

From: [REDACTED]
To: [REDACTED]
Subject: 99 Bishopsgate EC2M 3XD
Date: 23 September 2024 14:59:21

THIS IS AN EXTERNAL EMAIL

I object to to this application.

The area is also too densely developed with high rise office buildings.

This is having a deleterious effect on overloaded utilities. We have already suffered from the effects of power cuts.

Further development will increase the disruption of traffic and cause further noise and pollution.

If the development is permitted please ensure that the hours of work are strictly adhered too particularly with regard to noise during the night.

Kind regards

Peter Rose

[REDACTED] [REDACTED] [REDACTED]
London EC3V 9DS

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
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Case Officer: Amy Williams

Customer Details

Name: Ms Josephine Knowles

Address: [REDACTED] Southampton

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This development is an existential threat to the charity of St Ethelburgas it will challenge its very existence due to the disruption. This charity's activities, (trainings, public talks, consultancy, faith and cultural events) will be impossible as these require a quiet and peaceful environment.

This place is unique in what it stands for and for being an oasis in the city. Having been a recent user for an event, this is a rare gem which will be profoundly affected by this development. Please reconsider your plans.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr marco sidoli

Address: [REDACTED] LONDON LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: THIS WILL CAUSE UNTOLD DISTURBANCE TO AN ALREADY TOUGH FINANCIAL CLIMATE THAT WE ARE SUFFERING.

THE CLOSURE OF PART OF BISHOPSGATE, THE DUST, NOISE, TRAFFIC CONGESTION, LOSS OF PARKING, THE LIST IS ENDLESS.

THERE IS NO CONSIDERATION FOR BUSINESSES OR RESIDENTIAL PROPERTIES AT ALL. ANY DISRUPTION TO BUSINESS MUST BE COMPENSATED AS WE CANNOT FINANCIALLY CONTINUE LIKE THIS.

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Case Officer: Amy Williams

Customer Details

Name: Mr Richard Doffman

Address: [REDACTED] London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: In reference to the proposed extensive re-development by Brookfield Properties of 99 Bishopsgate London EC2M 3XD

I represent, Pixielink Limited who are the owners of the building located at [REDACTED] Wormwood Street London EC2M 1RP

Notwithstanding that we are informed that the construction of the building is in line with the City of London's Local Plan 2040 our building will be dwarfed by the size and magnitude of the proposed scheme.

The building at [REDACTED] Wormwood Street will be greatly effected by loss of light once the development has been built leaving us with minimal daylight. We therefore wish to formally to object to the

current Planning Application submitted 6/08/2024 and validated by City Corporation on 9/09/2024

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: 99 Bishopsgate London EC2M 3XD Ref. No: 24/00836/FULEIA
Date: 04 October 2024 10:30:05

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I write to you in reference to the proposed extensive re-development by Brookfield Properties of 99 Bishopsgate London EC2M 3XD

I represent, Pixelink Limited who are the owners of the building located at [REDACTED] Wormwood Street London EC2M 1RP

Notwithstanding that we are informed that the construction of the building is in line with the City of London's Local Plan 2040 our building will be dwarfed by the size and magnitude of the proposed scheme.

The building at [REDACTED] Wormwood Street will be greatly effected by loss of light once the development has been built leaving us with minimal daylight. We therefore wish to formally to object to the current Planning Application submitted 6/08/2024 and validated by City Corporation on 9/09/2024

Richard

Richard Doffman

[REDACTED]
<http://www.pearl-coutts.co.uk>

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Pearl and Coutts Ltd

[REDACTED]
London
N1 9PD

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From: [Elsie Roderiques](#)
To: [PLN - Comments](#)
Subject: 24/00836/FULEIA - Objection
Date: 04 October 2024 11:48:25

You don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

I am objecting vehemently to the planning application 24/00836/FULEIA.

This development represents an existential threat to the building and charity St Ethelburga's Centre for Peace and Justice which is directly opposite.

The charity does such important work for thousands of people, locally, nationally and internationally. It represents an oasis in the city and it must be protected and helped to flourish.

The disturbance, noise, dust and vibrations for the first 2 years of demolition and basement works, and then a further 3 or 4 years of building, will make the continuation of the charity's activities, trainings, public talks, consultancy, faith and cultural events, for which they receive grant funding, impossible. Without exception these require a quiet and peaceful environment - and also depend on their reputation and iconic value of an oasis of calm in the city. I myself have just booked an event there in November on this basis and require the use of the gardens and a quiet, peaceful space and would have not done so with building works going on.

Furthermore the noise disturbance will render the venue hire business unworkable, thus destroying the charity's means to support itself and pay the staff, building and running costs.

Once built the development will cut their natural light still further, potentially threatening the Peace Garden. It may also increase the wind tunnel effect (they have already experienced wind damage to the fabric of the building as a result of the development next door), as well as unpleasantly high wind in the garden.

Please reject this application. London really doesn't need another skyscraper.

Many thanks,

Elsie Roderiques

[REDACTED]
Wolverton
MK12 5DJ

--

Elsie Roderiques (née Bryant)

[REDACTED]
She/her

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Dr Shereen Nizari

Address: [REDACTED] London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This development has the potential to be highly disruptive to the activities of St Ethelburga's charity and its Grade 1 listed building. The loss of natural light would be detrimental to the peace garden, the wind tunnels created would make it unpleasant to use. The noise and vibrations from the development would be problematic for the programs run by St Ethelburga's Centre for Peace and Reconciliation.

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Case Officer: Amy Williams

Customer Details

Name: Aminmohamed Juma

Address: [REDACTED] Harrow

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I believe that the level of disruption, disturbance, noise, dust, and vibrations involved in extensive demolition and construction, which will be ongoing for a minimum of 5-6 years, will render St. Ethelbergas space disruptive and unusable. Their work on peace and reconciliation so much depends on the quiet and peaceful nature of their space. Many of their projects will be disrupted or severely limited.

The development of 100m taller and storeys 5-53 will be very close to St Ethelburga's. This will reduce their natural light and likely create strong and unpleasant winds around their centre and will also adversely affect their Peace Garden.

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Case Officer: Amy Williams

Customer Details

Name: Lord Rowan WILLIAMS

Address: [REDACTED] Cardiff

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I write as a patron of the St Ethelburga's Centre to express dismay at the level of disruption and loss of amenity involved in the proposals for development at 99 Bishopsgate. Loss of natural light, building works over some 5/6 years, general adverse effect on the quiet and seclusion of the Centre, all combine to make this a wholly undesirable move. The crucial work of the Centre for reflection, conferences and meditation (especially its unique garden) will suffer severely.

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Case Officer: Amy Williams

Customer Details

Name: Ms Ruwani Gunawardene

Address: [REDACTED] Wembley

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I have been a volunteer at St Ethelburga's Centre for Reconciliation and Peace since 2008 when dialogue commenced for the war situation in Sri Lanka. The space that ST E's provided for our communities to meet and come to a resolution of living peacefully as diaspora communities was beyond valuable. Ours was just one community. I am aware of so many other important community reconciliatory work being held in this space.

It is a historic and an incredibly precious site which holds communities in Britain and from around the world to meet and work together for the common good.

With so many serious conflict happening around the world, not least the war in Ukraine and the Middle East and ecologically driven conflict, the work that St Ethelburga's do is going to be

increasingly important and vital for maintaining some degree of peace.

One way in which the Centre manages to keep going as a viable entity is by letting the space for events and functions. If yet another building project comes along and causes noise pollution (I have been there on many occasions during other building projects) the centre's work is bound to be disrupted and loss of income will be inevitable. For a charity such as St Ethelburga's this is not good news at all. I am writing therefore, to ask you please to grant due compensation for the long period of 6 years that the building work is going to take place so the work of St Ethelburga's will not need to cease or even be closed down. This will be such a phenomenal disaster in the current climate of things in the world.

I invite you to visit the place and see the work for yourself. It is unique and cutting edge and a very, very necessary part of civil society in this great city of London which is a centre for the whole world. Therefore your consideration of paying compensation for the loss of income for the centre will be much appreciated.

Revd. Ruwani Gunawardene

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Case Officer: Amy Williams

Customer Details

Name: Sarah Young

Address: [REDACTED] London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I'd like to express my concern regarding the redevelopment of 99 Bishopsgate and its impact on St. Ethelburga's Centre for Reconciliation and Peace.

As we're both part of the same industry, we had the opportunity to work with St. Ethelburga's Centre for many years with great success and many positive comments from clients who held their events there. Some of them underlined the great ambience of the venue and its uniqueness. We're afraid that the changes in the close proximity of the venue and the noise caused by the ongoing works will affect St. Ethelburga's severely & possibly impact the interest in event hosting due to the conditions in place. As a charity, the Centre relies on income generated from venue hire to support their charitable events and activities which are invaluable for the community and the area.

If the factors related to the redevelopment (such as noise, dust, vibrations, limited access, loud

work during operating hours) were to impact the number of events the Centre is able to host, it would be a huge loss in terms of the positive impact this place brings to us.

Please take a closer look at the impact of the redevelopment (especially in terms of noise, vibrations, access), and consider amending the plans.

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Case Officer: Amy Williams

Customer Details

Name: Mrs Durgamata Chaudhuri

Address: [REDACTED] Barnes London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: St Ethelburga's Centre for Reconciliation and Peace is a unique and vitally important facility in the city of London.

The proposed building would make it impossible for this charity to function effectively, as it needs a calm and peaceful environment.

At this time, with conflict killing hundreds of people every day, the need for the mediation and peace-building work provided by St Ethelburga's is needed more than ever.

I have attended many events at St Ethelburga's, including inter-faith and inter-cultural workshops which promote deeper empathy and understanding improving community cohesion and reducing the fear and prejudice which contribute to, for example, hate-riots which we saw so pertinently in summer.

I have also been to cultural events such as concerts and discussions, all of which require a quiet environment and would be seriously disrupted by the noise of building work which I understand would continue for years.

All the massive high-rise buildings springing up in London are damaging the nature and quality of our city. A building of the nature proposed here, would not only harm the whole local environment but also reduce the light and cause unpredictable winds which would affect the quality of the Peace Garden and affect the whole character, environment and 'spiritual consciousness' of St Ethelburga's - which is so desperately needed - especially at this time.

To conclude I would like to oppose in the strongest possible way, this development which would I presume, just make some wealthy people even richer - at the expense of the functioning of a unique and absolutely priceless, desperately needed resource in this city, which serves not only the entire nation but the whole world.

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Case Officer: Amy Williams

Customer Details

Name: Ms amina hirani

Address: [REDACTED] kingsbury London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I am objecting vehemently to the planning application 24/00836/FULEIA.

This development represents threatens the listed building - St Ethelburga's Centre for Peace and Justice which is directly opposite - which is a heaven in a very busy area for so many who use the centre for promoting wellbeing of the world.

The work of this charity is recognised locally, nationally and internationally and should continue to support good causes.

Notwithstanding the upheaval during construction at various levels which will be a nightmare and will reduce the importance of the work of the charity as less and less people will access it,

once built the development will cut their natural light in the garden which is an oasis for so many. it will also impact on the micro climate of the garden and will attract less and less wild life which is already rare in the surrounding built up area.

Please reject this application. London really doesn't need another skyscraper

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Case Officer: Amy Williams

Customer Details

Name: Ms Wendy-May Jacobs

Address: [REDACTED] Portsmouth

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am deeply dismayed at the prospect of this proposal being given the go-ahead. St Ethelburga's is a precious place of restoration and hospitality and peace-education for thousands of people every year, of all faiths and none, from all backgrounds, all shapes and sizes. The ripple effect of the work of this centre of reconciliation is felt all over the world. The proposed building work would mean years of noise and disruption which would have a deeply detrimental effect on the activities of St Ethelburga's, and my understanding is that the light available to the Centre would be drastically diminished. Please reconsider this harmful proposal.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i))); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
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Case Officer: Amy Williams

Customer Details

Name: Mr Michael Cawley

Address: [REDACTED] London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am writing to express my deep concern and heartfelt objection to the planning application 24/00836/FULEIA.

I feel compelled to highlight the significant and damaging consequences this project would have on such an invaluable community asset. I have had the privilege of attending events at St Ethelburga's Centre for Reconciliation and Peace, experiences that have been profoundly transformative and enlightening.

St Ethelburga's is more than just a building; it is a sanctuary where people from all walks of life can come together in peace and harmony. The centre's inclusive work is a beacon of hope, providing a safe haven for those seeking solace amidst the chaos of the city. This little oasis of

calm is so special to many of us, offering an environment where interfaith dialogue, conflict resolution, and peacebuilding can thrive. It is truly irreplaceable.

The extensive demolition and construction work proposed for 99 Bishopsgate will cause severe disruptions lasting at least five years. The noise, dust, vibrations, and reduced natural light due to the new building's height and proximity will render St Ethelburga's unusable for extended periods, significantly impairing their ability to operate. At a time when our world needs more peace and unity, this development threatens to silence one of London's most vital voices.

So much will be lost if this development goes ahead: the tranquil space that supports so many in need, the crucial work they do in fostering understanding and reconciliation, and the unique cultural heritage of a Grade I listed building. In contrast, what will be gained from this development? So little, compared to the invaluable sanctuary that St Ethelburga's provides.

I strongly urge you to reconsider this application and protect the irreplaceable space that St Ethelburga's Centre for Reconciliation and Peace offers to our city. It is a treasure that we cannot afford to lose.

Comments for Planning Application 24/00836/FULEIA

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Mrs Susan Bolen

Address: [REDACTED] Augustus Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: I am writing to express my strong opposition to the proposed demolition and reconstruction at 99 Bishopsgate, London, EC2M 3XD.

While the site itself may not hold significant historical value, its proximity to St. Ethelburga's Centre is deeply concerning. As someone who frequently visits and has strong ties with St. Ethelburga's Centre for Peace and Reconciliation, I believe the proposed development could harm the character and integrity of this important institution. Located just 20 metres from the site, the Centre plays a vital role in interfaith relations, mediation, reconciliation, and community engagement. It draws people from across the UK and internationally, offering critical services in our current social climate. The impact on the Centre's users and its peaceful environment is a serious concern for

myself and many others.

The demolition could also lead to increased traffic, noise, and disruptions, negatively affecting both local residents and visitors to the Centre. It is essential that any development in the area supports, rather than detracts from, the community's key landmarks and institutions.

I strongly urge you to reconsider this proposal and work with local residents and stakeholders to explore alternatives that respect the significance of St. Ethelburga's Centre while addressing modern needs.

Thank you for considering my concerns.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
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Case Officer: Amy Williams

Customer Details

Name: Ms Giedre Kleivaite

Address: [REDACTED] Canning Town London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: Dear Sirs,

I had recently attended a Spiritual Ecology Workshop Carousel at St Ethelburga's and felt really inspired by their heartfelt offerings and gathering. Their serene courtyard feels like such an oasis in busy central London and is important to protect! The work they deliver to build peace across divides is crucially important, especially amidst current world events and therefore extensive disruption and noise will have an adverse impact on their efforts.

I wish to object the proposed developments (Application number: 24/00836/FULEIA) based on the following:

- The disruptions caused by the development will severely impair the ability of the charity to operate, resulting in them not being able to offer crucial peacebuilding, conflict resolution, and interfaith dialogue events.
- Once completed, the development will obstruct the Centre's light, will increase damaging and unpleasant winds which will detrimentally impact the ambiance of the space and the quality of events offered at St Ethelburga's.

This great charity and their Grade 1 Listed building are under threat. Please reconsider this planning application.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr Michael Gibbs

Address: [REDACTED] Belfast

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: Dear Sir/Madam,

I am writing to formally object to the proposed development of 99 Bishopsgate.

St Ethelburga's is a vital institution, both culturally and spiritually, and plays an irreplaceable role in fostering peace, reconciliation, and interfaith dialogue. These functions are made possible by the unique, quiet, and serene environment that the Centre has cultivated over the years. However, the proposed development directly threatens the viability of this environment. The level of disruption anticipated from five to six years of demolition and construction-including noise, dust, vibrations, and general disturbance-would severely impair the Centre's ability to operate effectively during this period. Many of the events, workshops, and peacebuilding initiatives that the Centre runs could be

disrupted or even rendered impossible under such conditions.

Furthermore, the scale of the proposed development-specifically the significant increase in building height and the closer proximity of the upper storeys-poses additional long-term threats to the Centre. The reduction in natural light, coupled with increased wind turbulence, would drastically affect the ambiance of St Ethelburga's Peace Garden and the Centre's ability to offer a peaceful and welcoming space for reflection, dialogue, and reconciliation. This would not only harm the physical space but also diminish the quality of what St Ethelburga's can offer to the community.

The Centre provides a sacred space for peacebuilding, and it is vital that this is protected. The proposed development risks undermining not just the physical presence of the Centre, but also the profound impact it has on promoting peace and reconciliation in a time of global turmoil.

We respectfully urge you to consider the long-term implications of this development on such a critical institution and ask that you reject the current planning application.

Sincerely,
Michael Gibbs

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Noeline Sanders

Address: [REDACTED] Hatton Hill Windlesham

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I strongly object to the building of this new development and associated impact it will have on St Ethelburga's, which is one of the few remaining historical buildings that has provided a vital role to society over centuries. In the current context it was re-built after the IRA Bishopsgate bombings as a Centre for Reconciliation and Peace, providing a vital service/programmes of training for Community based conflict transformation, developing young leaders in reconciliation and peacemaking and interfaith dialogue events.

I was a trustee of the Centre from 2011 -2020. I know first hand of the work that has been successfully developed by the team and painstakingly implemented by the team over the years in

terms of impact and reaching a sustainable funding model.

I met with the team last week on St Ethelburga's feast day and heard first hand of the very real potential impact of the disruption on the Centre - namely, the 6 year new building works opposite could have on the ongoing viability of the Centre, as a result of a huge reduction to programmes and also the important funding source of the venue hire business.

Furthermore, once completed, it will obstruct the Centre's light, will increase damaging and unpleasant winds, and will detrimentally impact the ambiance of the space, the Peace Garden and the quality of what St Ethelburga offers

Right now, with so many conflicts happening around the world, not to mention the impact of ecologically driven conflict already developing, the work and programmes of St Eths is a beacon of practical action for peace building and resilience training.

As the very least, the developers need to most urgently compensate the St Ethelburgas centre for the loss of earnings and disruption to its programmes - financial compensation to be offered for the 6 year period of disruption envisaged, to mitigate against the loss of income in order to remain a 'going concern' and not to shut down.

I urge you to consider this with due care.

Comments for Planning Application 24/00836/FULEIA

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Mr Sir Tony Baldry

Address: [REDACTED] Bloxham

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: Application number 24/00836/FULEIA

I am writing in my capacity as Parish Clerk of St. Ethelburga's Bishopsgate.

As a previous Chair of the Trustees of the St. Ethelburga's Centre for Peace and Reconciliation and as a previous Chair of the Church Buildings Council, a statutory body that has responsibility for the care and maintenance of all 16,000 parish churches in England, including all of the Church of England's church buildings within the City of London.

The Corporation will be familiar with the history of St. Ethelburga's, a church building that goes back to Saxon times, one of the very few church buildings within the City that survived both the

Great Fire and the Blitz, but which tragically became collateral damage to an IRA lorry bomb attack on the City of London in the early 1990s.

Due to the leadership of the then Bishop of London and Cardinal Archbishop of Westminster, and the encouragement of our present King, St. Ethelburga's was rebuilt and restored as near as possible to its original design and became a Centre for Peace and Reconciliation.

St. Ethelburga's is still a consecrated church building, subject to faculty jurisdiction but today its main purpose is as a Centre for Peace and Reconciliation.

To fund its core activities, St. Ethelburga's lets out its space - the Nave, the garden and the Peace Tent at the rear of the church - for others to hire those spaces.

As you can imagine, these include events from conferences or meetings during the day to corporate dinners in the evening.

The income from these lettings is crucial to the sustainability and survival of St. Ethelburga's.

Also, much of the work of St. Ethelburga's is dependent upon St. Ethelburga's being as far as is possible an oasis of quiet in the hubbub of the City.

Not surprisingly, as against this background, the planning application for the extensive redevelopment of 99 Bishopsgate, less than 20 metres from St. Ethelburga's, a Grade One Listed building, is met with very serious concern as the prospect of several years demolition work followed by several years of construction work is likely to seriously threaten the viability and existence of St. Ethelburga's, one of the oldest churches in the City of London.

The disruption caused by the development will severely impair the ability of St. Ethelburga's to operate, resulting in St. Ethelburga's not being able to offer peace building, conflict resolution and interfaith dialogue at a time when such activities are perhaps most acutely needed in the world. If the development takes place, once completed it will seriously obstruct St. Ethelburga's light and increase new wind tunnels which will both damage the centre and the amenity of St. Ethelburga's, including the garden behind the church, which is a small oasis of calm in this part of the City of London.

The City of London has no shortage of skyscrapers but within the townscape there are a finite number of historic buildings, such as St. Ethelburga's, that help define the City's history and continuity. In addition, St. Ethelburga's seeks to assist the building of a cosmopolitan city where all feel welcomed and valued.

The sheer scale, size and duration of the proposed building works relating to the proposed rebuilding of 99 Bishopsgate are a very real threat to the existence and survival of St. Ethelburga's

as a church building and as an organisation serving the people of London.

It is much to be hoped that the Planning Committee in considering this application will not be insensitive to these very real concerns.

Rt. Hon. Sir Tony Baldry

Parish Clerk

St. Ethelburga's, Bishopsgate

Comments for Planning Application 24/00836/FULEIA

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Mr Anthony Bennett

Address: [REDACTED] London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have been over the course of the last twenty years been a frequent visitor to St Ethelburga's and a user of its services. I can therefore testify to the immense transformative effect this historic building and centre has had on its environs and community, and the threat posed by this development.

My objections are: Firstly) the extended nature of the construction work (up to six years) will necessarily have a destructive impact on the delicacy of the meditative nature of the space. For at least 700 years, this has been a "quiet space", allowing respite and reflection. The noise, shadow, physical obstruction and smoke generated by the build cannot help but destroy this calm. Secondly) Post build, the new build will have a heavily domineering presence on the activity of the space, blocking sunlight and casting much of the delicate work into darkness. Moreover, the garden space will be caught in a heightened wind tunnel, obstruct its light, increase damaging and

unpleasant winds, detrimentally impact the ambiance of the Garden and the quality of what St Ethelburga offers.

Lastly, beyond the practical and aesthetic, there is a significant cultural, historical, and spiritual importance of St Ethelburga's to the history of the City of London. When the building was first destroyed in the 1990s by bombing, there was an enlightened decision taken to reinstate the building to maintain what little was left of the medieval built environment. Given the in the new Museum of London, and the huge escalation of new skyscraper builds since the 1990s, it would seem to me that the we can ill afford to denigrate further any of the outstanding historic fabric, and that this new development will reverse the commitment to retain as much of the original character of the City of London as possible. Post pandemic, the City needs to diversify toward more leisure, touristic, leisure and heritage usage. The retention and respect of St Ethelburga cannot help but be a core part of this.

Comments for Planning Application 24/00836/FULEIA

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Mrs Laura Janner-Klausner

Address: [REDACTED] London London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

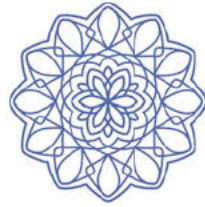
Comment Reasons:

Comment: As a senior Jewish Communal leader I'd like to voice my opposition to this development, the scale of which will unquestionably disrupt the work and essential viability of St Ethelberga's Centre for Peace and Reconciliation.

The Centre conducts vital work in addressing some of the toughest conflicts in our world. It's work is vital to maintaining dialogue within UK communities that are impacted by such conflicts and in so doing, the Centre makes a vital contribution to community cohesion in the UK.

The commercial benefits that may come from the proposed development need to be weighed against their impact on the Centre. The six year demolition and construction period will disrupt St Ethelberga's essential work, and endanger its crucial revenue from hosting events. It will also undermine the Centre's unique character as an oasis of calm in the City.

At the very least the Corporation should stipulate unequivocally that the developers compensate St Ethelburga's for the consequences of the disruption as a condition of Planning Permission, thus ensuring that the critical work of the Centre can continue and that should the proposed development go ahead and be completed, it will still have a thriving St Ethelburga as its close neighbour.



St Ethelburga's

Centre for Reconciliation and Peace

We are making an objection to the full application (ref. 24/00836/FULEIA) for a 53 storey (plus plant) high rise development at 99 Bishopsgate (hereafter referred to as 99 Bishopsgate and the "Development") directly opposite our centre, St Ethelburga's Centre for Reconciliation and Peace, at 78 Bishopsgate (hereafter referred to as "St Ethelburga's").

Summary

The proposed development, if allowed, will result in a range of significant negative impacts on St Ethelburga's, principally:

- An adverse impact on both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- Prevention of the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive this, a continued and long-term impact through impacts on the local microclimate and other environmental effects.

For the reasons set out in this objection, it is our view that the proposed development conflicts with policies of the development plan, and that these conflicts attract such significant weight as to outweigh any public benefits in favour of the scheme. We therefore urge the City of London Corporation, and the Mayor of London, to reject the planning application.

Without prejudice to this position, in the event that planning permission is resolved to be granted, we require the following safeguards to be imposed so as to minimise the impacts on St Ethelburga's:

- Direct support in offsetting the financial impact that the construction will have on St Ethelburga's.
- Investment in St Ethelburga's in recognition of its status as a unique and valuable cornerstone of local culture and heritage.
- Specialist consideration and surveying of the impact of wind and vibrations on our fragile and historic Grade 1 listed building.
- Specialist monitoring of vibrations and movement within our Grade 1 listed building. Likewise, specialist repair if required.
- Limitations on site working hours and noisy works so as to lessen the severity of disruption to St Ethelburga's; this would include especially strict limitations on site working hours and noisy works so as to avoid disruption to St Ethelburga's higher-value evening events (18.00 - 21.00) and Saturday events (10.00 - 16.00).
- Financial contributions to triple glazing to lessen the noise pollution caused by building works and protect St Ethelburga's historic windows.

- Regular cleaning of the windows and specialist cleaning of the stone facade, which will be affected by the dust from demolition and construction. Potentially redecoration of the bell tower if particularly affected.

About St Ethelburga's place in the City

St Ethelburga's, named after the first leader of a monastic order for women in England, was first recorded in 1250. It is a Grade 1 Listed Building which was one of only 8 City churches to survive the Great Fire of 1666. It also survived the Blitz and a major IRA bombing in 1993. It was proposed that St Ethelburga's be demolished after the bombing, but the public and influential figures in the City recognised the importance of the church and its role in the community and opposed demolition. St Ethelburga's was restored as a Centre for Reconciliation and Peace and the building was formally reopened by the then Prince, now King, Charles in 2002.

Since 2002, St Ethelburga's has been dedicated to reconciliation and peace. We run various programs focused on community reconciliation, peacebuilding, interfaith dialogue, refugee inclusion, spiritual ecology, and navigating climate and ecological crises. The foundation of all of our work is the symbolism and historic importance of St Ethelburga's as a place of peace and sanctuary. It has had a tangible impact on the lives of many of those with whom we have worked. It stands on ground that has been consecrated for at least 800 years. Our work relies on the peaceful, quiet, and secluded ambiance of our building.

The building and grounds

The following are the key elements that make up St Ethelburga's:

The Nave

The proposed development will be situated directly opposite the Nave of St Ethelburga's, which is located behind the historic facade and bell tower. The Nave is at the heart of the building and our work. It is here that we regularly run trainings, talks, workshops, and music events. We also offer this as an affordable venue for hire. It is an important space for dialogue, peace and reconciliation, and community building. For instance, in the wake of October 7th and subsequent events, the Nave was used by the Lord Mayor of London to bring together senior Jewish, Muslim, and Christian leaders.

The Peace Garden

The Peace Garden is a rare space of tranquillity in the heart of the City. It is open to the public and is a notable stop on city walking tours. The garden is ecologically diverse, containing ferns, roses, olive trees, and vines among other plants, and has won 'Flowers in the City' awards from The Worshipful Company of Gardeners. Its central fountain retains its original column and we believe it is the only working historic fountain in the City.

As well as benches and seating, the garden also contains a number of attractions for visitors who come to and enjoy the garden, including:

- A statue by Naomi Blake, who is known for her work reflecting her Holocaust experiences and for her vision of uniting faiths, building understanding between religions and her hope for the future;
- A plaque celebrating the reconciliation between the British and Japanese soldiers who fought each other in Burma;
- A memorial plaque to Edward Henty, who was killed in the 1993 bombing; and
- A Peace Pole, which is an internationally-recognized symbol of humanity's desire for peace and connects us with many other important locations across the globe.

People come and use the garden for many reasons: it provides the public and our community with a place to gather and meet, to take some time away from the surrounding busyness, to connect with nature and our wider humanity, and for contemplation and reflection in hard times.

The Bedouin Tent

The Bedouin Tent is situated in the courtyard of St Ethelburga's. It is woven with goat's hair and fitted with stained glass windows, hand carved doors, intricate metal work, and mosaic tiling. The Tent was conceived and constructed as a response to 9/11: it is a meeting of East and West and a place for non-hierarchical dialogue, where all perspectives are welcomed equally. The Eastern-style design contrasts the Western ecclesiastical architecture and highlights the need to build community across differences. This is reflected in the architecture of the tent, designed by Professor Keith Critchlow around the principles of sacred geometry. Its design carries a hint of the architecture of Al-Andalus, southern Spain, during the mediaeval period when Jews, Christians, and Muslims lived alongside each other, sharing the space and enriching each other's cultures. Each window in the Tent contains the word 'peace' in a different language, as well as the sun and the moon, symbolising reconciliation. The window designs also incorporate trees and seeds, illustrating the reconciliation needed between humanity and the Earth.

The Tent is an acutely important space which is used for many important events around peacebuilding and community building; it has often been used as a space to bring together senior Christian, Jewish, and Muslim leaders. Like the garden, the Tent, when not in use, is open to the public as a space of peace, contemplation and reflection.

Venue hire

We have a venue hire business which has been growing at a fast rate. We have been hiring out our venue at an affordable rate for weddings, parties, exhibitions, conferences, concerts, gatherings, and book launches. The income generated from this supports the grants and funding that we receive and goes into the running of our projects and the maintenance of our building. St Ethelburga's has been a significant and growing site of culture within Bishopsgate.

Projects

Since John Medows Rodwell, who was rector to St Ethelburga's between 1843 to 1900 and published one of the very earliest reliable translations of the Qur'an into English in 1861, first

envisioned our space as a place where all faiths are welcomed, St Ethelburga's has been known as a beacon of peaceful and constructive interfaith exchange within the heart of London and is a space in which Christian, Muslim, Buddhist, and Sikh prayers are regularly held. The proposed development threatens this vital work, which is even more valuable in our current political and geopolitical climate.

St Ethelburga's also acts as an educational centre. We regularly welcome school and university groups to supplement the curriculum and run educational programs and workshops on various themes, including the importance of peace and reconciliation, the role of interfaith encounter and religious diversity within our society, and how to navigate and respond to climate and ecological breakdown. We equip young people to be leaders and community builders, peacemakers, and reconcilers and we teach peace-making and reconciliation skills to community and faith leaders across a wide range of contexts. Further, we consistently seek to raise awareness of the plight of displaced people and build understanding between Londoners and refugees through the power of encounter. Alongside this, we also lead a coalition of 11 leading Christian peace organisations in curating a 9-month immersive and values-based leadership program called 'Journey of Hope'. We likewise often welcome international groups and provide a space for those involved in peace work, interfaith engagement and conflict resolution as well as those of the front lines of humanitarian crises and climate breakdown.

Cultural importance

St Ethelburga's is a thriving centre of culture within the City. We provide a vibrant community space with diverse events. For instance, our 'People of the Earth' events aim to strengthen UK communities by designing and co-creating events that bring people together across diverse cultures, faiths, and traditions. We have co-created and collaborated on events with partners such as Freedom from Torture, Paiwand Afghan Association, Camden Community Engagement, City of Sanctuary, Migrateful, and Islington Centre for Refugees and Migrants. We also host the charity Migrateful free of charge, who run cookery classes taught by refugees and migrants on their journey to integration.

Likewise, our regular 'Listen to the world' music series offers a space in which the cultural diversity of our city is meaningfully celebrated. Our performers have musical roots from across the world, from Nicaragua to Ukraine, Armenia to Sudan, and beyond. Our audience is global and intergenerational; we celebrate the traditions and talents of migrants, refugees, and asylum seekers, alongside local artists, and we often find our events are very emotional, as people are able to connect with a place of origin that is sorely missed or inaccessible due to the horrors of war, conflict, and starvation. These events are always free for guests who have sought, or who are seeking, sanctuary in the UK.

The harm that will be caused by the Development to St Ethelburga's

St Ethelburga's is situated approximately 20 metres from the site of the Development. The Development, if allowed, will result in a range of significant negative impacts which we set out below. Principle among these are our core concerns that:

- The Development will adversely impact both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- The Development will prevent the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive the period of building works, the completed Development will have a continued and long term impact through impacts on the local microclimate and other environmental effects.

Heritage impacts

Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC1 also states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. In addition, this policy states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials, and architectural detail.

London Plan Policy D9 (Tall Buildings) 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.

Policy CS10 (Design) of the City of London Local Plan 2015 (hereafter "Local Plan") seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. This includes ensuring that the bulk, height, scale, massing, quality of materials, and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

Local Plan Policy CS14 (Tall Buildings) requires proposals for tall buildings to consider the character and amenity of their surroundings, and the significance of heritage assets and their settings. Neither of which appear to have been clearly addressed as part of this application in relation to St Ethelburga's.

Further, Local Plan Policy DM12.1 (managing change affecting all heritage assets and spaces) requires development to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

Our primary concern is in relation to the impact of the construction of the Development on the fabric of the Grade 1 Listed Building. The EIA for the Development records that the proposed works will cause 'adverse effect interactions in relation to noise, vibration and built heritage at St Ethelburga's Centre for Reconciliation and Peace. The effect interaction is considered to be significant'.

The Heritage, Townscape and Visual Impact Assessment (hereafter “HTVIA”), which forms part of the Environmental Statement volume 2, states at paragraph 7.2 that:

“In terms of heritage receptors, there would be significant cumulative effects ranging from moderate to major adverse as a result of demolition and construction works for the Proposed Development, in respect to the Bishopsgate Conservation Area, Bank Conservation Area, and the Church of St Botolph, the Church of St Ethelburga, the Cathedral Church of St Paul, and the Church of All Hallows. All effects would be temporary.”

Table 7.1 of the HTVIA goes on to set out that the sensitivity of the Church of St Ethelburga to construction is ‘high’ and both the ‘Significance of effect and nature of effect (short term-temporary)’ would be ‘Moderate, adverse, significant’ and that the ‘Significance and nature of effect (cumulative)’ will also be ‘Moderate, adverse, significant’.

We note that the HTVIA records the construction impact as being ‘temporary’, but neglects to identify that the temporary period will be at least six years (possibly longer), and in these terms fails to give sufficient weight to the impact of this effect.

Paragraph 7.32 of the HTVIA advises that construction effects will be mitigated through the *“...use of appropriate hoarding. Site lighting would be designed to minimise light pollution on the surroundings of the Site, using light sources of the minimum intensity required and ensuring that light is only used where needed.”*

Respectfully, these measures appear to be wholly inadequate to protect the historic fabric of a building, parts of which date back over 800 years. We would like to draw to the Corporation’s attention that following a meeting with the developer on 26th September 2024, it appears that the development modelling that has been done has not properly considered the unique fragility of St Ethelburga’s, nor its Grade 1 listed status. We are concerned that the fabric of St Ethelburga’s will not be able to withstand the extended periods of vibration from drilling, deep excavation, piling, use of other heavy machinery, and general construction work that is described in the Construction and Environmental Management Plan (hereafter “CEMP”). Previous developments adjacent to St Ethelburga’s have caused significant shifts and cracks within the building. We are worried that St Ethelburga’s cannot physically survive further levels of stress. There is no information, as far as we can see, in the applicant’s submission documents that give us grounds to be assured on this point.

Clearly, should the construction have the significant adverse impact on the historic fabric of the building – and at present there is no evidence to demonstrate clearly that it will not – then it could, ultimately, result in the total loss of one of the City’s most important heritage assets, something which would be contrary to national and local planning policy and would afford the greatest weight against granting planning permission.

The HTVIA, at Table 11.1, describes St Ethelburga’s sensitivity to the effects of the development as ‘high’. This confirms that there will be a material adverse impact on the St Ethelburga’s that must be weighed in the planning balance against the granting of planning permission.

We note that the Planning Statement submitted with the application states the following at paragraph 8.11:

“Enhancement of the setting of the Guild Church of St Ethelburga the Virgin (Grade I) through the deliberate spatial separation between the Proposals and 55 Bishopsgate to enable clear sightlines toward the listed building”.

The HTVIA states that the significance of effect of the proposed development on St Ethelburga’s would be ‘Moderate Beneficial (Significant)’ in nature. The report considers that the effect would be beneficial due to the proposal’s high quality design, as well as its articulation of details.

The form and scale are utterly unsympathetic to St Ethelburga’s and the proposed works risk doing significant damage to the church. The Development will tower 253.5m (AOD) over St Ethelburga’s and poses an existential threat to our ability to function as a centre for reconciliation and peace. The existing building on the site is 28 storeys and the proposal seeks consent for a 53-storey building, which is a significant increase. This has not been clearly addressed as part of this application in relation to St Ethelburga’s.

We do not agree with the conclusions of the applicant’s heritage assessment and do not believe any strong argument has been made for the enhancement of the setting of St Ethelburga; rather, the proposed increase in density and scale on the site, from 28 storeys to 53 storeys, will harm the heritage asset. In accordance with Local Plan Policies CS10 and DM12.1, the Development must respect the setting of the building and character of the surrounding area.

The developer has not sought our views on how St Ethelburga’s could be integrated into proposals, early on in the design process or at all. The Development has been presented to us without genuine consultation or consideration.

Impact on the use of St Ethelburga’s

Use of the site as a cultural facility

Local Plan Policy CS11 aims to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation’s Visitor Strategy. This includes encouraging the use of places of worship, livery halls, and other venues for cultural events alongside their primary uses. As well as protecting existing cultural facilities where they are needed, ensuring there is no net loss of cultural facilities in the City. Further, Local Plan Policy DM11.1 seeks to resist the loss of existing visitor, arts and cultural facilities.

There is a clear emphasis in the London Plan and Local Plan policies on the importance of cultural facilities and their retention and protection. However, this does not appear to have been reflected in the planning application as the proposal will result in impacts on St Ethelburga’s and therefore the cultural services provided.

If the Development goes ahead, we would not be able to run our community building events because of the noise and disruption caused by the demolition and construction. Not only will the area lose an incredibly important aspect of its cultural capital if we cannot run these events, but we will also lose our funding and therefore be unable to care for our Grade 1 Listed Building.

None of this would be replicated by the proposed Open Gate building, which appears to be being offered as a replacement to the existing heritage, culture, environment, and diversity of the area. It seems to only replicate the already existing 'culture and arts programme' situated at 22 Bishopsgate. The Planning Statement (5.17) explains that this has been 'designed to celebrate local heritage' and invite 'a more diverse community to the area'. St Ethelburga's is a keystone of local heritage and nurturing and celebrating our diverse community is central to the work that we do. However, rather than investing in and celebrating St Ethelburga's, the Development poses an existential threat to the existence of St Ethelburga's and the very activities which result in successfully welcoming 'diverse community' into the area.

Construction impacts

Local Plan Policy DM15.7 (Noise and light pollution) requires that noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development. Local Plan Policy DM10.1 (New development) seeks to ensure that development does not cause unacceptable wind impacts at street level.

The programme for the proposed demolition and building work indicates that it will take at least 6 years to complete and probably longer given the extensions that are normal with major building works. Even if this does not physically damage the building, this would make the Nave of limited use and would severely disrupt or entirely prevent our projects from running. The vibrations of drilling, the noise of building and construction, the resultant pollution and dust, the effect on traffic, and the disruption to pavement traffic and accessibility are factors that would render it impossible to use this space during construction. It would lose its peaceful ambiance.

Many of our regular projects run within or overlap with the proposed site working hours of Monday to Friday 8.00 – 18.00 and Saturday 8.00 – 13.00. We are further concerned because we have heard suggestions that these working hours may be changed to Monday to Friday 9.00-19.00 and Saturday 9.00-14.00, which would significantly impact our evening events. The impact of 'noisy works' proposed to take place between 10.00 – 12.00 and 14.00 – 16.00 on weekdays would be destructive of events that we run, especially in the Nave but also in the Tent. The unpredictable "*extended working hours ... required for drilling and placing concrete for these piles*" (CEMP, p. 35), the pouring of concrete in the basement (CEMP, p. 36), and other out of hours working would also make it difficult for us to schedule any events free of the risk of disruption from the works. With the Nave and Tent incapacitated and their character disrupted, many of our projects, which benefit from the unique history and ambiance of the Nave and Tent, will not be able to run. This would result in St Ethelburga's losing funding and being unable to maintain the building.

The disruption, vibrations, and noise caused by the demolition and construction phases of the Development would result in us no longer being able to run our venue hire business. This would both be a loss to the culture of Bishopsgate and would also make it more difficult, if not impossible, to support our charity and St Ethelburga's building. All of this would be severely impacted by the Development.

As set out above, we regularly run peacebuilding workshops, interfaith dialogues, prayer, meditation and contemplation gatherings, and various other events within the Bedouin Tent. It is unlikely that we would be able to run any of these gatherings and events during the demolition and construction phases of the development. The noise and vibration would simply be too much. With this important space rendered impotent and unusable, our charity objectives and the running of our projects will be severely impacted. The Tent is the centre of much of our interfaith work and peacebuilding, areas in which St Ethelburga's has an important history.

The Development also threatens the character of the Peace Garden. During the demolition and construction phases of the Development, the effect of dust, vibrations, and noise pollution are liable to severely diminish, if not destroy, the Garden as a rare green space and a peaceful oasis for the community.

The submitted Framework Construction Logistics Plan and Outline Construction Management Plan do not provide any specific details or reassurance that St Ethelburga's will be appropriately protected during the demolition and construction period and impacts minimised, where possible. If the application was to be approved, we recommend a Construction and Environmental Management Plan be imposed which makes specific reference to protection measures for the St Ethelburga building.

Wind impacts

The Environmental Statement contains a wind microclimate report which identifies strong winds in Bishopsgate and a concentration of wind close to St Ethelburga's. We have noticed a wind tunnel effect between St Ethelburga's and the adjacent 100 Bishopsgate building. The wind force caused by the tunnelling effect has already caused significant damage to our building. We have been forced to board up one of the large windows in the Nave because it was buckling under the force of the wind. The Development will significantly extend the length of the Bishopsgate wind tunnel, increase winds, and threaten St Ethelburga's. We are concerned from our conversations with the developer and from the wind survey that wind modelling has not taken into account the fragility of our Grade 1 Listed Building, nor our unique situation.

The submitted Wind Microclimate Assessment identifies that there will be increased windiness within areas around Great St Helens and Bishopsgate which are already identified as areas where strong wind occurs. We urge the Corporation to ensure that the mitigation measures identified are sufficient, and conditioned appropriately. Further, once constructed, additional wind testing should take place to ensure the mitigation measures are working correctly and relevant wind levels are not being exceeded, with the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors.

Light impacts

The Development will be greatly increased in height and, aside from the first 4 storeys, will be closer to our centre. We believe that proper consideration has not been made for our rights of light. We will be overshadowed and the fragile ambiance of St Ethelburga's will be severely impacted. This will affect specific events and long-term projects, such as our workshops on connecting with nature (which will be much harder to run in the absence of natural light) as well as negatively affect our day to day operations and likely threaten the health of the Peace Garden.

The effect on our site has been excluded from the Limited Daylight Survey and we have not been considered in the Radiance-based MDF analysis and report. The Planning Statement (7.202) asserts that there will be a 'negligible' (not significant) effect on St Ethelburga's, however this is still an impact. Once completed, the compounding effect of the wind tunnel and the obstruction of light from the new development towering over our space would permanently change the nature of St Ethelburga's.

Ecology and biodiversity Impacts

Although the planning application refers to improving ecology and biodiversity by introducing spaces and trees, no comment has been made about the destruction of existing ecology and biodiversity, a key site of which can be found in our garden. Outside our site, the Development will have an impact on the Ginkgo tree next to the Development, which is the only tree in the local streetscape. The developer's proposed plan is to screen it from above and at ground level and carry on construction around it. No proper consideration seems to have been given to the prospects of this tree over 6 years of development. Having observed the effect of other developments in Bishopsgate on the natural environment, we would not expect this tree to survive.

Conclusion

We believe that the developer has not recognised the cultural importance and historic value of St Ethelburga's, nor the potentially devastating consequences of their development on our building and work. By way of clear example, the CEMP (p. 23) names St Ethelburga's as a key stakeholder for local engagement and our activity is listed as 'Hospitality - Event Space', which does not accurately represent the activity of our organisation and building. The developer and its advisers have failed to recognise the importance of the heritage of St Ethelburga's, the sensitivity of the building to development, and the work we do.

Demolition work at 99 Bishopsgate is intended to commence in April 2026 and will create a level of disturbance, nuisance, noise, dust, and vibrations for the first 2 years of demolition and basement works. There will then be a further 3 or 4 years of construction work, which will make the continuation of our charitable activities, trainings, public talks, consultancy, faith and cultural events impossible. Without exception these activities require a quiet and peaceful environment and also depend on our reputation and iconic value of an oasis of calm in the City. Such circumstances will result in the loss of most of our funding. Furthermore, the aforementioned disturbances will render the venue hire business unworkable, thus destroying the charity's means to support itself and pay for the upkeep of

our Grade 1 Listed Building. In this scenario, St Ethelburga's would likely cease to exist and the City of London will therefore lose a priceless space of historic and cultural value which is a cornerstone of the character of the local area.

The developer's application does not appropriately respond to London Plan Policies D9, HC1 or HC5 or Local Plan Policies CS10, DM10.1, DM11.1, DM12.1 or DM15.7. In addition, when considering the planning balance, the proposed development will result in the following impacts on St Ethelburga's which are material considerations:

- Unreasonable disturbance, nuisance, noise, dust, and vibrations during the demolition and construction period;
- The proposal does not protect St Ethelburga's and rather jeopardises it's function and useability as an important cultural venue;
- Increased windiness within areas around Great St Helens and Bishopsgate which has the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors; and
- Failure to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

St Ethelburga's and the work that we do reflects the very best of the City and remains true to its ancient purpose: we continue to offer a space for connection with the sacred and with our deepest human values, protecting them against erosion. We are not opposed to progress or change - indeed responding constructively and in the interests of our community to progress, change, and crisis are at the heart of our mission and history. However, for the reasons set out in this objection, the Development will irrevocably disfigure and devastate St Ethelburga's.

We urge the Corporation to consider the concerns raised in this objection and ensure that these are appropriately addressed as part of any further application documentation and, if approval is granted, conditioned accordingly.

Yours sincerely,



Clare Martin

Co-Director



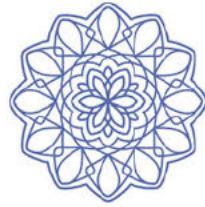
Tarot Couzyn

Co-Director

St Ethelburga's Centre for Reconciliation and Peace, 78 Bishopsgate, London, EC2N 4AG

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St Ethelburga's

Centre for Reconciliation and Peace

We are making an objection to the full application (ref. 24/00836/FULEIA) for a 53 storey (plus plant) high rise development at 99 Bishopsgate (hereafter referred to as 99 Bishopsgate and the "Development") directly opposite our centre, St Ethelburga's Centre for Reconciliation and Peace, at 78 Bishopsgate (hereafter referred to as "St Ethelburga's").

Summary

The proposed development, if allowed, will result in a range of significant negative impacts on St Ethelburga's, principally:

- An adverse impact on both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- Prevention of the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive this, a continued and long-term impact through impacts on the local microclimate and other environmental effects.

For the reasons set out in this objection, it is our view that the proposed development conflicts with policies of the development plan, and that these conflicts attract such significant weight as to outweigh any public benefits in favour of the scheme. We therefore urge the City of London Corporation, and the Mayor of London, to reject the planning application.

Without prejudice to this position, in the event that planning permission is resolved to be granted, we require the following safeguards to be imposed so as to minimise the impacts on St Ethelburga's:

- Direct support in offsetting the financial impact that the construction will have on St Ethelburga's.
- Investment in St Ethelburga's in recognition of its status as a unique and valuable cornerstone of local culture and heritage.
- Specialist consideration and surveying of the impact of wind and vibrations on our fragile and historic Grade 1 listed building.
- Specialist monitoring of vibrations and movement within our Grade 1 listed building. Likewise, specialist repair if required.
- Limitations on site working hours and noisy works so as to lessen the severity of disruption to St Ethelburga's; this would include especially strict limitations on site working hours and noisy works so as to avoid disruption to St Ethelburga's higher-value evening events (18.00 - 21.00) and Saturday events (10.00 - 16.00).
- Financial contributions to triple glazing to lessen the noise pollution caused by building works and protect St Ethelburga's historic windows.

- Regular cleaning of the windows and specialist cleaning of the stone facade, which will be affected by the dust from demolition and construction. Potentially redecoration of the bell tower if particularly affected.

About St Ethelburga's place in the City

St Ethelburga's, named after the first leader of a monastic order for women in England, was first recorded in 1250. It is a Grade 1 Listed Building which was one of only 8 City churches to survive the Great Fire of 1666. It also survived the Blitz and a major IRA bombing in 1993. It was proposed that St Ethelburga's be demolished after the bombing, but the public and influential figures in the City recognised the importance of the church and its role in the community and opposed demolition. St Ethelburga's was restored as a Centre for Reconciliation and Peace and the building was formally reopened by the then Prince, now King, Charles in 2002.

Since 2002, St Ethelburga's has been dedicated to reconciliation and peace. We run various programs focused on community reconciliation, peacebuilding, interfaith dialogue, refugee inclusion, spiritual ecology, and navigating climate and ecological crises. The foundation of all of our work is the symbolism and historic importance of St Ethelburga's as a place of peace and sanctuary. It has had a tangible impact on the lives of many of those with whom we have worked. It stands on ground that has been consecrated for at least 800 years. Our work relies on the peaceful, quiet, and secluded ambiance of our building.

The building and grounds

The following are the key elements that make up St Ethelburga's:

The Nave

The proposed development will be situated directly opposite the Nave of St Ethelburga's, which is located behind the historic facade and bell tower. The Nave is at the heart of the building and our work. It is here that we regularly run trainings, talks, workshops, and music events. We also offer this as an affordable venue for hire. It is an important space for dialogue, peace and reconciliation, and community building. For instance, in the wake of October 7th and subsequent events, the Nave was used by the Lord Mayor of London to bring together senior Jewish, Muslim, and Christian leaders.

The Peace Garden

The Peace Garden is a rare space of tranquillity in the heart of the City. It is open to the public and is a notable stop on city walking tours. The garden is ecologically diverse, containing ferns, roses, olive trees, and vines among other plants, and has won 'Flowers in the City' awards from The Worshipful Company of Gardeners. Its central fountain retains its original column and we believe it is the only working historic fountain in the City.

As well as benches and seating, the garden also contains a number of attractions for visitors who come to and enjoy the garden, including:

- A statue by Naomi Blake, who is known for her work reflecting her Holocaust experiences and for her vision of uniting faiths, building understanding between religions and her hope for the future;
- A plaque celebrating the reconciliation between the British and Japanese soldiers who fought each other in Burma;
- A memorial plaque to Edward Henty, who was killed in the 1993 bombing; and
- A Peace Pole, which is an internationally-recognized symbol of humanity's desire for peace and connects us with many other important locations across the globe.

People come and use the garden for many reasons: it provides the public and our community with a place to gather and meet, to take some time away from the surrounding busyness, to connect with nature and our wider humanity, and for contemplation and reflection in hard times.

The Bedouin Tent

The Bedouin Tent is situated in the courtyard of St Ethelburga's. It is woven with goat's hair and fitted with stained glass windows, hand carved doors, intricate metal work, and mosaic tiling. The Tent was conceived and constructed as a response to 9/11: it is a meeting of East and West and a place for non-hierarchical dialogue, where all perspectives are welcomed equally. The Eastern-style design contrasts the Western ecclesiastical architecture and highlights the need to build community across differences. This is reflected in the architecture of the tent, designed by Professor Keith Critchlow around the principles of sacred geometry. Its design carries a hint of the architecture of Al-Andalus, southern Spain, during the mediaeval period when Jews, Christians, and Muslims lived alongside each other, sharing the space and enriching each other's cultures. Each window in the Tent contains the word 'peace' in a different language, as well as the sun and the moon, symbolising reconciliation. The window designs also incorporate trees and seeds, illustrating the reconciliation needed between humanity and the Earth.

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envisioned our space as a place where all faiths are welcomed, St Ethelburga's has been known as a beacon of peaceful and constructive interfaith exchange within the heart of London and is a space in which Christian, Muslim, Buddhist, and Sikh prayers are regularly held. The proposed development threatens this vital work, which is even more valuable in our current political and geopolitical climate.

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Cultural importance

St Ethelburga's is a thriving centre of culture within the City. We provide a vibrant community space with diverse events. For instance, our 'People of the Earth' events aim to strengthen UK communities by designing and co-creating events that bring people together across diverse cultures, faiths, and traditions. We have co-created and collaborated on events with partners such as Freedom from Torture, Paiwand Afghan Association, Camden Community Engagement, City of Sanctuary, Migrateful, and Islington Centre for Refugees and Migrants. We also host the charity Migrateful free of charge, who run cookery classes taught by refugees and migrants on their journey to integration.

Likewise, our regular 'Listen to the world' music series offers a space in which the cultural diversity of our city is meaningfully celebrated. Our performers have musical roots from across the world, from Nicaragua to Ukraine, Armenia to Sudan, and beyond. Our audience is global and intergenerational; we celebrate the traditions and talents of migrants, refugees, and asylum seekers, alongside local artists, and we often find our events are very emotional, as people are able to connect with a place of origin that is sorely missed or inaccessible due to the horrors of war, conflict, and starvation. These events are always free for guests who have sought, or who are seeking, sanctuary in the UK.

The harm that will be caused by the Development to St Ethelburga's

St Ethelburga's is situated approximately 20 metres from the site of the Development. The Development, if allowed, will result in a range of significant negative impacts which we set out below. Principle among these are our core concerns that:

- The Development will adversely impact both the historic fabric and the setting of a Grade 1 Listed Building, with a very real risk of structural damage being caused to the building;
- The Development will prevent the continued use of St Ethelburga's as a Centre for Reconciliation and Peace because of the extensive and significant demolition and construction process which is scheduled to last at least six years;
- In the event that the St Ethelburga's Centre for Reconciliation and Peace is able to survive the period of building works, the completed Development will have a continued and long term impact through impacts on the local microclimate and other environmental effects.

Heritage impacts

Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy HC1 also states that development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. In addition, this policy states that development affecting heritage assets and their setting should conserve their significance, by being sympathetic to their form, scale, materials, and architectural detail.

London Plan Policy D9 (Tall Buildings) 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.

Policy CS10 (Design) of the City of London Local Plan 2015 (hereafter "Local Plan") seeks to promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment. This includes ensuring that the bulk, height, scale, massing, quality of materials, and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

Local Plan Policy CS14 (Tall Buildings) requires proposals for tall buildings to consider the character and amenity of their surroundings, and the significance of heritage assets and their settings. Neither of which appear to have been clearly addressed as part of this application in relation to St Ethelburga's.

Further, Local Plan Policy DM12.1 (managing change affecting all heritage assets and spaces) requires development to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

Our primary concern is in relation to the impact of the construction of the Development on the fabric of the Grade 1 Listed Building. The EIA for the Development records that the proposed works will cause 'adverse effect interactions in relation to noise, vibration and built heritage at St Ethelburga's Centre for Reconciliation and Peace. The effect interaction is considered to be significant'.

The Heritage, Townscape and Visual Impact Assessment (hereafter “HTVIA”), which forms part of the Environmental Statement volume 2, states at paragraph 7.2 that:

“In terms of heritage receptors, there would be significant cumulative effects ranging from moderate to major adverse as a result of demolition and construction works for the Proposed Development, in respect to the Bishopsgate Conservation Area, Bank Conservation Area, and the Church of St Botolph, the Church of St Ethelburga, the Cathedral Church of St Paul, and the Church of All Hallows. All effects would be temporary.”

Table 7.1 of the HTVIA goes on to set out that the sensitivity of the Church of St Ethelburga to construction is ‘high’ and both the ‘Significance of effect and nature of effect (short term-temporary)’ would be ‘Moderate, adverse, significant’ and that the ‘Significance and nature of effect (cumulative)’ will also be ‘Moderate, adverse, significant’.

We note that the HTVIA records the construction impact as being ‘temporary’, but neglects to identify that the temporary period will be at least six years (possibly longer), and in these terms fails to give sufficient weight to the impact of this effect.

Paragraph 7.32 of the HTVIA advises that construction effects will be mitigated through the *“...use of appropriate hoarding. Site lighting would be designed to minimise light pollution on the surroundings of the Site, using light sources of the minimum intensity required and ensuring that light is only used where needed.”*

Respectfully, these measures appear to be wholly inadequate to protect the historic fabric of a building, parts of which date back over 800 years. We would like to draw to the Corporation’s attention that following a meeting with the developer on 26th September 2024, it appears that the development modelling that has been done has not properly considered the unique fragility of St Ethelburga’s, nor its Grade 1 listed status. We are concerned that the fabric of St Ethelburga’s will not be able to withstand the extended periods of vibration from drilling, deep excavation, piling, use of other heavy machinery, and general construction work that is described in the Construction and Environmental Management Plan (hereafter “CEMP”). Previous developments adjacent to St Ethelburga’s have caused significant shifts and cracks within the building. We are worried that St Ethelburga’s cannot physically survive further levels of stress. There is no information, as far as we can see, in the applicant’s submission documents that give us grounds to be assured on this point.

Clearly, should the construction have the significant adverse impact on the historic fabric of the building – and at present there is no evidence to demonstrate clearly that it will not – then it could, ultimately, result in the total loss of one of the City’s most important heritage assets, something which would be contrary to national and local planning policy and would afford the greatest weight against granting planning permission.

The HTVIA, at Table 11.1, describes St Ethelburga’s sensitivity to the effects of the development as ‘high’. This confirms that there will be a material adverse impact on the St Ethelburga’s that must be weighed in the planning balance against the granting of planning permission.

We note that the Planning Statement submitted with the application states the following at paragraph 8.11:

“Enhancement of the setting of the Guild Church of St Ethelburga the Virgin (Grade I) through the deliberate spatial separation between the Proposals and 55 Bishopsgate to enable clear sightlines toward the listed building”.

The HTVIA states that the significance of effect of the proposed development on St Ethelburga’s would be ‘Moderate Beneficial (Significant)’ in nature. The report considers that the effect would be beneficial due to the proposal’s high quality design, as well as its articulation of details.

The form and scale are utterly unsympathetic to St Ethelburga’s and the proposed works risk doing significant damage to the church. The Development will tower 253.5m (AOD) over St Ethelburga’s and poses an existential threat to our ability to function as a centre for reconciliation and peace. The existing building on the site is 28 storeys and the proposal seeks consent for a 53-storey building, which is a significant increase. This has not been clearly addressed as part of this application in relation to St Ethelburga’s.

We do not agree with the conclusions of the applicant’s heritage assessment and do not believe any strong argument has been made for the enhancement of the setting of St Ethelburga; rather, the proposed increase in density and scale on the site, from 28 storeys to 53 storeys, will harm the heritage asset. In accordance with Local Plan Policies CS10 and DM12.1, the Development must respect the setting of the building and character of the surrounding area.

The developer has not sought our views on how St Ethelburga’s could be integrated into proposals, early on in the design process or at all. The Development has been presented to us without genuine consultation or consideration.

Impact on the use of St Ethelburga’s

Use of the site as a cultural facility

Local Plan Policy CS11 aims to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation’s Visitor Strategy. This includes encouraging the use of places of worship, livery halls, and other venues for cultural events alongside their primary uses. As well as protecting existing cultural facilities where they are needed, ensuring there is no net loss of cultural facilities in the City. Further, Local Plan Policy DM11.1 seeks to resist the loss of existing visitor, arts and cultural facilities.

There is a clear emphasis in the London Plan and Local Plan policies on the importance of cultural facilities and their retention and protection. However, this does not appear to have been reflected in the planning application as the proposal will result in impacts on St Ethelburga’s and therefore the cultural services provided.

If the Development goes ahead, we would not be able to run our community building events because of the noise and disruption caused by the demolition and construction. Not only will the area lose an incredibly important aspect of its cultural capital if we cannot run these events, but we will also lose our funding and therefore be unable to care for our Grade 1 Listed Building.

None of this would be replicated by the proposed Open Gate building, which appears to be being offered as a replacement to the existing heritage, culture, environment, and diversity of the area. It seems to only replicate the already existing 'culture and arts programme' situated at 22 Bishopsgate. The Planning Statement (5.17) explains that this has been 'designed to celebrate local heritage' and invite 'a more diverse community to the area'. St Ethelburga's is a keystone of local heritage and nurturing and celebrating our diverse community is central to the work that we do. However, rather than investing in and celebrating St Ethelburga's, the Development poses an existential threat to the existence of St Ethelburga's and the very activities which result in successfully welcoming 'diverse community' into the area.

Construction impacts

Local Plan Policy DM15.7 (Noise and light pollution) requires that noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development. Local Plan Policy DM10.1 (New development) seeks to ensure that development does not cause unacceptable wind impacts at street level.

The programme for the proposed demolition and building work indicates that it will take at least 6 years to complete and probably longer given the extensions that are normal with major building works. Even if this does not physically damage the building, this would make the Nave of limited use and would severely disrupt or entirely prevent our projects from running. The vibrations of drilling, the noise of building and construction, the resultant pollution and dust, the effect on traffic, and the disruption to pavement traffic and accessibility are factors that would render it impossible to use this space during construction. It would lose its peaceful ambiance.

