXTERNAL EMAIL

Hi Anna

Thank you for consulting me on the Bury House application. The additional information supplied does not affect my previous advice, which I have attached for information

Regards

Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London
Greater London Archaeology Advisory Service (GLAAS)
Phone: 020 7973 3223 Mobile: 07551 134926

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill. London EC4R 2YA

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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

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

Sent: 29 October 2024 14:56

To: E-Glaas <E-Glaas2@historicengland.org.uk>

Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at
<http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6YBENFHH1E00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anna Tastsoglou

Details

OUR REF: 24/00021/FULEIA

ADDRESS: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR (Grid Reference: 533373, 181207)

PROPOSAL: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD) THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: <http://www.cityoflondon.gov.uk>

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0048

Date of issue of this decision: 11/11/2024



www.southwark.gov.uk

LBS Reg. No.: 24/OB/0048
Your Ref No.:

Date of Issue of Decision: 11/11/2024

Applicant Ms Anna Tastsoglou
City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

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

At Bury House 1 - 4 31 - 34 Bury Street London EC3A 5AR

In accordance with your letter received on 23 October 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

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

Housing and Regeneration Directorate
Planning and Building Control

Development Management
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

Date: 11th November 2024

CITY OF LONDON REF: 24/00021/FULEIA

TOWER HAMLETS REF: PA/24/01869

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

PROPOSAL:

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

Dear Anna Tastsoglou,

Thank you for your correspondence dated 29th October 2024, informing the London Borough of Tower Hamlets (LBTH) about the City of London's receipt of additional information and revised drawings for the aforementioned Planning application.

LBTH previously submitted comments on 14th May 2024 objecting to 24/00021/FULEIA, and related LBC application 24/00011/LBC, due to the harmful impact of the proposals toward the Tower of London World Heritage Site.

As the revised drawings do not alter the height, scale, design or massing of the proposed new building, we maintain our original objection without further comment.

Yours sincerely,

Catarina Cheung

Planning Officer

For and on behalf of The Director of Planning and Building Control

The London Borough of Tower Hamlets



From: [REDACTED]
To: [REDACTED]
Subject: C20 Society 24/00011/LBC & 24/00021/FULEIA FAO Anna Tastsoglou
Date: 11 November 2024 15:14:35
Attachments: [image001.png](#)
[image002.png](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

Dear Anna Tastsoglou,

Thank you for re-consulting the Twentieth Century Society on the applications 24/00011/LBC & 24/00021/FULEIA. We have reviewed the submitted documents including KM Heritage's response to consultee comments dated 10 October 2024. We maintain our objection to the proposals as outlined in our letter of the 17 May 2024, remaining seriously concerned about potential harm caused to the Grade II* listed Holland House and Creechurch Conservation Area.

Kind regards,
Coco

Coco Whittaker – Head of Casework
(she/her)
Twentieth Century Society
70 Cowcross Street, London, EC1M 6EJ

[REDACTED]
[REDACTED]
www.c20society.org.uk

[Twitter](#) | [Instagram](#) | [Facebook](#) | [LinkedIn](#)

Reg. charity no: 1110244



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Become a C20 Society member and save money on our events and publications.

Join us

Date: 08 May 2024
Our ref: 470087
Your ref: 24/00021/FULEIA & 24/00011/LBC



City of London

BY EMAIL ONLY

lpaburstreet@cityoflondon.gov.uk

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

T 0300 060 3900

Dear Sir or Madam

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

Location: 1-4, 31-34 Bury Street, London, EC3A 5AR (for 24/00021/FULEIA) and Holland House, 1 - 4, 32 Bury Street, London, EC3A 5AW (for 24/00011/LBC)

Thank you for your consultation on the above dated 14 March 2024 which was received by Natural England on 14 March 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Helen Churchill
Consultations Team

Anna Tastsoglou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136844/03
Your ref: 24/00021/FULEIA
Date: 15 November 2024

Dear Anna,

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

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

Thank you for reconsulting us on the above application.

Environment Agency Position

Having reviewed the additional information submitted we have no further comments to our original response NE/2024/136844/01 sent on 26 March 2024.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Should you have any queries regarding this response, please contact me.

Yours sincerely

Harry Scott
Planning Advisor

E-mail: HNL SustainablePlaces@environment-agency.gov.uk

Telephone: 02030251774

Application ref: 2024/4348/P
Contact: Elaine Quigley
Tel: [REDACTED]
Email: [REDACTED]
Date: 15 November 2024

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: [REDACTED]
planning@camden.gov.uk
www.camden.gov.uk/planning

City of London
PO Box 270,
Guildhall
London
EC2P 2EJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

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

Proposal:

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

Drawing Nos: City of London Cover Letter dated 8th October 2024.

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

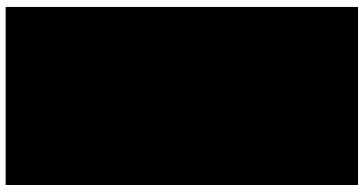
Informative(s):

- 1 Reasons for raising no objection:-

The proposal includes the demolition subsequent redevelopment of the whole site as outlined in the description of development. The application for planning permission is an EIA application (24/00021/FULEIA). The London Borough of Camden were consulted on the original application in March 2024 and raised no objection advising that the application site is a significant distance from the London Borough of Camden boundary. The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental, or ecological conditions.

In light of the submission of additional information and revised drawings the London Borough of Camden continues to raise no objections to the application.

Yours faithfully



Daniel Pope
Chief Planning Officer

Memo

To Assistant Director (Development Management)
Environment Department

From Access Advisor
Environment Department

Telephone [REDACTED]

Email [REDACTED]



Date:

Our Ref: 24/00021/FULEIA

Address: 31 Bury St

The planning Guid application has been assessed to ensure that the proposal meets the highest standards of accessibility and inclusive design required by the NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1.

The Access Team promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

The proposal is for: **Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works**

Comments are structured to follow the journey through from planning a visit, arrival, entrance, travel through, and out from the site.

Summary of key issues

Engagement

Guidance in the London Plan is that there should be engagement with relevant user groups such as disabled, or older people's organisations. Some relevant groups are listed within the Statement of Community involvement.

There is no reference to a review of the current proposals by the City of London Access Group (CoLAG).

Good practice evidence provided

| RIBA ID Overlay used? | CoLAG review | Access audit of existing buildings | EqIA | CoLSAT used? |
|-----------------------|--------------|------------------------------------|------|--------------|
| No | No | No | Yes | No |

Planning a visit

Preview, or prior information that is made available on websites is key to removing barriers to access for many disabled people. It is recommended this should be reserved by condition as part of the Inclusive Access Management Plan.

Arrival and departure

Aldgate station is 350m from the site and Aldgate East is 600m from the site. These stations do not provide step free access to the train. The nearest station providing step-free access is Tower Hill at 600m from the site. The nearest bus stop is 150m away on St Katherine Cree. It is noted that buses are not suitable for all people.

Parking

Whilst there is a high PTAL, step-free public transport routes to the site are significantly further than the recommended 50m from principal entrance points as set out in Inclusive Mobility and British Standard BS 8300 (1). Accordingly, disabled people may require access to parking, or drop-off at the site. [It is recommended that details of rest points at 50m intervals and dropping-off are reserved through the Transport Management Plan and S278.](#)

The Red Badge parking scheme is for disabled residents and workers in the City. Red Badge holders may park in pay and display and disabled persons parking bays in the City without time limits. Blue Badge holders may park for up to four hours in these bays and six hours in the bays nearest to St Bartholomew’s hospital. Disabled people who hold a Blue Badge, but not a Red Badge, are limited to four hours of on-street parking. London Plan T6.5 says for non-residential uses that ‘at least one on or off street’ disabled persons parking space is provided. A relevant

space is provided to be shared with the servicing bay. This should be reserved for use for free by the disabled persons parking bay only between the hours of 7.00am and 11.00pm for the life of the development. Details of controlled entry and use of the space, its layout and surface are reserved by condition. Arrangements for booking the space and its management are reserved as part of the Inclusive Access Management Plan.

There are three existing on-street disabled persons parking bays in the vicinity of the development which should be re-provided if any are affected during the construction period and details reserved through the Construction Management Plan.

The servicing bay incorporates two short-stay cycle parking stands for cargo bikes. It is proposed that the servicing bay incorporates a disabled persons parking space for use between the hours of 7.00am and 11.00pm. Details of the space will need to be reserved by condition through the Transport Plan to ensure that it is adequately sized and set out with suitable protected zones, and available for the life of the development. These should be supported by details of its management secured through the Inclusive Access Management Plan (IAMP) and including information about priorities for booking and confirming that it will be free for use and available for disabled persons only for the lifetime of the development.

Dropping-off

Good practice guidance is that setting-down points should be positioned close to the accessible entrance of a building on firm and level ground. No drop-off points are identified in the proposals. It is recommended that details of secure drop-off on firm and level ground are reserved by condition and secured through Section S278 works.

Cycle parking

Commented [BH1]: Let me know if we need to discuss.

Cycle parking should accommodate a range of people, so as not to exclude or disadvantage riders of certain types of cycle.

London Plan policy and London Cycle Design Standards recommend that 5% of cycle spaces should be suitable for larger cycles with associated, and appropriately-sized lifts and end-of-trip facilities. The 5% should be spread across both short and longer stay spaces. Routes to cycle parking should include no more than two sets of doors and those should be automated.

The application states that 5% of spaces for larger cycles will be provided.

Larger cycle storage spaces are provided at level B1 and Lower Ground Floor, accessed by a stepped entrance with cycle ramp or a cycle lift from the northern end of Heneage Arcade. The cycle lift is dual purpose, shared with refuse transfer. There is larger cycle parking at the southern end of the Lower Ground Floor which is not accessible by lift by larger and adapted cycles. It is recommended that details of accessible cycle parking, including controlled points of entry, swept paths, and end of trip facilities are reserved by condition in the TMP to ensure that all spaces are easy to access and are consistent with LCDS.

Larger cycle storage is at B1 or Lower Ground Floor. Cyclists will move between levels from the cycle storage via lifts A and F to access end of trip facilities on level B2. Cyclists requiring step-free routes will transfer from the cycle lift, put the cycle into storage and then move across to the passenger lifts in the central lift lobby. The cycle lift allows access to B2 but connects directly into the refuse store. Details of how this lift will be managed and cleaned are reserved by condition through the IAMP to maintain independent and dignified access and avoid inadvertent access to the refuse store. No mobility scooter storage charging or storage points are provided which is regrettable.

It is recommended that passive EV charging should be provided for all larger cycle spaces and details reserved through the Travel Plan.

Entrances

Guidance in the London Plan is that entrances should be easy to identify and accessed without undue effort, special treatment or separation. Automated sliding doors are proposed to principal entrance points, and for which step free access is provided. Step free access routes and sliding doors are welcomed. Sliding doors are more inclusive of a range of people than revolving doors, which reinforce separation and are not considered inclusive.

A new arcade will be created which will improve the permeability of the site and is welcome. Some of the units are shallow and may not have sufficient passing or turning space for wheelchair users. Details of all shopfronts should be reserved by condition to ensure that doors are of sufficient width and have suitable door furniture and surface contrast

Reception facilities should be consistent with AD M(2) 3.6 and include facilities for both standing and seated visitors, have non-slip surfaces, lowered sections of any desks, options for seating and an audio induction loop. As these are not currently shown on the drawings details of reception facilities should be reserved by condition.

Vertical access

London Plan 2021 Policy D5 requires that at least one lift per core is a fire evacuation lift suitably sized for step-free access out from the building in addition to fire-fighting lifts. Two evacuation lifts are identified in the central lift core, with separate fire-fighting lifts

Details of the management protocol for assisting people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition through the IAMP to ensure that there is sufficient training and awareness as part of the the building's management.

Reference is not made to the use of Easy Access to Historic Buildings. However, the proposals would bring greater access to the listed buildings and which is welcome in principle. The SCI indicates that some relevant disabled persons user groups were engaged during project development although there is not detail of how this has shaped the proposals. The proposals were not reviewed by CoLAG.

Culture/education space

An end-user has not been secured for the culture use and conditions are recommended to ensure that the cultural offer is inclusive of the greatest

range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

Sanitary facilities

Policy in the London Plan and Local Plan requires free, publicly accessible toilets for a range of people where there is major development, particularly when they are near significant attractions, public open spaces or existing transport interchange. Sanitary facilities will need to meet standards in both Approved Documents M and, the updated, T.

Changing Places toilets are a requirement of Building Regulations for certain types and/or scales of development. The criteria are set out in Approved Document M of the Building Regulations. Changing Places toilets are intended for people with multiple and/or complex impairments. They are not intended for independent use. A 'Changing Place' toilet is indicated on the proposed drawings, accessed from Heneage Arcade. This is not currently shown fitted out as a Changing Places toilet.

Under the requirements of current Building Regulations and relevant policy, separate wheelchair accessible toilet and baby changing facilities should also be provided as well as ambulant accessible toilets. Whilst indicative layouts show some scope for inclusive toilet provision this needs further development and an Inclusive Toilet Strategy is recommended to be reserved by condition encompassing the whole development. This should include , plans and relevant details at a scale of no less than 1:20 of Changing Places, wheelchair accessible, ambulant accessible, single sex and universal provision as well as baby changing facilities.

Landscape

Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and arm-rests for support when rising, as well as a wheelchair user to transfer.

Spend areas for assistance animals are not currently identified but could be reserved by condition.

It is recommended that details of all landscaping are reserved by condition including surface materials, planting, seating – with options to include seating with backs and arm rests for support- and spend areas.

