



Hackney Council  
Planning Service  
1 Hillman Street  
London E8 1DY  
**[www.hackney.gov.uk](http://www.hackney.gov.uk)**  
Hackney  
Reference:2025/0632

Mr Georgia McBirney  
P O Box 270 Guildhall  
London

24-03-2025

EC2P 2EJ

**Dear Sir/Madam**

**Town and Country Planning Act 1990 (as amended)**  
**Town and Country Planning (Development Management**  
**Procedure) (England) Order 2015**

**Application Number:** 2025/0632

**Site Address:** 63 St Mary Axe, London, EC3A 8AA

**Development Description:** Notification from the City of London of application 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 1 Hillman Street, London, E8 1DY, by email to [planning@hackney.gov.uk](mailto:planning@hackney.gov.uk), or by phone to 020 8356 8062.

Yours sincerely

A solid black rectangular box used to redact the signature of Natalie Broughton.

Natalie Broughton

Assistant Director Planning and Building Control  
Climate, Homes and Economy

# PLANNING DECISION NOTICE

## Town and Country Planning (Development Management Procedure) (England) Order 2015

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**Agent:**

**Applicant:** Georgia McBirney

P O Box 270 Guildhall  
London  
EC2P 2EJ

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Part 1- Particulars of the **Application No:** 2025/0632  
Application

**Date** of 17-03-2025  
**Application:**

**Date Validated:** 18-03-2025

**Application** Adjoining Borough  
**Type:** Observations

**Proposal:** Notification from the City of London of application 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former

churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

**Location:** 63 St Mary Axe, London, EC3A 8AA

**Plan Numbers:**

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Part 2 – Particulars of Decision: **No Objection**

**Date of Decision:** 24-03-2025

Yours sincerely

A solid black rectangular box used to redact the signature of the official.

Natalie Broughton

Assistant Director Planning and Building Control  
Climate, Homes and Economy



From: [REDACTED]  
To: [REDACTED]  
Subject: LPA Reference: 25/00223/FULEIA Standing Advice Response  
Date: 25 March 2025 15:56:15

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 25/00223/FULEIA

**ATE Reference:** ATE/25/00441/FULL

**Site Address:** 63 ST MARY AXE, LONDON, EC3A 8AA

**Proposal:** Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. 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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

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

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

Regards,



**Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

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

]]>

[ ref:a0zTw000003Dxa1IAC;7bb557de2417b28eeb398d528fdc69f5:ref ]

26 March 2025

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

Dear Georgia

**Re: Planning Application No: 25/00223/FULEIA – Demolition of existing buildings and the construction of a 45 storey building with associated works at 63, St Mary Axe, London**

**Our Ref: LGW5790**

Thank you for your letter/email dated 17 March 2025, regarding the above-mentioned consultation.

The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. We therefore have no objection to this proposal in relation to Gatwick Airport.

Please note that the 'The Town & Country Planning (Safeguarded Aerodromes, Technical Sites & Military Explosives Storage Areas) Direction 2002', in Annex 2 under 'High Structures', requires the Local Planning Authority to notify the CAA in relation to any proposed buildings/structures at 91.4m (AGL) or above as soon as permission has been granted. The Safeguarding Circular can be found at [Safeguarding aerodromes, technical sites and military explosives storage areas - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364842/Safeguarding_aerodromes_technical_sites_and_military_explosives_storage_areas_-_GOV.UK.pdf)

The contact email is [AROps@caa.co.uk](mailto:AROps@caa.co.uk)

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer  
For and on behalf of London Gatwick

Email: 

Classification: Internal

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

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

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

Visit our website: [Home - Airport Safeguarding Limited](#) or connect on LinkedIn - Airport Safeguarding Limited.



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COMPANY PARTICULARS: For particulars of Heathrow companies, please visit <http://www.heathrowairports.com/about-us>. For information about Heathrow Airport, please visit [www.heathrowairport.com](http://www.heathrowairport.com).

Heathrow Airport Holdings Limited is a private limited company registered in England under Company Number 31297208, with the Registered Office at The Compass Centre, Aldon Road, Hounslow, Middlesex, TW6 2DR

From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Planning Application Consultation: 25/00223/FULEIA [SG37805]  
Date: 28 March 2025 11:03:02  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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THIS IS AN EXTERNAL EMAIL

Our Ref: SG37805

Dear Sir/Madam

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

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

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

Yours faithfully

**2TAM**

**NATS Safeguarding**

E: [REDACTED]

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



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**NATS Internal**

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

**Sent:** 17 March 2025 11:44

**To:** NATS Safeguarding <NATSSafeguarding@nats.co.uk>

**Subject:** Planning Application Consultation: 25/00223/FULEIA

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 63 St Mary Axe London EC3A 8AA .

Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Georgia McBirney  
Environment Department  
City of London

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If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15





LPA Ref: 25/00223/FULEIA

London City Airport Ref: 2025/LCY/078

Date: 28/03/2025

Dear Georgia McBirney,

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

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>LPA Reference</b> | 25/00223/FULEIA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Proposal</b>      | Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. |
| <b>Location</b>      | 63 St Mary Axe London EC3A 8AA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Borough</b>       | City of London                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Case Officer</b>  | Georgia McBirney                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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

### **Permanent Obstacle Lighting Scheme**

Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of

obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

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

We would also make the following observations:

### **CAA Building Notification**

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

### **CAA Crane Notification**

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

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

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

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

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

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

Kind regards,

**Simon Vince**

On behalf of London City Airport

**From:** [Haringey Planning Services](#)  
**To:** [PLN - Comments](#)  
**Subject:** Decision Notice - HGY/2025/0700  
**Date:** 31 March 2025 16:15:04

THIS IS AN EXTERNAL EMAIL



## **Town and Country Planning Act 1990**

## **Town and Country Planning (Development Management Procedure) Order 2015**

**Application** HGY/2025/0700  
**No:**

**Proposal:**

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. 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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118 (Observations to City Of London - their planning reference 25/00223/FULEIA)

**Site**  
**Address:** 63 St Mary Axe, London, EC3A 8AA

Dear Sir/Madam,

I am writing to inform you that Haringey Council raises NO OBJECTION to the above request for observations.

Thank you,

Head of Development Management and Planning Enforcement  
Planning Service

[ ref:a0iTU00000129ZhIAI;63cdcff98d7adcc6315f8396b074883c:ref ]

Planning | Placemaking and Housing | Haringey Council

Alexandra House (5th Floor), 10 Station Road, London, N22 7TR  
[www.haringey.gov.uk/planning-and-building-control/planning](http://www.haringey.gov.uk/planning-and-building-control/planning)

**Planning and Place**

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

**Director of Planning and Place**

Amanda Reid



THE ROYAL BOROUGH OF  
**KENSINGTON  
AND CHELSEA**

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

**Date:** 02/04/2025  
**My Ref:** OB/25/01627  
25/00223/FULEIA

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990**

**63 St Mary Axe London EC3A 8AA**

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

**SCHEDULE**

**Development:**

This Council is asked for its observations on an application submitted to the City of London for: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118

**Site Address:**

**63 St Mary Axe London EC3A 8AA**

**RBKC Drawing Nos:**

OB/25/01627

**Applicant's Drawing Nos:**

available on City of London website at

<https://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SRJ3RVFHIH400>

**Application Dated:** 17/03/2025

**Application Completed:** 17/03/2025

**FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S)  
ATTACHED OVERLEAF**

## **CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION**

### **INFORMATIVE(S)**

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see [Advice for Builders](#) on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at <http://www.rbkc.gov.uk/OB/25/01627> . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid  
**Director of Planning and Place**

The full report is available for public inspection on the Council's website at [www.rbkc.gov.uk/297201](http://www.rbkc.gov.uk/297201) . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Tel: [REDACTED]



City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

**Directorate of Place and Growth**  
The Woolwich Centre, 5th Floor  
35 Wellington Street  
London, SE18 6HQ

**25/1009/K**

Your Ref: 25/00223/FULEIA  
03 April 2025

## **DECISION NOTICE - RAISE NO OBJECTION**

Dear Sir/Madam,

**Town & Country Planning Act 1990 (As Amended)**  
**The Town and Country Planning (General Permitted Development) (England) Order 2015**

**Site:** 63 St Mary Axe London EC3A 8AA

**Applicant:** C/O Agent

**Proposal:** Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118.

**Drawings** Consultation Letters

I refer to your letter dated 17 March 2025 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director

# SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0018

Date of issue of this decision: 07/04/2025



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LBS Reg. No.: 25/OB/0018

Date of Issue of Decision: 07/04/2025

Your Ref No.:

---

Applicant      City Of London Corporation

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

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.'

At                      63 St Mary Axe London EC3A 8AA

In accordance with your letter received on 18 March 2025 and supporting documents.

Signed:              *Stephen Platts*

Director of Planning and Growth



Historic England

Ms Georgia McBirney  
Planning Administration  
Environment Department  
City of London Corporation

Your Ref: 25/00223/FULEIA  
Our Ref: 231485

Contact: Helen Hawkins

08 April 2025

Dear Ms McBirney,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2024

63 St Mary Axe London EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 March 2025.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

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

### Assessment of Significance and Impact

GLAAS advises the City of London on their non-designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter.

The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable.

### Significance

The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings –this is explained further in the Development Advice letter.

At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street.

Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period.

An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial



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ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset –the burial ground –into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'.

Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset.

Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well-preserved Roman deposits were encountered. This is a significant omission.

Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it.

## Impact

Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains.

The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully compensated for by the proposed new park design for the area.

The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new



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development. The Scoping response also requested that the results of the proposed pre-determination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided.

The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works.

The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

## Policy

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest and that a field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

The City Local Plan Policy DM 12.4 requires that planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site and that schemes preserve, protect, safeguard and enhance archaeological monuments, remains ..where appropriate. The supporting text says "The City Corporation will refuse schemes which do not make any provision for the incorporation, safeguarding or preservation in situ of nationally or locally important monuments or remains, or which would adversely affect those monuments or



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remains”.

If preservation is not achievable then if you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

## Conclusion and Recommendations

The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed.

The development proposal as submitted would result in the total loss of this non-designated heritage asset.

We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision.

Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken.

If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

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

This response relates solely to archaeological considerations.

Yours sincerely

Helen Hawkins

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



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Your Ref:  
Our Ref: 25/00873/OBS



**Georgia McBirney**

City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

11th April 2025

**RE: REQUEST FOR OBSERVATIONS**

Dear Georgia McBirney

**DECISION NOTICE  
TOWN AND COUNTRY PLANNING ACT 1990.**

**REQUEST FOR OBSERVATIONS**

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 25/00873/OBS Date of Application: 18.03.2025 Date of Decision 11.04.2025

Proposed Development At:  
**Adjoining Borough Observations Within The Corporation Of London**

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| For: | Observations on a proposed development within the adjoining Borough of City of London with respect to Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development at 63 St Mary Axe London EC3A 8AA. |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Approved Plans**

Consultation letter from City of London dated 17 March 2025

**Lambeth Planning**  
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London  
SW2 9QQ

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[www.lambeth.gov.uk](http://www.lambeth.gov.uk)  
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## Conditions

Notes to Applicant:

Yours sincerely



**Rob Bristow**

Director - Planning, Transport & Sustainability  
Climate and Inclusive Growth Directorate

Date printed: 11th April 2025

Georgia McBirney  
Corporation Of London  
Planning & Transportation Department  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2025/137997/01  
**Your ref:** 25/00223/FULEIA  
**Date:** 15 April 2025

Dear Georgia

**63 St Mary Axe, London, EC3A 8AA.**

**Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.**

Thank you for consulting us on the above application on 17 March 2025. Please accept our apologies for the delay in getting back to you.

