

From: [Rohan Thakkar](#)
To: [PLN - Comments](#)
Cc: [McBirney, Georgia](#)
Subject: Re: Concerns Regarding Proposed Development at 36 St Mary Axe
Date: 19 March 2025 10:46:43

THIS IS AN EXTERNAL EMAIL

Dear Shupi,

Yes of course, my full address is

80 Houndsditch
Flat 3208
London EC3A7AB

Can you advise next steps regarding the planning application and where the process is?
Would it be helpful to our objection to get a similar email from the other residents?

Thank you.

On Wed, Mar 19, 2025 at 10:43 AM PLN - Comments
<PLNComments@cityoflondon.gov.uk> wrote:

Dear Rohan Thakkar,

Thank you for your email. I can confirm receipt of your objection.

However, I cannot take into account comments that do not include a name and address, nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. You can ask for your name and address to be removed from the planning report to the Planning and Transportation Committee but your comments will be anonymous and that may affect the weight the Members give them.

In light of the above, please can you provide a full address?

Kind Regards

Shupi Begum

Shupi Begum

Planning Administrator|Development Division
City of London Corporation | Environment Department | Guildhall | London | EC2V



7HH

shupi.begum@cityoflondon.gov.uk | www.cityoflondon.gov.uk

Juliemma McLoughlin

Executive Director Environment

From: Rohan Thakkar [REDACTED]
Sent: 12 March 2025 11:10
To: Pln - CC - Development Dc <PLNDev@int.cityoflondon.gov.uk>; Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Concerns Regarding Proposed Development at 36 St Mary Axe

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

Good morning,

I hope this email finds you well. I am writing to express my concerns, along with those of other local residents, regarding the proposed development at 36 St Mary Axe and its potential impact on our daily lives.

As residents of the area, including those residing at the Pan Pacific Hotel and Residences, we are particularly concerned about the loss of light, privacy, increased noise levels, and overall disruption that this project may bring to the neighborhood. Given the scale of the proposed development, we believe it is crucial to assess its implications on both residential and hotel communities in the vicinity.

We would appreciate your guidance on the following:

1. Public Consultation Status: Could you confirm whether the application has now been published for public consultation? If so, could you provide details on the timeline for submitting comments?
2. Engagement Process: How can we formally communicate our concerns to the planning team? Is there an upcoming meeting, consultation, or forum where we can raise these issues?
3. Impact Assessments: Has a thorough daylight/sunlight, noise, and environmental impact assessment been conducted? If so, we would appreciate access to these reports to better understand how this development will affect the surrounding area.

We would welcome the opportunity to discuss this matter further and ensure that the views of local residents and businesses are considered in the decision-making process. Please let us know the best way to engage with the planning team and any next steps we should take.

Thank you for your time, and we look forward to your response.

Best regards,
Rohan Thakkar

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Comments for Planning Application 25/00223/FULEIA

Application Summary

Application Number: 25/00223/FULEIA

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. |cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118
Case Officer: Georgia McBirney

Customer Details

Name: Mrs Daniella Wax

Address: 80 Houndsditch London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: We currently enjoy a comfortable living conditions at 80 Houndsditch with privacy and and plenty of light available.

The plans proposed will destroy this as we will be overlooked by the new building which is proposed to have a roof terrace on levels 27-29 of 63 St Mary Axe which correspond with approximately floors 31-34 of the Pan Pacific. We live on floor 28.

The new building will be uncomfortably close to our living space windows and further more, the roof terraces will also provide views into the apartment.

The proximity of the proposed building will make our apartment feel hemmed in on three sides destroying our views which are aesthetically pleasing. The new building will create an uncomfortable sense of enclosure.

We strongly object to the planned building works.

**Private and Confidential
For Addressee Only**

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

Date: 5 June 2025
Our Ref: 303118.000023
Direct:
Email: [REDACTED]

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

Dear Mrs Williams,

Planning Application 25/00223/FULEIA – Development at 63 St Mary Axe**1. Introduction**

1.1 We have been instructed by The Wardens and Society of the Mystery or Art of the Leathersellers of the City of London to advise in relation to the above planning application.

1.2 AXA REIM ("The Applicant") is seeking detailed planning permission for the proposed redevelopment of an area of land ('the Site') located at 63 St Mary Axe and Camomile Court (23 Camomile Street). The scheme proposal for the Site (hereafter referred to as the 'Proposed Development'), for which planning permission is sought, comprises:

"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; ancillary plant, servicing and parking and other associated works."

1.3 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the Site:

- (a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;
- (b) 33 Great St Helens;
- (c) 52-68 and 88 Bishopsgate;
- (d) 12/20 Camomile Street;
- (e) 25-51 (odd), 61 St Mary Axe; and

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(f) 7-11 Wrestlers Court.