Many of our regular projects run within or overlap with the proposed site working hours of Monday to Friday 8.00 – 18.00 and Saturday 8.00 – 13.00. We are further concerned because we have heard suggestions that these working hours may be changed to Monday to Friday 9.00-19.00 and Saturday 9.00-14.00, which would significantly impact our evening events. The impact of 'noisy works' proposed to take place between 10.00 – 12.00 and 14.00 – 16.00 on weekdays would be destructive of events that we run, especially in the Nave but also in the Tent. The unpredictable "*extended working hours ... required for drilling and placing concrete for these piles*" (CEMP, p. 35), the pouring of concrete in the basement (CEMP, p. 36), and other out of hours working would also make it difficult for us to schedule any events free of the risk of disruption from the works. With the Nave and Tent incapacitated and their character disrupted, many of our projects, which benefit from the unique history and ambiance of the Nave and Tent, will not be able to run. This would result in St Ethelburga's losing funding and being unable to maintain the building.

The disruption, vibrations, and noise caused by the demolition and construction phases of the Development would result in us no longer being able to run our venue hire business. This would both be a loss to the culture of Bishopsgate and would also make it more difficult, if not impossible, to support our charity and St Ethelburga's building. All of this would be severely impacted by the Development.

As set out above, we regularly run peacebuilding workshops, interfaith dialogues, prayer, meditation and contemplation gatherings, and various other events within the Bedouin Tent. It is unlikely that we would be able to run any of these gatherings and events during the demolition and construction phases of the development. The noise and vibration would simply be too much. With this important space rendered impotent and unusable, our charity objectives and the running of our projects will be severely impacted. The Tent is the centre of much of our interfaith work and peacebuilding, areas in which St Ethelburga's has an important history.

The Development also threatens the character of the Peace Garden. During the demolition and construction phases of the Development, the effect of dust, vibrations, and noise pollution are liable to severely diminish, if not destroy, the Garden as a rare green space and a peaceful oasis for the community.

The submitted Framework Construction Logistics Plan and Outline Construction Management Plan do not provide any specific details or reassurance that St Ethelburga's will be appropriately protected during the demolition and construction period and impacts minimised, where possible. If the application was to be approved, we recommend a Construction and Environmental Management Plan be imposed which makes specific reference to protection measures for the St Ethelburga building.

Wind impacts

The Environmental Statement contains a wind microclimate report which identifies strong winds in Bishopsgate and a concentration of wind close to St Ethelburga's. We have noticed a wind tunnel effect between St Ethelburga's and the adjacent 100 Bishopsgate building. The wind force caused by the tunnelling effect has already caused significant damage to our building. We have been forced to board up one of the large windows in the Nave because it was buckling under the force of the wind. The Development will significantly extend the length of the Bishopsgate wind tunnel, increase winds, and threaten St Ethelburga's. We are concerned from our conversations with the developer and from the wind survey that wind modelling has not taken into account the fragility of our Grade 1 Listed Building, nor our unique situation.

The submitted Wind Microclimate Assessment identifies that there will be increased windiness within areas around Great St Helens and Bishopsgate which are already identified as areas where strong wind occurs. We urge the Corporation to ensure that the mitigation measures identified are sufficient, and conditioned appropriately. Further, once constructed, additional wind testing should take place to ensure the mitigation measures are working correctly and relevant wind levels are not being exceeded, with the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors.

Light impacts

The Development will be greatly increased in height and, aside from the first 4 storeys, will be closer to our centre. We believe that proper consideration has not been made for our rights of light. We will be overshadowed and the fragile ambiance of St Ethelburga's will be severely impacted. This will affect specific events and long-term projects, such as our workshops on connecting with nature (which will be much harder to run in the absence of natural light) as well as negatively affect our day to day operations and likely threaten the health of the Peace Garden.

The effect on our site has been excluded from the Limited Daylight Survey and we have not been considered in the Radiance-based MDF analysis and report. The Planning Statement (7.202) asserts that there will be a 'negligible' (not significant) effect on St Ethelburga's, however this is still an impact. Once completed, the compounding effect of the wind tunnel and the obstruction of light from the new development towering over our space would permanently change the nature of St Ethelburga's.

Ecology and biodiversity Impacts

Although the planning application refers to improving ecology and biodiversity by introducing spaces and trees, no comment has been made about the destruction of existing ecology and biodiversity, a key site of which can be found in our garden. Outside our site, the Development will have an impact on the Ginkgo tree next to the Development, which is the only tree in the local streetscape. The developer's proposed plan is to screen it from above and at ground level and carry on construction around it. No proper consideration seems to have been given to the prospects of this tree over 6 years of development. Having observed the effect of other developments in Bishopsgate on the natural environment, we would not expect this tree to survive.

Conclusion

We believe that the developer has not recognised the cultural importance and historic value of St Ethelburga's, nor the potentially devastating consequences of their development on our building and work. By way of clear example, the CEMP (p. 23) names St Ethelburga's as a key stakeholder for local engagement and our activity is listed as 'Hospitality - Event Space', which does not accurately represent the activity of our organisation and building. The developer and its advisers have failed to recognise the importance of the heritage of St Ethelburga's, the sensitivity of the building to development, and the work we do.

Demolition work at 99 Bishopsgate is intended to commence in April 2026 and will create a level of disturbance, nuisance, noise, dust, and vibrations for the first 2 years of demolition and basement works. There will then be a further 3 or 4 years of construction work, which will make the continuation of our charitable activities, trainings, public talks, consultancy, faith and cultural events impossible. Without exception these activities require a quiet and peaceful environment and also depend on our reputation and iconic value of an oasis of calm in the City. Such circumstances will result in the loss of most of our funding. Furthermore, the aforementioned disturbances will render the venue hire business unworkable, thus destroying the charity's means to support itself and pay for the upkeep of

our Grade 1 Listed Building. In this scenario, St Ethelburga's would likely cease to exist and the City of London will therefore lose a priceless space of historic and cultural value which is a cornerstone of the character of the local area.

The developer's application does not appropriately respond to London Plan Policies D9, HC1 or HC5 or Local Plan Policies CS10, DM10.1, DM11.1, DM12.1 or DM15.7. In addition, when considering the planning balance, the proposed development will result in the following impacts on St Ethelburga's which are material considerations:

- Unreasonable disturbance, nuisance, noise, dust, and vibrations during the demolition and construction period;
- The proposal does not protect St Ethelburga's and rather jeopardises its function and useability as an important cultural venue;
- Increased windiness within areas around Great St Helens and Bishopsgate which has the potential to cause damage to St Ethelburga's and general discomfort for pedestrians and visitors; and
- Failure to respect the significance, character, scale, and amenities of surrounding heritage assets and spaces and their settings.

St Ethelburga's and the work that we do reflects the very best of the City and remains true to its ancient purpose: we continue to offer a space for connection with the sacred and with our deepest human values, protecting them against erosion. We are not opposed to progress or change - indeed responding constructively and in the interests of our community to progress, change, and crisis are at the heart of our mission and history. However, for the reasons set out in this objection, the Development will irrevocably disfigure and devastate St Ethelburga's.

We urge the Corporation to consider the concerns raised in this objection and ensure that these are appropriately addressed as part of any further application documentation and, if approval is granted, conditioned accordingly.

Yours sincerely,



Clare Martin

Co-Director



Tarot Couzyn

Co-Director

St Ethelburga's Centre for Reconciliation and Peace, 78 Bishopsgate, London, EC2N 4AG

www.stethelburgas.org

St Ethelburga's Centre for Reconciliation and Peace is a company limited by guarantee
Registered in England and Wales no: 6408424 and a registered charity no: 1121983

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Case Officer: Amy Williams

Customer Details

Name: Dr Joy Carter

Address: [REDACTED] Winchester

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: Highly concerned about the impact on St Ethelburga's Centre for Peace and Reconciliation.

The important work of the Centre requires a peaceful space. The length and nature of the proposed work is likely to make our building unusable.



16 October 2024

Dear Planning Committee

99 Bishopsgate London EC2M 3XD Ref. No: 24/00836/FULEIA

The MPGA is a long-established charity, founded in 1882, which has been involved in the London gardening world for over a century. It was set up to meet the need for public open spaces, including churchyards and burial grounds, as the urban population expanded. We keep a close eye on planning applications, the Green Belt and any parks and gardens under threat. It is therefore with great concern that we hear from our sister organisation St Ethelburga's Peace Garden of the likely exacerbation of wind tunnel effect and significant loss of light on its projects and facilities if re-construction of the tower at 99 Bishopsgate (adding an extra 100m in height) goes ahead.

We note from the MDF-based Radiance Report (document 24_00836_FULEIA-RADIANCE-BASED_MDF_REPORT-1556512.pdf) that consultants were not even asked to assess the impact of loss of light on St Ethelburga's. Perhaps that is because it is not a residential building and there is no methodology for assessing impact on this kind of facility that supports projects for peace and reconciliation. We also understand from St Ethelburga's that until a few weeks ago the planners were completely unaware that there is *already* wind tunnel effect, and that 'turbulence' has had a negative effect on the Grade 1-listed building, which dates back to 1411 and survived both the Great Fire of 1666 and the IRA bomb of 1993.

We very much hope and would urge that the GLA uses its powers to delay proceedings until a proper right to light assessment on the impact of the development on St Ethelburga's has been undertaken, and that sufficient time is granted for appropriate mitigation of all the negative effects (including wind and the several-years disruption of the construction phase) to be put in place.

As a general point we would urge the planners to consider the negative impact of yet another skyscraper (99 Bishopsgate would become the City's fifth tallest) on all workers and residents and faith communities in Shoreditch. In this part of the City only a handful of precious public open spaces such as St Ethelburga's Peace Garden remain. We must protect the few we have left.

Kind regards

*Rex Thornborough MStJ RD, Chairman
The Metropolitan Public Gardens Association
Registered Charity number 303330*

President: Hugh Johnson OBE

Vice Presidents:

The Dowager Marchioness of Salisbury

The Rt Rev & Rt Hon the Lord Bishop of London

The Master, The Worshipful Company of Gardeners

Viscount Davidson, Sir David Howard Bt, Wesley Kerr OBE

Christopher Woodward, Alastair Gould



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

Date: 17 October 2024
Your ref: 24/00836/FULEIA
Our ref: 303118.NEW
Direct: [REDACTED]
Email: [REDACTED]

By email to PLNComments@cityoflondon.gov.uk and by special delivery

Dear Mrs Williams

Planning Application 24/00836/FULEIA – 99 Bishopsgate London EC2M 3XD

1. Introduction

- 1.1 We have been instructed by The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London to advise in relation to the above planning application.
- 1.2 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:
- (a) [REDACTED] 7 St Helen's Place;
 - (b) [REDACTED] Great St Helens;
 - (c) [REDACTED] and [REDACTED] Bishopsgate;
 - (d) [REDACTED] Camomile Street; and
 - (e) [REDACTED] and [REDACTED] St Mary Axe.
- 1.3 We have undertaken a review of the available information relating to the above planning application and we have substantive concerns as to the potentially adverse effect the proposed development could have on the levels of available light to the above properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.

2. Daylight and Sunlight Impacts

- 2.1 Our client's property at 33 Great St Helen's (Daylight and Sunlight and Light Spillage) has been identified as sensitive receptors in Chapter 11 (Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage) of the Environmental Statement submitted with the application.

- 2.2 The Environmental Statement (Table 10.6) reports that at 33 Great St Helens, 10 windows (of a total of 11) and a total number of 4 rooms (of a total of 4) are expected to meet BRE Guidelines on daylight levels following the construction of the proposed development and any relevant cumulative schemes. As a consequence, a total of 1 window and 0 rooms would experience a greater than 20-29.9% reduction in daylight as a consequence of the proposed development.
- 2.3 The identified effect of the proposed development and other development schemes within the vicinity of 33 Great St Helens is of great concerns to our clients who have already experienced the detrimental impact upon the function, operation and amenity of their buildings due to overshadowing and the loss of daylight and sunlight. These concerns are reflected at Table 10.9 of the Environmental Statement.
- 2.4 When considered cumulatively, at 33 Great St Helen's, 9 windows (of a total of 11) and a total number of 4 rooms (of a total of 4) are expected to be below BRE Guidelines on daylight levels. Notably, the cumulative impact of neighbouring development will ensure that nearly 70% of the windows (8 out of 11 windows) of this residential property will experience a greater than 40% alteration in daylight levels when assessed against the BRE Guidelines following the construction of the proposed development. Similarly, the cumulative impact of neighbouring development will ensure that all of the rooms of this property will experience a greater than 40% alteration in daylight levels when assessed against the BRE Guidelines following the construction of the proposed development.
- 2.5 As the Environmental Statement concludes (see paragraph 10.272), this would result in a "major adverse impact" on the property and the overall effect on this property would be "significant". Whilst this establishes a clear planning harm, it is also an infringement of private law rights to light by creating a substantial interference with the use and enjoyment of our client's properties.
- 2.6 We have yet to conclude our detailed impact assessment of the proposed development and reserves our position in relation to these issues. We do, however, have serious concerns that 33 Great St Helens will experience a significant adverse impact as a result of the construction of another tall building in this area. As a consequence, the findings in the Environmental Statement show a clear risk that our client's enjoyment of their property will be materially affected.

For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.

Yours faithfully



EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP

Comments for Planning Application 24/00836/FULEIA

Application Summary

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Case Officer: Amy Williams

Customer Details

Name: Ms Theodora Cadbury

Address: [REDACTED] London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The disruptions caused by this development will severely impair the ability of nearby charity St Ethelburga's to operate. They are a vital national charity offering crucial peacebuilding, conflict resolution, and interfaith dialogue events - much of which will be near-impossible both due to the long-term noise and disruption to the site of many of its activities, and in terms of impact on income for activities on-site through disruption to venue revenue.

It's not only disruption during the development that concerns me. Once completed, the building will obstruct St Ethelburga's light, and will increase extreme winds (already increased due to other nearby developments). This will forever detrimentally impact the ambiance of the space, in particular the Peace Garden, and will make coming through the doors of St Ethelburga's to experience the quality of what the charity offers an unpleasant and distinctly un-peaceful experience.

I personally have experienced the deep cultural, historical, and spiritual importance of St

Ethelburga's, both as a site and a charity delivering such important work. The proposed development will impact this in such a way that I am not sure the centre will be able to continue doing its important work - and surely this is of greater importance than yet another high-rise building in central London.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Dr Mark Owen

Address: [REDACTED] Milford on Sea Lymington

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: It is clear this development will have a significant, and possibly disastrous, detrimental impact on St Ethelburga's Centre for Reconciliation and Peace. As a long time supporter, and collaborator (we have a formal partnership as the University of Winchester), St Ethelburga's has become an internationally renowned centre for peacebuilding and reconciliation knowledge and programming. Whilst in the short-term the development will have a devastating impact on the use of the Centre, and the funding to keep it running, in the longer term it will materially degrade the surroundings and ambience, undermining its ability to operate as a viable charity, and putting this vital peacebuilding centre at serious risk of closure at a time when it is arguably needed more than ever. Once completed, the currently proposed development will obstruct the Centre's light, will increase damaging and unpleasant winds, increase noise and footfall, and irreversibly degrade the Centre's amenities and environment. This is surely unacceptable, and against planning conditions.

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
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Case Officer: Amy Williams

Customer Details

Name: Miss Kelly Waugh

Address: [REDACTED] Torquay

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Traffic or Highways

Comment: This development would seriously affect a peace centre, which holds a note of faith, and creates connections within London, the UK, and also worldwide.

St. Ethelburga's is a historic site, and a unique venue of significant importance in London, which I feel deeply touched when attending the events held there, and the new people I meet.

The building of the new site, and its permanent structure would seriously impact St. Ethelburga's. It would impact its whole runnings during such a prolonged construction, with all that entails a large development, creating lengths of time when events would not be able to run. In the much longer term the building's beautiful gardens, and unique architecture would be affected by the

blocking of light by such a large structure in close proximity.

The city has many huge buildings with little to offer, but St. Ethelburga's is a small site of wonder, with no comparison and its loss would be a loss for the whole city!