### **Environment Agency Position**

Whilst we have **no objections** to this application, we would like to draw your and the applicant's attention to the following advisory comments.

### **Advice to Local Planning Authority and applicant**

#### **Development in close proximity to activity regulated by an Environment Agency permit advisory.**

New developments within 75m metres of Medium combustion plant (MCP) could result in impacts including the nearby community being exposed to fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations (EPR) require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

### **Advice to Local Planning Authority**

#### **The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites.**

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO<sub>x</sub>), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

#### **Use of Sustainable Drainage Systems (SuDS)**

Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS

manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

## **Advice to applicant**

### **Water Resources**

Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

### Commercial/Industrial developments

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the [BREEAM 'excellent' standard](#) for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

## **Final comments**

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

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

**Demitry Lyons**  
**Sustainable Places Planning Advisor**

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From: [REDACTED]  
To: [REDACTED]  
Subject: 63 St Mary Axe, London, EC3A 8AA. Application no. 25/00223/FULEIA  
Date: 16 April 2025 14:09:40  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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**FAO Georgia McBirney**

Dear Georgia,

Thank you for notifying the Council for British Archaeology of the above application.

We do not wish to make detailed comments on existing proposals at this stage, but would like to express our serious concerns over the applicant's failure to follow the clear advice offered by GLAAS at a pre-application stage.

The application site is highly archaeologically significant, with remains from the Roman period and a medieval and post-medieval burial ground. Archaeological evidence about the city's past is a finite resource of high evidential value, and this site is extremely rare in that there are no records of modern development which would have disturbed the surviving archaeological remains. The proposed new development on this site would cause permanent and substantial harm to this archaeology. This harm cannot be justified by an archaeological mitigation strategy (under para. 218 of the NPPF).

The application does not demonstrate an adequate understanding of the significance or nature of the archaeological remains on the site, as required by para. 207. The probable presence of undisturbed Roman archaeology is not acknowledged and insufficient assessment work has been done to enable an understanding of the site and the survival of archaeological remains, against the previous advice offered by GLAAS.

The CBA do not consider that this application meets the requirements of para 207 of the NPPF or Policy HE2 of the City Plan 2040. Unless a detailed archaeological evaluation is undertaken and a detailed scheme of mitigation works is agreed with GLAAS, we recommend that this application be **refused** due to insufficient information and the substantial harm which would be caused to the unique archaeology of the site.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

We would be grateful if these comments could be uploaded to the planning portal.

Kind Regards,  
Dr Alison Edwards  
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications –notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.

**Alison Edwards**  
**[she/her]**  
Listed Building Caseworker  
/ JCNAS database  
coordinator

**Please note my normal  
working days are Monday-  
Thursday**

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Historic England

Ms Georgia McBirney  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01590237

16 April 2025

Dear Ms McBirney

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**63 ST MARY AXE LONDON EC3A 8AA  
Application No. 25/00223/FULEIA**

Thank you for your letter of 17 March 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

These proposals would harm attributes of the Tower of London World Heritage Site's Outstanding Universal Value and consequently harm its integrity. This weighs very heavily against the application.

The proposal includes revealing and conserving the London Wall scheduled monument. This would represent an enhancement of its significance and the ability to appreciate it. However, we are concerned that removing the associated, non-designated burial ground (which forms part of the London Wall's setting that is likely to contribute highly to its significance) may cause a level of harm that would not be outweighed by the heritage benefit of showcasing the wall, nor would it be capable of outweighing the harm to the World Heritage Site.

The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich. The Greater London Archaeological Advisory Service (GLAAS) has advised that further information is required to fully assess the nature of the harm which may be caused by the development.

Our advice does not preclude the redevelopment of the site, but these considerable heritage impacts together indicate that the proposals represent neither sustainable



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development as required by national planning policy, nor the optimum capacity for the site, as required by the London Plan's design-led approach. It would be possible to redevelop the site without causing the harm we have described and we encourage that this should instead be pursued. We recommend that planning permission for the current proposals should therefore not be granted.

## **Historic England Advice**

### Significance of heritage most affected by the proposed development

There are three heritage assets that we consider would be most affected by the proposed development. The Tower of London World Heritage Site and The London Wall scheduled monument are the subject of this advice letter. An assessment of the total loss of the burial ground on the site, a non-designated heritage asset, is provided by the Greater London Archaeological Advisory Service in a separate consultation response, but we note that impact here too, in considering the proposal in the round.

#### **a) The Tower of London World Heritage Site**

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

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

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



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

The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London. While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower's turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height.

#### b) The London Wall scheduled monument

This section of the Roman and medieval city wall is scheduled as 'London Wall: remains of Roman wall and bastion, Camomile Street' (NHLE reference 1005547). We know from previous excavations that much of this section of wall has been removed previously, retaining only a small section of wall below the current building.

Although the wall was first built by the Romans around AD 200, it continued to provide defence and security to Londoners into the turbulent medieval period. It also created a marked boundary for the city, a boundary that was both physical but also social, as it served to demarcate space for certain activities, such as burials.

In the Roman period, cemeteries were always placed outside the walls of the city. There is an obvious shift in practice during the medieval period, where cemeteries are in consecrated grounds associated with churches, and therefore allowed inside the walls of the city.

The non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich exemplifies this, as it is situated immediately inside the city wall and utilises the wall as its northern boundary. It serves to illustrate both the historical development of the London Wall as a physical and social boundary, and how the wall was integrated into the wider cityscapes of Roman and medieval London. Therefore, there is a direct historic association of the non-designated burial ground and the London Wall, which contributes strongly to our appreciation and understanding of the significance of the scheduled monument.



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There are limited places within the city where the wall retains its relationship with associated Roman and/or medieval archaeological remains. Until archaeological evaluation of the burial ground is carried out, we cannot confirm the level of survival of the burial ground. There is also the potential for other remains to be present here which pre-date the burial ground, possibly to the Roman period, which cannot be identified or assessed without proper evaluation. We therefore have to assume on the basis of desk-based evidence that, at a minimum, the burial ground is largely intact and that it retains its evidential value.

The setting of this section of London Wall is therefore likely to contribute highly to its significance.

#### c) The medieval and post-medieval burial ground

In addition to the importance of the burial ground in its relationship with the London Wall scheduled monument, the burial ground also has significance in its own right as a non-designated heritage asset.

The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich.

Further information on the burial ground and its significance is provided to you in an accompanying letter from the Greater London Archaeological Advisory Service.

#### Impact of the proposals on these heritage assets

##### a) The Tower of London

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

The further encroachment of this development into the sky space around the Tower would present a greater distraction in views of its silhouette. The White Tower's silhouette is recorded in the 2016 WHS Management Plan as a key component of the World Heritage Site's attributes of OUV as an internationally famous monument, in a landmark siting, and reflecting the physical dominance of the White Tower. The latter





reflects the Tower as a symbol of Norman power - an appreciation of this is similarly reliant on the clear sky backdrop.

The proposed building would appear different to the character of the existing cluster because of the unusual form that results from its eastern edge being twisted to face south, the staggered terraces and the contrast of materials on that eastern edge. It would therefore be more eye-catching than the existing Cluster buildings, which would compound the impact described above. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above.

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

The proposals would leave less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City. The important sky space around its silhouette, which is essential to sustaining the attributes and values of the Tower discussed above, would be further compromised when compared to the existing situation. This would add to the cumulative harm to the attributes of OUV described above.

In its Technical Review report on the refused schemes at 31 Bury Street, regarding the LVMF view 10A.1, ICOMOS advised that "when that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. Whilst that comment concerned a different scheme - proposals at 63 St Mary Axe would be shorter - it is notable that the silhouette of the White Tower and its visual separation from the City would be impacted in a similar way.

#### b) The London Wall scheduled monument

The current proposals have been developed to include an area from which the London Wall can be readily viewed by the public.

We currently do not know what the condition of the wall is; however, there will likely be a need for a programme of conservation and/or consolidation. There will also likely be further design considerations that would need to respond to the condition of the wall when revealed. Specifically, there will be a need for closer analysis of the likely



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environmental conditions of the proposed space and if they would be appropriate for preserving the wall.

There is a small potential for harm to the fabric of the wall which could result from exposing it to the wider environment. However, it is likely that this harm could be adequately limited through appropriate conservation works, suitable environmental controls, and commitment to a programme of ongoing management. Therefore, we think that the proposals for revealing the wall within the design would enhance the significance of the monument through increasing its legibility and accessibility.

However, we also consider that there would be harm to the scheduled monument caused by the complete removal of the non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. Removal of the burial ground will likely destroy archaeological remains which have a direct historical association with the London Wall and which contribute to an understanding and appreciation of the scheduled monument.

The extent of this harm cannot be fully defined as no archaeological evaluation has been undertaken to confirm the level of retention of archaeological remains within the burial ground and to characterise any remains.

It should also be noted that no assessment of impacts on the London Wall scheduled monument (both adverse and beneficial) has been presented as part of the Environmental Statement or Archaeological Desk Based Assessment.

#### c) The medieval and post-medieval burial ground

As previously stated, the archaeological advisor for the City of London is the primary contact for advice in relation to the burial ground as a non-designated heritage asset.

However, we note here her position that the development proposal as submitted would result in the total loss of this non-designated heritage asset and that the impact of development on the burial ground has not been properly assessed in the Environmental Statement due to a lack of archaeological evaluation.

#### Relevant policy and guidance

##### a) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations





under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

The Framework sets out a presumption in favour of sustainable development. This requires pursuing three overarching objectives (economic, social and environmental) in mutually supportive ways - including the protection of the historic environment (Para 8).

Chapter 16 of the NPPF concerns the historic environment. Para 202 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required, including any contribution made by their setting. Where the site has the potential to include heritage assets with archaeological interest, it may be necessary that a field evaluation is also undertaken (Para 207).

Significance should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Para 208).

If harm is deemed to be less than substantial, harm should be weighed against the public benefits of the proposals (Para 215). Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Para 212). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Para 213).

It is also clear that, regardless of the ability to record evidence of our past (such as through a programme of archaeological works), this should not be a factor in deciding whether such loss should be permitted (Para 218).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 139 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.



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b) The London Plan

Polic HC1 requires development proposals to avoid harm by integrating heritage considerations early in the design process

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

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

The LVMF reinforces that “new development should not harm a viewer’s ability to appreciate the OUV of a WHS” (Para 57). Specific to view 10A, it states that the Tower of London should not be dominated by new development close to it” and that “some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background” (Paragraphs 183 and 186)

Policy D3 requires a design-led approach for optimising sites, which means ensuring that development is of the most appropriate form and land use for the site. This requires consideration design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth.

Policy D9 states that any tall building “must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it”.

c) Historic England’s GPA3 ‘The Setting of Heritage Assets’ (2017)

GPA 3 sets out guidance on how to understand and assess the contribution of setting to the significance of a heritage asset The setting of a heritage asset is defined by the NPPF as ‘the surroundings in which a heritage asset is experienced’ (NPPF, Annex 2: Glossary). It also makes clear that setting ‘may include associative relationships’ (p.3).

It recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on



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significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- § Proximity to asset
- § Position in relation to key views to, from and across
- § Prominence, dominance or conspicuousness
- § Competition with or distraction from the asset
- § Dimensions, scale and massing
- § Materials (texture, colour, reflectiveness, etc)
- § Change to skyline, silhouette
- § Lighting effects and 'light spill'

In regard to buried assets such as the London Wall, GPA3 makes clear that although the remains 'may not be readily appreciated by a casual observer', they retain a presence in the landscape' (p.5) and that:

*Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the longterm continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible. (p.5)*

### Historic England's position

The proposals would cause harm to attributes of OUV of the World Heritage Site, the significance of the scheduled monument and result in the total loss of the non-designated burial ground. Overall, we do not consider that the proposals have been developed in a way that sufficiently accords with the requirements of national and regional planning policy, which stipulate that heritage significance must inform the form of development proposals early on in the process.

Our advice does not preclude the redevelopment of the site. Harm could be greatly reduced, or potentially avoided, in each case with a lower building, which would avoid all three elements of heritage harm (to attributes of OUV of the WHS, the significance of the monument and the total loss of significance of the burial ground) while still achieving a considerable uplift in office space, thereby delivering sustainable development.

Such a scheme would accord with the design-led approach required by the London Plan, responding to all elements of the site's highly significant heritage context and its capacity for growth.



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a) The Tower of London World Heritage Site

Whilst the proposals were reduced in scale in response to our pre-application advice, we do not consider that this has adequately reduced the harmful impact. These proposals would continue to have a comparable impact to the 31 Bury Street proposals. That application (ref. 24/00021/FULEIA) was recently refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated.

In this case, we consider that the same attributes of OUV (as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance) and the integrity of the WHS would be harmed. We therefore recommend that the current application should be refused for the same reason.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the WHS. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals.

The submitted heritage impact assessment features many inconsistencies with the methodology required by UNESCO, the adopted SOUV and previous commentaries from ICOMOS as an advisory body to the World Heritage Committee. It has scoped out attributes of OUV where setting makes an important contribution (attributes that were identified in the Tulip decision, set out above). Furthermore, it has not assessed the kinetic impact, instead treating the viewpoint as static, and presents a limited assessment of the cumulative impact of the proposals.

ICOMOS has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (31 Bury Street Technical Review, 20/00848/FULEIA; 24/00021/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA). The World Heritage Centre subsequently



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requested that the UK State Party submit a State of Conservation Report for the WHS, indicating UNESCO's serious concerns.

The application submission does not therefore adequately assess the impact on attributes of OUV, which is required by Para 200 of the NPPF and Policy HC2 of the London Plan.

#### b) London Wall scheduled monument

In relation to the London Wall scheduled monument, we acknowledge that there is a more complex exercise to be had in weighing the level of harm caused by complete removal of the non-designated, but associated, medieval burial ground and the enhancements proposed through exposing the wall, providing interpretation, and expressing it further through elements of the design.

This weighing exercise is further complicated by the lack of archaeological evaluation, and therefore the lack of key details regarding the condition and nature of the archaeological resource here. The Environmental Statement has not assessed impacts (adverse or beneficial) to the scheduled monument. However, we think that removing the associated, non-designated burial ground (which forms part of the London Wall's setting) would cause a level of harm to the scheduled monument which would not be outweighed by the heritage benefit of showcasing the wall.

### **Recommendation**

Historic England objects to the application on heritage grounds. We recommend that it should be refused or withdrawn.

We note that the advice provided to you by the Greater London Archaeological Advisory Service recommends that further assessment of the impact of development on the burial ground be provided. As the burial site is intricately linked to the London Wall, we agree that further information and an assessment of the impacts on the scheduled monument should be required through a Regulation 25 request.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred



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until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

**Alexander Bowring**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]

**Chris Reade**

Inspector of Ancient Monuments

E-mail: [REDACTED]

Cc Helen Hawkins, GLAAS



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Environment Department (Planning)/Development  
Management  
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Guildhall  
London EC2P 2EJ

FAO Ms Georgia McBirney

By email to [REDACTED]

22 April 2025

**Ref: 63 St Mary Axe, London EC3A 8AA**

**Planning Ref: 25/00223/FULEIA**

Dear Ms McBirney,

We write in relation to the current consultation on the above referenced planning application, to express HRP's concerns about aspects of the scheme, which relates to the redevelopment of the site at 63A St Mary Axe, based on its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS).

HRP has previously been invited to view proposals for the site while these were in development, in March and July 2023. In response to the scheme presented in July 2023, which had been amended since March, HRP advised that it welcomed the reduction in height of 3 storeys and some enhancement in the lean away from the White Tower that had been achieved. However, it emphasised it wished to see a greater degree of lean-in to the eastern apex of 100 Leadenhall Street to enhance the sky space between the White Tower and better define the eastern edge of the City Cluster, and to preserve the LVMF view 10A.1 which is the key view that has most impact on the OUV of the World Heritage Site in terms of this proposed development. HRP also highlighted that, although the proposals sat within the draft city cluster profiles at that time, HRP was not in agreement with the tall vertical edge of that profile on the eastern edge and indicated it would be advocating for a more angled profile during the formal consultation (which it has since done so).

With regard to the submitted proposals (ref 25/00223/FULEIA), HRP wishes to reiterate its concerns about the profile and massing of the proposed tower element of the development, and its impact on the silhouette of the White Tower in LVMF view 10A.1. Whilst the slant achieved since the earlier iterations of the design are acknowledged, HRP maintains that the impacts on the OUV of the Tower of London

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could(should) be further mitigated with a steeper lean and a further reduced height.

HRP would also highlight that there remains a lack of consensus over the appropriate outline for the City Cluster, including at the eastern edge. Although the design appears to continue to sit within the proposed cluster profile, HRP does not agree that this provides sufficient protection to the Tower of London and LVMF view 10A.1. It therefore requests that the profile is modified as suggested above to mitigate the impact on the silhouette of the White Tower and thereby help to preserve the OUV of the Tower of London.

HRP is also concerned that the lower-level shoulder of the proposals might be more apparent in winter, without the benefit of tree cover, and requests that winter versions of View 10A.1 are provided so that this risk can be reviewed.

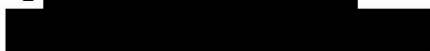
Please do not hesitate to get in touch with me should you wish to discuss any of the issues raised here further.

Yours faithfully



**Adrian Phillips**  
Palaces & Collections Director

T



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Date: 22 April 2025  
Our ref: 507023  
Your ref: 25/00223/FULEIA



FAO Georgia McBirney  
City of London Planning

**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Madam,

**Planning consultation:** Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St. Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development

**Location:** 63 St Mary Axe London EC3A 8AA

Thank you for your consultation on the above dated 17 April 2025 which was received by Natural England on 17 April 2025

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

## **SUMMARY OF NATURAL ENGLAND'S ADVICE**

### **NO OBJECTION**

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

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

## **Sites of Special Scientific Interest Impact Risk Zones**

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

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

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

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

Yours faithfully

Richard Gibson  
Consultations Team

## Annex A – Natural England general advice

### Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

### Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.gov.uk/government/publications/guidelines-for-landscape-and-visual-impact-assessment) for further guidance.

### Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/complying-with-the-biodiversity-duty) for further information.

### Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-public-body-responsibilities)).

### Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

## Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](https://www.gov.uk/wildlife-licences) (www.gov.uk) for more information.

### Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](https://www.gov.uk/local-nature-recovery-strategies) (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](https://www.gov.uk/habitats-and-species-of-principal-importance-in-england) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.brownfieldhub.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/open-mosaic-habitat) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

### Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/glossary) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](https://www.gov.uk/biodiversity-net-gain) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/sites-of-special-scientific-interest-managing-your-land)

## Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

### **Ancient woodland, ancient and veteran trees**

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Best and most versatile agricultural land and soils**

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### **Green Infrastructure**

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

## Annex A – Natural England general advice

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

### **Access and Recreation:**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

### **Rights of Way, Access land, Coastal access and National Trails:**

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).

**Place Division / Development Management**

Web: [www.richmond.gov.uk/planning](http://www.richmond.gov.uk/planning)

Email: [envprotection@richmond.gov.uk](mailto:envprotection@richmond.gov.uk)

Tel: 020 8891 1411

Textphone: 020 8891 7120



City Of London  
63 St Mary Axe London EC3A 8AA

**RECOMMENDATION DATED**  
23 April 2025

Dear Sir/Madam,

**The Town and Country Planning Act 1990, (as amended)  
Consultation – Raise no Objection**

**Application:** PA25/0698  
**Type:** Consultation Other  
**Our ref:** DC/KEM\_PA25/0698  
**Applicant:** City Of London  
**Agent:**

**LOCATION**

63 St Mary Axe London EC3A 8AA

for

**PROPOSAL**

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

I refer to your consultation regarding the above mentioned proposal.

**My Council's observations are as follows:**

That the City Of London be advised that the London Borough of Richmond upon Thames raise no objection to the above mentioned proposal.

[www.richmond.gov.uk/planning](http://www.richmond.gov.uk/planning)

London Borough of Richmond upon Thames

Civic Centre, 44 York Street, Twickenham TW1 3BZ

**Tel** 020 8891 1411 **Textphone** 020 8891 7120 **Email** [envprotection@richmond.gov.uk](mailto:envprotection@richmond.gov.uk)

Yours faithfully,



Robert Angus  
Head of Development Management (Richmond)

---

From: Gregory Barrett <[REDACTED]>  
Sent: 02 May 2025 10:10  
To: McBirney, Georgia <[REDACTED]>  
Cc: Oliver Caroe <[REDACTED]> ; Nancollas, Tom <[REDACTED]>  
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for the extension of time to review these documents. Following our review, we offer no further comment on the scheme.

Kind regards,

Greg

**Gregory Barrett**

BA (Hons) MPhil (Cantab) FRSA IHBC  
Lead Heritage Consultant and Clerk to the Surveyor  
**Mobile:** [REDACTED]  
on behalf of Caroe Architecture Ltd

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Please be assured I do not expect a reply outside normal working hours.*

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Office 5, Unit 8; 23-25 Gwydir Street  
Cambridge CB1 2LG  
Tel: 01223 472237

**London Office:**

The Surveyor's Office, The Chapter House, St Paul's Churchyard  
London EC4M 8AD  
Tel: 020 7246 8341

Visit our website: [caroe.com](http://caroe.com)

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---

From: McBirney, Georgia <[REDACTED]>  
Sent: 02 April 2025 10:45  
To: Gregory Barrett <[REDACTED]>  
Cc: Oliver Caroe <[REDACTED]>; Nancollas, Tom <[REDACTED]>  
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

Good morning, Greg,

Thank you for your email below. We can agree to the extension until the 2<sup>nd</sup> May, if you are in a position to provide your comments earlier than the 2<sup>nd</sup> that would be appreciated.

Kind regards



---

**Georgia McBirney (she/her)**  
**Planning Officer**  
**(Development Management)**  
Environment Department | City of London  
Corporation, Guildhall, London EC2V 7HH  
[REDACTED]  
Environment  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Katie Stewart –Executive Director Environment

---

From: Gregory Barrett <[REDACTED]>  
Sent: 01 April 2025 11:53  
To: McBirney, Georgia <[REDACTED]>  
Cc: Oliver Caroe <[REDACTED]>; Nancollas, Tom <[REDACTED]>  
Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for this. We also have periods of imminent upcoming leave, so might the 2<sup>nd</sup> May be workable?

Kind regards,

Greg

**Gregory Barrett**

BA (Hons) MPhil (Cantab) FRSA IHBC

Lead Heritage Consultant and Clerk to the Surveyor

Mobile: [REDACTED]

on behalf of Caroe Architecture Ltd

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---

From: McBirney, Georgia <[REDACTED]>

Sent: 28 March 2025 08:58

To: Gregory Barrett <[REDACTED]>

Cc: Oliver Caroe <[REDACTED]>; Nancollas, Tom <[REDACTED]>

Subject: RE: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

Good morning, Greg,

Thank you for your email below.

In terms of an extension to the consultation period, do you know how much longer you would need to respond to the consultation request.

Kind regards



**Georgia McBirney (she/her)**  
**Planning Officer**  
**(Development Management)**  
Environment Department | City of London  
Corporation, Guildhall, London EC2V 7HH  
[REDACTED]  
Environment  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Katie Stewart –Executive Director Environment

---

From: Gregory Barrett <[REDACTED]>  
Sent: 27 March 2025 17:14  
To: McBirney, Georgia <[REDACTED]>  
Cc: Oliver Caroe <[REDACTED]>; Nancollas, Tom <[REDACTED]>  
Subject: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

We have recently received notification of consultation for 63 St Mary Axe.

As we discussed recently with your colleague Tom Nancollas (copied in), we are dealing with a variety of planning caseload tasks related to the City at the moment - principally our representations and preparation for the forthcoming *City Plan 2040* Examination in Public.

As such, could we please request an extension to the deadline for us to respond?

Kind regards,

Greg

**Gregory Barrett**  
BA (Hons) MPhil (Cantab) FRSA IHBC  
Lead Heritage Consultant and Clerk to the Surveyor  
Mobile: [REDACTED]

on behalf of Caroe Architecture Ltd

*I may send email outside normal working hours from time to time.*

*Please be assured I do not expect a reply outside normal working hours.*

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# GREATER **LONDON** AUTHORITY

## Good Growth

Georgia McBirney  
City of London Corporation  
By Email

**Our ref:** 2025/0190/S1  
**Your ref:** 25/00223/FULEIA  
**Date:** 6 May 2025

Dear Georgia McBirney

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**63 St Mary Axe, London, EC3A 8AA**  
**Local Planning Authority reference: 25/00223/FULEIA**

I refer to the copy of the above planning application, which was received from you on 20 March 2025. On 6 May 2025, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0190/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 86 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If the City of London Corporation subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the City of London Corporation under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, email [REDACTED]

Yours sincerely

[REDACTED]

**John Finlayson**

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
TfL  
Emily Keenan, Agent, DP9

## 63 St Mary Axe

**Local Planning Authority: City of London Corporation**

**Local Planning Authority reference: 25/00223/FULEIA**

### **Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

### **The proposal**

Demolition of the existing office buildings and construction of an office-led mixed-use development consisting of a 46-storey building with office, cultural and community uses.

### **The applicant**

The applicant is **AXA Investment Management**, and the architect is **Fletcher Priest Architects**.

### **Strategic issues summary**

**Land use principles:** The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations.

**Urban design and heritage:** The proposed building is of high architectural quality and will deliver new public realm, however a final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.

**Transport:** Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics.

Other issues on **environment and sustainable infrastructure** also require resolution prior to the Mayor's decision making stage.

### **Recommendation**

That the City of London Corporation be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 86. Possible remedies set out in this report could address these deficiencies.

## Context

1. On 20 March 2025, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following category of the Schedule to the Order 2008:

**Category 1C** (b) *a building that is more than 150 metres high and is in the City of London*

3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the City of London Corporation to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk>

## Site description

6. The 0.06 hectare site comprises two buildings constructed in the 1980s, the 8-storey Camomile Court to the west and the 9-storey 63 St Mary Axe to the east, which contain predominantly office uses. The site is bounded by Bevis Marks, Outwich Street, Houndsditch, and St Mary Axe. The site is located within the Central Activities Zone (CAZ) and is located near several tall buildings such as Salesforce Tower, 100 Bishopsgate, the Pan Pacific London and 70 St Mary Axe.
7. The site contains a Scheduled Monument (remains of a Roman wall) and remains of a burial ground. The site is in the setting of The Tower of London World Heritage Site (WHS) but not within its Buffer Zone. The site falls within London View Management Framework (LVMF) Views 4A.1 Primrose Hill, 10A.1 City Hall to the White Tower, 15B.2 Waterloo Bridge and 25A.1 to 3 The Queen's Walk at City Hall.

## Details of this proposal

8. Demolition of the existing office buildings and construction of an office-led mixed-use development consisting of a 46-storey building with office, cultural and community uses.

## Case history

9. The GLA held pre-application meetings with the applicant team (also attended by the City Corporation) in April 2022, October 2022, November 2023, and February 2024 in respect of proposals to redevelop this site for a phased mixed-use redevelopment of the site. Previous pre-application meetings were held in 2013, 2019 and 2020. The applicant was advised that the uplift of high-quality office floor space in the CAZ was strongly supported, however, concerns were raised with the potential impacts of the tall building on the setting of the WHS.
10. The London Review Panel (LRP) undertook a design review with GLA and City officers, and applicant, on 17 May 2024. The LRP were broadly supportive of the proposals, with comments provided on the quality of the public realm and accessibility of spaces, facades and planting, and sustainability.

## Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021; and the City of London Local Plan 2015.

12. The following are also relevant material considerations:

The National Planning Policy Framework and National Planning Practice Guidance;

Tower of London World Heritage Site Management Plan;

Tower of London Local Setting Study: An Assessment of the Local Setting of the Tower of London and Guidelines for its Management (August 2010);

Draft City Plan 2040; and

Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on land use principles, urban design, heritage, transport, sustainability, and environment, which can be found on the GLA's website [here](https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507).<sup>1</sup>

---

<sup>1</sup> <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

## Land use principles

13. The proposal for an office-led mixed-use redevelopment of the site, providing an uplift of 85,624 sq.m. of office floor space in the CAZ, is strongly supported in land use terms, in line with Policies SD4 and E1 of the London Plan. The applicant is not providing affordable workspace in line with Policy E3 of the London Plan. Given this is not required by local policy, the non-provision is acceptable in this instance.
14. The proposed development includes 4,006 sq.m. of cultural and community uses and 461 sq.m. of multi-functional space. Although the site is not located in a specific cultural quarter of the CAZ, the use of part of the building for cultural floorspace is strongly encouraged as it would help to enhance and expand London's cultural assets in line with Policies HC5 and SD4 of the London Plan. Further details on the use, access, fit-out and future management of the cultural uses should be provided to the City Corporation and be appropriately secured by condition or obligation. Any community use on the site should be fully accessible to the public and a community use agreement and management plan should be secured in a S106 agreement in line with Policy S1 of the London Plan.
15. Overall, the redevelopment of the site is strongly supported in principle, subject to addressing the issues set out in this report.

## Urban design

16. The London Review Panel (LRP) undertook a design review with GLA and City officers, and applicant, on 17 May 2024. This is considered to meet the requirements of Policy D4 of the London Plan.

### Development layout

17. GLA officers are supportive of the public realm at street level and public uses within the building which could be a transformational addition to the area. The active frontages at lower levels of the buildings will contribute positively to the street environment.
18. The future management of the public spaces internally and externally, including the entrances themselves, should be carefully considered to create spaces that are welcoming, unique, and engaging with maximum hours of accessibility. The double-height glazed sliding entrance screens, if fully open as frequently as possible, will facilitate this.
19. Public seating has been included in Camomile Park and within the internal public spaces of the building to help facilitate spontaneous activation and create a place for informal meeting for the local community. The sense of identity could be strengthened by the inclusion of a sculpture or water features or commissioning of local artwork.

20. A sunlight study has been carried out to inform the planting proposals at lower levels beneath the projecting upper floors. The LPA should ensure that appropriate plant specification and maintenance is secured by condition to ensure that this key feature of the proposals thrives.

#### Tall buildings, scale and massing

21. The proposal includes a 46-storey building. This constitutes a tall building according to the LPA's local definition. The site is identified in the adopted and draft local plan as a site which is suitable for tall buildings, however, no heights have been specified. Therefore, this leads to a technical policy conflict with the locational requirements of Policy D9 (Part B) of the London Plan.
22. In terms of visual impacts, the overall height and massing of the scheme is well considered and works as a calm addition to the Eastern Cluster. The proposed materials and colour palette for the upper levels achieve a visual non-prominence which may help mitigate the sky gap reduction. The landscaped terraces at upper levels are less verdant than indicated at pre-application stage, which is supported. GLA officers are supportive of the amendments to the appearance of the crown to increase its significance.
23. With regards to the functional, environmental (including daylight, sunlight, glare, light, and wind impacts), and cumulative impacts, the LPA's assessment of these aspects will be reviewed at Stage 2.

#### Strategic views

24. The site falls within London View Management Framework (LVMF) Views 4A.1 Primrose Hill, 10A.1 City Hall to the White Tower, 15B.2 Waterloo Bridge and 25A.1 to 3 The Queen's Walk at City Hall. The design development process has achieved iterative improvements in the relationship of the building with the WHS in LVMF View 10.A.1, however potential impacts have been identified as discussed in the Heritage section below.

#### Internal quality

25. GLA officers are supportive of the internal layout to provide cultural and community uses in the building, which are the result of an engagement process to understand people's needs and aspirations. The inclusion of weather-protected non-transactional spaces that are accessible to all should be secured by the LPA. The office accommodation appears to be high quality and the multiple external terraces for office workers are strongly supported.

#### Architectural quality

26. The proposed materials and colour palette will provide the building with a high-quality appearance. Refinement of the visibility of the mid-level plant floors on the St Mary Axe elevation could be considered.

### Public toilets

27. The proposed development includes a public toilet in line with Policy S6 of the London Plan. Management and maintenance details should be appropriately secured.

### Free drinking water

28. The proposed development includes a water fountain in line with Policy D8 of the London Plan. Its provision and future management should be secured by condition.

### Fire safety

29. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
30. Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with Policies D12 and D5 and all proposed measures should be secured by appropriate conditions.

### Inclusive design

31. An inclusive design statement has been included in the application submission which identifies design and mitigation measures which should be secured to achieve an inclusive environment.

## **Heritage**

32. Policy HC1 of the London Plan states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. As the site is in the setting of Tower of London World Heritage Site (WHS), London Plan Policy HC2 is relevant which states that development proposals in the setting of a WHS should not compromise the ability to appreciate their Outstanding Universal Value (OUV). Changes to setting can either have an adverse, neutral or beneficial impact on the ability to appreciate the site's OUV.
33. Beneath the existing buildings is a Scheduled Monument, London Wall: remains of Roman wall and bastion, Camomile Street, which forms part of the Roman wall around the northeast of the city. The site also contains a raised landscaped area, which is the remains of the graveyard of St Augustine Papey and St Mary Outwich.

34. The proposals include the full excavation, preservation in situ, presentation to public view and historical interpretation of a 5-metre stretch of the Roman wall. The proposals include appropriate hard and soft landscaping and historical interpretation of the on-site churchyard. This enhancement, once managed through conditions and secured through the S106 agreement would form welcomed heritage-related public benefits.
35. It is considered that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario); the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

| <b>Table of indirect (setting) impacts</b>                                                                                           |                         |                       |                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------|---------------------------------------------------|
| <b>Designated heritage asset</b>                                                                                                     | <b>Category of harm</b> | <b>Extent of harm</b> | <b>View reference</b>                             |
| Tower of London WHS, Scheduled Monument, Grade I, II* and II listed buildings and conservation area                                  | Less than substantial   | Low to middle         | Views 4, 5, 6, 7, 8a-c, 9, 10, 11, 12, 13, 14, 15 |
| Botolph Street group: Church of St Botolph Aldgate, listed Grade I; Sir John Cass School, listed Grade II*;                          | Less than substantial   | Very low              | Views 17, 18, 26                                  |
| Church of St Helen, listed Grade I;                                                                                                  | Less than substantial   | Very low              | View 22                                           |
| Lime Street group: Church of St Mary Undershaft, listed Grade I; Lloyds Building, listed Grade I;                                    | Less than substantial   | Low                   | View 21                                           |
| Bank group: The Royal Exchange, listed Grade I; 13 Bishopsgate, listed Grade I; Numbers 51-53 Threadneedle Street, listed Grade II*. | Less than substantial   | Very low              | View 3                                            |

36. In the view from the north bastion of Tower Bridge (View 8b, which is also LVMF View 10A.1) the angle of view shows a closing of the sky gap between the White Tower and the Eastern Cluster, of which the proposed building forms a part. In this view, the height of the proposal is now equivalent to the shoulder height of the Salesforce Tower to the west, and the eastern edge of the proposed development follows the edge line of the Pan Pacific Hotel. In this view an area of open sky will be obscured by the proposed development. It is also noted that the building will be closer to the viewer than either the Salesforce Tower or the Pan Pacific Hotel. The closing of the gap is considered to cause less than substantial harm at a low to middle extent to the setting of the Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the Outstanding Universal Value of the Tower of London.
37. As the proposal is considered to result in a very low to middle level of less than substantial harm to heritage assets, the proposed development is therefore contrary to Policy HC1 and HC2 of the London Plan. Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm

should be attributed considerable importance and weight and weighed against the public benefits of the proposal.

38. GLA officers acknowledge that the proposal would deliver public benefits such as the delivery of new office space within the CAZ, publicly accessible cultural and community floor space, and new public realm improvements in addition to the heritage benefits associated with the Roman Wall. GLA officers will report at Stage 2, following a full assessment of the heritage impacts of the proposals by the City of London Corporation and once these public benefits have been secured by the Corporation to ensure that full weight can be given to these public benefits, to outweigh any harm identified.

## **Transport**

### Transport assessment

39. The Transport Assessment (TA) generally follows TfL guidance and includes an Active Travel Zone (ATZ) assessment including a night walkaround in alignment with the Women's Night Safety Charter, the Mayor's Violence Against Women and Girls Strategy, and Policy T4 Part B of the London Plan.
40. The LPA should consider securing highway works in kind or S106 contributions to their own relevant projects based on the outputs of the day and night ATZ assessments.
41. Measures should be proposed to ensure the public realm at and within the boundary of the site is always well lit and overlooked to maximise safety, including during any pedestrian diversions or gantries needed for construction.
42. Further contribution requests and comments on technical analysis elsewhere in the TA are outlined in detail below.

### Public transport impacts

43. Distributional analysis of expected trips in terms of which local National Rail and London Underground (LU) stations might be used by visitors to and from the development has been provided; however, this does not split expected inward and onward travel by directions, platforms or lines as requested at pre-application stage.
44. The proposal meets TfL's strategic modelling threshold. As such, the TA should include directional analysis for buses, National Rail and London Overground (OU) / LU trips (including line loadings expected from the proposal).
45. The applicant is therefore advised to further engage with TfL to discuss and agree on the scope of modelling requirements through a follow up strategic modelling meeting.

46. Further public transport capacity modelling or equivalent technical analysis approved in principle by TfL is necessary to fully demonstrate compliance with Policy T4 Part F of the London Plan. This should be addressed prior to Stage 2.
47. Standard conditions are also requested for LU infrastructure protection and the applicant is strongly recommended to engage further with LU directly to ascertain the exact requirements based on the likely impact of the development to sub-surface LU infrastructure before, during and after its construction.

#### Highway impacts

48. The proposal for a minor relocation of the on-highway bus stands on Houndsditch to accommodate a new pedestrian route crossing to follow desire lines may be supported. Further clarification is required for bus standing at least equivalent to the current capacity, including driver and other associated facilities that would remain in in any new future highway layout. Swept paths for vehicles entering the proposed disabled parking and servicing area from the public highway must be provided.
49. TfL has requested a distribution of forecast pedestrian and cycle trips to determine the impact on their A10 corridor scheme and inform any mitigation. This is necessary to enable viable and proportionate costing of any S106 contribution to that scheme, pooled with other local committed developments in the vicinity.
50. Subject to further negotiation and the outcome of pedestrian distribution analysis once it has been provided, TfL may also request a contribution to their emerging TLRN A10 corridor scheme. This would be used to deliver strategic highway improvements at the Bishopsgate/Camomile Street junction. The sum requested would be proportionate to contributions recently secured from other significant developments in the City Cluster such as 55 Bishopsgate.
51. If preferable to the applicant, suitable mitigation works for the A10 could also be finalised through further modelling and design work prior to commencement and implemented through a S278 agreement. The S106 agreement would then need to specify an agreed scope of S278 works to be subsequently designed, validated and delivered by the applicant, including all technical assurance, road safety audits and traffic modelling if requested, with all necessary auditing.

#### Car parking

52. The proposed car-free nature of the scheme except for two disabled parking spaces is welcomed and aligns with Policy T6 of the London Plan. This should be secured by condition.
53. It is understood that the adjacent servicing area may be used for open space / retail during daytime, therefore consideration should be given ensuring disabled car users would not conflict with other visitors at the proposed ground floor open space.

### Cycling and cycle hire

54. The proposed cycle access from Houndsditch is acceptable but provision of an additional alternative access point and route in from St Mary Axe should be considered.
55. The proposed mix of cycle parking is acceptable in principle, despite an under provision of 27 visitor spaces. The TA notes these spaces are required by the London Plan but not proposed and has offered to fund their creation off-site through a S106 obligation.
56. Under provision of cycle parking spaces against London Plan standards can only be supported subject to agreement by the applicant of significant financial contributions to the local London Wall highway scheme, which will improve surrounding highway conditions for cyclists in line with Policy T5 of the London Plan, and to free Cycle Hire memberships for initial occupants of the development.
57. The outline Cycle Promotion Plan submitted instead of a Travel Plan is broadly acceptable. However, S106 contributions toward its monitoring and £200,000 for free TfL Cycle Hire memberships to be offered to site users at first occupation and within the following 5 years should also be secured. The applicant should engage directly with TfL on this matter.
58. The applicant should ensure the design of all cycle parking accords with the with the London Cycle Design Standards (LCDS) as also set out in Policy T5. The provision of cargo bike spaces should be considered given the anticipated demand for the future. Details on the space of and location of the cycle parking should be provided prior to Stage 2.

### Deliveries and servicing

59. Servicing access is proposed from Houndsditch using vehicle lifts which would be able to accommodate vehicles up to 7.5T panel van in size. The access location and effective vehicle size limit are acceptable in principle in line with Policy T7 of the London Plan. Robust measures and facilities to enable and increase the number of deliveries by cargo bike should feature in the proposals in both the TA and the outline Delivery and Servicing and Cycle Promotion Plans.
60. Concerns remain in relation to lifts, which may be subject to potential failure and associated impacts on the surrounding road network. In line with similar developments recently consented nearby, it is recommended to restrict delivery and servicing by motor vehicles including motorcycles by condition to between 11PM and 6AM only on weekdays. This is appropriate to support Part G of Policy T7 which highlights that developments should be designed and managed to receive deliveries. At present, restrictions are proposed from 7am -10am, 12pm – 2pm and 4pm – 7pm only.
61. The inclusion in the submitted outline Delivery and Servicing Plan of proposals to use an off-site freight consolidation centre and maximise the use river freight,

cargo bikes and available local 'last mile' logistics hubs are welcomed. However, as stated above, to support those aspirations, stringent restrictions on daytime deliveries by motorised modes and provision of specific on-site facilities for cargo bikes, including at the main entrance, must also be proposed and appropriately secured.

62. Any waiting areas on the public highway, even expected to be used only for infrequent overspill loading or in emergencies, must be agreed in advance with TfL and the LPA prior to Stage 2, and secured via S106 and S278.
63. Along with other requested further information and obligations, this is essential to prevent any unacceptable impact on the existing bus stand directly to the north of the site in accordance with Policies T3 and T4 of the London Plan.

### Construction logistics

64. The submitted outline Construction Logistics Plan (CLP) is broadly acceptable in principle in line with Policy T7.
65. A very large number of vehicles are expected including over 60 HGVs per day during the busiest month of the overall construction programme. Access routes to and from the site include key junctions of the TLRN in close proximity, which are also part of TfL's A10 corridor walking, cycling and highway safety improvement scheme. TfL works nearby may coincide with construction access to support implementation of the development.
66. As such the CLP itself may require further future design assurance, traffic modelling and S278 highway works on both local highway and the TLRN, which should be referenced in any planning decision and secured by condition in the S106 agreement.

## **Environment and sustainable infrastructure**

### Energy strategy

67. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

### *Energy strategy compliance*

68. An energy statement has been submitted with the application. The energy statement does not yet comply with Policies SI2, SI3 and SI4 of the London Plan. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the LPA and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

Be Lean – further evidencing of energy efficiency measures/modelling techniques for the non-domestic element;

Be Clean – demonstration that the number of energy centres has been minimised;  
Be Green – demonstration that renewable energy has been maximised, including more detailed roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;  
Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;  
Energy infrastructure – further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation;  
Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

### *Carbon savings*

69. The development is estimated to achieve a 33% reduction in CO2 emissions compared to 2021 Building Regulations.
70. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. This is unacceptable and the carbon savings must be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the LPA's carbon offset price. The draft S106 agreement should be submitted when available to evidence the agreement with the LPA.

### Whole life-cycle carbon

71. In accordance with Policy SI2 of the London Plan, the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.
72. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with Policy SI2. Further information is required on the operational modelling methodology, cost per building element, GGBS availability, material quantity, assumptions and end of life scenarios, and GWP potential.
73. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance)<sup>2</sup>.

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<sup>2</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

### Circular economy

74. The London Plan requires development proposals to integrate circular economy principles as part of the design process, and referable applications must submit a Circular Economy Statement.
75. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with Policy SI7. The applicant should provide a pre-demolition audit, end-of-life strategy, site waste / resource management plan, cut and fill calculations and / or excavated materials options assessment, circular economy workshop or meeting notes, and reused or recycled content calculations.
76. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)<sup>3</sup>.

### Urban greening and biodiversity

77. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.57 which exceeds the target score of 0.3. The applicant should explore additional opportunities to increase the urban greening and the LPA should secure all greening measures to ensure the target is met.
78. The applicant has set out that there would be a biodiversity net gain of 6,943.64% which complies with the London Plan. Measures to secure the biodiversity net gain should be secured by the LPA.

### Sustainable drainage and flood risk

79. The flood risk assessment (FRA) provided generally complies with Policy SI.12 of the London Plan. Direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk.
80. The sustainable urban drainage strategy does not comply with Policy SI.13 of the London Plan. Whilst the FRA states that runoff will be restricted to 0.93 l/s (QBAR greenfield rate), the table in Section 5.2.1 of the drainage strategy indicates a proposed runoff rate of 2.9 l/s. This inconsistency should be clarified to ensure the design aligns with the agreed drainage parameters. The applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits. The LPA should also include in the SuDS maintenance arrangements the assessment of exceedance flood flow routes, the use of any pump discharges is appropriate, and the completed LPA version of the London Sustainable Drainage Proforma.
81. The water efficiency measures generally meet the requirements of Policy SI.5 of the London Plan.

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<sup>3</sup> <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

## Air quality

82. The applicant should clarify whether the site is located within an air quality focus area as the submitted reports conflict with the maps. The applicant has provided an air quality assessment, and it was determined the scheme would be air quality neutral. Further information is required on the air quality positive assessment. The LPA should identify all appropriate mitigation and appropriately secure these as part of any future planning permission.

## **Local planning authority's position**

83. City of London Corporation planning officers are currently assessing the application. In due course the City of London Corporation will formally consider the application at a planning committee meeting.

## **Legal considerations**

84. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the City of London Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the City of London Corporation under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## **Financial considerations**

85. There are no financial considerations at this stage.

## **Conclusion**

86. London Plan policies on land use principles, urban design, heritage, transport, sustainability, and environment are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

**Land use principles:** The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations.

**Urban design and heritage:** The proposed building is of high architectural quality and will deliver new public realm, however the final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.

**Transport:** Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics.

**Environment and sustainable infrastructure:** Further information is required for the energy strategy, whole life cycle carbon, circular economy, green infrastructure, water and air quality.

---

For further information, contact GLA Planning Unit (Development Management Team):

**Zeb McInnes, Senior Strategic Planner (case officer)**

email: [REDACTED]

**Matt Christie Team Leader – Development Management**

email: [REDACTED]

**Allison Flight, Deputy Head of Development Management**

email: [REDACTED]

**John Finlayson, Head of Development Management**

email: [REDACTED]

**Lucinda Turner, Assistant Director of Planning**

email: [REDACTED]

---

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

City of London Planning Department

Submission by email:  
[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

Dalia Alghoul  
Town planning Technician  
1 Stratford Place,  
London  
E15 1AZ

Date: 9 May 2025

NR Reference:  
TPA/3PT/25/530

### Network Rail Consultation Response

**Reference:** 25/00223/FULEIA  
**Location:** 63 St Mary Axe London EC3A 8AA.

Dear Sir/Madam,

Thank you for consulting Network Rail (NR) regarding the planning application reference: 25/00223/FULEIA. Network Rail would like to be contacted for future applications in the vicinity of Liverpool Street Station.

#### *Liverpool Street Station Capacity Considerations*

In reviewing the application, it is important to highlight that the forecast additional growth in rail demand at Liverpool Street Station (LST), considered on an individual development basis, can be accommodated by the available and planned *on-train* capacity.

However, NR remain concerned about the *cumulative* impact of multiple consented and proposed major developments in the immediate vicinity of LST — particularly in relation to medium-term pedestrian flow and station concourse capacity. At present, there is no committed or funded scheme to address this growing pressure on pedestrian infrastructure within and around the station.



This is a material consideration that should be weighed by the City of London when assessing the overall acceptability of ongoing development in the area.

NR would therefore encourage the City to continue to consider potential allocation of its Community Infrastructure Levy (CIL) funds in addressing the collective infrastructure challenges created by cumulative growth.

I trust the above clearly sets out Network Rail's position on the planning application. Should you require any more information from Network Rail, please do not hesitate to contact me.

Kind regards,



**Dalia Alghoul**

Town Planning Technician | Property | Eastern Route | Anglia  
1 Stratford Place | London | E15 1AZ



[www.networkrail.co.uk/property](http://www.networkrail.co.uk/property)

From: [REDACTED]  
To: [REDACTED]  
Subject: Re: 63 St Mary Axe - Planning Application - Re-Consultation  
Date: 09 May 2025 13:42:14  
Attachments: [image.png](#)

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

We have now assessed the additional information in relation to the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the additional information.

Therefore, our previous safeguarding comments remain valid and should still be consider at all future stages of this development.

Kind regards

**Simon Vince** | Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Airport Safeguarding Limited | Admin Building (EDC), Teesside  
International Airport, Darlington, DL2 1LU  
United Kingdom



Visit our website: [Home - Airport Safeguarding Limited](#) or connect on LinkedIn - Airport Safeguarding Limited.



From: PLN - Comments <PLNComments@cityoflondon.gov.uk>  
Sent: 09 May 2025 12:58  
Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>  
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

**Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.**

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Heathrow Airport Holdings Limited is a private limited company registered in England under Company Number 05757208, with the Registered Office at The Compass Centre, Nelson Road, Hounslow, Middlesex, TW6 2GW.

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From: [REDACTED]  
To: [REDACTED]  
Subject: LPA Reference: 25/00223/FULEIA Standing Advice Response  
Date: 09 May 2025 16:42:35

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 25/00223/FULEIA

**ATE Reference:** ATE/25/00441/FULL

**Site Address:** 63 ST MARY AXE, LONDON, EC3A 8AA

**Proposal:** Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. 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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

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

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

Regards,



**Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

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

]]>

[ ref:a0zTw000003Dxa1IAC;2a75d692f626b35aec29bae6a83dfa3d:ref ]



LPA Ref: 25/00223/FULEIA

London City Airport Ref: 2025/LCY/122

Date: 12/05/2025

Dear Georgia McBirney,

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

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>LPA Reference</b> | 25/00223/FULEIA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Proposal</b>      | Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. AMENDED APPLICATION |
| <b>Location</b>      | 63 St Mary Axe London EC3A 8AA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Borough</b>       | City of London                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Case Officer</b>  | Georgia McBirney                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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

### **Permanent Obstacle Lighting Scheme**

Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of

obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

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

We would also make the following observations:

### **CAA Building Notification**

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

### **CAA Crane Notification**

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

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

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

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

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

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

Kind regards,

**Simon Vince**

On behalf of London City Airport

From: [REDACTED]  
To: [REDACTED]  
Subject: RE: 63 St Mary Axe - Planning Application - Re-Consultation [SG37805]  
Date: 13 May 2025 12:42:57  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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THIS IS AN EXTERNAL EMAIL

Our Ref: SG37805

Dear Sir/Madam

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

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

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

Yours faithfully

**2TAM**

**NATS Safeguarding**

E: [REDACTED]

4000 Parkway, Whiteley,  
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**NATS Internal**

**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** 09 May 2025 12:59  
**Cc:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Subject:** 63 St Mary Axe - Planning Application - Re-Consultation

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Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Tel: 020 8921 5222



City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

**Directorate of Place and Growth**  
The Woolwich Centre, 2nd Floor  
35 Wellington Street  
London, SE18 6HQ

**25/1538/K**  
25/00223/FULEIA  
15 May 2025

## **DECISION NOTICE –RAISE NO OBJECTION**

Dear Sir/Madam,

**Town & Country Planning Act 1990 (As Amended)**  
**The Town and Country Planning (General Permitted Development) (England) Order 2015**

**Site:** 63 St Mary Axe, London, EC3A 8AA  
**Applicant:** C/O Agent  
**Proposal:** An application has been received for: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. 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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118.

### **Drawings**

I refer to your letter dated 09 May 2025 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: 63 St Mary Axe - Planning Application - Re-Consultation  
Date: 16 May 2025 09:44:00  
Attachments: [25-00223-FULEIA - Consultee Re-consultation Letter.rtf](#)  
[63 St Mary Axe Archaeology final.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Thank you for reconsulting me on this application. The additional information submitted does not affect my previous advice which I have attached

Regards

Helen



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[historicengland.org.uk](http://historicengland.org.uk)

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From: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: 09 May 2025 12:59

Cc: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Historic England

Ms Georgia McBirney  
Planning Administration  
Environment Department  
City of London Corporation

Your Ref: 25/00223/FULEIA  
Our Ref: 231485

Contact: Helen Hawkins

08 April 2025

Dear Ms McBirney,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2024

63 St Mary Axe London EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Recommend Pre-Determination Archaeological Assessment/Evaluation

Thank you for your consultation received on 18 March 2025.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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

### Assessment of Significance and Impact

GLAAS advises the City of London on their non-designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter.

The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable.

### Significance

The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings –this is explained further in the Development Advice letter.

At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street.

Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period.

An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial



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ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset –the burial ground –into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'.

Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset.

Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well-preserved Roman deposits were encountered. This is a significant omission.

Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it.

## Impact

Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains.

The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully compensated for by the proposed new park design for the area.

The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new



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development. The Scoping response also requested that the results of the proposed pre-determination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided.

The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works.

The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

## Policy

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest and that a field evaluation may also be necessary.

NPPF paragraphs 212 - 215 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 216). Conservation can mean design changes to preserve remains where they are.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities.

The City Local Plan Policy DM 12.4 requires that planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site and that schemes preserve, protect, safeguard and enhance archaeological monuments, remains ..where appropriate. The supporting text says "The City Corporation will refuse schemes which do not make any provision for the incorporation, safeguarding or preservation in situ of nationally or locally important monuments or remains, or which would adversely affect those monuments or



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remains”.

If preservation is not achievable then if you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

## Conclusion and Recommendations

The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed.

The development proposal as submitted would result in the total loss of this non-designated heritage asset.

We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision.

Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken.

If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

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

This response relates solely to archaeological considerations.

Yours sincerely

Helen Hawkins

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



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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Georgia McBirney  
City of London  
PO Box 270  
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London  
EC2P 2EJ

Development Management  
Planning and Building Control  
Housing and Regeneration Directorate  
Tower Hamlets Town Hall  
160 Whitechapel Road  
London E1 1BJ  
[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/25/00489  
**Your ref:** 25/00223/FULEIA

**Enquiries to:** Robin Bennett

**Tel:**

**Email:**

16 May, 2025

Dear Georgia McBirney,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location  
Proposal**

63 St Mary Axe London EC3A 8AA

Observations requested by City of London in relation to Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Thank you for your letter requesting the observations of the London Borough of Tower Hamlets on the above referenced application. I would be grateful if you would take the observations set out below into consideration in determining the application:-

- 1 The application proposes a development which would provide c85,000sqm Grade A office floorspace. The London Borough of Tower Hamlets (LBTH) acknowledges that this has the potential to make a significant contribution towards the growth in office development, and consequent long term economic and employment growth, that is sought in the City of London's Local Plan 2015 and the emerging City Plan 2040.

In considering the effect of the proposal on land within LBTH, particular regard has



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Tower Hamlets Town Hall  
160 Whitechapel Road  
London  
E1 1BJ

been had to the Townscape and Visual Impact Assessment and Heritage Impact Assessment submitted with the application.

In the majority of views the development does not raise significant concerns, as it is either fully or partially obscured by existing buildings, appears at a sufficient distance from the White Tower to avoid a meaningful impact, or is read as part of a wider backdrop of tall buildings. LVMF View 10A.1 does, however, warrant particular attention due to the increased visual proximity of the development to the White Tower and its potential effect on the composition of the view.

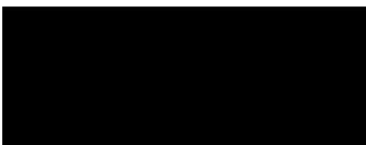
From this viewpoint, the cluster of tall buildings in the City appears much closer to the White Tower, which is the central feature of the WHS, with only a narrow gap separating them. The LVMF guidance highlights that the appreciation of the Tower of London's detailed architecture and historic layering is enhanced by the surrounding free sky space.

The proposed development would be visible in this view, positioned in front of existing tall buildings, including the Salesforce Tower (formerly Heron Tower). Although it would retain the final part of the gap between the cluster and the White Tower, its presence would intensify the visual dominance of built form and contribute to the crowding of the White Tower's immediate setting. The development would also appear taller than the current building at the cluster's edge, reducing the sky space between the cluster and the White Tower and competing visually with the tower's corner turrets. While the building leans away from the White Tower, mitigating some sky space loss, this design also introduces a more striking and potentially distracting form, where a calmer appearance might better respect the WHS setting.

Overall, LBTH consider that the proposed development would result in only limited harm to the WHS, taking into account the number and variety of views in which they are experienced together. However, in the context of viewing location 10A.1, the proposed development is considered to cause some harm to the setting of the WHS. The decision maker should carefully consider this harm and weight it against the public benefits of the scheme.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,

A black rectangular box redacting the signature of the Director.

**Sripriya Sudhakar, Director Planning and Building Control**

Georgia McBirney  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Development Management  
Planning and Building Control  
Housing and Regeneration Directorate  
Tower Hamlets Town Hall  
160 Whitechapel Road  
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[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

**Application Number:** PA/25/00859  
**Your ref:** 25/00223/FULEIA

**Enquiries to:** Robin Bennett  
**Tel:**  
**Email:**

16 May, 2025

Dear Georgia McBirney,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location** 63 St Mary Axe London EC3A 8AA  
**Proposal** Observations requested by City of London for Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works. 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](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118.  
RE-CONSULTATION due to the submission of additional information.

Thank you for your letter requesting the observations of the London Borough of Tower Hamlets on the above referenced application. I would be grateful if you would take the observations set out below into consideration in determining the application:-

- 1 The London Borough of Tower Hamlets (LBTH) has considered the additional information that is subject to the re-consultation. LBTH do not wish to add to the comments in their letter dated 16 May 2025 under LBTH ref:PA/25/00489, and ask



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160 Whitechapel Road  
London  
E1 1BJ

that these are taken into account by the City of London in the determination of the application.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



**Sripriya Sudhakar, Director Planning and Building Control**

**London Borough of Hammersmith & Fulham**

Development Management, Place Department  
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081  
Email: [planning@lbhf.gov.uk](mailto:planning@lbhf.gov.uk)  
Web: [www.lbhf.gov.uk](http://www.lbhf.gov.uk)



**19th May 2025**

City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

---

Applicant:

Application Reference: **2025/00950/OBS**

City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Registered on: **2nd April 2025**

---

**Town and Country Planning Act 1990**

**NO OBJECTION RAISED**

**Location and Description:**

**63 St Mary Axe London EC3A 8AA**

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes

E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St

Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

Drawing Nos:

**Particulars of Decision:**

**This Council raises no objection to the proposed development.**

Chief Planning Officer of Place  
Department: Joanne Woodward



**Joanne Woodward Chief Planning Officer of Place Department**  
Duly authorised by the Council to sign this notice.

Georgia McBirney  
Corporation Of London  
Planning & Transportation Department  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2025/137997/02  
**Your ref:** 25/00223/FULEIA  
**Date:** 21 May 2025

Dear Georgia

**63 St Mary Axe, London, EC3A 8AA.**

**Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.**

Thank you for re-consulting us on the above application on 9 May 2025.

### **Environment Agency Position**

We continue to have **no objections** to this application. However, we would like to draw your attention, and that of the applicant, to the following advisory comments.

### **Advice to Local Planning Authority and applicant:**

#### **Development in close proximity to activity regulated by an Environment Agency permit advisory**

New developments within 75m metres of Medium combustion plant (MCP) could result in impacts including the nearby community being exposed to fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new

development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations (EPR) require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 200 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

### **Advice to Local Planning Authority**

#### **The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites**

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NO<sub>x</sub>), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM<sub>10</sub> and PM<sub>2.5</sub>). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

### **Use of Sustainable Drainage Systems (SuDS)**

Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

### **Advice to applicant**

#### **Water Resources**

Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

#### Commercial/Industrial developments

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the [BREEAM 'excellent'](#)

[standard](#) for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

**Final comments**

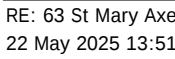
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely

**Demitry Lyons**  
**Sustainable Places Planning Advisor**



From:   
To:   
Subject: RE: 63 St Mary Axe - Planning Application - Re-Consultation  
Date: 22 May 2025 13:51:46  
Attachments: [image001.png](#)

---

THIS IS AN EXTERNAL EMAIL

Good afternoon,

25/00223/FULEIA

Location: 63 St Mary Axe London EC3A 8AA

**Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.**

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground infrastructure.

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not be commenced until the following documents (in consultation with London Underground), have been submitted to and approved in writing by the local planning authority which:

- a. Provide predicted short term and long-term ground movement effects of the works on LU structure or tunnels and in particular changes in stresses, changes in heave or settlement, distortion of the structure or tunnels due to required temporary and permanent works.
- b. provide detailed design and Risk Assessment Method Statement (RAMS) for both temporary and permanent works associated with demolition, excavation and construction of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling.

**Reason:** To ensure that the development does not impact on existing London

Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

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

Kind regards,

**Mehmet Kani | Safeguarding Engineer**

LU/DLR | Infrastructure Protection | Engineering

Transport for London

7<sup>th</sup> Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



*Mitigating risk - while helping London develop.*

---

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>

Sent: Friday, May 9, 2025 12:59 PM

Cc: PLN - Comments <PLNComments@cityoflondon.gov.uk>

Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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---

From: SM-NE-Consultations (NE) <[REDACTED]>  
Sent: 27 May 2025 18:20  
To: PLN - Comments <[REDACTED]>  
Subject: FAO. Georgia McBirney [Re: 63 St Mary Axe - Planning Application - Re-Consultation]

THIS IS AN EXTERNAL EMAIL

Please see below for Natural England's response to this consultation.

Dear Ms McBirney

Application Ref: 25/00223/FULEIA  
Our Ref: 512637

Thank you for your consultation.

Natural England has previously commented on this proposal in our letter dated 22 April 2025 [NE Ref: 507023] and enclosed for your convenience.

The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours sincerely

**Paul Scott**

Natural England  
Consultation Service  
County Hall, Spetchley Road, Worcester, WR5 2NP.

[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) | [www.gov.uk/natural-england](http://www.gov.uk/natural-england)



We strongly recommend using the [SSSI Impact Risk Zones](#) (SSSI IRZs) to decide when to consult Natural England on development proposals that might affect a SSSI. The SSSI IRZs tool is quick and simple to use and gives instant planning advice as a formal consultation response in certain circumstances and can reduce unnecessary delays in the planning process.

Natural England offers two chargeable services: the [Discretionary Advice Service](#), which provides pre-application and post-consent advice on planning / licensing proposals to developers and consultants; and the [Pre-submission Screening Service](#) for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development; reduce uncertainty; the risk of delay and added cost at a later stage while securing good results for the natural environment.

---

From: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: 09 May 2025 12:59

Cc: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Subject: 63 St Mary Axe - Planning Application - Re-Consultation

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Date: 22 April 2025  
Our ref: 507023  
Your ref: 25/00223/FULEIA



FAO Georgia McBirney  
City of London Planning

**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Madam,

**Planning consultation:** Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St. Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development

**Location:** 63 St Mary Axe London EC3A 8AA

Thank you for your consultation on the above dated 17 April 2025 which was received by Natural England on 17 April 2025

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

## **SUMMARY OF NATURAL ENGLAND'S ADVICE**

### **NO OBJECTION**

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

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

## **Sites of Special Scientific Interest Impact Risk Zones**

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

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

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

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

Yours faithfully

Richard Gibson  
Consultations Team

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: FW: 25/00223/FULEIA 63 St Mary Axe - Re-Consultation  
Date: 30 May 2025 17:25:35  
Attachments: [image001.png](#)

Hello,

Could the email below please be logged and uploaded as consultation response from Historic England on 25/00223/FULEIA –63 St Mary Axe.

Kind regards



**Georgia McBirney (she/her)**  
**Planning Officer**  
**(Development Management)**  
Environment Department | City of London  
Corporation, Guildhall, London EC2V 7HH

Environment  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Katie Stewart –Executive Director Environment

**Advance Leave Notice:**

From the 11<sup>th</sup> June returning on 23<sup>rd</sup> June

From the 15<sup>th</sup> September returning on 22<sup>nd</sup> September

From: Bowring, Alexander <[REDACTED]>  
Sent: 29 May 2025 15:33  
To: McBirney, Georgia <[REDACTED]>  
Cc: Reade, Chris <[REDACTED]>  
Subject: 25/00223/FULEIA 63 St Mary Axe - Re-Consultation

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Thank you for reconsulting Historic England on this application.

A revised Heritage Impact Assessment and a video of the 3D model of the proposed development illustrating the kinetic experience of Tower Bridge have been submitted.

We continue to refer you to advice letter of 16 April 2025 –the additional information does not overcome the concerns that we have previously set out. The video in particular illustrates the harmful impact of the proposals on the Outstanding Universal Value of the Tower of London World Heritage Site that we have described.

Historic England continues to object to the application on heritage grounds. However, we would welcome further discussion with the applicants and your authority about possible amendments to the proposals which would reduce the harmful impact on the important heritage assets previously discussed, including the World Heritage Site, the scheduled monument and the burial ground.

Please contact Chris and I if we can be of any further assistance.

Kind regards

Alex Bowring  
Inspector of Historic Buildings and Areas  
London and South East Region  
Historic England  
Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Email: [Alexander.Bowring@HistoricEngland.org.uk](mailto:Alexander.Bowring@HistoricEngland.org.uk)



Ensuring our heritage lives on and is loved for longer.  
[historicengland.org.uk](http://historicengland.org.uk)

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From: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
Sent: 09 May 2025 12:59  
Cc: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
Subject: 63 St Mary Axe - Planning Application - Re-Consultation

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

Dear Sir or Madam,

Please see the attached letter pertaining to a re-consultation for a planning application at 63 St Mary Axe.

Kind regards,

Planning Administration Team

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Your ref:  
My ref: 25/03284/OBS

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

Georgia McBirney  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

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

29 May 2025

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990**

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

**SCHEDULE**

|                         |              |                          |            |
|-------------------------|--------------|--------------------------|------------|
| <b>Application No.:</b> | 25/03284/OBS | <b>Application Date:</b> |            |
| <b>Date Received:</b>   | 09.05.2025   | <b>Date Amended:</b>     | 09.05.2025 |

**Plan Nos:** Letter from City of London dated 9 May 2025.

**Address:** 63 St Mary's Axe, City Of London, London, EC3A 8AA

**Proposal:** Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

Yours faithfully,

[REDACTED]

Tracy Darke  
Director of Town Planning & Building Control

**Note:**

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



Your Ref:  
Our Ref: 25/01599/OBS



**City Of London**

PO Box 270  
Guildhall  
London  
EC2P 2EJ

4th June 2025

**RE: REQUEST FOR OBSERVATIONS**

Dear City Of London

**DECISION NOTICE  
TOWN AND COUNTRY PLANNING ACT 1990.**

**REQUEST FOR OBSERVATIONS**

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 25/01599/OBS Date of Application: 09.05.2025 Date of Decision 04.06.2025

Proposed Development At:  
**Adjoining Borough Observations Within The Corporation Of London**

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| For: | Observations on a proposed development within the adjoining Borough of City of London with respect to: 'Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.', at: 63 St Mary Axe, London, EC3A 8AA. [RE-CONSULTATION due to the submission of additional information.]<br>Reference number: 25/00223/FULEIA |
|------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Approved Plans**

Consultation letter from City of London dated 15 May 2025

**Lambeth Planning**  
PO Box 80771  
London  
SW2 9QQ

Telephone 020 7926 1180  
[www.lambeth.gov.uk](http://www.lambeth.gov.uk)  
[planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk)

## Conditions

Notes to Applicant:

Yours sincerely



**Rob Bristow**

Director - Planning, Transport & Sustainability  
Climate and Inclusive Growth Directorate

Date printed: 4th June 2025

**London Borough of Hammersmith & Fulham**

Development Management, Place Department  
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081  
Email: [planning@lbhf.gov.uk](mailto:planning@lbhf.gov.uk)  
Web: [www.lbhf.gov.uk](http://www.lbhf.gov.uk)



**6th June 2025**

City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

---

Applicant:

Application Reference: **2025/01302/OBS**

City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Registered on: **12th May 2025**

---

**Town and Country Planning Act 1990**

**NO OBJECTION RAISED**

**Location and Description:**

**63 St Mary Axe London EC3A 8AA**

25/00223/FULEIA - Reconsultation - Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and other associated works.

Drawing Nos:

**Particulars of Decision:**

**This Council raises no objection to the proposed development.**

Chief Planning Officer of Place  
Department: Joanne Woodward



**Joanne Woodward Chief Planning Officer of Place Department**  
Duly authorised by the Council to sign this notice.

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: 63 St Mary Axe London EC3A 8AA (ref: 25/00223/FULEIA) Re-consultation  
Date: 06 June 2025 13:39:34

---

THIS IS AN EXTERNAL EMAIL

Dear Georgia,

Many thanks for letting us know of the re-consultation of this scheme. Following review, we offer no further comment on the scheme.

Kind regards,

Greg

**Gregory Barrett**

BA (Hons) MPhil (Cantab) FRSA IHBC  
Lead Heritage Consultant and Clerk to the Surveyor

**Mobile:** [REDACTED]

on behalf of Caroe Architecture Ltd

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**Cambridge Office:**

Office 5, Unit 8; 23-25 Gwydir Street  
Cambridge CB1 2LG  
Tel: 01223 472237

**London Office:**

The Surveyor's Office, The Chapter House, St Paul's Churchyard  
London EC4M 8AD  
Tel: 020 7246 8341

Visit our website: [caroe.com](http://caroe.com)

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From: [REDACTED]  
To: [REDACTED]  
Subject: 63 St Mary Axe, London, EC3A 8AA. Application no. 25/00223/FULEIA  
Date: 10 June 2025 10:22:17  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

FAO Georgia McBirney, Planning Case Officer

Dear Georgia,

Thank you for re-consulting the Council for British Archaeology on this revised application.

We refer you to our previous response, dated 16 April 2025. In this we advised that a detailed pre-determination archaeological evaluation of the site is required to understand the survival and significance of the surviving below-ground archaeology, in order to understand the potential impacts of the scheme. In the absence of this, there is insufficient information to meet the requirements of para. 207 of the NPPF or Policy HE2 of the City Plan 2040. There is potential for this application to cause substantial harm to a highly significant archaeological site spanning centuries; the level of harm caused and significance of the site cannot be understood without an expert on-site evaluation.

While the applicants have provided additional information on the above-ground impacts on the setting of nearby heritage assets, no archaeological assessment of the site has been undertaken, as previously recommended by the CBA and GLAAS.

As such, we maintain our previous objection to the scheme. If an archaeological evaluation of the site which permits an understanding of the probable surviving archaeology on site is not provided, we recommend that this application be refused.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

We would be grateful if these comments could be uploaded to the planning portal.

Kind Regards,  
Dr Alison Edwards  
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications –notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.

**Alison Edwards**  
[she/her]  
Listed Building Caseworker  
/ JCNAS database  
coordinator

*Please note my normal  
working days are Monday-  
Thursday*

[www.archaeologyuk.org](http://www.archaeologyuk.org)  
De Grey House | St Leonard's  
Place | York | YO1 7HE  
01904 671417



Certified Carbon Literate



Event registration for the 2025 Festival of Archaeology  
is now open.

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From: [REDACTED]  
Sent: 17 June 2025 12:35  
To: Grierson, John <[REDACTED]>  
Subject: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

17 June 2025

**Our DTS Ref: 77421**

**Your Ref: 25/00223/FULEIA - revise response**

Dear Sir/Madam,

Re: 63, ST MARY AXE, LONDON, EC3A 8AA

**Waste Comments:**

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to

ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Please ensure to apply to determine if a build over agreement will be granted.

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<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

### **Supplementary Comments:**

Yours faithfully,  
Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
Denham Way,  
Rickmansworth,  
WD3 9SQ,  
Email: [REDACTED]

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**From:** lauren underwood [REDACTED]  
**Sent:** 17 June 2025 15:04  
**To:** Grierson, John [REDACTED]  
**Subject:** RE: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Hi John,

That's correct, the supplementary comments heading should have nothing underneath. What came through from our system should look like the below:-

Dear Sir/Madam,

**Re: 63, ST MARY AXE, LONDON, EC3A 8AA**

**Waste Comments:**

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**Supplementary Comments:**

Yours faithfully,  
Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Email: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)

I hope that helps

**Lauren Underwood**

Regional Development Manager (London)  
Development Planning Team  
Asset Management & Engineering

[REDACTED]  
Maple Lodge Sewage Treatment Works, Denham Way, Rickmansworth, WD3 9SQ



Working schedule: Mon, Tues Fri 8am-5:30pm. Wed & Thurs 9:30am - 2:30pm

**From:** Grierson, John [REDACTED]  
**Sent:** 17 June 2025 14:59  
**To:** lauren underwood [REDACTED]  
**Subject:** Fw: 3rd Party Planning Application - 25/00223/FULEIA - revise response

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Hi Lauren,

Just to clarify as the applicant has queried - there aren't supposed to be any additional supplementary comments as this section was blank on the response?

Kind regards,

John



John Grierson MRTPI | Planning Officer (Development Management)  
Environment Department | City of London | Guildhall | London EC2V 7HH  
Email: [REDACTED] | Mob: [REDACTED] | Website: [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)



Katie Stewart – Executive Director Environment



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**From:** Eleanor Hulm [REDACTED]  
**Sent:** 17 June 2025 14:55  
**To:** Grierson, John [REDACTED]  
**Cc:** McBirney, Georgia [REDACTED]; Tastsoglou, Anna [REDACTED]  
**Subject:** RE: 3rd Party Planning Application - 25/00223/FULEIA - revise response

THIS IS AN EXTERNAL EMAIL

Hi John

Many thanks for the below.

Can I take it that there no objection from Thames Water and nothing further required at this stage prior to committee due to detail that can be conditioned?

It appears that a section is missing on supplementary comments?

Best

Eleanor

Eleanor Hulm

Senior Planner

mobile: [REDACTED]

e-mail: [REDACTED]

DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 website: [www.dp9.co.uk](http://www.dp9.co.uk)

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**From:** Grierson, John [REDACTED]  
**Sent:** 17 June 2025 12:37  
**To:** Eleanor Hulm [REDACTED]  
**Cc:** McBirney, Georgia [REDACTED]; Tastsoglou, Anna [REDACTED]  
**Subject:** Fw: 3rd Party Planning Application - 25/00223/FULEIA - revise response

Hi Eleanor,

Please see below an updated response from TW.

Kind regards,

John



John Grierson MRTPI | Planning Officer (Development Management)  
Environment Department | City of London | Guildhall | London EC2V 7HH  
Email: [REDACTED] | Mob: [REDACTED] | Website: [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)



Katie Stewart – Executive Director Environment



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**Subject:** 3rd Party Planning Application - 25/00223/FULEIA - revise response

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17 June 2025

Our DTS Ref: 77421

Your Ref: 25/00223/FULEIA - revise response

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Development Planning Department

Development Planning,  
Thames Water,  
Maple Lodge STW,  
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WD3 9SQ,  
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From: [REDACTED]  
To: [REDACTED]  
Subject: 3rd Party Planning Application - 25/00223/FULEIA - revise response  
Date: 20 June 2025 12:06:27

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Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

20 June 2025

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**Waste Comments:**

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

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

Business customers; Groundwater discharges section.

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Please ensure to apply to determine if a build over agreement will be granted.

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

**Water Comments:**

Water Comments: The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

**Supplementary Comments:**

Yours faithfully,  
Development Planning Department

Development Planning,  
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