Suggested conditions

Accessibility

Prior to commencement of development conditions:

Location of drop-off points on level surfaces within 50m of entrances (may go in Transport Plan?)

Details of disabled persons parking space including markings, protected access zones, hours of operation and signage to entrance points. This should include provision for passive EV charging. (again probably in TP?)

Details of to demonstrate how accessible cycle parking will meet London Cycle Design Standards Chapter 8 including: provision for passive EV charging, plans at a scale of no less than 1:20 to show layout, swept paths and dimensions, lift dimensions including internal clear and door sizes; operational management to ensure that users requiring step-free routes cannot inadvertently access the refuse store and cleaning and maintenance of dual-function lifts

Details of access to inclusive end of trip facilities with relevant information made available on the building management website

Statement for the construction period to demonstrate that disabled persons parking bay provision is maintained or the equivalent provided in alternative locations for the course of the works (CMP or TP?)

Details of all shopfronts including plans and elevations at a scale of no less than 1:20 to ensure that doors are of sufficient width and have suitable door furniture and surface contrast

Reception facilities to include non-slip surfaces, lowered sections of desks, options for seating and a hearing induction loop

Submission of an Inclusive toilet strategy including plans at a scale of no less than 1:20 of:

Location of wheelchair accessible toilets and proximity to all entrance points

Changing Places – identifying how the Changing Places standards set out in Approved Document M have been met, location and fit out and registration with the Changing Places Consortium

Details of ambulant accessible toilets and statement of how provision of ambulant accessible toilets meets Approved Documents M and T

Details of single sex toilets and universal toilet facilities

Location of baby changing facilities associated with cultural and retail use

Spend facilities for assistance dogs

Landscape and public realm details to include access to, and circulation routes including: door widths from the building, threshold and mat details, path widths and surfaces, passing places for wheelchair users, seating and furniture, planting to avoid highly scented plants or opportunities for unwelcome touch and lighting

All seating and furniture which should include recesses for wheelchair users or people with assistance animals to sit alongside companions, a range of seating heights, and options with of arm supports for rising, and back rests.

Inclusive Access Management Plan

Prior to occupation of the development, an Inclusive Access Management Plan shall be submitted to the Local Planning Authority which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details of:

Preview information for website for each building use including travel distances, dimensions and photographs/visual stories to assist with visit planning for all building users:

Details of use of the disabled persons parking bay including its management, booking and frequency of relevant staff training

Details of any equipment loan for the building including, but not limited to wheelchair, noise cancelling headphones, information for culture spaces in alternative formats

Wayfinding strategy including how Information will be available in more than format

Information on publicly accessible toilet facilities including maintenance schedule and access to Radar keys and slings, as necessary

Cleaning and maintenance schedule for lifts to ensure that the lifts are kept clean, in good working order, and available at all times, with lift users kept separate from the refuse store

Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-creation, co-curation, mentoring and volunteering

Planting maintenance schedule

An inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs)

REASON: To ensure an inclusive and accessible development in accordance with Policy DM10.8 and Policy D5 of the London Plan

Yours sincerely

Harriet Bell

Access Advisor



Historic England

Ms Anna Tastsoglou
City of London Corporation
Environment Department
PO Box 270, Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: L01574353

18 November 2024

Dear Ms Tastsoglou

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HOLLAND HOUSE 1 - 4, 32 BURY STREET LONDON EC3A 5AW
BURY HOUSE 1 - 4, 31 - 34 BURY STREET LONDON EC3A 5AW
Application Nos 24/00011/LBC & 24/00021/FULEIA**

Thank you for your letters of 29 October 2024 regarding further information on the above applications for listed building consent and planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Summary

In 2021 your authority considered a similar scheme for the replacement of Bury House with a 48-storey tower. That application was refused, which we welcomed. This was because the proposals would have harmed the Outstanding Universal Value of the Tower of London World Heritage Site. The application was also refused because the proposed tall building would have harmed the grade I listed Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard.

The current proposal, an amended scheme on a larger site, would not overcome either of the previous reasons for refusal. Indeed, further harm caused by the proposed alterations to Holland House and the development's impact on the Creechurch Conservation Area mean that this scheme is worse than that refused from a heritage perspective.

Historic England objects strongly to the applications and recommends they should be withdrawn or refused.

Historic England Advice



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

We have set our position on these applications in detail in our letter of 15 May 2024 and continue to refer you to this advice. The recent amendments concern aspects of the detailed design which do not materially change the impacts on significance. The heritage commentaries submitted by the applicant in response to our advice do not provide any new information which changes our position.

We wish to draw the City Corporation's attention to the following points in light of further correspondence and information which has been submitted.

In our previous response we advised that given the similarities between the refused application and the current proposals, ICOMOS's previous advice remains relevant to the current application. As indicated in our email to the case officer on 24 July 2024, UNESCO's World Heritage Centre has welcomed Historic England's advice that the comments made by ICOMOS in its 2022 Technical Review of the previous application for this site remain relevant and should be taken into consideration in the local planning authority's determination of the current scheme. Please find this email and ICOMOS's Technical Review appended. We would encourage careful consideration to be given to ICOMOS's advice given the potential implications for the World Heritage Site.

We note the submission of the Lunar Transit Study Above The Bevis Marks Synagogue (GIA August 2024). This pertains to the Sephardi community's ability to practice the Kiddush Levana ritual - prayers performed outside at night to bless the new moon. A review of the Transit Study (BRE 04 November 2024) notes a significant reduction of visibility of the moon at relevant times of the lunar cycle as a consequence of the application proposals.

In our previous response, we highlighted the importance of the clear sky backdrop in the setting of the Synagogue to its significance, both in terms of its tangible and intangible contributions. As set out in 'The Setting of Heritage Assets' (GPA3) 'the asset's intangible associations with its surroundings, and patterns of use' and 'intentional intervisibility with other historic and natural features' (which we take to include the celestial bodies) are relevant to the consideration of impacts on significance. We defer to the expertise of the Sephardi community on their traditions and the impact of the proposals on their ability to worship, but note the clear link to heritage significance raised by this point.

In addition to the harm to the Tower of London and Bevis Mark Synagogue, we have also previously set out how the proposals would harm the significance of Holland House and the Creechurch Conservation Area. For the purposes of the NPPF, we find that the harm to the former would be in the middle of the range of 'less than substantial' and in the lower part of that range for the latter.

Historic England continues to object strongly to the current proposals. We consider



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they would harm designated heritage assets of the highest possible significance, including the Tower of London and Bevis Marks Synagogue, contrary to planning legislation, policy and guidance. We do not support the development of a building of the scale proposed in this location due to the inevitable harmful impact it would have on the historic environment.

We consider that the reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard. The current proposal would result in a worse impact in this case.

Recommendation

Historic England strongly objects to these applications. We recommend that they are refused or withdrawn.

We will update the Department for Culture, Media & Sport (DCMS) in its role representing the UK State Party to the 1972 World Heritage Convention, about the recommendation in your report and the decision of your Planning Committee. This is in order that they can update UNESCO World Heritage Centre on this case in accordance with Paragraph 172 of the Operational Guidelines.

We have not authorised the granting of listed building consent and will review our position on that matter after your Planning and Transportation Committee has met.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
E-mail: [REDACTED]



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HISTORIC ROYAL PALACES

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

FAO Ms Anna Tastsoglou
By email to [REDACTED]

21 November 2024

Bury House, Bury Street, London EC3A 5AR
Planning Ref: 24/00021/FULEIA and 24/00011/LBC

Dear Ms Tastsoglou,

We write in relation to the recent re-consultation on the above referenced planning and listed building consent applications, to reiterate HRP's strong objection to the scheme, which relates to the redevelopment of the site that includes Bury House, on the basis of its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS).

HRP previously made representations to the City of London (CoL) in respect of this application in May 2024, during the initial consultation period. We do not repeat the detail of that representation here but note that the scheme does not appear to have changed in any meaningful way since then and therefore the **original objection** (dated 13 May 2024) still stands. While we note the response to comments made by HRP prepared by The Townscape Consultancy, **HRP remains strongly of the belief that the proposed development would significantly harm the Outstanding Universal Value (OUV) of the ToL WHS** by virtue of the position and height of the proposed buildings and their impact on key views from and of the ToL.

In this letter we provide more detail about some of the issues raised in the original objection, highlight the changing policy context for consideration of the proposals, and raise a new concern about the misrepresentation of HRP's opinion of the emerging scheme during pre-application consultation which we ask CoL Officers to consider alongside HRP's original letter of representation in the determination of this application.

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Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)
The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



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Growth of the City Cluster

The growth of the CoL tall buildings cluster over the last 15 years, particularly the rapid development of new high-rise buildings, represents growth beyond that which was first envisaged when the LVMF was first published in 2012. The growth in tall buildings has resulted in cumulative impacts which HRP considers are threatening the OUV of the ToL WHS. HRP considers the emerging CoL Local Plan to 2040, which proposes additional height in the cluster, would further exacerbate the harm to the OUV through its promotion of an expanded eastern edge to the cluster and additional height. HRP believes that the Bury House development, along with the emerging CoL Local Plan 2040, to be a significant threat to the status of the WHS and as such maintains its objection both to this application and the emerging City Plan 2040.

Harm to the OUV of the ToL WHS

HRP remains of the view that the proposed development would harm the OUV of the ToL WHS. The original representation (May 2024) set out the unacceptable impact of the proposals on views of the Tower of London from Tower Bridge (LVMF 10A.1), in the dynamic journey across Tower Bridge, in the local views from within the inner ward of the Tower (in particular the view north-west from the centre of Tower Green over the roof of St Peter and Vincula), and on views of the White Tower, which is compromised by the erosion of the visual separation from the emerging City Cluster.

This is contrary to the guidance of the LVMF, in relation to View 10A.1 which states that '*Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site*' (LVMF para 186).

HRP notes the Townscape Consultancy response to the HRP comments made in May 2024. However, HRP maintains its position and does not agree with the conclusions in that response. In relation to View 9 in the TVIA (LVMF View 10A.1), HRP does not agree that '*in the cumulative condition the height of the proposed development would better mediate the cliff edge caused by the consented scheme at 100 Leadenhall*'. HRP considers the height would in fact exacerbate the abrupt vertical cliff edge in this view, resulting in a domineering and overbearing relationship to the ToL White Tower in this view.

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In relation to the Townscape Consultancy comments on View 22, from the ToL Inner Ward, HRP maintains its comments. While the wire line shows the proposed development occluded in this view, the cumulative impact view in the TVIA clearly shows a development visible over the top of the Royal Chapel of St Peter and Vincula. This further highlights HRP's concerns about the growth of the city cluster overall and the damaging impact this is having on the ToL.

Policy Considerations

The proposals are contrary to numerous policies in the adopted CoL Local Plan (2015) and draft City of London Plan 2040 which seek to protect the ToL WHS and its setting. In the adopted Plan: Policy CS12 (Historic Environment) requires development to preserve and where appropriate enhance the OUV of the ToL WHS and its local setting; Policy CS13 (Protected Views) requires development to protect and enhance significant City and London views of important buildings, townscape and skylines (including the ToL); and, Policy CS14 (Tall Buildings) requires tall buildings proposals to have regard to the significance of heritage assets and their settings. HRP considers that the current proposals are not in accordance with these policies because they demonstrably harm the OUV of the ToL WHS, impacting on its setting and views of the White Tower. The application should therefore be considered a departure from the development plan and refused.

In the emerging Plan, strategic policy S11 (Historic Environment) states that the CoL will preserve and seek to enhance the OUV, architectural and historic significance, authenticity and integrity of the ToL WHS and its setting; Policy HE1 (Managing change to the historic environment) requires that development preserves and where possible enhances and better reveals the special architectural or historic interest and the significance of heritage assets and their settings; and, Policy HE3 (Setting of the Tower of London World Heritage Site) requires proposals affecting the setting of the ToL WHS to preserve and enhance its OUV, architectural and historic significance, authenticity and integrity. Furthermore, strategic policy S12 (Protected Views) states that CoL will secure an appropriate setting of and backdrop to the ToL WHS and ensure its OUV. HRP therefore considers that the proposals for Bury House, given the harm they will cause to the OUV of the ToL WHS, are also contrary to emerging CoL policy.

HRP's concerns about the harm to the ToL OUV are made clear in the images provided in the ToL HIA submitted with the Application, particularly Figures 5.3 and 5.4. These images show that the proposed development sits demonstrably apart from the established City Cluster and that this is beyond what could reasonably be interpreted as denoting the

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'edge' of the cluster, clearly intruding on views of the ToL and particularly the White Tower. Moreover, the reference in the ToL HIA to the proposed development representing a stepping down to the 'foothills' of the Cluster is also contradicted by these images, which clearly demonstrate that –even at its 'reduced' height, compared with the previous, rejected proposals - it is a similar height to other buildings in the centre and foreground of the cluster and not significantly or visibly diminutive.

In its response to the CoL draft City Plan 2040 (letter dated 29 May 2024), HRP referenced the growth of the City Cluster and highlighted that the proposed profile of the cluster set out in the draft Plan (which appears to be designed to incorporate the Bury Street proposal) pushes the tall vertical edge of the eastern shoulder too close to the White Tower. HRP has regularly and consistently highlighted the danger posed by the proposed development to the ToL WHS over a prolonged period of time and strongly requests that all of these representations are carefully considered in the determination of this application.

Changing policy context

In its original objection to this 2024 scheme, HRP highlighted the reliance in the submitted Planning Statement on the draft policies of the City Plan in seeking to justify the excessive height and position of the proposal, pointing out that only limited weight could be attributed to the emerging plan given the early stage of its preparation, with significant objections remaining to the tall buildings policies and proposals in the draft document. Since then, the draft Plan has been submitted for Examination in Public, however the process is in the relatively early stages (it was submitted at the end of August and Inspectors were appointed in September; no date is currently indicated for the hearings) and therefore only limited weight can continue to be attributed to these draft policies. Furthermore, we have demonstrated above that elements of the proposals are not compliant with either emerging or adopted policy. HRP believes that the extent to which the proposals can demonstrate compliance with CoL policy, particularly in relation to heritage harm and tall buildings, is overstated in the application submission documents.

It is also clear that the development of the City Cluster, in both scale and height, is now beyond anything that was envisaged when the current version of the LVMF was published. HRP is aware that the LVMF is currently under review and understands that further protections will be afforded to the Tower of London and the White Tower to recognise the threat to its OUV from development in a future version. HRP requests that CoL Officers have regard to this likely update to the LVMF and consider its implications in the determination of this application.

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Misrepresentation of HRP comments on the emerging scheme

HRP notes the statement in the Planning Statement (para 2.30) which refers to the way in which the 2024 submission seeks to address the reasons for refusal of the 2020 scheme: that ‘*The Applicant has also worked with key stakeholders including the GLA, Historic Royal Palaces (‘HRP’) and Historic England (‘HE’) to address the second reason for refusal. In this regard, HRP feedback acknowledged that there was “much to welcome in the new design proposals, particularly in respect of the existing incongruous extensions to Holland House, bringing public use to Holland House, and the reduction of height and introduction of shoulder elements to the tall building”, which were described as helpful in key views. It was acknowledged that the “height of the massing would re-establish a softer edge in the foothills of the City Cluster that would mitigate to some extent against the ‘cliff edge’ created by consented developments”*. The Planning Statement concludes on this point (para 2.31) that there is ‘*consensus from the GLA, HRP and the HE that the height reduction represents a positive change from the previous scheme, but some concern remains in respect of the overall height of the scheme.*’

HRP takes issue with this presentation of its view of the current scheme, which overstates its assessment of the advantages of the current scheme compared with the previous rejected scheme, and suggests that its remaining concerns are minimal and entirely addressed in the Heritage Assessment, HTVIA and Design and Access Statement submitted as part of the current application. The quotes presented in the Planning Statement are from an email exchange immediately following an online presentation of the scheme by the Applicant to HRP, and omit other important issues raised by HRP in that email, including that ‘*the massing in LVMF view 10A.1 (from the northern bastion of Tower Bridge) still appeared tall and close to the White Tower*’. This position was set out in more detail in HRP’s follow-up formal objection letter dated 13 May 2014.

Historic Royal Palaces therefore continues to strongly object to the proposed development, which would harm the OUV of the Tower of London WHS and which therefore does not comply with CoL adopted or emerging Local Plan Policies, the LVMF and NPPF. We therefore request that the City of London refuses the application as currently presented.

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Please do not hesitate to get in touch with me should you wish to discuss any of the points raised here.

Yours sincerely



Adrian Phillips
Palaces & Collections Director

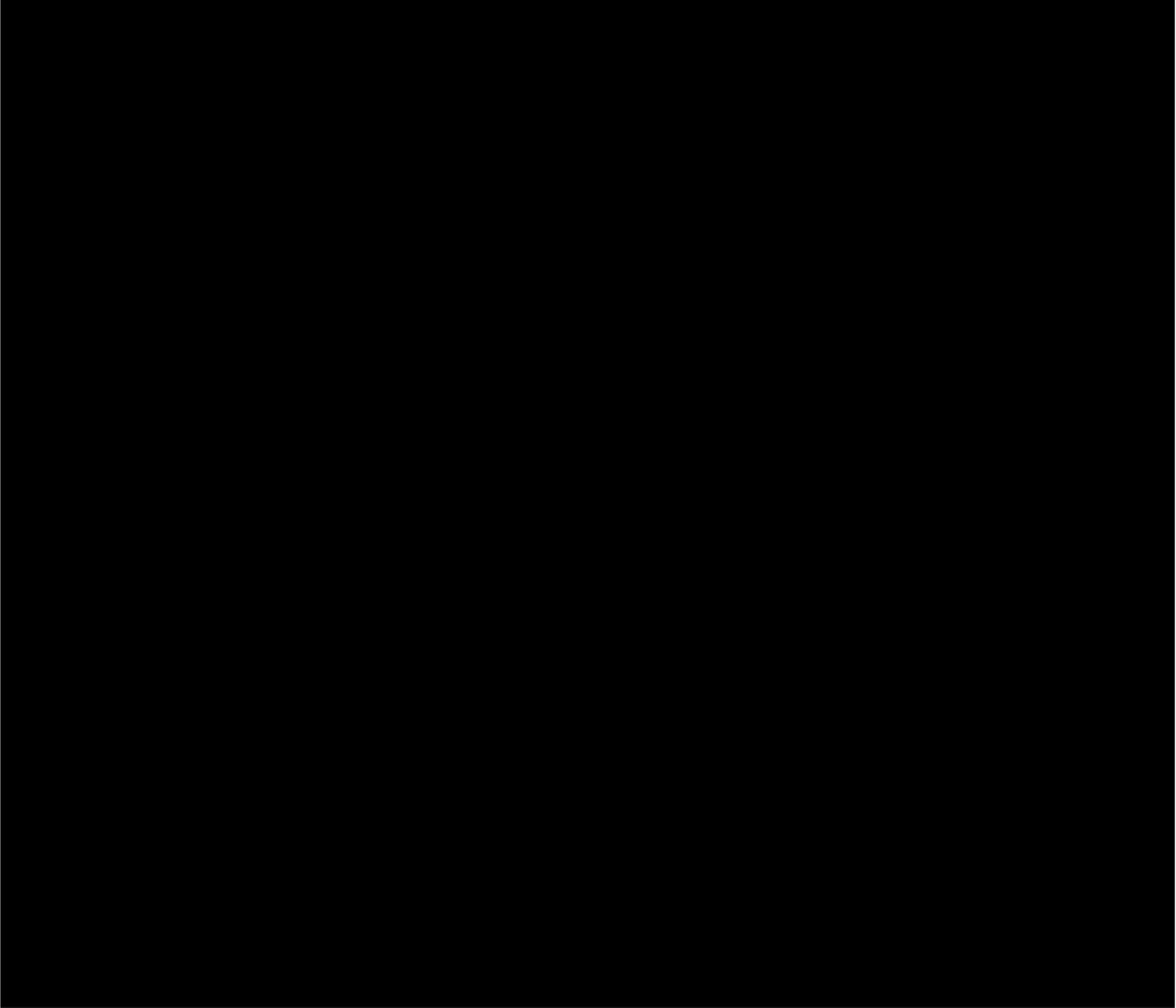


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From: Varma, Vimal <[REDACTED]>
Sent: 24 November 2024 3:21 PM
To: Tastsoglou, Anna <[REDACTED]>
Cc: Turner, Lee <[REDACTED]>
Subject: 24/00021/FULEIA - Bury House 1 - 4, 31 - 34 Bury Street

Hi Anna,

The proposed waste and storage collection facilities indicated on drawings no. 4458-ST-PR-02-100 & 4458-ST-PR-02-097 and in the Delivery and Servicing Plan, Jan 2024, comply with our requirements. Therefore, this division will not object to this proposal.

Thanks

Cimal

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 08 October 2024 11:37

To: Varma, Vimal <[REDACTED]>; Turner, Lee

<[REDACTED]>

Subject: Planning Application Consultation: 24/00021/FULEIA

Dear Sir/Madam

Please see attached consultation for Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR .

Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"

PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou

Environment Department

City of London



Ministry of Housing,
Communities &
Local Government

Anna Tastsoglou
Principal Planning Officer
Development Management
City of London Council

Please ask for: Maria Bowen

Tel:

Email:

Your ref: 24/00021/FULEIA and 24/00011/LBC

Our ref: PCU/RTI/K5030/3352878

Sent via e-mail only to:

Date: 19 November 2024

Dear Ms Tastsoglou

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

Application by WELPUT for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works at Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR. Planning Application Numbers: 24/00021/FULEIA and 24/00011/LBC.

1. I am directed by the Secretary of State to refer to the above planning application.
2. In exercise of her powers under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Secretary of State hereby directs your Council not to grant permission on this application without specific authorisation. This direction is issued to enable her to consider

whether she should direct under Section 77 of the Town and Country Planning Act 1990 that the application should be referred to her for determination.

3. This direction does not, of course, prevent your Council from considering the application, forming a view as to the merits or, if they are so minded, refusing permission.

4. This letter is for procedural purposes and should not be read as any indication of the Secretary of State's attitude towards the application scheme.

5. I would be grateful for acknowledgement of your receipt of this letter. Please contact the case officer if you have any queries.

Yours sincerely

Maria Bowen

Maria Bowen
Head of Crown Casework
Planning Casework Unit

Authorised by the Secretary of State to sign on their behalf

The decision to issue this Article 31 was made by officials on behalf of the Secretary of State under delegated powers.