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Susie Talbot

Address: [REDACTED] Landscope

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I'm writing to object to the proposed development given the detrimental and likely permanent impact on the operation of St Ethelburga's Centre for Reconciliation and Peace. This is a vital space in London for peaceful, quiet, public gatherings to address crucial UK and global challenges - any reduction in such services would negatively impact social cohesion in the UK at a time when such efforts are required more than ever, due to ecological-related anxiety, cost of living challenges and tensions related to conflicts in Europe. The proposed demolition and construction would have an immediate impact on the physical setting of an historical Grade I listed building and the financial ability of St Ethelburga's to operate, with severe impacts on its short-term and long-term viability as a charity. It is essential that diverse interests are respected and represented in all parts of London and that this location does not simply become an undifferentiated set of similarly built environment. Further, the environmental impact to the UK of

this unnecessary demolition and construction is not outweighed by private interests. I request that the City of London takes a long-term view of the social fabric of this location and rejects this proposal.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr John Woodhouse

Address: [REDACTED] South Norwood LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The disruptions caused by the development will severely impair the ability of St Ethelburga's charity to operate, resulting in them not being able to offer crucial peacebuilding, conflict resolution, and interfaith dialogue events (perhaps in a time when this is most acutely needed in the world).

The development, once completed, will obstruct the Centre's light, will increase damaging and unpleasant winds, and how this will detrimentally impact the ambiance of the space, our Peace Garden and the quality of what St Ethelburga offers.

I have found the centre to be a haven of peace in a troubled world. My experience has convinced me that because of the cultural, historical, and spiritual importance of St Ethelburga's, it is of vital importance. The proposed development threatens this.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Dr Justine Huxley

Address: [REDACTED] London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: This development should not go ahead. It will severely disrupt the operations of St Ethelburga's Centre for Reconciliation & Peace at 78 Bishopsgate. Their programme activities will be impossible during daytime hours. Once complete, the development will have a huge impact on the Centre's light, will create damaging and unpleasant winds, and how this will wreck the atmosphere and sacred nature of the space, and the Peace Garden, the Tent. What St Ethelburga's offers is entirely unique in the UK, and is deeply rooted in the place and the stories of the building and its history. They cannot simply hire other spaces to do their work - because firstly, their work is rooted in the location, and secondly because hiring venues is prohibitively expensive. The centre has iconic value - people who visit it and attend programmes comment on a regular basis that it is 'an oasis of peace' and that there is nowhere else in the UK offering this kind of

work, which is so much needed in our current times. The peacework is also dependent on an income stream from venue hire, which will mostly likely be slashed during the demolition and building period. Unrestricted income of this kind is essential to the charity's functioning and will make covering their costs extremely challenging. I was working at the Centre when Brookfield were responsible for the development at 100 Bishopsgate and St Ethelburga's was on the brink of going bankrupt because of it. Almost all the staff were made redundant - including myself - and it was years before the centre could offer the full potential of its peacework again. Having survived that and built the work and the venue hire income back up to what it was really worth, it would be a travesty if this development went ahead and risked the same thing all over again. In a country that is dangerously polarised, we cannot afford to lose this unique amenity. Besides which the development seems entirely unnecessary. The existing building is not old!

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Ms Jeanne Mynett

Address: [REDACTED] Catford London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have only just become aware of the threat that this new development right beside and towering over St. Ethelberga's poses to the very valuable work that their interfaith centre does both within and beyond the boundaries of the City of London. Understanding and co-operation between the different faiths in our country and across the world is a vital necessity at this time and St.E.'s has long and effective experience in this work. I have been present at several of their offerings and have benefitted from them in my own local interfaith involvement. The staff and users there are sure that their work will be curtailed and undermined both by the ongoing construction work, including its noise and disturbance to their premises, and the overwhelming presence of the tower block proposed so close to their unique Kurt and church building. It is a most valuable contribution to the City of London's culture and offering to the city and the whole country which these building plans threaten.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Mr Martin Weightman

Address: [REDACTED] Forest Row

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I submit this application as the Director of the All Faiths Network, an interfaith and religious freedom organisation active in the UK and elsewhere.

Whilst I understand the need for development, I consider this project detrimental to what is a higher and more important purpose and for which there is not a great deal of space given to such purpose in such a busy city environment.

I writing with regards to the disturbance it will cause to St Ethelburga's Centre for Reconciliation and Peace which is directly opposite the planned building. This is a place I have used in the past, including the courtyard which lends itself to talks and social events on summer days and is open to the elements (and obviously the dust and detritus in the air that may result from a building site). The work of the Centre depends on its relatively quiet and peaceful nature in the middle of the city and there will be a great deal of disruption over the 5 -6 years it will take for the building to be

completed. The final building is also likely to block light from the Centre which again will detract from its value as a place of meeting.

The Centre is a beautiful and important landmark and is a centre for events that aim to create peace and harmony in a world that is sorely in need of it. The planned building would be a distraction and imposition on the purpose of the Centre

It is for these reasons that I oppose the planned building.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Sue Nicholls

Address: [REDACTED] Kendal

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am a supporter of St Ethelburga's opposite the proposed work. This is a place of peace and reconciliation- much needed in this time. A place of beauty and stillness and a Grade I listed building. The proposed work would impact the building's light and may prove the building unusable for extended periods meaning projects would be cancelled. I strongly oppose this disruptive building work.

Comments for Planning Application 24/00836/FULEIA

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Case Officer: Amy Williams

Customer Details

Name: Dr Patrick Elf

Address: [REDACTED] London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Having worked with St Ethelburga's to understand their positive impacts on the community through their numerous programmes, I can say that our research showed the far-reaching positive impact they have on their communities' wellbeing.

This planned project will severely impair the ability of the charity to operate in the way that currently allows them to have said impact on many members of society.

I would therefore urge you to take into consideration the crucial contribution St Ethelburga's makes to London, its people and beyond!

Date: 25 October 2024
Your Ref: 24/00836/FULEIA
Our Ref: 17826

DWD

69 Carter Lane
London
EC4V 5EQ

Ms. Amy Williams
City of London Corporation
Guildhall
Aldermanbury
London
EC2V 7HH

Dear Amy,

LETTER OF OBJECTION –PLANNING APPLICATION REF. 24/00836/FULEIA AT 99 BISHOPSGATE LONDON EC2M 3XD

DWD has been instructed to write to you on behalf of the London Diocesan Fund (LDF), to submit representations **objecting** to planning application reference 24/00836/FULEIA at 99 Bishopsgate, London, EC2M 1RP (the Development Site). The application has been submitted to the City of London and proposes the following development:

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

This letter has been prepared to set out our client's concerns with regards principally to three churches which are part of the Anglican Diocese of London that are proximate to the Development Site:

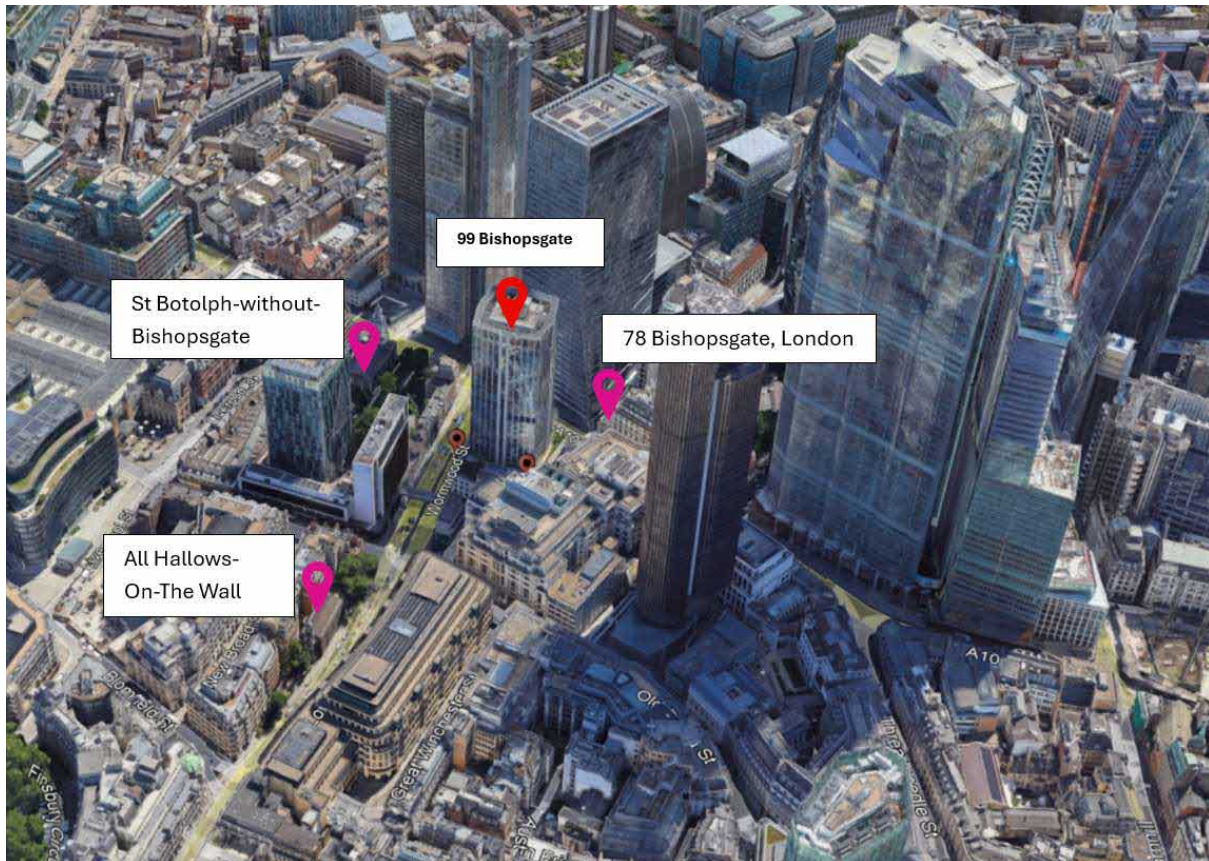
1. St Ethelburga's Church, 78 Bishopsgate, London EC2N 4AG (St Ethelburga's);
2. St Botolph-without-Bishopsgate, London EC2M 3TL and St Botolph's Church Hall (St Botolph);
and
3. All Hallows-On-The Wall, 83 London Wall, London EC2M 5ND (All Hallows).

The concerns primarily relate to the scale and massing of the proposed development, daylight and sunlight impact, the heritage impact, the public realm works and the construction phase.

Our client does not object to the principle of the development or to the wider regeneration benefits it will bring to the local community and public realm. Notwithstanding this, our client wants to ensure that the heritage significance of these churches and the use of the churches are not compromised by the proposed development.

Below is a Google Earth view of the Development Site. It shows the Development Site in relation to our client's properties.

Locations of Churches in relation to 99 Bishopsgate



A brief summary of each of the churches is provided below:

St Ethelburga's Church, 78 Bishopsgate (St Ethelburga's)

78 Bishopsgate also known as St Ethelburga the Virgin is a **Grade I listed building** one of the principal heritage assets of the St Helen's Place Conservation Area. It is now the home to St Ethelburga's Centre for Reconciliation and Peace, a space offering community services across a range of topics including life coaching, climate change, and societal issues. The church also hosts community events and is available for venue hire. St Ethelburga's is located in the **St Helen's Place Conservation Area** and is located less than 50m to the Southeast of the Development Site. St Ethelburga is a medieval church and was first recorded in 1250 as the church of St Adelburga-the-Virgin.

St Ethelburga's Centre for Reconciliation run various programs focused on community reconciliation, peacebuilding, interfaith dialogue, radical resilience, spiritual ecology, and navigating climate and ecological crises and breakdown. The foundation of all their work is the symbolism and historic importance of St Ethelburga's as a place of peace and sanctuary.

The proposed development will be situated directly opposite the Nave of St Ethelburga's, which is located behind the historic facade and bell tower. The Development Site is situated directly opposite the Nave of St Ethelburga's, which is where the Centre regularly run trainings, talks, workshops and music events.

To the rear of the church building is the Peace Garden. This is an ecologically diverse space of tranquillity in the heart of the City. The Garden is open to the public and is a notable stop on city walking tours.

St Botolph-without-Bishopsgate (St Botolph)

St Botolph-without-Bishopsgate is located further to the North on the Western side of Bishopsgate Road. It is located approximately 70 meters from the development site. The building is **Grade II* listed** and located in the **Bishopsgate Conservation Area**. The building hosts community events, church services and other events/ activities associated with the church. The building is also home to 'The Good Coffee Kiosk' coffee shop selling ethically sourced coffee, which donates its proceeds for good causes. Additionally, different parts of the premises including the church itself are available for hire.

The church's origin date back to 1212. It was rebuilt in 1729 to a design by Nathaniel Dance the Elder, a very important architect who shaped the City during the early modern period. St Botolph's churchyard also was the City's first burial grounds that was landscaped into a public garden, it is one of the major green space within the City, and is a significant public amenity. As open space with seating and tennis courts it is very heavily used by the general public.

To the west of the church building is the St Botolph's Church Hall, which is **Grade II listed**. The listing description for this property advises that it is dated 1861 and comprises a single storeyed classical building in red brick and Portland stone with pedimented end to slated roof. Where this letter refers to St Botolph, it refers to both the church building and church hall.

All Hallows-On-The Wall (All Hallows)

The Guild Church of All Hallows-On-The Wall represents a 1767 rebuilding to a design by Nathaniel Dance the Younger, like his father, the surveyor for the Corporation and is a very significant figure. The present Guild Church replaced ancient 12th century building on the same site, reusing its Roman foundation. All Hallows is a Guild Church and is now home to City Gates Church which uses the church for services, as well as housing an urban youth charity named XLP. XLP which stands for the 'Excel Project' helps disadvantaged young people in London to set achievable goals and help build their future. The project focuses on people that experience anti-social behaviour at home and helps young people to stay out of gangs, providing a safe supportive environment.

The **Grade I listed building** sits approximately 85m Northwest of the Development Site on London Wall Road. It is located within the **New Broad Street Conservation Area**. With its high-level windows, the proposed development will have a very high impact on this remarkable church building.

In the next section of this letter we have provided comments on the planning application, having regard to each of the above 3 churches in the context of the proposed development and the Development Plan. The Development Plan comprises of The London Plan (March 2021) and the City of London Local Plan, adopted in 2015 (the LP). The National Planning Policy Framework (NPPF), published in December 2023, is also a material consideration in planning decisions.

Scale, Massing, Design, Daylight Sunlight and Wind Impact

The proposal introduces a 53-storey building in the City of London, positioned between our client's three churches. It is considered that the proposed development will have a harmful impact on the churches as it will dwarf them, harm their setting and overshadow the premises. We have considered each of these concerns in further detail below.

Scale, Massing and Design

The substantial bulk and massing of the proposed development, beyond the existing building, which will extend close to the street along Bishopsgate Street and Wormwood Street will result in the modern building having an overbearing impact on the churches, which are of a significantly small scale. The new building will dwarf these existing historic assets, that form an important part of the City of London's history and character of this area.

Whilst it is acknowledged that there are a number of tall buildings in the City of London, it is considered that the additional height proposed to be introduced at the Development Site is not appropriate, as a result of the harmful impact this will have on the immediate surrounding street scene.

St Ethelburga's is positioned immediately to the south of 100 Bishopsgate, which comprises of a 40 storey building. The proposed development will extend to a significantly greater height than 100 Bishopsgate, as it is proposed to be 53 storeys. Building heights further south along this section of Bishopsgate are significantly lower in height. St Ethelburga's would therefore be positioned in-between these skyscrapers and the lower height building. The additional height and massing proposed to be introduced at the Development Site is considered to have a harmful impact on St Ethelburga's, and will erode the character of this section of Bishopsgate.

The cumulative impact of tall buildings in this part of the City, which the proposed development will add to, is considered to have a harmful impact on the character of the area. The proposed development is considered to be in conflict with LP CS10 (Design), which seeks to promote a high standard of design with development having regard to its surroundings and the historic and local character of the City.

Daylight Sunlight (DLS)

Our client is concerned that there will be a detrimental DLS impact on the 3 church buildings. The submitted Environmental Statement includes an appendix on Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage. Within this are reports prepared by GIA that assess the daylight sunlight and overshadowing caused by the proposed development. The Environmental Statement Non- Technical Summary (ES NTS) provides an overview of the results of these assessments and confirms that:

- In terms of daylight, the proposed development will result in significant adverse effects with regards to reductions in daylight amenity to St Botolph (Minor to Moderate Adverse).
- The overshadowing assessment shows that the Proposed Development (future baseline) would result in St Botolph garden experiencing a Minor Adverse effect.
- A cumulative assessment has also been carried out, as a number of other developments are proposed in the surrounding area. This shows further significant effects, experienced by St Ethelburga's and St Botolph.

The Planning Statement also discusses the results of the DLS reports and identifies at paragraph 7.198 that All Hallows will not meet BRE Guidance, when the (Vertical Sky Component (VSC) and No Sky Line (NSL) tests are carried out and will experience a negligible (not significant) daylight impact. It is noted that all Hallows has limited natural light as the main windows are high, and therefore any diminution of daylight will have a disproportionately adverse effect.

Paragraph 7.202 of the submitted Planning Statement considers the sunlight impact and identifies that St Ethelburga's and All Hallows will both experience a negligible (not significant) effect on sunlight.

Located to the rear of St Ethelburga's is their Peace Garden. The proposed development risks impacting upon the light that the Peace Garden receives, which could impede the ecologically diverse range of plant species that grow in this garden and also the character of the garden, which provides a tranquil space in the City of London.

It is therefore apparent that all 3 churches will experience a DLS impact. LP policy DM10.7 (Daylight and sunlight) states that "*new development should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.*" It is considered that given the above-mentioned results, that the proposals conflict with this policy.

Natural light to the worship spaces and community spaces that are actively used by the churches and community groups in all 3 church buildings is very important to the use and enjoyment of these spaces. These building would have originally been designed to benefit from natural light. Our client's premises would suffer a reduction in natural light as a result of the development and this is considered to be in conflict with the development plan, when taking into account the nature of the uses of these buildings and their historic significance.

Wind Impact

The impacts of the development on wind flow paths and intensities have been assessed within the submitted documents, including the Design and Access Statement (DAS) and RWDI's Pedestrian Level Wind Microclimate Assessment that forms part of the Environmental Statement. However, the Wind Microclimate Assessment hasn't specifically analysed the impacts of the development on the church buildings.

Whilst the section of Bishopsgate where St Ethelburga's is located been considered in the modelling and modelling has also been undertaken along Wormwood Street, a more specific analysis of the results would help our client understand the potential impacts. We have been advised by St Ethelburga's Centre for Reconciliation and Peace that a wind tunnel effect has already been created by the development of 100 Bishopsgate, which has damaged the fabric of the building and therefore understandably they are concerned that the proposed development will compound and extend this wind tunnel effect.

As mentioned above, the churches currently provide community services and events, attracting a variety of people from all ages to the Site, with the majority of visitors arriving and departing on foot. It is therefore important to understand the specific impacts of wind on particularly the entrance of the church buildings and assess whether any safety measures need to be considered, to ensure that visitors to and from the site don't experience uncomfortable wind conditions, as a result of the development..

Heritage Impact

The imposing new structure proposes to introduce 25 new storeys on top of the existing 28 storey building, to provide a 53 storey building. This development would see the existing skyscraper grow to a total height exceeding 200m.

All of the churches that this letter of objection relates to are statutory listed buildings and all are located in designated conservation areas.

Adopted Local Plan (LP) heritage policies CS12 (Historic Environment) and DM 12.1 (Managing change affecting all heritage assets and spaces) confirm that development should conserve or enhance the significance of the City's heritage assets, their setting and significance. In addition, policy CS12

confirms that the City of London will preserve and enhance the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them. Policy DM 12.1 confirms that the loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

The NPPF at paragraph 206 also confirms that that heritage assets should be protected, advising that any harm to the significance of designated heritage asset, including from development within its setting, should require clear and convincing justification. Paragraph 206 goes on to confirm that substantial harm to Grade I and Grade II* buildings should be *“wholly exceptional”*.

LP policy CS10 (Design) confirms that the City of London will *“promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City”*.

In addition, LP policy CS14 (Tall Buildings) confirms that the Council will refusing planning permission for tall buildings within inappropriate areas. The policy states that conservation areas are inappropriate areas for tall buildings. Whilst the Development Site is not within a Conservation Area, it is proximate to a number of Conservation Areas. The policy goes on to site that *“Elsewhere in the City, permitting proposals for tall buildings only on those sites which 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 submitted Environmental Statement includes a Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy. Table 7.1 within this report considers the heritage assets proximate to the Development Site and the impact of the development on these during the construction phase. With regards to the three churches, the report considers that:

- St Ethelburga's : There will be a *“moderate, adverse, significant”* impact on the church and a *“negligible, neutral, not significant”* impact on the St Helen's Place Conservation Area that the church is located within.
- St Botolph . There will be a *“moderate, adverse, significant”* impact on the church. With regards to the Bishopsgate Conservation Area, that the church is located within the report concludes that there is a *“moderate, adverse, significant”* effect; and
- All Hallows –There will be a *“moderate, adverse, significant”* on the church and *“minor, neutral, not significant”* impact on the Conservation Area that the church is located within.

It is clear from the above, and also from reviewing the impact on other heritage assets assessed at Table 7.1 that there will be an extensive significant impact on these heritage assets during the construction phase.

Furthermore, beyond the construction phase, once the scheme is built out there will also be a permanent impact on the extensive number of heritage assets that are in close proximity to the Development Site. With regards to the three churches, the submitted impact assessment considers that:

- St Ethelburga's: The report considers that there will be a *“Moderate Beneficial (Significant) in nature.”* impact on the church that the *“The cumulative effect would be Negligible Neutral (not Significant) in nature”* on the St Helen's Place Conservation Area that the church is located within.

- St Botolph: The report considers that there will be a “*Moderate Neutral (Significant)*” impact on the church. With regards to the Bishopsgate Conservation Area, that the church is located within the report concludes that the “*The Proposed Development would result in a medium magnitude of change to the Conservation Area*” and goes on to suggest the significance of the effect would be “*Moderate Beneficial (Significant)*”. The report also considers the other heritage assets associated with the church, including the church hall, church yard, drinking fountains and parish memorial which are each individually designated as Grade II heritage assets and concludes that the impact will be “*Negligible Neutral (not Significant) in nature*”; and
- All Hallows –The report considers that there will be a “*Moderate Neutral (Significant)*” impact on the church and that “*The cumulative effect would be Minor Neutral (not Significant)*” on the New Broad Street Conservation Area that the church is located within.

We disagree with the above statements made in the report, for the permanent impact, and consider that these downplay the actual harm that will be caused to the three churches, and the associated heritage assets at St Botolph including the church hall.

It is considered that the proposed development would introduce a very prominent and incongruous feature within the setting of Grade I listed churches at St Ethelburga’s and All Hallows and the Grade II* listed St Botolph. The proposed development would detract from the significance of the churches as a designated heritage asset. With regards to All Hallows the proposed development will impact views from Finsbury Circus which is a Registered Park and Garden and which the All Hallows sits within the setting of. The proposed development would have a negative impact on the appreciation of this significant specific view.

The church buildings are of limited scale compared to the adjoining buildings and their prominence in the street scene has already been eroded over time. The proposed development would exacerbate this even further and the Council should take into account the cumulative impact of this proposal, alongside previously consented and built out schemes, when assessing this application.

It is noted that a number of developments have recently been approved in the immediate and wider setting of the church, however, these are generally set back from the street scene, which helps to reduce their visual impact on the immediate setting of the churches.

In addition to the above mentioned heritage assets, there are an extensive number of further heritage assets that will also be effected by the proposed development during the construction phase, together with the Conservations Areas that are located close to the Development Site.

The scale and design of the proposed development will be in stark contrast to the heritage assets that this letter focuses on, together with an extensive number of further heritage assets. The impact caused by the development to these heritage assets conflicts with LP policies CS10, CS12, CS14 and DM 12.1, as well as the NPPF. The development fails to have appropriate regard to the Development Site’s surroundings and the historic and local character of the City, and the setting of the extensive number of heritage assets that are proximate to the Development Site.

LP policy CS12 and DM 12.1 are clear that development proposals should “*conserve or enhance the significance of the City’s heritage assets, their setting and significance*”, however it is clear that the development will fail to do this and instead will result in harm to a high number of heritage assets. Cumulatively, this impact on the significance and setting of the heritage assets is considered to be significant and substantial. There is not considered to be an exceptional reason or justification to justify this significant harm, and therefore the proposed development is considered to be in conflict with the Development Plan and NPPF.

Construction Phase Impact

Noise and Vibration

The submitted Environmental Statement includes Noise and Vibration Survey Report, prepared by Sandy Brown. The results of this survey are summarised in the submitted Environmental Statement Non- Technical Summary (ES NTS), prepared by Trium.

All Hallows and St Ethelburga's (or St Ethelburga's Church) are identified at Figure 10 of the ES NTS. Paragraph 93 of the report states that nine "*receptors (eight commercial and one place of worship) would experience Moderate Adverse (Significant) noise from demolition works, noise from basement construction and noise from superstructure works*". St Ethelburga's and All Hallows are both identified at Table 4 as experiencing this Moderate Adverse (Significant) noise impact.

The conclusions of the Noise and Vibration Survey Report confirm our client's concerns regarding the noise impact during the construction phase are valid. In particular, they are concerned noise from construction and demolition will significantly disrupt services and community meetings/ events held at the churches and in particular at St Ethelburga's, due to its close proximity to the Development Site. The churches provide a space for quiet reflection in a peaceful setting, the construction phase of the development will conflict with this. Many of the services and meetings/ events held at the churches require the quiet setting that the churches offer, this is key to the reflective activities being carried out.

If development proceeds at the Development Site, it is essential that there is close dialogue with the churches to ensure that the timings of noisy works do not conflict with key services/ meetings/ events taking place in the church buildings. The churches also need to be given advance warning of when noisy works will be taking place. Close dialogue between the site contractors and representatives from the church will be essential, to ensure the impact is mitigated as best as possible. Conditions and/ or S106 obligations must be secured to ensure the contractor is required to engage with the churches and work proactively with them, both ahead of and during the construction phase.

In addition to noise concerns, there are also concerns regarding the impact of vibrations arising as a result of the construction works on the three historic church buildings. Due to their age and historic significance, these buildings risk being structurally harmed or damage arising, as a result of the construction activities. The construction methodologies need to be carefully considered, to ensure no harm arises to the heritage assets.

Traffic & Access

An Outline Construction Manage Plan, prepared by Multiplex has been submitted as part of the planning application.

The submitted Outline Construction and Environmental Management Plan identifies Bishopsgate Road (A10) as the main route for construction materials and personnel to reach the Site.

In addition to noise concerns from the construction activity itself, our client is also concerned with the impact from lorries and other heavy machinery accessing and exiting the Site. This could potentially obstruct access to St Ethelburga's. St Ethelburga's require vehicle access for vehicle drop offs/ collection for less able visitors to the church building. It is also important that there is safe access for pedestrians to and from the church buildings, and that construction vehicle movements and activities do not risk conflict with pedestrians.

As set out above, if the development proceeds at the Development Site conditions and/ or S106 obligations must be secured to ensure the contractor is required to engage with the churches and work proactively with them, both ahead of and during the construction phase.

Public Realm

It is acknowledged that the proposed ground floor public realm will provide a benefit to the public. The comments below are not an objection to the principle of the public realm design, but rather seek more information and further consideration by the applicant, to better understand its relationship with St Ethelburga's and to ensure that it will not cause a detrimental impact on St Ethelburga's.

Paragraph 55 of the ES NTS states the design of the new public realm was informed by the presence of St Ethelburga's. Page 129 of the submitted DAS also identifies that there will be framed views from the public realm out over Bishopsgate including to St Ethelburga's. The submitted documents do not however assess the impact of other elements of this proposal on St Ethelburga's, such as increased footfall and pedestrian traffic in the area.

With the proposal's publicly accessible top floor, a community/sui generis space, and the introduction of 20+ extra storeys, the Development site will attract a very high footfall, including tourists and the building's increased workforce. This will likely increase footfall significantly in the immediate surrounding area, including the number of people using the pavement outside all three church buildings which will exacerbate the existing issues of crowding along the pavements, which risks the safety of the pavement users.

The increased footfall could negatively impact the access to St Ethelburga's, with conflict between pedestrians and visitors to the church at times just before a service or meeting starts or just after it finishes, when visitors to St Ethelburga's may congregate outside the building. Furthermore, if the new public realm is not managed properly, it could result conflict with the activities taking place at the church.

In summary, whilst we are not objecting to the principle of the public realm that is proposed we consider that the impact of this public realm on the three churches needs to be further considered, in particular for St Ethelburga's, due to the close proximity of the entrance to St Ethelburga's to the proposed public realm.

Summary

The London Diocesan Fund objects to the proposed development. The development will erode the historic significance and setting of the three listed churches at St Botolph-without-Bishopsgate, All Hallows-On-The Wall and St Ethelburga's Church. The proposed development's imposing height will impact upon daylight and sunlight received to these buildings which were originally designed to be reliant on natural light. During the construction phase, the development works risk conflicting with the use of these church buildings by the local community, who live and work in the local area.

Further consideration is required by the applicant and engagement with our client is needed to consider the impact of the tall building on the heritage assets, on the surrounding Conservation Areas and on the character of the area. Furthermore, in the event that the Council is minded to support the application, further careful consideration and close engagement with each of the churches and with the LDF is needed, to consider how the construction phase can be managed to protect the day to day use of the church buildings. This is essential to ensure that the users and community groups that utilise these buildings are not detrimentally impacted by the works and must be secured through conditions and/ or S106 obligations.

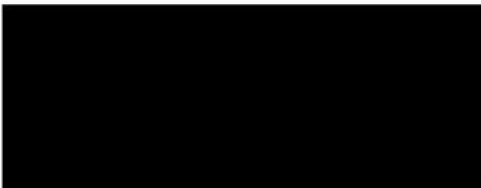
The community spaces available at all 3 churches are available for use by faith and non faith organisations. There is concern that the detrimental impact that the development will have on these community spaces, in addition to the extensive further development in the local area, will result in these buildings providing lower quality, less sought after and less attractive community space. Whilst the additional community space that is brought forward by the development will provide modern community space, the development serves to make existing community space less useable, lower quality and less attractive spaces for community groups. The Council must protect and help enhance existing community spaces, and ensure development does not impact upon the quality of these spaces.

It is considered that the proposed development is in conflict with the development plan and that the harm identified will outweigh the benefits associated with the proposed development. This is in particular with regards to the impacts on heritage assets, scale and massing, daylight and sunlight, public realm works and the construction phase. It is therefore considered that planning permission should be refused.

My client would welcome the opportunity to speak with officers at the City of London to further discuss their concerns. My client can also arrange for the Council to visit the above-mentioned churches.

We would be grateful if the City of London could continue to keep us notified on this application moving forward.

Yours faithfully,



Emma Penson
Director
DWD



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

Sent via e mail to PLNComments@cityoflondon.gov.uk

CBRE

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Henrietta House
Henrietta Place
London W1G 0NB
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8th November 2024

Dear Sir/Madam,

LLOYDS BANK PLC

99 BISHOPSGATE, LONDON, EC2M 3XD (REF 24/00836/FULEIA)

We are responding on behalf of Lloyds Banking Group Plc, in relation to the above referenced planning application. This was validated by The City of London (CoL) on 9th September 2024. The description of development is as follows:

'Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.'

Background

Lloyds Banking Group is the leaseholder of 33 Old Broad Street, which is immediately adjacent to the application site. Following extensive refurbishment works over the past 18 months, Lloyds Banking Group is scheduled to reopen 33 Old Broad Street in 2025. This nine-storey building will serve as the Group's new headquarters. 33 Old Broad Street is situated to the south west of 99 Bishopsgate, immediately adjacent to the application site.

Scope of Representations

Lloyds Banking Group has no in principle objections to the proposed scheme of development for 99 Bishopsgate. Given the role of the City of London as a world leading international financial and professional services centre, with a nationally important role in the economy, we acknowledge this area is a focal point for significant levels of development activity. However in the context of its recent significant investment to refurbish and upgrade 33 Old Broad Street, Lloyds Banking Group is understandably keen to ensure this proposed scheme of development will not adversely impact its operations, both during the course of construction works and also once the scheme is complete. This response relates to the following matters:

- Mitigation of Demolition and Construction impacts
- Plant noise associated with completed scheme
- Proposed planning application drawings (and contextual information shown)



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Demolition and Construction

We are aware CoL has a long established Code of Practice in place for Deconstruction and Construction Sites, the most recent version of which was published in January 2019 (Ninth Edition). This sets out what constitutes acceptable site practice within the City

We welcome the initial consideration the applicant has given to construction impacts, as set out in the Construction and Environmental Management Plan (CEMP) by Multiplex, which supports this application. Whilst we appreciate the level of detail is commensurate with that typically provided at this stage of a project, this is a high level and largely generic document which the applicant advises will be further developed and refined by the appointed Principal Contractor.

We request any planning permission is subject to a condition requiring submission and approval of a detailed CEMP prior to commencement of development (or the relevant phases of this). We also request Lloyds Banking Group are consulted by CoL in relation to any subsequent approval of details application (or applications) relating to a detailed CEMP, to allow an opportunity to review and comment.

Given the scale of the proposed scheme of development and the proximity of the application site to 33 Old Broad Street, this could potentially have an adverse impact on Lloyds Banking Group's operations during demolition and construction, particularly in relation to noise, vibration and dust impacts. It is essential such impacts are minimised as far as is reasonably practical throughout the duration of works in accordance with the CoL's own Code of Practice.

It is particularly important for Lloyds Banking Group that the reduced impact hours for noisy works, i.e. 1000-1200 and 1400-1600 (Monday to Friday) as set out within section 7 (Site Hours) of the applicants CEMP and section 3.6 of the CL's own Code of Practice, are strictly adhered to.

Section 13 (Neighbourhood Liaison) of the CEMP sets out a broad overview of the strategy the appointed contractor will follow for stakeholder engagement. This is in line with Section 2 (Community Liaison and Consultation) of the CoL's own Code of Practice. It is essential that the applicant and their appointed contractors liaise with their neighbours on an ongoing basis and Lloyds Banking Group looks forward to actively engaging with the proposed neighbourly meetings.

We have also reviewed the applicant's Framework Construction Logistics Plan (FCLP) by Momentum. This anticipates the provision of a detailed CLP prior to commencement of construction will be secured by a planning condition. We request CoL imposes a condition to this effect. We also request, as per our above comments on the CEMP, Lloyds Banking Group are consulted by CoL in relation to any subsequent approval of details application (or applications).

We note the proposed ingress and egress routes and pit lane locations as shown on Figure 4.2 (local construction routes) of the FCLP are not in the immediate vicinity of 33 Old Broad Street. However, we are mindful these proposed arrangements are to a large extent indicative in advance of the appointment of a main contractor. It therefore remains important for Lloyds Banking Group to be kept abreast of the applicant's plans in respect of construction logistics, given the scale and nature of the proposed scheme and its proximity to 33 Old Broad Street. It is essential the proposed detailed arrangements in respect of Construction Logistics do not adversely impact access and egress to 33 Old Broad Street and its associated service yard

Proposed Plant Noise

We note the proposed pavilion building, which will be adjacent to 33 Old Broad Street, would incorporate plant and machinery at 6th and 7th floor levels. The Noise and Vibration Report by Sandy Brown (which forms Chapter 7 of the Environmental Statement Part I), sets out proposed plant noise limits to the façade of 33 Old Broad Street (and other nearby buildings) based on baseline background noise levels.

As the Noise and Vibration Report states, all external plant should be designed to achieve these limits and this is typically enforced through a planning condition set by the local authority. We request the CoL imposes a condition requiring submission and approval of a supplementary acoustic report, which details

plant selections as well as associated noise attenuation measures and how they would comply with noise emission limits. In the interim, given the extent of plant and machinery proposed and number of receptors in close proximity to the application site, we also request the applicant is asked to provide indicative plant selections as part of this application, demonstrating how these would comply with noise emission limits. This would provide greater certainty to Lloyds Banking Group (and also the applicant) that the identified noise emission limits will be achievable in practice at the detailed design stage.

Planning Application Drawings

The applicant's proposed plan drawings do not incorporate any surrounding context. i.e. they do not show the building lines of neighbouring buildings, including 33 Old Broad Street. It is therefore difficult to ascertain the extent to which the existing lightwell to the south west of the building between 99 Bishopsgate and 33 Old Broad Street would be built out and the separation distances that would remain between these buildings. We therefore request the CoL asks the applicant to submit a supplementary set of proposed drawings for the relevant floors that show this wider context. This would enable Lloyds Banking Group to review and better understand any potential implications for 33 Old Broad Street.

I trust that the above is clear. We kindly request we are kept updated on the progress of this application. If you have any queries or require any additional information, please contact me or my colleague Grace Collins

[REDACTED]

Thank you for your assistance.

Yours faithfully

[REDACTED]

GRAHAM TIMMS

Associate Director

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

Submitted via email to PLNComments@cityoflondon.gov.uk

FAO: Amy Williams, Planning Case Officer

Planning Application Ref: 24/00836/FULEIA

Re: Planning Consultation for 99 Bishopsgate, EC2M 3XD

January 2025

Dear Amy,

The Eastern City is proud to be making a representation in relation to the above planning application. We are a Business Improvement District (BID) covering the tall building cluster in the City of London. Our investment partnership is made up of the businesses that call this part of the Square Mile home, primarily financial and professional services companies that make up around 40% of the businesses in this area.

We operate under a mandate from those paying member businesses to deliver our Business Plan (2022-2027), providing hyper local area wide projects and services to support business growth and vibrancy, working with occupiers, property owners and developers and our public sector partners.

Given our holistic and strategic approach, it is appropriate that we make representations on key planning applications, and in particular, those that have an impact on the wider area, public amenity provision and ground floor public realm.

For clarity, it is not the role of the BID to explicitly support or oppose any specific planning application and this is not the purpose of this letter. Rather, we view aspects of the above application in relation to our published evidence base – namely our [Public Realm Vision \(2024\)](#) – which is rooted in insight, data and consultation with our member businesses, key stakeholders and the public.

We are supportive of the significant development pipeline and projected growth in the area. We see this as a positive thing for the Eastern City, bringing benefits such as increased vibrancy and economic growth to this globally important area and unique part of the City. This is an area that has driven change for 2000 years, a hub of economic activity and the growing Destination City agenda. We are excited about the opportunities provided by the future growth of the area. In the context of this growth, our public realm and the ‘spaces between the buildings’ are ever more important.

We are grateful to the developer for their consultation and positive engagement with the BID through the planning process. We have shared our Public Realm Vision with them and drawn specific attention to the development’s strategic location in the Eastern City, aligned with the project family routes set out in the document. We would urge consideration of these priority

areas in relation to the proposed development's wider context. In addition, the Public Realm Vision outlines our seven key principles, which are:

Welcoming publicly accessible spaces – designing spaces that are inviting and accommodating;

Resilient trees and planting – ensuring the area is as green as possible;

Lively uses and activity – creating a dynamic and energetic place;

Intuitive navigation – making it easier to reach your destination;

Historic character and lighting – celebrating and improving the heritage features;

A mobility environment which is accessible to all – establishing environments where modes of movement can co-exist;

A safe and secure neighbourhood – promoting spaces where all users feel safe.

Considering the above scheme against these principles, we welcome a number of provisions in the application and look forward to working with the developer should the scheme receive approval.

Whilst the proposed project supports all of our principles outlined above, we specifically wish to draw attention to the following aspects of this application;

Extensive opening up of the public realm so that the majority of the ground floor is publicly accessible;

New routes for pedestrians providing significantly enhanced connectivity to neighbouring developments and nearby transport interchanges, good alignment with the project family routes set out in our Vision;

Animation through the introduction of a new city market at ground;

Dedicated multi-use cultural facility with ground-floor activation;

Providing extensive green space for commuters and visitors.

We hope this is a helpful contribution ahead of the committee meeting in January 2025.

Yours sincerely



Nick Carty
Chair, Eastern City

MAYOR OF LONDON

Amy Williams, Senior Planning Officer
(Design and Development
Management), City of London
Corporation, PO Box 270, London,
EC2P 2EJ

Date: 9 January 2025

Dear Amy,

Letter of support for Intermission Youth space, 99 Bishopsgate Open Gate

I am writing to express support for Intermission Youth being offered Open Gate as a permanent space.

Intermission Youth was founded by Darren Raymond, who discovered a love of Shakespeare while in the prison system, where he met Sir Mark Rylance. The charity works with young people predominantly from Afro-Caribbean and African backgrounds who have experienced the prison system, the care system, family breakdown, have been homeless and are often at risk of criminality.

As well as great characters and stories, working with Shakespeare gives young people something much deeper - a space for self-reflection, an understanding of the human condition and empathy. The work builds confidence, connection and self-belief and helps participants make positive choices - changing their lives. The young people who have experienced being a part of this theatre company have established careers in teaching, HR, investment banking, have secured agents, pursued acting careers, and obtained Oxford University degrees. Intermission Youth has achieved all of this without a permanent space.

Through the Mayor's support, they have fostered a strong partnership with Brookfield Properties - a positive working relationship and open lines of communication. As a result, this exciting proposal is now tabled.

It's vital that all Londoners are represented through the spaces we create. Providing space within the development will be a trailblazing example of what can be achieved through meaningful partnership between cultural organisations and new development. It will contribute to the cultural aspirations of the City of London and deliver the ambitions of the Mayor of London's Cultural Strategy.

All Best wishes

Justine Simons OBE
Deputy Mayor for Culture and Creative Industries, London



Senior Planning Officer
(Design and Development Management)
City of London Corporation,
PO Box 270
London EC2P 2EJ

15 January 2025



Dear Ms Williams

Planning Application (24/00836/FULEIA - 99 Bishopsgate London EC2M 3XD)

Intermission Youth is writing in support of the planning application (24/00836/FULEIA - 99 Bishopsgate London EC2M 3XD) and its outlined Cultural Plan that develops a standalone Cultural Centre, currently titled Open Gate. Intermission Youth's interest is to further the discussions as the Cultural Anchor for the centre, understanding that it would become a permanent home for Intermission Youth, and we would have the opportunity to curate open invitations to community groups, schools and other cultural organisations to fulfil the vision of Open Gate as a destination for diverse, emerging creative voices to showcase and create onsite.

Intermission Youth is a registered charity that helps transform the lives of young people in London aged 11-30+ through theatre, film, whole-person support and community empowerment. Since 2008, we have worked with over 8000 young people to improve their mental health, social skills, life outcomes and outlook on their ambitions.

Our productions are collaborations with Shakespeare's original language and contemporary language devised with the young people to align the specific and universal stories of life. We have strong links with national and local entities such as Shakespeare's Globe Theatre, LAMBDA, RADA,

Patrons: Naomie Harris, The Right Reverend Rob Gillion
Ambassador: Danny Sapani

Intermission Youth, a charitable company limited by guarantee, registered in England and Wales under company number 12359502 and whose registered office is at 124 City Road, London EC1V 2NX.

Registered charity number: 1190391

The Royal Court, BBC, Arcola Theatre, Collective Acting Studio and the BFI. The young people that attend our programmes are highly motivated, passionate and come from across London.

The City of London is attractive to us as it avoids the 'postcode wars' that affects many of our young people and provides a neutral, well-connected and prominent place in London – adding value and aspirations to young people. We are also rapidly growing to provide film production, expanding on our writer's programme, and delivering drama initiatives in communities across London, including plans to launch a national touring company. As Shakespeare's original presence was in this borough, it seems a rightful place for Intermission Youth to encourage young people to bring their contemporary perspective into conversation with the histories of their city. We developed the name 'Open Gate' in response to the original suggestion of 'Fourth Gate' in the spirit of this mash-up.

After losing our original home of twelve years (St Saviours Church in Knightsbridge) we have been searching for a permanent home. We are fortunate to have support from Foster+Partners to co-design our new space with our young people. Sir Mark Rylance (Trustee) is dedicated to our mission and Deputy Mayor of Culture and the Creative Industries, Justine Simons OBE, has been championing our organisation's growth and need for a new home.

There aren't many art spaces in London (if any) conceived by young people from marginalised backgrounds and I think it is important this starts to happen, if we really want to make impactful changes. Being a part of this project is not only about housing Intermission Youth, but also about equity, reparations and moving into a more inclusive society.

We have already been on an organic 15-month getting-to-know-one another discussion and held workshops with Brookfield Properties, whereby they have been transparent and collaborative in supporting Intermission Youth's role as a Cultural Anchor and the business development growth to get there. We are unusual in that we have already developed a strong alternative fundraising approach, where we do not rely solely upon state funds and feel confident that we can develop a business model with Brookfield Properties that will help the organisation flourish.

We have begun workshops with the RSHP team to understand the building's flexibility and welcome the future sessions in co-designing with our young people to ensure the fit-out meets the multi-purpose nature of the space and that it is welcoming to creatives that we have been championing since our inception and audiences, who too often feel shut out from these arts spaces. We understand that this ethos continues the initial co-design exercises in creating the Cultural Plan and we welcome a ground-breaking approach of young people's engagement throughout every aspect of the development. Open Gate would enable us to grow the interests of our current cohort and alumni in production, facilities management, administration and fundraising naturally and practically – opening additional career opportunities.

The partnership with Brookfield Properties, and the advantage of being adjacent to the new tower and their other properties, bring us a new community to connect to potential audiences and supporters. The access to generate programming and communications with Brookfield's Activated programme connecting us with over 7000 users will help to grow our profile. We welcome the potential to develop volunteer timebanks and new initiatives to integrate with the fabric of the office workers and open more opportunities to our young people.

From the senior leadership of Dan Scanlon and his team, Brookfield Properties have attended a number of our performances and talkbacks, as well as a funding event at C. Hoare & Co bank and held workshops with our Trustees and senior leadership team. The Brookfield Properties Team and cultural advisor have been transparent and supportive, and we have begun the discussions regarding the development of a long-term partnership to ensure success for all.

We hope that you will consider the significance of having an Open Gate at the heart of the City of London and the impact it will have for Intermission Youth and similar voices to share their creativity – breaking down the barriers of welcome, affordability and access to great, emerging creativity. We have been looking for years now; this cultural centre is just what Intermission Youth needs.

Yours sincerely



Alexander Hoare
Chair of the Board of Trustees
Intermission Youth

Comments for Planning Application 24/00836/FULEIA

Application Summary

Application Number: 24/00836/FULEIA

Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Case Officer: Amy Williams

Customer Details

Name: Mr GEORGE HAYWARD

Address: [REDACTED], Wickhambreaux Canterbury

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I write to strongly object to the effect that this development will have on the historic building opposite at St Ethelburga's. At 53 storeys this development will dwarf those opposite and around it but in particular St Ethelburga's, a building which I have visited and indeed attended a marriage ceremony there. It is a place of tranquility and light that will hugely affect it.