- 1.4 The Site is bounded by Houndsditch to the north / north-east, Outwich Street to the north / north-west, beyond which lies the Salesforce Tower, and importantly, for our client, St Mary Axe, to the east and south-east; and Camomile Street to the south and west.
- 1.5 We have undertaken an initial review of the above planning application and we have substantive concerns as to the potentially adverse effect the Proposed Development could have on the levels of available light to our client's properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.
2. Daylight and Sunlight Impacts
 - 2.1 Trium Environmental Consulting LLP prepared the Environmental Statement ('ES') pursuant to the planning application. Chapter 8, Daylight, Sunlight and Overshadowing, Light Trespass and Solar Glare of the ES submitted with the application purports to assess the key impacts associated with the Proposed Development once completed in relation to
 - Changes to the quantity of daylight and sunlight experienced by sensitive receptors in the proximity to the Site;
 - Changes to the amount of overshadowing at amenity areas surrounding the Site;
 - The potential for light trespass from the proposed commercial uses at surrounding sensitive receptors; and
 - The potential for solar glare to surrounding road viewpoints.
 - 2.2 It is noted in this Chapter that the existing baseline for the assessment was determined by undertaking a review of the Site and surrounding land uses, achieved via data sources from the Council and Google Maps. In paragraph 8.2, the buildings which were identified as sensitive receptors, were selected based on the criteria, identified in the BRE Guidance, where, "if the angle to the horizontal subtended by a new development, at the level of the centre of the lowest window of a neighbouring property is less than 25°, then it is unlikely to be affected by the Proposed Development. Therefore, those sensitive receptors which intersect with the 25° angle planes have been assessed in the baseline condition". Although the Applicant has made reference to the BRE Guidance, we would query whether this is sufficient in the context of the Proposed Development and the nature of the sensitive receptors in close proximity to the Site.
 - 2.3 Three scenarios are assessed and reported on in Chapter 8, the Existing Baseline Scenario, the Proposed Development Scenario and the Cumulative Scenario. However, solar glare and light trespass were omitted from consideration of the baseline scenario on the basis that "The light trespass analysis and solar glare analysis are not comparative assessments, i.e. the occurrence of light trespass in the baseline condition would not justify the occurrence of light trespass from the Proposed Development. The current and evolved baseline are, therefore, not relevant with respect to the light trespass". Solar glare and light trespass assessments were also not considered in the Proposed Development Scenario and the Cumulative Scenario.
 - 2.4 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") (Schedule 4) requires a description of the current state

of the current environment being the Existing Baseline and the identification of significance effects as a result of a new development: -

A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. (Regulation 18(3), Schedule 4, Section 3, the EIA Regulations)

- 2.5 While Chapter 8 provides an assessment of the baseline conditions, it is surprising that the buildings in surrounding areas, namely Camomile Street, are not considered in more detail. Room layouts were considered to assess No Sky Line (NSL) criteria, however only two properties were selected, 80 Houndsditch and 16 New Street – Tapestry Building (Paragraph 8.53). This is a significant limitation, given the impact of the Proposed Development on the daylight distribution and potential reduction of that daylight distribution on existing buildings, and there is no justification for acquiring data from these properties only.
- 2.6 In paragraph 8.60 the methodology for defining effects, receptors and receptor sensitivity for daylight and sunlight is discussed. It is noted that “existing surrounding residential properties (i.e. receptors) are considered highly sensitive to daylight and sunlight levels, specifically habitable rooms” and accordingly, all existing residential receptors assessed within the ES are considered highly sensitive, but commercial buildings have “not been assessed as they are not typically considered to have a reasonable expectation of daylight” this is despite the BRE Guidelines (2022) advising that the guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight.
- 2.7 In paragraph 8.88 it is acknowledged that the baseline considers the existing daylight and sunlight conditions at neighbouring residential properties, with the potential to be affected by the Proposed Development, however, again, a full definitive list of properties is not provided. It is also acknowledged that sensitive receptors that are in close proximity to the Site, but their views are “obstructed or otherwise shielded” and are therefore excluded from the assessment, examples are given, Bevis Marks Synagogue, but again a full list of excluded properties is not provided.

Baseline, Daylight and Sunlight results

- 2.8 The results assessing Vertical Sky Component (VSC) show that out of 787 windows assessed, only 175 (22.2%) would meet BRE’s criteria in the Baseline condition. For No Sky Line (NSL), of the 216 rooms assessed, only 130 (60.2%) would meet BRE’s criteria in the Baseline condition. For sunlight of the 634 windows assessed, 310 (48.2%) windows assessed would meet BRE’s criteria in the Baseline condition.
- 2.9 The Map at Figure 8.1, showing Daylight, Sunlight and Light Trespass Receptors in the areas surrounding the Site, is not in high definition so it is not possible to see exactly where the sensitive receptors are located. Table 8.5 however, does show that addresses in which our client owns properties, including Bishopsgate and St Marys Axe, which is listed as having a High Sensitivity to Daylight and Sunlight, Overshadowing, Light Trespass and Solar Glare, yet limited analysis appears to have been undertaken (or made available) in respect of the specific properties in these areas. It is therefore not entirely clear what specific baseline information has been compiled and assessed in respect of our client’s properties, and thus how this is then affected by the Proposed Development.

Completed Development

- 2.10 Only 6 properties (identified as sensitive receptors) have been assessed for daylight, and out of the 787 total windows in these receptors assessed for VSC, only 393 (49.9%) would meet the BRE criteria.
- 2.11 In assessing the future environment, the Chapter concludes at 8.214 that out of the 6 properties assessed, 3 would experience an overall negligible effect, one minor adverse and one property would experience a major adverse significant affect. For sunlight, the same 6 properties were assessed. We would like to reiterate that this limited sample (6 properties) is small and may not provide a sufficiently accurate representation of the full impact of the Proposed Development. Moreover, we are not able to appreciate the specific impacts of the Proposed development on our client's properties.
- 2.12 We have yet to conclude our detailed impact assessment of other aspects of the Proposed Development and reserve our position in relation to these issues. We do, however, have serious concerns that our client's properties could experience a significant adverse impact as a result of the construction of another tall building in this area. The Environmental Statement simply does not provide sufficient detail, to enable our client to confirm and appreciate whether the impact of the Proposed Development on their properties in the surrounding area have been fully scrutinised and assessed.

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

Yours faithfully



EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP