

Committee	Date:
Planning Application Sub-Committee	13 December 2024
Subject: Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR 24/00021/FULEIA: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works. 24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.	Public
Ward: Aldgate	For Decision
Registered No: 24/00021/FULEIA and 24/00011/LBC	Registered on: 11 March 2024
Conservation Area: Creechurch Conservation Area	Listed Building: Holland House – grade II*

Summary

The application relates to a site located on the northeast corner of Bury Street, northwest of Creechurch Lane and it comprises three buildings, namely Holland House, Renown House and Bury House.

The site lies within the recently designated Creechurch Conservation Area, which includes all three buildings. Holland House is a Grade II* listed building, which was built to designs by H.P. Berlage for a Mueller, a Dutch shipping company and completed in 1916. Renown House is a characterful survival of a small-scale early 20th-century office building, not listed but considered a non-designated heritage asset. Bury House was constructed in the 1967 for use as commercial offices.

Planning permission for the demolition of the building at 31 Bury Street and the construction of a 48 storey tower building was previously refused, under the terms of application 20/00848/FULEIA. The reasons for refusal included the adverse impact of the development on the setting and amenities of the Grade 1 listed Bevis Marks Synagogue by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue and the adverse impact of the development on the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion. It was considered that the public benefits of the development did not overcome the harm identified to the heritage assets.

The current proposal incorporates three buildings, as noted above, and not only Bury House. In terms of the tower element of the proposal though, this has been amended by reducing the height of the building by 19 metres, and by setting back the top eight floors, at level thirty-seven to reduce the massing towards the termination point of the tower.

The redevelopment of the site is covered by two applications; one application for planning permission (ref.no.: 24/00021/FULEIA) and one application for listed building consent (ref. no: 2400011/LBC).

Planning permission is now sought for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House and three storey extension resulting in ground plus 5 storeys at Renown House and interconnection of the three buildings. The use of the buildings would be office (Class E(g)(i)), including affordable workspace,

flexible retail/café (Class E(a)/E(b)), and flexible community/education/cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses. The development also includes the provision of a new covered pedestrian route, cycle parking and facilities, public toilet, landscaping and highway improvements and the provision of a single servicing access point onto Heneage Lane.

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

Objections have been received from statutory consultees including Historic England, the Greater London Authority, the 20th Century Society, the Victorian Society, the Georgian Group, Historic Royal Palaces, the CAAC, SAVE Britain's Heritage, the London Borough of Tower Hamlets, as well as several objections from third parties, including the Jewish community, relating to the scale, massing and design of the development and its perceived impact on designated heritage assets, including the Tower of London World Heritage Site, the Bevis Marks Synagogue and the Creechurch Conservation Area and concerns around the ability of the Synagogue's congregation to use the Synagogue and its courtyard as a place of worship due to the daylight, and overshadowing impacts and by reason of the reduced visibility of the night sky and the moon. This report has considered these impacts, which are addressed below.

The application site is situated within the City Cluster. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings.

The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development in the emerging City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

The scheme would provide 34,584 sqm (GIA) of office floorspace (Use Class E(g)(i)), which would be flexible, sustainable Grade A office floorspace suitable

for circa 2,470 FTE City workers. The site is within the City's growth modelling and would deliver 1.5% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international, financial and professional services business centre.

The proposed office floorplates would range between 350 and 580sqm for businesses of 50-60 people supporting smaller, start-up businesses, providing office tenants with their own private entrance and dedicated floor rather than sharing with other tenants, which will ensure that the floorspace is attractive to a range of potential occupiers. The proposal would also provide 1,170sqm of affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities, fulfilling the City's vision to providing inclusive workspace.

Alongside the office space the proposed flexible educational/ cultural/ community/ sports/ multi-faith space within the lower ground, ground and first floors of the three buildings, would combine to create a compelling and inclusive public offer in the heart of the cluster in line with the Destination City agenda. These multi-functional bookable spaces would attract a wide range of activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. The spaces would be available to pre-book, free of charge for community based groups and non-profit organisations, schools and other local groups, for 81 hours a week, of which over 67 hours will be free of charge. The public offer would also include an Urban Farm at the ninth floor of Holland House to be used as a rooftop classroom and the provision of a climbing wall, offering a new sport facility and attraction in the City Cluster. Heneage Arcade would create a new pedestrian route, with flexible retail/café uses, incorporating public art. The dedicated cycle repair space at lower ground floor level would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community. The provision of a changing place, public toilet and water fountain, will be secured by condition.

The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of accessible spaces. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8,

DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

Officers consider the site to be acceptable for a tall building, supporting the consolidation of the City Cluster. While there is conflict with Local Plan policy CS7 (3) and CS14 (2) and London Plan D9 B (3), because the site is located in a conservation area and therefore considered inappropriate for a tall building, officers nevertheless find that the qualitative impacts of the proposal would be acceptable and that it would accord with London Plan Policy D9 A, C and D, Local Plan Policy CS7 (1,2, 4-7), draft City Plan S12 (1,2, 4-10) S21 (1,3-8). Most relevantly, the proposal would not cause harm to the setting, significance, character or appearance of the Creechurch Conservation Area in which it is situated. As such, officers consider the site acceptable for a tall building, notwithstanding some limited further conflict with emerging City Plan 2040 S21 (5) due to an impact on the significance of the grade II* listed Holland House which forms part of the application site.

The proposal would be a sophisticated new addition to the City Cluster, massed in tapering stages to form an endpiece at the eastern edge, and clad in pale blue faience elevations to do so elegantly and differentiate it from the more glazed towers at the centre. It would enliven the locality of the City at its feet by reinstate the lost leg of Heneage Lane with a new route and retail arcade and reimagining the existing open space between Bury House and Holland House; both these existing buildings on the application site and the new spaces between them, and the wider locality, would be made more accessible, inclusive, inviting, and animated by the scheme. The creation of the proposed new public spaces and improvements to the existing public spaces are considered by officers to be a benefit of the scheme. The proposal would comply with the relevant design policies set out above.

The proposal would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

The proposals would preserve the characteristics and composition of all relevant strategic views and would comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. The development would preserve the experiences from public high-level viewing platforms including

from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging elevated public spaces which are also important to the character of the City of London.

The proposal would result in a low level of harm to the grade II* listed Holland House. As such, it would fail to preserve the significance/special interest or setting of this designated heritage asset and conflict with Local Plan policies, CS12 (1 and 2), DM12.1 (1), Draft City Plan S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals would otherwise comply with Local Plan CS14, CS 12 (2-5), CS13 and DM12.1 (2-5) DM12.5 Draft City Plan 2040 S11 (1,3-5) S 13, HE1 and London Plan HC 1 (D), HC2, HC3 and HC4. Most germanely, they would preserve the setting and significance of Bevis Marks Synagogue and the special interest, character and appearance of the Creechurch Conservation Area.

Giving considerable importance and weight to the desirability of preserving the significance of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits, set out in more detail in the Heritage section below, include a low level of enhancement to the grade II* Holland House and a low level of enhancement to the Creechurch Conservation Area. The public benefits include the delivery of growth in a highly sustainable location, the opening up of Holland House, and in particular its heritage lobbies, to a much broader demographic, and the provision of a highly compelling mix of educational/ cultural/ community/ sports/ multi-faith spaces across the lower levels of the proposal. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.

The proposals comply with the required initial steps of archaeology investigation, in accordance with Local Plan DM 12.4, emerging City Plan 2040 HE2 and London Plan HC1, subject to archaeology conditions.

In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking (582 long stay and 85 short stay) and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The three buildings are proposed to be serviced by a single

point onto Heneage Lane. 66 daily trips are forecasted following consolidation of deliveries by 50%. This would need to be set out in a delivery and servicing management plan. It is considered at this stage that the proposed servicing arrangement would be acceptable. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy T5.

Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. The whole life-cycle carbon emissions per square meter of the selected option would be the lowest out of the 4 options tested. A lower new build option might be able to deliver the same sustainability benefits with less carbon impacts, however, the scheme in its proposed form would unlock a number of benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London.

The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

Compared to retrofit options with limited extension potential, the proposed development would result in the lowest whole life-cycle carbon emissions per square meter, with benefits relating to avoiding harmful interventions into historic fabric, improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. The energy strategy has been optimised for the site and a BREEAM “excellent” rating is targeted, aspiring to an “outstanding” rating through detailed design. Circular economy measures have been incorporated, such as by retaining approximately 35% of the existing structures, as well as designing for longevity, adaptability and low maintenance. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would overall comply with London Plan policies SI 2, SI 7, Local Plan policies CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise,

contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant. In terms of thermal comfort beneficial impacts are expected on the existing benches to the north of 30 St Mary Axe.

A number of objections have been received from Bevis Marks Synagogue and members and the wider Sephardi community, inter alia, relating to the impact of the development to the historical and religious significance and the setting of Bevis Marks Synagogue, the loss of daylight and sunlight to the Synagogue, overshadowing of its courtyard and the ability to view the night sky and the moon in order to recite the Kiddush Levana prayer.

All the representation received are set out in the main body of the report and are also included in full in the background papers.

As discussed above and in length in the main body of the report, it is considered that the proposed development would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

In terms of the daylight and sunlight impacts into the Synagogue, officers are extremely cognisant of the matters raised by the Jewish community and have analysed these in considerable detail. However, it is considered that the impacts would be limited, localised and minimally noticeable at ground floor level and slightly more noticeable at the southwest area to the mezzanine level. The VSC effects caused by the proposed development are minor adverse, the BRE guidelines for NLS and sunlight are met and therefore, overall, the daylight and sunlight effects are not considered significant, in EIA terms. The effects of cumulative scenarios have been assessed including consented and unconsented schemes. Although minor to moderate adverse effects are identified in the cumulative vs existing baseline scenario, the additional effects would be due to other consented schemes. It is also noted that BRE guidelines for daylight distribution and sunlight are again met in the cumulative scenario.

As such, it therefore follows that there is a very limited impact on the visual appreciation of the historic interior and on the visual appreciation of interior features of key religious significance such as the Bimah and the Ark. Consequently, on the basis of the detailed evidence provided, officers come to the view that the visual appreciation of the religious ceremonies and associated activities including the reading of religious texts would not be diminished to a significant or perceptible degree. From this it can be concluded that, based on the quantifiable daylight impact results, the effects of the proposal on daylight

to the interior of the Synagogue would not be great enough to compromise the religious use or activities therein.

Since the submission of the application, a daylight and sunlight empirical report has been submitted on behalf of the S&P Sephardi community and the Bevis Marks Synagogue Rabbi. Overall, based on the results of the submitted data it is accepted that the Synagogue currently experiences low levels of light, which accords with the results of the Daylight, Sunlight and Overshading Assessment submitted by the Applicant. Officers, based on the findings and conclusions of the reviewer, consider that although the Bevis Marks Synagogue daylight report is not based on a published or generally used method, if carried out appropriately with adequate equipment and controlled methodology it can give an understanding of the current and proposed light levels. However, it is considered that the submitted daylight report, is not complete or entirely accurate, due to the lack of necessary information and other limitations, as discussed above, and therefore, it can be attributed limited weight. It is considered more appropriate that officers give substantial weight to the findings of the Daylight, Sunlight and Overshadowing Assessment submitted by the Applicant and reviewed by the Corporation's appointed daylight consultant, as this follows the BRE guidelines as referred to in Local Plan policy DM10.7, and paragraph 3.10.41 of the reasoned justification to that policy. The BRE guidelines are also referred to in draft City Plan 20240 policy DE7.

An application at 31 Bury Street proposing the erection of a 48-storey tower was previously refused by reason of the overbearing and overshadowing impact of the tower to the Synagogue's courtyard. Since the determination of the previous application the courtyard of the Synagogue has undergone changes to include a new ramp to the visitor centre, permanent security booth at the entrance of the site and ticketing booth on the northern part of the courtyard. At present no area of the courtyard receives two hours of sunlight on 21 March and therefore, although no area would be able to receive sunlight on the 21 March following the erection of the proposed development, the BRE guidelines are met. The Sun Exposure analysis and shadow diagrams, submitted with the application, show a reduction in the average sunlight availability within the courtyard of 16 minutes to 19 minutes when comparing the proposed development (including the consented schemes) with the consented scenario. It is therefore considered that the proposed development alone would not materially change the sunlight on the Bevis Marks Synagogue courtyard. As a result, it is not considered that the development would result in overshadowing in the Synagogue's courtyard that would affect the setting of the listed building or its associated amenities and it would not preclude from continuing to be used for religious events and as part of the visitor experience visiting the Synagogue's exhibition centre.

To respond to the concerns raised regarding the ability to recite the Kiddush Levana prayer, the applicant has submitted a Lunar Transit Study, assessing the impact the development would have on the visibility of the moon in the night sky. This study was independently reviewed. Following discussions with the Synagogue's Rabbi, the visibility of the sky from two observer points at the entrance of the Synagogue courtyard were assessed. Based on the results produced taking into account a full moon cycle, only for the 12-day periods of the waxing moon when the Kiddush Levana prayer can be recited (discounting cloud cover), the visibility of the moon when comparing the existing and cumulative scenario will be reduced by 2.5% and 2.1% in the major and minor lunistice respectively from point P (indicated by the Rabbi) and between 2.2% and 2.1% respectively from point N (initially included in the submitted study). The absolute reductions between the future baseline and cumulative scenario, effectively those resulting from the proposed development, are between 1.8% and 1.3% in the major and minor lunistics from both points. When considering the months and days that the moon would be able to be visible, taking into account the development alone (cumulative vs future baseline) it is noted that there would be no further reduction in the months that the moon would be able to be visible (the moon would still be able to be viewed 8 months of the year) and minor reductions in the number of days (50 days instead of 52 or 51 days every year, in case of a major and minor lunistice year respectively). In terms of hours there will be a reductions exceeding 40 hours in each year.

It is therefore concluded that currently there is a reduced overall opportunity to view the moon from the Synagogue courtyard due to obstructing effects from the existing surrounding buildings. The proposal would result in varying reductions of the number of hours available to see the moon on each relevant occasion, though in theory there would always be enough visibility to recite the prayer, and there would not be a reduction in the number of occasions (i.e. months) per year against the future baseline. Although the impact of the development in terms of relative losses is acknowledged, the prayer would still be able to be recited in those same months each year as the future baseline scenario. Whilst the development would have some impact on the ability to recite the Kiddush Levana Prayer due to the reduced hours that the moon would be able to be visible, it would not have a material impact on the ability to carry out of other religious practices including circumcision, the observance of Shabbat, and daily obligations. It is the view of officers that such an adverse impact is small, and should, taking account of the duties imposed by section 149 of the Equality Act 2010, therefore be attributed limited weight. In any event such adverse impact would be outweighed by the many public benefits of the scheme as set out in this report.

In terms of daylight impacts on other receptors, the proposed development would result in no significant adverse effect on the majority of the properties

assessed with the exception of 2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane which would experience moderate adverse effects. However, the absolute alterations in most instances are either very limitedly or not likely to be noticeable and as such, the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels.

It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, Eastern/City Cluster and public realm would be complied with that, notwithstanding the conflict with CS12 (Historic Environment) , DM12.1 (Managing Change affecting all heritage assets and spaces), CS14 (Tall Buildings); Draft City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets), S21 (City Cluster Key Area Of Change) and London Plan HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S106 agreement.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan (such as the proposal before you) without delay.

As discussed above, the paragraph 208 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less than substantial harm.

It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached. Officers also consider that the applications for listed building consent should be granted.

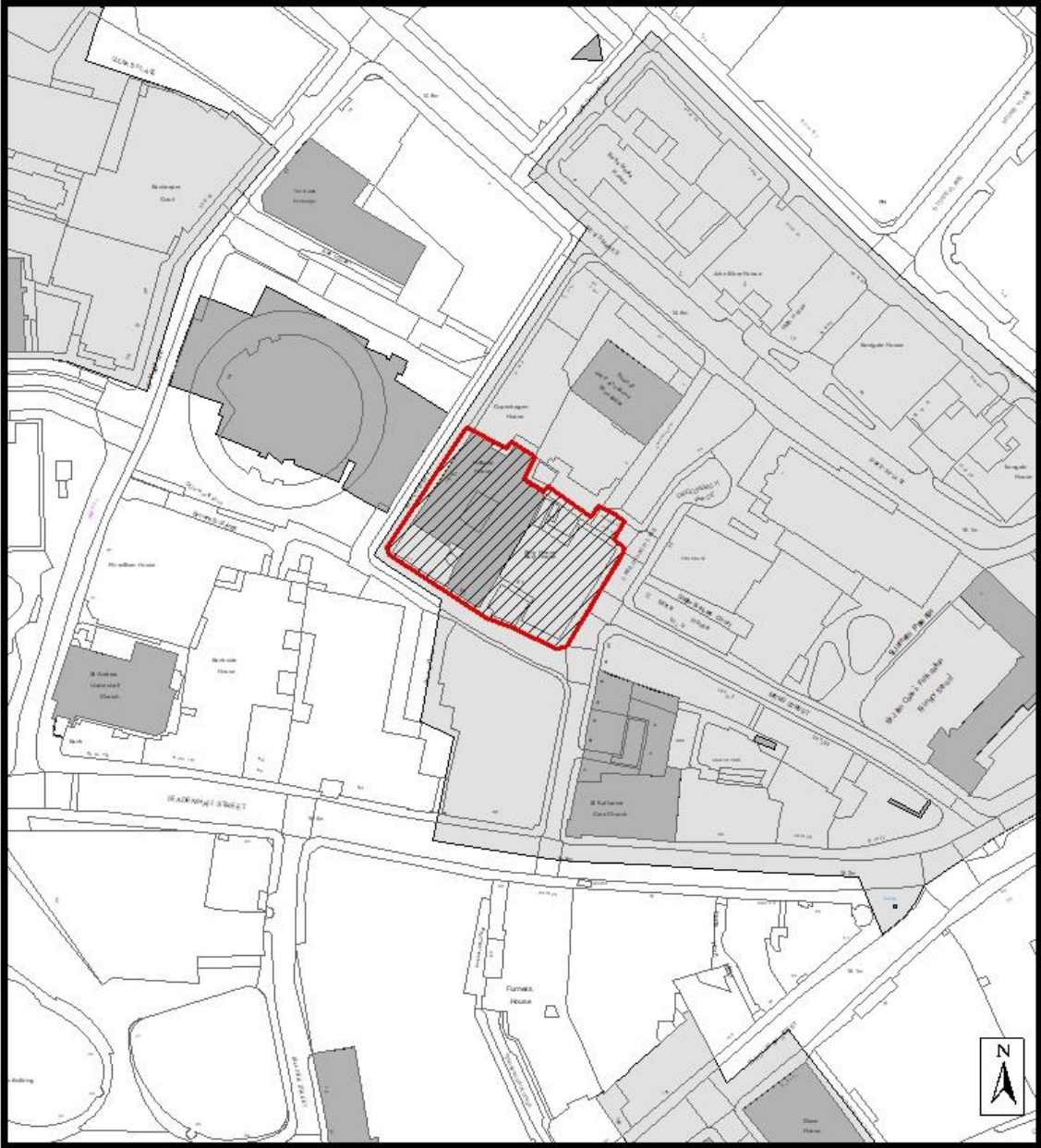
Recommendation

- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
 - (a) The direction made by the Secretary of State under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015;
 - (b) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);
 - (c) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) (England) Direction 2024 and the application not being called in under section 77 of the Town and Country Planning Act 1990;
 - (d) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.
- (2) That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.
- (3) That your Officers be instructed to negotiate and execute obligations in respect 55 of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highways Act 1980.
- (4) That members note that land affected by the building which is currently public highway and land over which the public have right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for

the area shown marked on the Stopping-up plan annexed to this report under the delegated arrangements approved by the Court of Common Council.

- (5) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

Site Location Application Plan



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ADDRESS:
1-4, 31-34 Bury Street

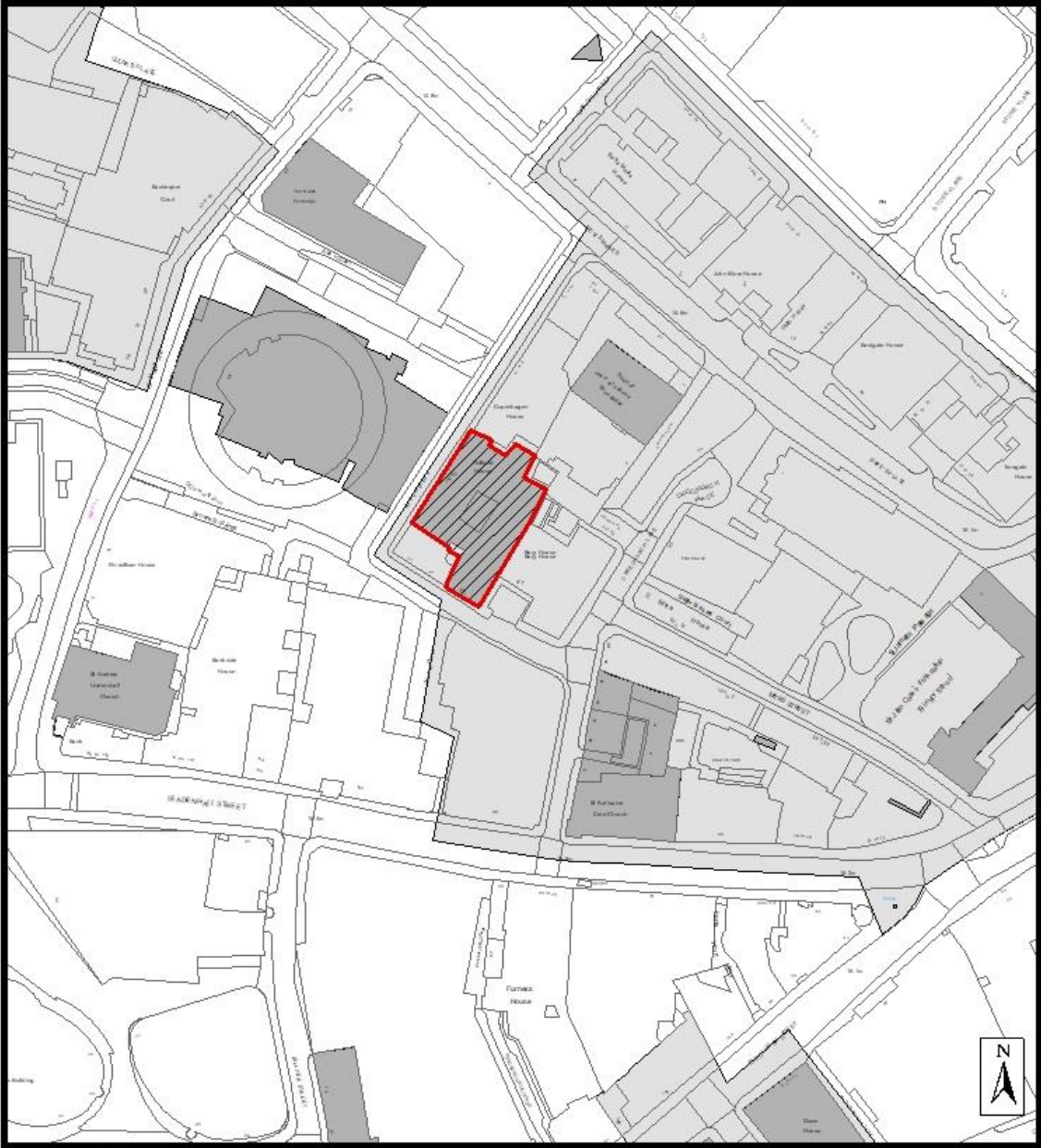
CASE No.
24/00021/FULEIA

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT

Site Location Application Plan



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ADDRESS:
1-4, 32 Bury Street

CASE No.
24/00011/LBC

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT

Site Photos

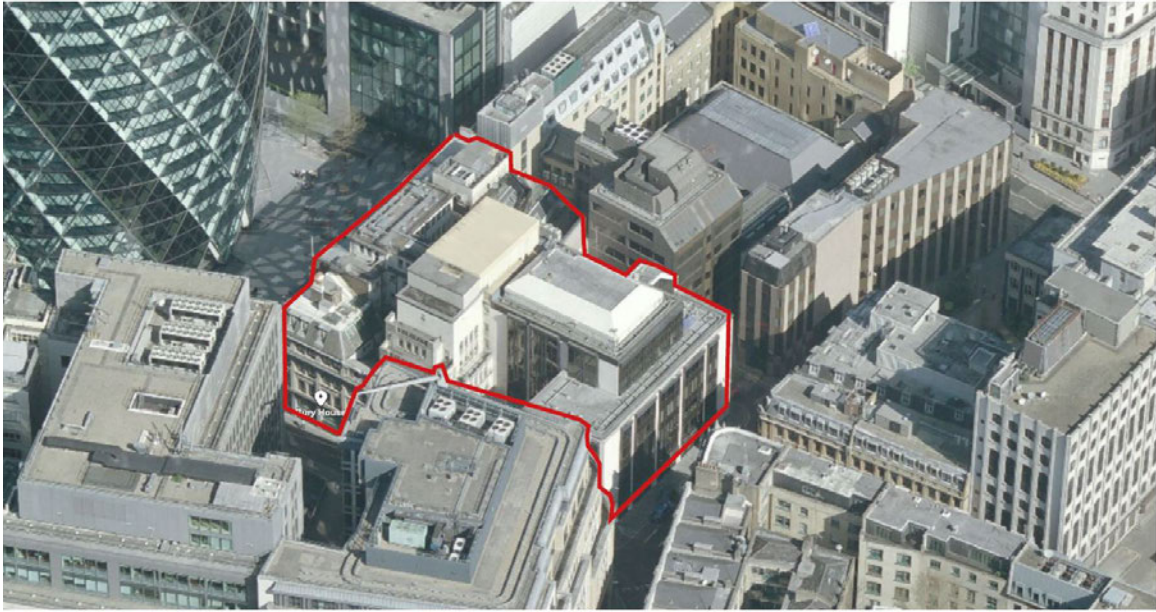


Figure 1: Application site -Aerial view (south)



Figure 2:View of Bury House from Mitre Street



Figure 3: Bury House entrance. View from Bury Street.



Figure 4: View of Bury House from Bury Street.



Figure 5: View of Bury House from Heneage Lane.



Figure 6: view of Renown House from Bury Street.



Figure 7: View of Renown House from St Mary Axe plaza.



Figure 8: View of Holland House from St Mary Axe plaza.



Figure 9: View of Holland House (southwest elevation) from Bury Street.



Figure 10: View of Holland House and Renown House from Bury Street.

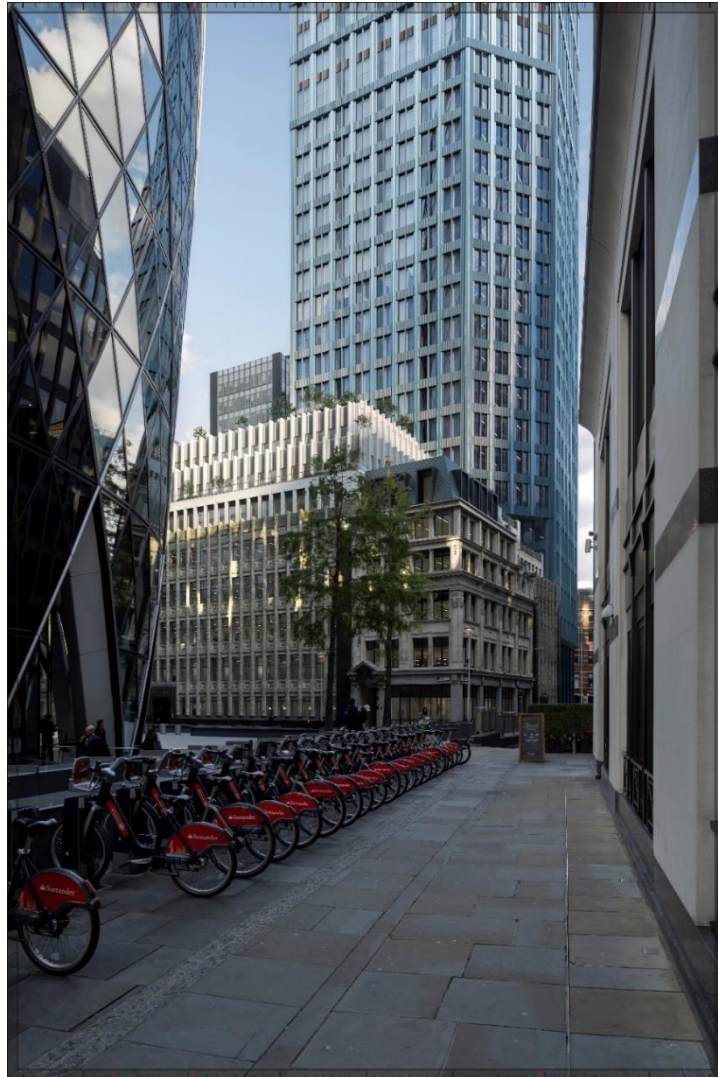


Figure 11: Proposed development - View from south part of the Gherkin plaza.



Figure 12: Proposed development - View from Bury Street.

APPLICATION COVER SHEET

Bury House 1 - 4, 31 - 34 Bury Street

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	Bury House = 42.40m AOD Holland House = 43.57m AOD Renown House = 35.49m AOD		Bury House = 178.700 m AOD Holland House = 48.05m AOD Renown House (36.49m AOD)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	10,064 sqm	Office	34,584 sqm
	BOH	1,275 sqm	Ancillary (Basement / BOH)	4,794 sqm
			Retail (Class E(a)/E(b)	504 sqm
			Community/Education/Cultural/Amenity	1,411 sqm
	TOTAL	11,339 sqm	TOTAL	41,293 sqm
			TOTAL UPLIFT:	29,954 sqm
3. OFFICE PROVISION IN THE CAZ	Existing GIA: 10,064 sqm Proposed GIA: 34,584 sqm Uplift GIA: 24,520 sqm (243.6% uplift from the existing office floorspace)			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	330		Between 1,905 to 2,470 new employment opportunities	
5. VEHICLE / CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	19	Car parking spaces	0
	Cycle long stay	15	Cycle long stay	582
	Cycle short stay	0	Cycle short stay	85
	Lockers	0	Lockers	667
	Showers	0	Showers	59
	Changing facilities	0	Changing facilities	3 (Female / Male and Unisex located in the basement levels)
6. HIGHWAY LOSS / GAIN	0.95 sq.m loss / 2.7 sq.m gain			

7. PUBLIC REALM	Existing: 352 sqm Proposed: 619 sqm	
8. TREES	EXISTING	<u>PROPOSED</u>
	<u>Planting at Bury house entrance</u>	<u>4 (Ground Floor)</u> 6 (Sixth Floor) 11 (Eighth Floor) 4 (Ninth Floor) 5 (Twenty Second Floor) 3 (Thirty Sixth Floor) 6 (RF1) Total= 39
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	78 two-way vehicle trips (including 38 car trips)	<u>66 two-way trips (33 vehicles)</u>
10. SERVICING HOURS	<u>Servicing allowed throughout the day other than restricted hours as detailed below:</u> 07:00 to 09:00 12:00 to 14:00 16:00 to 18:00 23:00 on one day and 07:00 on the following day <u>Last mile delivery solutions (e.g. cargo bikes) can deliver at all times.</u>	
11. RETAINED FABRIC	Substructure retained: 64% Superstructure (Frame) retained: 39% Superstructure (Façades) retained: 22% (all percentages show retention by mass)	
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: New Build Areas: 23.7% Refurbishment Areas: 48.2% Site-wide: 28.6% GLA target: 35%	
13. OPERATIONAL CARBON EMISSIONS	33,183 tonnes CO₂ over 60 years 0.803 tonnes CO₂ per square meter over 60 years (includes life-cycle modules B6+B7)	
14. EMBODIED CARBON EMISSIONS	<u>PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS</u>	
	Total upfront embodied carbon 59,755 tonnes CO ₂ e / 887 kgCO ₂ e per sqm	

15. WHOLE LIFE -CYCLE CARBON EMISSIONS	Total whole life-cycle carbon emissions: 92,938 tonnes CO₂ Total whole life-cycle carbon emissions per square meter: 2.251 tonnes CO₂/sqm																																																																																
16. WHOLE LIFE-CYCLE CARBON OPTIONS	<u>Carbon Options</u>     <table><tr><th>Option Reference</th><th>1</th><th>2</th><th>3</th><th>4</th></tr><tr><td>Project reference period</td><td>60</td><td>60</td><td>60</td><td>60</td></tr><tr><td>Gross Internal area (GIA) m²</td><td>11,207</td><td>13,467</td><td>13,467</td><td>40,558</td></tr><tr><td>Net Internal area (NIA) m²</td><td>7,845</td><td>9,427</td><td>9,427</td><td>25,278</td></tr><tr><td>Change in NIA (compared to existing) m²</td><td>0</td><td>1,594</td><td>1,594</td><td>17,445</td></tr><tr><td>Substructure % retained by mass</td><td>92%</td><td>92%</td><td>92%</td><td>64%</td></tr><tr><td>Superstructure % retained by mass</td><td>88%</td><td>75%</td><td>77%</td><td>39%</td></tr><tr><td>Total WLCA (incl. B6 & pre-demo) (kgCO₂e/m² GIA, B7 not included)</td><td>1,395</td><td>1,440</td><td>1,424</td><td>1,383</td></tr><tr><td>Upfront Embodied Carbon (A1-A5) (kgCO₂e/m² GIA)</td><td>278</td><td>332</td><td>329</td><td>726</td></tr><tr><td>In-Use Embodied Carbon (B-C) (incl. B6 & B7 kgCO₂e/m² GIA)</td><td>815</td><td>815</td><td>815</td><td>444</td></tr><tr><td>Operational Carbon for building lifetime (B6) (kgCO₂e/m² GIA)</td><td>293</td><td>282</td><td>271</td><td>203</td></tr><tr><td>Total WLCA (incl. B6 and pre-demo) (tCO₂e, B7 not included)</td><td>15,629</td><td>19,387</td><td>19,177</td><td>56,095</td></tr><tr><td>Total existing building demolition (tCO₂e)</td><td>88</td><td>140</td><td>130</td><td>402</td></tr><tr><td>Upfront Embodied carbon (A1-A5) (tCO₂e)</td><td>3,120</td><td>4,474</td><td>4,426</td><td>29,450</td></tr><tr><td>In-use embodied carbon (B-C) (tCO₂e)</td><td>9,134</td><td>10,976</td><td>10,976</td><td>18,008</td></tr><tr><td>Operational Carbon for building life time (B6) (tCO₂e)</td><td>3,287</td><td>3,798</td><td>3,646</td><td>8,235</td></tr></table>	Option Reference	1	2	3	4	Project reference period	60	60	60	60	Gross Internal area (GIA) m²	11,207	13,467	13,467	40,558	Net Internal area (NIA) m²	7,845	9,427	9,427	25,278	Change in NIA (compared to existing) m²	0	1,594	1,594	17,445	Substructure % retained by mass	92%	92%	92%	64%	Superstructure % retained by mass	88%	75%	77%	39%	Total WLCA (incl. B6 & pre-demo) (kgCO₂e/m² GIA, B7 not included)	1,395	1,440	1,424	1,383	Upfront Embodied Carbon (A1-A5) (kgCO₂e/m² GIA)	278	332	329	726	In-Use Embodied Carbon (B-C) (incl. B6 & B7 kgCO₂e/m² GIA)	815	815	815	444	Operational Carbon for building lifetime (B6) (kgCO₂e/m² GIA)	293	282	271	203	Total WLCA (incl. B6 and pre-demo) (tCO₂e, B7 not included)	15,629	19,387	19,177	56,095	Total existing building demolition (tCO₂e)	88	140	130	402	Upfront Embodied carbon (A1-A5) (tCO₂e)	3,120	4,474	4,426	29,450	In-use embodied carbon (B-C) (tCO₂e)	9,134	10,976	10,976	18,008	Operational Carbon for building life time (B6) (tCO₂e)	3,287	3,798	3,646	8,235
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17. TARGET BREEAM RATING	Good Very Good Excellent Outstanding Policy target Excellent or Outstanding																																																																																
18. URBAN GREENING FACTOR	0.32 (surpasses policy requirement of 0.3)																																																																																
19. AIR QUALITY	Air Quality Positive																																																																																
20. Biodiversity Net Gain	300% Biodiversity Net Gain																																																																																

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - To examine the environmental information
 - To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
 - To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.

5. Representations made by any body required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

Site and Surroundings

8. The application site is located on the northeast corner of Bury Street, northwest of Creechurch Lane. It is approximately 0.25 hectares in size and it comprises three buildings, namely Holland House, Renown House and Bury House.
9. The surrounding area is on high density and is primarily commercial with some residential properties, religious buildings and some retail units. To the north the site abuts Valiant House and Copenhagen House. Beyond Valiant House, approximately 30 metres north of the site, lies the Grade I listed Bevis Marks Synagogue. To the southeast of the site there are some residential properties along Creechurch Lane with commercial uses at ground floor. The Aldgate school is located further to the east of the site. To the south of the site there are medium rise commercial buildings. Beyond these lie a couple of high-rise buildings including 52-54 Lime Street. Immediately adjacent to the west of the site lies the Gherkin, at 30 St Mary Axe. There are further tall buildings to the west of the site, including the Leadenhall Building (the Cheesegrater) beyond the Gherkin. Another important religious building, Grade I listed St Helen's Bishopsgate Church, is located further to the west of the site.
10. The site lies approximately 500m to the north of the Tower of London World Heritage Site.

11. The site lies within the recently designated Creechurch Conservation Area. The Conservation Area includes all three buildings within the application site. The area that was designated is richly historic, comprising a critical mass of characterful, late Victorian/Edwardian warehouses built on the site and echoing the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, and including three outstanding places of worship: Bevis Marks Synagogue, St Katherine Cree Church and St Botolph Aldgate Church (all listed Grade I). It is noted that the site is not located within the immediate setting of the Bevis Marks Synagogue, as this is defined in the Policy S21 map of the draft City Plan 2040.
12. The site comprises three buildings as stated above. Bury House is a 7-storey commercial building (including the ground floor), which contains an underground car park providing 18 car parking spaces and ancillary storage for 10 cycle parking spaces that can be accessed via a car lift to the north of the site from Heneage Place. There is also 1 car parking space and 15 cycle parking spaces located at ground level. The building was constructed in 1967 for use as commercial offices and has remained relatively unchanged since. The single storey basement provides some ancillary storage and 18 car parking spaces.
13. Holland House is a Grade II* listed building, which was built to designs by H.P. Berlage for a Mueller, a Dutch shipping company and completed in 1916. It extends to seven storeys including the ground floor. The building consists of six storeys with additional set back roof storeys. It is mainly located on the eastern side of Bury Street, however, it wraps around Renown House on the southern corner of the Bury Street. It is of expressionist style with vertical architectural form and vaguely Art Deco detailing, finished in distinctive grey-green faience. Holland House has a very high quality and is considered as one of the architecturally standout buildings in the locality.
14. Renown House is a 5-storey office building including the basement and attic storeys built for Messrs Burge, grain dealers in 1912. It is a characterful survival of a small-scale early 20th-century office building, once a common type in the City. It has good quality carved stone detailing and makes an effective contrast with the adjacent Holland House.
15. In terms of size, Bury Street comprises 4,462sqm GIA floorspace, Holland House comprises 6,161sqm floorspace and Renown House is smallest of the three, comprising 716sqm GIA floorspace.
16. Aside of the Grade II* listed Holland House building within the application site and the Creechurch conservation area that the site lies within, there are several other heritage assets in the vicinity of the site, including:

- The Bevis Marks Synagogue (Grade I); located to the north,
- Church of St Helens Bishopsgate (Grade I); located to the west,
- Church of St Andrew Undershaft (Grade I); located to the south-west,
- St Katherine Cree (Grade I); located to the southeast,
- Creechurch Lane No's 2-16 (Grade II); located to the southeast,
- 38 St Mary Axe (The Baltic Exchange) (Grade II); located to the northwest and
- St Helen's Place Conservation Area; located to the north.

17. Other designated heritage assets in the wider area include:

- The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
- St Paul's Cathedral (Grade I);
- Tower Bridge (Grade I);
- Royal Exchange (Grade I);
- Lloyd's Building (Grade II);
- Church of St Botolph, Aldgate (Grade I);
- Guild Church of St Ethelburga the Virgin (Grade I);
- The Monument (Scheduled Monument and Grade I);
- 13 Bishopsgate (Grade I) ;
- Museum of the Home (formerly The Geffrye Museum, 136 Kingsland Road – Grade I);
- Former Port of London Authority (Grade II*);
- Leadenhall Market (Grade II*);
- Lloyd's Registry, 71 Fenchurch Street (Grade II*);
- Bishopsgate Institute (and 6 Brushfield Street) (Grade II*);
- Church of St Botolph Without Bishopsgate (Grade II*)
- Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II);
- Gateway in yard of Church of St Katherine Cree (Grade II);
- Liverpool Street Station (Grade II);
- 46 Bishopsgate (Grade II);
- 48 Bishopsgate (Grade II);
- Hasilwood House 52-68 Bishopsgate (Grade II);
- Park House and Garden House (Grade II);
- Finsbury House (Grade II);
- London Wall Buildings (Grade II);
- 139- 144 Leadenhall Street (Grade II);
- 147-148 Leadenhall Street (Grade II);
- 38 St Mary Axe (The Baltic Exchange) (Grade II);
- 20 and 21 Billiter Street (Grade II);
- 2-16 Creechurch Lane (Grade II);

- 10 Brushfield Street (Grade II);
 - 14 Brushfield Street (Grade II);
 - Whitehall Court (Grade II*);
 - Horse Guards (Grade I);
 - War Office (Grade II*);
 - Ministry of Defence (Grade I);
 - Leadenhall Conservation Area;
 - Bank Conservation Area;
 - Bishopsgate Conservation Area;
 - Finsbury Circus Conservation Area;
 - The Tower of London Conservation Area
 - Bunhill Fields and Finsbury Square Conservation Area;
 - St James Park Registered Historic Park and Garden (Grade I);
 - Finsbury Circus Registered Historic Park and Garden (Grade II);
 - Bunhill Burial Ground Registered Historic Park and Garden (Grade I)
 - 113-116 Leadenhall Street (Non-designated heritage asset);
 - Liverpool Street Arcade (Non-designated heritage asset);
 - 33-34 Bury Street (Non-designated heritage asset);
 - 18-20 Creechurch Lane (Cree House) (Non-designated heritage asset);
 - 24 Creechurch Lane (Fibi House) (Non-designated heritage asset);
 - 12-14 Mitre Street (Mitre House) (Non-designated heritage asset);
 - 27-31 Mitre Street (Non-designated heritage asset);
 - 30 St Mary Axe (Non-designated heritage asset); and
 - Liverpool Street Arcade (Non-designated heritage asset)
18. The application site is situated within the City Cluster. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and Draft City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The Draft City Plan in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.
19. For the above reason there are a number of tall buildings in the vicinity of the site and many more in the wider area. Within those in the vicinity are 30 St Mary Axe (the Gherkin, ground plus 40 storeys), 122 Leadenhall Street (the Leadenhall Building, ground plus 51 storeys), 110 Bishopsgate (ground plus 45 storeys), 52 Lime Street (the Scalpel, ground plus 38 storeys), 22 Bishopsgate (ground plus 61 storeys), 150 Bishopsgate (ground plus 40 storeys); 40 Leadenhall Street (ground plus 33 storeys), and 8 Bishopsgate (ground plus 51 storeys). There are more that benefit from planning consent, including within others 1 Undershaft (ground plus 72 storeys)¹¹ and 100, 106

& 107 Leadenhall Street ('100 Leadenhall Street') (ground plus 56 storeys), 115 - 123 Houndsditch (ground plus 23 storeys), Bevis Marks House (ground plus 19 storeys).

20. In terms of public transport, the site is located within Public Transport Accessibility Level (PTAL) 6b (excellent), the highest rating available. The site is served by numerous London Underground, DLR and National rail services within walking distance, including Liverpool Street Rail and Underground Station, Bank Underground Station Aldgate Underground Station, Aldgate East Underground Station, Tower Hill Underground Station, Tower Gateway DLR Station and Fenchurch Street Rail Station. The site is also served by numerous bus services with bus stops within a short walking distance.

Relevant Planning History and Background to the Proposal

21. The most recent and relevant planning history of the site relates to an application under the reference number of 20/00848/FULEIA which was submitted for the *'Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.'* The application was recommended for approval by officers and presented at the Planning and Transportation Committee on the 5th of October 2021 and overturned to be refused by the Committee Members for the following reasons:
- *The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal), contrary to Local Plan Policy CS10.1 (ensuring buildings are appropriate to the setting and amenities of surrounding buildings and spaces); Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's communities) and London Plan Policy GG1 (Building strong and inclusive communities, promoting fairness, inclusivity and equality).*
 - *The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the*

resulting harm to the Outstanding Universal Value of the World Heritage Site (which harms would not be outweighed by the public benefits of the proposal) contrary to Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's heritage assets and their settings and providing an attractive environment to the City's communities); Local Plan Policy CS13 (protecting and enhancing significant views of important buildings); London Plan Policies D9e; HC2, and HC3 (protecting the significance of the Tower of London).

22. The application related to 31 Bury Street only and was for a singular tower providing 25,406sqm (GIA) of new floor space. Holland House and Renown House did not form part of the previous application site. Since the refusal of the above application, the current proposal has been amended and two more buildings (Holland House and Renown House) have been included into the application site. The main amendments of the current application in relation to the one previously refused are discussed in the 'Proposal' section of the report.
23. Since the refusal of the previously proposed application the applicant has engaged into pre-application discussions with the aim to address the impacts of the proposed development, which related primarily to the height and massing of the proposed development, albeit maintaining the vision for an office-led tall building.
24. Other planning history of the site relates to Holland House, which was the subject of a Listed Building Consent application granted on 10 May 2022 (ref no.: 21/00838/LBC) for the removal and reinternment of the external faience together with the removal and replacement of existing concrete beam together with associated works.
25. The most recent planning application relating to Renown House was an application which sought the replacement of windows to first, second, third and fourth floors of Renown House. The application was approved in March 2016 (ref. no.: 16/00010/FULL).
26. The following section of the report sets out full details of the proposal.

Proposal

24/00021/FULEIA

27. Planning permission is sought for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys

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

28. The proposed scheme would provide 41,293 sq.m (GIA) of floorspace comprising:
- 34,584sq.m (GIA) of office floorspace (Use Class E(g)(i)), including 1,176sq affordable workspace
 - 504sq.m (GIA) of retail/ food and beverage floor space (Use Class E(a)-(b))
 - 1,411sq.m (GIA) flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses
 - 4,794sq.m (GIA) of ancillary basement uses, including plant space, cycle storage space, shower facilities and building management, fire command centre, security room, refuse and misc. storage and servicing areas

Office Floorspace

29. In terms of the internal layout, the office floorspace will be provided in smaller floorplates (circa 350 – 580 sqm) within the tower component. The office workspace would include 1,176sqm GIA of community workspace at level 1 of Holland house comprising meeting room space and office space with 60 desks available at affordable rent (50% of market rent for qualifying occupiers and zero rent for charities).

Community, Education and Cultural Floorspace

30. The flexible space would be provided at lower ground, ground and first floor levels of proposed development, primarily within Holland House. This space would include classrooms, flexible immersive room for free use by qualifying users (Holland House Hub), between 8am and 9pm on weekdays and 9am till 5pm on weekends and a 339 sqm GIA auditorium (Creechurch Hall), a multi-functional space for office tenants and the wider community. The later

would be available to qualifying users between 8am and 9pm on weekdays and 9am till 5pm on weekends, with allowance for 12 hours a week and an additional 5 days a year for private and paid use.

31. The proposals also include a 120sqm 'Urban Farm' on the terrace at level 9 of Holland House which will be accessible to those using the Community, Education and Cultural Space, including those using the school classes.

Retail and Café Floorspace

32. The proposed shop, café, restaurant and kiosk uses would be delivered at ground floor level at the west of the site, and will be accessible between 7am and 11pm. In addition, both James' Court and Heneage Arcade are supported by smaller, flexible retail units.

Ancillary space

33. A single servicing area will be provided to serve all three buildings, which will be accessed directly via Heneage Lane.
34. A total of 582 long stay cycle parking spaces will be provided in the basement, lower ground and basement; and 85 short stay cycle parking spaces in the basement and lower ground with concierge service from the ground floor along with associated cyclist facilities, comprising 59 showers and 667 lockers. Cycle parking will be accessed via Creechurch Lane at the northeast corner of the new building. Stairs with wheeling channel are proposed as well as access via lift.
35. An area of approximately 200sqm of workshop and retail space is proposed for a Social Enterprise (City Cycles), which will be a charity aimed for young people living in the local area. The programme will support 8-10 people a year.

Public Realm

36. New and improved public routes and public realm are proposed at ground level. These include the new route through the site, namely Heneage Arcade, extending the existing Heneage Lane, which is proposed to stay in private ownership and management. The Heneage Arcade would be open from 7am until 11pm daily.

37. A new open space, namely James' Court, is proposed to be created at the southern end of the site, off Bury Street, which is also proposed to be privately owned and managed. This would be partially covered under the proposed colonnaded entrance of the tower at 31 Bury Street and it would remain open for public access at all times.
38. Combining both Heneage Arcade and James' Court, the proposed development would deliver 619sqm of new and varied public realm, including the improved areas within the public highway. The City of London's paving pallet will be used for the paving in and around James' Court, including through Heneage Arcade.
39. On the southwest façade of the proposed tower, within St James Court, the proposed development would include an outdoor climbing wall. Public art is also proposed within the public realm.
40. A public toilet accessed via Heneage Arcade is proposed as well as a drinking fountain. This is proposed to be available between 7am and 11 pm.
41. Outside open space would be provided on 6th to 9th floors of Holland House and floors 22, 36 and 41 of the tower at 31 Bury Street. The development would achieve an Urban Greening Factor score of 0.318 (rounded down to 0.31).

Bury House – Design and Massing

42. The design of the proposed tower has a more solid punched façade to respond to and interrelate with the design of Holland House and achieve better sustainability credentials. The façade has strong vertical hierarchy with recessive spandrels which frame single storey windows. The lower section of the building has been designed with a triple order base and double order attic storey before it transitions to the slender upper sections. The taller stepped massing of the upper levels has been designed with a strong horizontal emphasis with an attic storey replicating that of the lower section. The top storeys are designed with increasing façade proportions, with the upper part being three times taller than the lower elements. The entrances are articulated by contrasting material and the principle north and south arcade entrances given priority with a double width opening. The building would be finished in elegant, pale blue faience.

Holland Houe – Design and Massing

43. The proposed development at Holland House would see the existing 1960s and 1980s extensions being removed. The proposed additional massing would be stepped, setting backwards on the top floors, and designed to be symmetrical with principal elevation to Bury Street and largely invisible in the important original views of the building obliquely along that street. The rhythm and verticality of the Holland House facade has been continued in the proposal. Reinstatement works to the façade of the building area are also proposed.

Renown House

44. The existing juxtaposition of Renown House with Holland House is proposed to be retained. The proposals seek to raise Renown House by a single storey by raising the mansard line with a new upper masonry storey at 4th floor level. The floor plates to Renown House have been designed to re-align and interconnect with Holland House and proposed tower at 31 Bury Street. At ground floor level the existing stepped raised ground floor is lowered to provide step free access to Renown and Holland House.

Design amendments to Bury House from the previously refused scheme

45. Consideration has been given to the reasons for refusal of the previously submitted application at 31 Bury Street (Ref. no.: 20/00848/FULEIA). Apart from the inclusion of two more buildings to the application site (Holland House and Renown House), the main amendments to the proposed tower at 31 Bury Street are as follows:
- The height of the building has been reduced by 19 metres. By this reduction in height at midpoint (level 22) the tower which is proposed to be set back provides a shoulder line creating a proportionate (50/50) balance to the massing of the tower.
 - A further set back has been introduced on the top eight floors, at level thirty-seven to reduce the massing towards the termination point of the building.

24/00011/LBC

46. The application for the Listed Building Consent relates to the restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam;

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

Consultations

Statement of Community Involvement

47. The applicant has submitted a Statement of Community Involvement prepared by Kanda Consulting. Engagement on the proposals was primarily conducted in two phases within a 13-month period between November 2022 and December 2023. Alongside ongoing consultation with the City of London Corporation, Historic England and the Greater London Authority the applicant engaged with (across London and Southeast):
- 44 Education providers
 - 15 Sporting organisations
 - 44 Charities, social enterprises and community interest companies
 - 26 Arts and cultural organisations and
 - 21 Multi-faith groups
 - 10 Livery companies
 - 14 other organisations
48. 84 meetings were carried out with key stakeholders including:
- Ward Members
 - Local tenants
 - Resident associations
 - Representatives of surrounding businesses
 - Faith-based organisations
 - Sports England
49. Extensive discussions have also taken place with representatives of the neighbouring Bevis Marks Synagogue over the last five years. At least 13 meetings and discussions have taken place with the representatives of the Synagogue over the two years since the previously refused application.
50. The submitted Statement of Community Involvement advises that during the 6-week period from 23rd October - 3rd December 2023, 22 meetings, trainings and events were hosted at Holland House. 369 people visited Holland House. It is also stated that through the 78 test case and workshop

sessions, it has been identified that there is significant demand for more accessible, affordable and flexible spaces which are accessible to communities and groups both within the CoL and across the Capital.

46. The first phase of wider consultation was held in March 2023 and involved discussions with local stakeholders and immediate neighbours. The second phase of wider consultation took place in June 2023 and provided an opportunity to comment on the detailed proposals for the future of the site. The wider engagement process included the following:
- Emails sent to local stakeholders inviting them to meet to discuss the emerging ideas and proposals for the site
 - A virtual exhibition of the emerging ideas and the detailed proposals on the applicant's consultation website
 - Two designed two-page flyers, each time distributed to 3,030 properties
 - Four drop-in sessions with an exhibition of the emerging ideas on the 1st and 2nd March 2023 and detailed proposals shared on the 12th and 13th June 2023
 - A total of 32 people attended the exhibitions across the 4 days
 - 5 written responses to two surveys
 - Two social media campaigns, targeted at the local area, which secured a reach of:
 - March 2023: 11,467 individuals, 82,497 impressions and 491 clicks
 - June 2023: 4,301 individuals, 51,002 impressions and 236 Clicks
 - A telephone number and email address were available and managed by Kanda consultants.
47. Feedback from key stakeholders mainly focused on the following:
- Tower element, particularly regarding its reduced scale and massing since the previously refused application.
 - The applicant was encouraged to ensure that the public benefits reflect the needs of the users and the wider area.
 - Suggestions have been made to introduce further cultural, arts and sports groups.
 - Interest was expressed regarding the public realm and questions raised regarding the activation of the ground floor.
 - representatives of the Bevis Marks Synagogue have continued to express opposition, with concerns primarily about the tower element of the scheme.
48. Feedback from other organisations focused on the following:
- Education:
 - Expressed the need to have a place to visit in the CoL to get young people understand of the possibilities in working in the future.

- Expressed the need for activities that do not incur a cost.
- Holland House is easily accessible for schools to visit by public transport.
- Spaces in Holland House should be designed to support the development of a wide range of skills.
- Highlighted the need for provision of calm areas; good technology; availability of resources; access to outside space; and flexible areas where they can share and work collaboratively.
- For the future development, pupils prioritise celebrating the history of Holland House and the CoL.
- Need for accessible spaces.
- Provision of outdoor space.
- Provision of immersive space that enhances curriculum learning, and by providing additional specialist resources and flexible learning space.
- Delivery of a variety of community building events, celebrating cultural diversity and bringing different groups together to better understand each other and forge relationships.
- Demand for accessible and affordable spaces within the CoL.
- Sports:
 - Meetings with representatives of Sports England, Netball England, Badminton England, Table Tennis England and GG3x3 (3-a side basketball), have reinforced the need for more casual sports facilities throughout the week.
 - Highlighted the lack of climbing facilities in the City.
- Charities/community interest companies and social enterprises:
 - Affordable meeting space in London has been a constant challenge.
 - It was highlighted that Holland House is ideally situated to address this need with a central location, easy transport links, professional meeting rooms and lobby areas, and additional support facilities.
- Arts and culture:
 - The need for benevolent spaces, such as Holland House, to support the voluntary sector.
- Multi-faith groups:
 - St Helen's Bishopsgate Church has raised the need for affordable spaces to carry out events and classes.
 - The significant shortage of spaces for faith-based groups to use for prayer within the City of London has been raised.
- Livery Companies:
 - Some Livery companies have raised interest in using Holland House to host events.

- The need for more free or affordable, flexible spaces within the CoL has been expressed.
49. 11 people attended the public exhibition events during the first round of consultation and a further 21 people attended the public exhibition events during the second round of consultation. Feedback from wider public consultation:
- Community groups, organisations and schools to be given priority for the space at Holland House.
 - The need for more clarification around the operation and funding of the space in the future was raised.
 - The need to improve the buildings' energy performance ratings was identified.
 - Supportive of the introduction of the new green spaces and improvements to air quality and biodiversity.
 - Supportive of the overall space of the tower element of the scheme. the reduction in height of seven storeys was recognised.
 - Some consultees raised ongoing concern regarding the potential detrimental impacts to the setting and operation of the Bevis Marks Synagogue.
 - The public realm improvements and activation of ground floor were welcomed by the public.
50. Since the submission of the application, a Statement of Community Involvement Addendum has been submitted, dated September 2024, capturing the ongoing 'Strategic Outreach Programme' from January 2024 to September 2024. Since submitting the planning application, the Applicant has continued to promote Holland House as a space for any interested groups and individuals to use, free of charge. The Applicant has also contacted all 125 Members of the City Corporation and continued updating the Aldgate and Portsoken ward councillors. The Applicant has continued to research and reach out to other potentially interested charities, education providers, arts, culture and faith-based organisations.
51. The abovementioned engagement has had the following outcomes:
- 6,027 people have visited and / or used Holland House at the time of the submission of the Addendum.
 - The Museum of Diversity has established a semi-permanent office headquarters at Holland House. The museum has used the site for over 133 days.
 - Use of Holland House for Friday prayer sessions for Muslim men and women working in the City of London. It is stated that at the time of the submission of the Addendum 37 prayer sessions had been, each accommodating up to 149 people, with over 1,710 people attending.

- St Helen's Bishopsgate have been using Holland House for Sunday sessions, bringing 490 members of their congregation to Holland House.
 - ClusterFlux has established regular weekly meetings of artists and creatives at Holland House with 37 meetings at the time of the submission of the Addendum.
 - 86 separate ad-hoc bookings within 2024.
 - On the 10th September an event was hosted at Holland House, which brought together 45 representatives of 22 organisations who have used Holland House and expressed interest in being part of the Holland House Hub community in future.
52. The key themes of feedback received through the outreach programme included the following:
- The cost of hiring spaces within the City is prohibitive.
 - Bury Street is well-located, within walking distance from public transport.
 - More space is needed for the considerable number of multi-faith groups in the City of London.
 - Bury Street can bring people together to foster connections and ideas, collaboration and sense of community.
 - The wide range of flexible spaces was welcomed.
 - There is a lack of space to rehearse in the City and performing in those areas is often out of reach to arts and culture organisations.
 - Need for youth friendly spaces in the City.
 - Holland House offers opportunities to create new attractions, meeting the City of London's Destination City ambitions.
 - There is a lack of spaces to play and promote sports within the City.

Statutory Consultation

53. Following receipt of the application by the Local Planning Authority in March 2024, it has been advertised on site and in the press and has been consulted upon twice as follows:
- On validation of the application in March 2024 for a period of 30 days.
 - Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, a 30 day consultation period has to be carried out. The application was re-consulted twice for 30 day, of which the second one ended on the 30th November 2024. These consultations covered the request for additional information primarily in conjunction with information

relating to a Lunar Transit Study and other Applicant's responses to the concerns raised by the objectors.

54. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
55. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation responses	
Greater London Authority (Stage 1 letter dated 10 October 2024)	Stage 1 Letter Strategic issues summary Land use principles: The proposed uplift in office floorspace in the CAZ is supported in land use terms. The proposed element of affordable workspace and community floorspace require suitable obligations, as well as some clarifications and improvements. Officer response: These points are addressed in the Proposed Uses sections of the report. With regard to the affordable workspace and community floorspace of the development, following negotiations with the Applicant has confirmed that they will be provided for the lifetime of the development. Urban Design: The proposal is generally well designed as an office-led CAZ mixed use building, however, the final assessment under London Plan Policy D9 will be finalised at Stage 2. However, the applicant should improve the proposed public realm offer to better integrate it into the street context in order to increase this public benefit. The proposed fire statement and public toilets details should be revised and secured. Officer response: These points are addressed in the Architecture, Urban Design and Public Realm,

	Public Access and Inclusivity and Fire Statement sections of the report. Heritage: The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to designated heritage assets. Nonetheless, further information is still needed to confirm impacts in full. The final NPPF paragraph 208 balance will be carried out at the Mayor's decision-making stage. Officer response: These points are addressed in the Heritage and Assessment of Public Benefits and paragraph 208 NPPF balancing exercise sections of the report. Transport: The applicant should provide a Stage 1 Road Safety audit and identify a suitable location for additional cycle hire services, for which a financial contribution should also be secured. Obligations are also sought for healthy streets improvements, a TfL safety improvement proposal and the submission of a revised Travel Plan. Conditions are also required. Officer response: These points are addressed in the Highways and Transportation section of the report. Equality: A degree of positive and negative equality impacts is expected to be caused by the proposals and these will be given further consideration at the Mayor's decision-making stage. Officer response: These points are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.

	Other issues on environmental matters 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 99. Possible remedies set out in this report could address these deficiencies.
Transport for London (letter dated 14 May 2024)	Access and parking Pedestrian Access It is proposed that the proposed development will enable access through James' Court (to the south) and also through Heneage Place (to the north) as part of new public route through the building (7am – 11pm). Office access 'out of hours' will be via the Creechurch Lane entrance (to the east). Public and retail uses are accessible wrapping around to the west directly to Renown House and Holland House. This will significantly improve permeability of the site and increase the overall space available for pedestrian movement between Heneage Place and Bury Street and along Creechurch Lane; which is welcomed in line with London Plan policy T2 Healthy Street. A Pedestrian Comfort Level analysis has been undertaken for 13 sections of local streets in the vicinity of the site. It is considered that the streets to be used as the main route for access would be able to accommodate the additional footfall and without adverse impacting the PCLS with B+ rating maintained, while the narrower minor routes would not see any notable increase in footway nevertheless. Cycle and vehicle Access Cycle parking access will be via Creechurch Lane at the north-east corner of the building. The entrance provided is dedicated for cyclists which

	is separated from the pedestrian entrance. The entrance is equipped with a sliding door and stairs with a wheeling channel to access basement B1 and B1 Mezzanine. An alternative cycle access is provided via a lift to the basement within the north core for those not wanting to use the staircases. In addition, A secondary access for cycle parking is provided via the eastern Holland House entrance, off James' Court, via lift or stair, this welcomed. Vehicle Access TfL welcomes that an off-street servicing area at the north west corner of the site is provided to serve Bury House, Holland House and Renown House, in line with London Plan Policy T7 Delivery & Servicing, and is accessed directly via Heneage Lane. Having said that, Stage 1 Road Safety audit is required to support its acceptability in highway safety terms. Cycle Parking A total of 667 cycle parking spaces will be provided, of which 585 spaces will be for long stay spaces, and 85 short stay spaces. It is also proposed that 5% (29 spaces) will be provided the form of adaptable spaces to accommodate users of larger / unconventional cycles and those with mobility impairments. The remaining spaces will be in the form of Sheffield Stands (87spaces), and Fold bike lockers (58) and 1 High Density solution type space. Alongside with long stay cycle space, the short stay spaces will be provided within the basement level 1 (B1) and B1 mezzanine level accessed via the Creechurch Lane cycle entrances. All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5

	Cycling and London Plan cycle parking standards. Car Parking TfL welcomes that no on-site car parking has been proposed as the proposal will be 'car free'. As per current, on-street blue badge parking spaces are available on Creechurch Lane and Mitre Street. Healthy Street & Vision Zero An Active Travel Zone assessment (ATZ) has been undertaken and seven routes has been reviewed. The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc. Since part of the land use of the proposed development would be for flexible community/education/ cultural/amenity use; therefore TfL considers that an Nighttime ATZ shall also be carried out to assess routes for darker hours, ensuring safety and security for vulnerable users. TfL is developing safety improvement proposal for the A10 Bishopsgate, the estimate cost of the project is currently £1.5m, therefore a partial contribution of £350K is sought from this proposal toward the project, the amount of contributions is based on common approach adopted for proposed developments in the area. The City Corporation is encouraged to secure necessary improvements for work on its highway network accordingly. Trip generation The submitted TA expected that the proposal would generate a total of 966 two-way trips are forecasted in the AM Peak (08:00-09:00) and 955

	two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 690 two-way persons trips during the peaks compare with the existing offices. This assessment is considered robust and is therefore accepted. A lower level of trips is also expected for the proposed retail use, which is not considered significant. Mode share It is also predicted that vast majority of the trips to/ from the proposal will be by sustainable transport modes. Of those, nearly 10% of trips will be by bike or on foot, and 7% will be by bus, 38% by tube and 47% by rail (including Elizabeth Line); and the level of car and taxi trips are negligible. Public Transport service The site is already with a very high level of public transport services; it is therefore considered that the proposal would not give rise to significant adverse impact to existing London Underground and local bus services in City area. London Cycle Hire It is estimated that the proposal would generate an additional 309 two-ways cycle trips over the current proposal, which means additional demand for cycle hire services. A financial contribution of £100K and land to construct additional docking station on footprint or as close to it as possible is therefore sought. The applicant is urged to identify a mutually agreeable location that would be accepted by the City Corporation and TfL Delivery & Servicing It is welcomed that at at-grade off-street on-site service yard will be provided for servicing, access from Heneage Place. A draft Delivery and Servicing Plan (DSP) has been submitted, which outlines the servicing arrangement for the proposal, includes consolidation and restricting

	servicing vehicle size of goods vehicle of up to 7.5T with 8m maximum length, this is due to the restricted width of Heneage Lane and the vehicle weight limit. However, the DSP shall also promote the use of cycle servicing to reduce goods vehicle traffic in the City and be more sustainable; as well as enabling night-time servicing to reduce traffic impact during normal business hours. The DSP should therefore be revised the comments above, and the final detailed DSP should be secured by pre-occupation condition. Construction Logistics A Detailed Construction Logistics Plan (DSP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition. Travel Planning A Framework Travel Plan have been submitted which is welcomed. It is considered that the 5 years mode shift targets to walking and cycling should be more ambitious to achieve the Mayors' long terms aspiration for 80% sustainable travel by 2041. The Travel Plan should therefore be revised to reflect the comments above, and the finalised Plan should be secured by s106 planning obligation. Community Infrastructure Levy The MCIL2 rate for City of London is £80 per square metre. Summary The following matters should be resolved before the application can be considered in line with the transport policies of London Plan;

	1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreement' 2. Undertake Stage 1 Road Safety Audit for the proposed servicing access 3. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ. 4. Secure a partial financial contribution of £100K for TfL toward proposed A10 Bishopsgate improvement. 5. Secure the submission and approval of cycle parking details by condition. 6. Secure £100K (index linked) financial contribution toward enhancing local cycle hire services. 7. Revise the DSP in light of comments, and secure approval of both DSP and CLP by conditions. 8. Revise the Travel Plan, and ensure that the Plan would contribute positively toward the Mayor's sustainable travel goal and secure them by s106 agreement; and 9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail. Officer Response: These matters are addressed in the Highways and Transportation and the Planning Obligations and Community Infrastructure Levy sections of this report. Officers, the applicant and TfL have been in discussions in respect of the matters raised.
Historic England (letter dated 15 May 2024. An email has also been received, dated 8 October 2024, by Historic England following re-consultation advising to refer to	Summary: In 2021 your authority considered a similar scheme for the replacement of Bury House with a 48-storey tower. That application was refused, which we welcomed. This was because the proposals would have harmed the Outstanding Universal Value of the Tower of London World Heritage Site. The application was also refused because the proposed tall

their original objection letter dated 15 May 2024. Another letter, dated 18 November, was received.)	building would have harmed the Bevis Marks Synagogue due to its overbearing and overshadowing impact on the synagogue and its courtyard. The current proposal, an amended scheme on a larger site, would not overcome either of the previous reasons for refusal in our view. Indeed, further harm caused by the proposed alterations to Holland House and the development's impact on the Creechurch Conservation Area mean that this scheme is worse than that refused from a heritage perspective. Historic England objects strongly to the applications and recommends they should be withdrawn or refused. Historic England Advice Significance of the heritage assets a) Tower of London World Heritage Site The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value as an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. They reflect the Tower's role as the setting of many significant episodes of European history and as one of the best surviving examples of a medieval fortress palace in the world. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. The World Heritage Site (WHS) is located approximately 550m south-east of the development site. The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The physical relationship of the Tower with the City as viewed from the river is central to understanding its Outstanding Universal Value

	(OUV). The Statement of OUV adopted by the World Heritage Committee, in the section relating to integrity, notes that such development ‘could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.’ The view from the north bastion of Tower Bridge towards the Tower of London, View 10A.1 in the London View Management Framework (LVMF), is historically important as a long-established picture post card view. It forms part of a kinetic experience of the Tower and wider London skyline along the bridge. Views of the Tower from this location showcase the Tower’s attributes as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance. These attributes were considered in detail during the Tulip public inquiry. The Inspector found that they ‘rely to a great extent on its setting’ (IR 14.25) and, of the latter three attributes, ‘the sky space component...is central to its OUV’ (IR 14.29). The eastern edge of the Cluster, between the Gherkin and the Tower of London, is presently defined by the Salesforce/Heron Tower at 110 Bishopsgate and Heron Plaza at 80 Houndsditch. These step away from the Tower and up in stages to the taller Gherkin, somewhat mitigating their impact on the Tower of London. b) Bevis Marks Synagogue (Grade I listed) Bevis Marks Synagogue is the oldest surviving synagogue in the United Kingdom. It was built between 1699-1701 for a growing Sephardi community in the City of London, following the Resettlement of the Jews in England in the 1650s. The synagogue has been described as the ‘Cathedral’ Synagogue to Anglo Jewry, such is its stature and symbolic importance. The synagogue is a key part of the history of British Judaism and is of international

	importance, particularly given its roots in the Sephardi diaspora created by the expulsion of Jews from the Iberian Peninsula in 1492. The synagogue continues the traditions of those communities who travelled to the Low Countries and is now one of the oldest continually functioning synagogues in Europe. The synagogue is remarkably little altered. Its architectural and historic significance, including its communal value is clearly exceptional and it is Grade I listed for that reason. Its setting, whilst somewhat compromised by the evolving City around it, continues to make an important contribution to its architectural and historic significance and the ability to appreciate that significance. The premier example of early synagogue architecture in England, Bevis Marks Synagogue was built by the master craftsman Joseph Avis who worked closely with both Sir Christopher Wren and Robert Hooke elsewhere in the City. It is a simple, well proportioned classical building executed in brick and shares much in common with the style preferred for public buildings and churches, designed by the likes of Wren, at the time. Perhaps the most striking way that the synagogue is externally distinguishable from these places of worship is by its discrete siting away from the street in a small courtyard. Its hidden away location suggests a degree of caution, or limitation, for a place of worship (particularly when compared to the near contemporary Sephardi synagogue in Amsterdam). Nevertheless, the high-quality architecture was a demonstration of their faith and an investment which suggests the congregation were confident that they would remain welcome in London. In this way architecture was used by the Sephardi community to establish a positive identity, and permanence, within society.

	Historically, the synagogue formed part of a wider estate with lower rise community buildings encircling it. Despite modern development largely replacing the former one and two storey ranges, the form of the courtyard remains, and the enclosure continues to provide separation from the outside world. The synagogue is the pre-eminent feature of the space, reflecting its function and status. It is currently seen with a largely clear sky backdrop which enhances its presence. The adopted Conservation Management Plan (CMP 2019) for the synagogue notes that the courtyard represents an arresting point of departure from the modern world into what is palpably a historic place. It states that 'views across and out of the courtyard, as well as visibility of the sky are important contributors to the setting of the synagogue, as well as the courtyard's amenity value.' We note that the synagogue has liturgical practices which include interactions with the sky and celestial bodies. The CMP further explains the communal significance of the courtyard as a place where people gather before and after services and other events, including weddings. It therefore has a key role in supporting the customs and traditions of the synagogue. Modern development, including tall buildings, is increasingly visible in the wider setting of the synagogue. Where tall buildings encroach into the skyspace around the courtyard and have windows facing into it, they reduce its special sense of privacy and openness to the sky. This makes elements of the setting particularly sensitive to further erosion or loss. The synagogue nevertheless continues to benefit from a large amount of clear sky making a strong positive contribution to the buildings setting and significance, and the ability to appreciate these. c) The site - Holland House (Grade II* listed), Renown House and Bury House

	Holland House was designed as the London headquarters of W.M. Müller & Co by the preeminent Dutch architect H.P. Berlage, from 1913-16. It is a highly original office design and the only example of his work in the country. This building is now prominently sited, following the construction of the Gherkin and the creation of the public space around it which has enhanced the ability to appreciate its significance. It is an important building particularly because of its pioneering approach to rational façade design. The primary elevation has a regular grid without any apparent hierarchy - radical for its time. The realised design was unprecedented in London, reflecting Berlage's interest in contemporary American architecture and his own progressive ideas. The building is of more than special interest which is reflected by its Grade II* designation. Holland House wraps around the slightly earlier 33-34 Bury St (Renown House) to the south, a good quality but unlisted commercial building of 1912 (designed by the architect Delissa Joseph). It contributes positively to the setting of Holland House. Despite being separated by only a few years, the traditional architectural language of Renown House, including the hierarchical arrangement of its floor levels as expressed in its composition, contrasts unmistakably with the radical approach to façade design pursued at Holland House. This juxtaposition enhances the appreciation of the latter's significance. 31 Bury Street (Bury House) is a late 60's office building. While its design is of no particular merit, it is sympathetic in scale to its historic neighbours. Bury House is physically connected to Holland House, which also has alterations and extensions contemporary with the former that detract from the listed building's significance.

	d) Creechurch Conservation Area Recently designated for its special architectural and historic interest, the Creechurch Conservation Area's character is embodied in three exceptional Grade I listed places of worship: Bevis Marks Synagogue, the churches of St Katherine Cree and St Botolph-without Aldgate. Alongside these are high quality commercial buildings and warehouses from the late-nineteenth and early-twentieth centuries. Subsequent modern development is generally sympathetic to the historic scale, resulting in a clearly defined character worthy of preservation. The tall building at 1 Creechurch Place is an outlier which detracts considerably from the area's qualities. Holland House, Renown House and Bevis Marks Synagogue make a strong positive contribution to the conservation area's special architectural and historic interest. Although Bury House may not make a distinct positive contribution, its perceived scale is sympathetic to its neighbours and the area more broadly. The loss of James Court and the southern part of Heneage Lane caused by its construction has interrupted the historic urban grain to a small extent. Impact of the proposals The proposals are for the replacement of Bury House with a new 44 storey building (178.7m AOD) and the alteration and extension of Holland House and Renown House. a) Tower of London World Heritage Site The current proposals show a modest reduction in height and a chamfering of the massing at the uppermost part of the building, compared to the refused scheme. The proposed tower would, though, be slightly wider than the previous scheme in its middle section. We conclude the proposals would cause a similar

	level of harm to OUV as the previously refused scheme. While the reduction of clear sky around the White Tower due to 80 Houndsditch has harmed OUV, we recognise that the height of this building was specifically designed to finish below the capping of the White Tower's turrets as viewed in LVMF 10A.1. As such 80 Houndsditch demonstrates some deference to the silhouette of the Tower because of its lower height. Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed cladding material. The additional height that would be introduced at its eastern edge, would result in a striking upward step in scale directly beside the White Tower, creating much more of a cliff edge than the current situation. It would therefore present a greater distraction and harm the Tower's attributes of OUV as a symbol of Norman power, its landmark siting and its physical dominance, and so harming the integrity of the WHS. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above. The experience from Tower Bridge is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest

	turret of the White Tower when it moves through the sky space behind it. The proposals would introduce a comparable scale and mass to the Gherkin, evident notably closer to the Tower, leaving less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City and its silhouette would be further compromised when compared to the existing situation, adding to the harm to the attributes of OUV we have identified above. The proposed development would also be visible within the Tower of London Inner Ward. At different points it would appear above the roofline of the Chapel Royal of St. Peter ad Vincula and 2 Tower Green (both Grade I listed), adding further to the visual intrusions of various tall buildings in the City. Consequently, it would further diminish the self-contained ensemble of historic buildings and spaces, distracting from the Tower's remarkable sense of place. b) Bevis Marks Synagogue The proposed development would harm the significance of the synagogue, intruding directly behind it when viewed from its courtyard. The new tower would appear closer to the synagogue than any other existing tall building development, greatly reducing the clear sky backdrop, resulting in a worse scenario than the previously refused application proposals. The ability to appreciate the architectural interest of the synagogue would consequently be diminished. Its precedence would be all but lost with a roofline that would become framed against distracting modern development of a very large scale. The new tall building would become a dominant feature of the courtyard at the expense of the synagogue, diminishing the latter's role as the focal point of the space. The special historic character of the place and the deliberate sense of separation from the outside world would be further diminished. The

	ability to see clear sky from the courtyard would also be lost, breaking the visual link between the space and celestial bodies. Such harm needs to be considered in a cumulative context, with existing and consented tall buildings already having a damaging impact. These proposals would cause a greater degree of harm than those schemes, because of the location of the development site relative to the synagogue, evident immediately upon entering the courtyard. c) Holland House and Renown House Holland and Renown House would be altered in order to combine them with the proposed tall building on the site of Bury House. We note as heritage benefits the conservation works and proposed increased access, which would improve the ability to appreciate the significance of Holland House. However, the alterations would include the demolition of party walls in order to provide better connectivity and to enable a shared core. The light well in Holland House would be extended and subdivided. These alterations would result in harm to Holland House by compromising the legibility of its historic design. Both Holland House and Renown House would be extended upwards which would result in a greater level of harm to the listed building and to the conservation area. In the case of Holland House, the addition of attic levels which do not reflect the order or proportions of the original design intent would be particularly harmful to the appreciation of its significance by appearing overbearing. The scale of the proposed roof level and dormer windows to Renown House do not reflect the hierarchy of the building. As such, the extension would compromise its positive contribution to Holland House and the conservation area through increases to its height.

	The proposed tall building would appear to tower over Holland House distracting from an appreciation of its high architectural interest, causing further harm. c) Creechurch Conservation Area The proposals would similarly harm the conservation area by reducing the positive contribution made to it by these buildings. The scale of the proposed tall building would detract from a relatively consistent historic scale and become the dominant form. We note proposals offer modest enhancement to the character and appearance of the area by reinstating the southern part of Heneage Lane as a route through, which would be a small heritage benefit. <u>Relevant Policy</u> The letter sets out relevant policy. Officer comment: The relevant policies are set out in the policy section of this report. Historic England's position Historic England objects strongly to the current proposals. We consider they would harm designated heritage assets of the highest possible significance, contrary to planning legislation, policy and guidance. We do not support the development of a building of scale proposed in this location due to the inevitable harmful impact it would have on the historic environment. The reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard. a) The Tower of London World Heritage Site

	The previously refused application was subject to a Technical Review by ICOMOS, one of the Advisory Bodies to UNESCO's World Heritage Committee, in July 2022. Given the similarities between the current scheme and the refused one, we consider that ICOMOS' previous advice remains relevant to the current application and should similarly be taken into consideration. ICOMOS considered that the proposals would harm the integrity of the WHS as well as the significance it derives from attributes conveying its OUV. This harm remains in the current planning application. In the case of the World Heritage Site, a small reduction in height of the proposed tall building (without an apparent loss of deliverable office floor space) causes a similar impact. The same attributes of OUV (as a symbol of Norman power, its landmark siting and its physical dominance) and so the integrity of the WHS, would be harmed. The submitted Heritage Impact Assessment for the Tower does not consider the potential for negative impacts on OUV and we disagree strongly with its conclusion of a minor and beneficial impact in LVMF View 10A.1. It does not adequately consider the impact on the important kinetic experience of the viewpoint either. In their technical review, on this point ICOMOS stated that 'the work to maintain a separateness from the Tower is completely unsuccessful'. The same is true of these proposals. The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the Tower. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them.

	We consider that, despite the changes to the scheme, a high level of harm would be caused to the same attributes of the WHS' OUV. For the purposes of the NPPF, we find that the harm would be in the middle of the less than substantial range to the World Heritage Site. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals. Notwithstanding our view that the advice received from ICOMOS on the previous scheme for this site remains relevant, the Department for Culture, Media & Sport (DCMS), representing the UK State Party to the World Heritage Convention, has decided to notify the current case to UNESCO. We consider that any decision on this application would benefit from knowing the position of the World Heritage Centre and/or further advice of ICOMOS. We note that we have received request from the World Heritage Centre to produce a State of Conservation Report for the Tower of London this year, indicating that UNESCO has serious concerns about the impacts of development on the setting of this WHS and its OUV. b) Bevis Marks Synagogue Our understanding of the significance of the synagogue has developed since the previous application. Clear harm would be caused to multiple aspects of the synagogue's significance by blocking the open sky in its backdrop - noting in particular the considerations set out in GPA3 and the assessment of significance in the adopted CMP. We defer to the expertise of the Sephardi community on the aspects of significance that are associated with their religious customs and traditions that may be impacted by the current proposals.

	We think that the harm arising from the proposals would be greater than we previously identified. The harm would fall in the middle of the less than substantial range, which represents a considerable impact to a building and setting of exceptional significance and rarity, which are sensitive to change. The submitted Heritage and Townscape Visual Impact Assessment presents a limited understanding of the significance of the synagogue, and the contribution made by setting to that significance. It does not explain why a different understanding to the adopted CMP has been reached with regard to the value of the sky. We consider that the application fails to meet the requirements of Paragraph 200 of the NPPF, as the level of detail is not sufficient. c) Holland House, Renown House and Creechurch Conservation Area. New additional harmful impacts to the historic environment arise through the present applications in the case of Holland House and the newly designated Creechurch Conservation Area, as described above. The proposed roof extensions have not been resolved in a way which avoids or minimises harm in accordance with the requirements of the NPPF. Given its importance as a pioneering building, we think that such harm is difficult to justify. The introduction of a tall building within the conservation area would harm its character and is at odds with the provisions of Local Plan Policy CS12 and CS14. The latter indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas. d) Design and heritage benefits We are not convinced that sufficient steps have been taken to minimise or avoid conflicts between the conservation of all of the designated heritage assets referred to above, as required by the NPPF.

	As context (including the historic environment, as set out in the NDG) is a fundamental aspect of good design, we find that the design quality is poor in this respect. Similarly, the proposals do not appear to comply with the design-led approach required by London Plan Policy D3, as the site's capacity has not been optimised with regard to the site's context and capacity for growth, including the setting of such exceptional heritage assets, which are an important consideration. The heritage benefits arising from the scheme are limited and could be achieved in less harmful ways. We afford them little weight and consider them incapable of outweighing the identified harm. Recommendation: Historic England strongly objects to these applications. We recommend that they are refused or withdrawn. In their letter, dated 18 November 2024, Historic England state the following: We have set our position on these applications in detail in our letter of 15 May 2024 and continue to refer you to this advice. The recent amendments concern aspects of the detailed design which do not materially change the impacts on significance. The heritage commentaries submitted by the applicant in response to our advice do not provide any new information which changes our position. We wish to draw the City Corporation's attention to the following points in light of further correspondence and information which has been submitted. In our previous response we advised that given the similarities between the refused application and the current proposals, ICOMOS's previous advice remains relevant to the current application. As indicated in our email to the

	case officer on 24 July 2024, UNESCO's World Heritage Centre has welcomed Historic England's advice that the comments made by ICOMOS in its 2022 Technical Review of the previous application for this site remain relevant and should be taken into consideration in the local planning authority's determination of the current scheme. Please find this email and ICOMOS's Technical Review appended. We would encourage careful consideration to be given to ICOMOS's advice given the potential implications for the World Heritage Site. We note the submission of the Lunar Transit Study Above The Bevis Marks Synagogue (GIA August 2024). This pertains to the Sephardi community's ability to practice the Kiddush Levana ritual - prayers performed outside at night to bless the new moon. A review of the Transit Study (BRE 04 November 2024) notes a significant reduction of visibility of the moon at relevant times of the lunar cycle as a consequence of the application proposals. In our previous response, we highlighted the importance of the clear sky backdrop in the setting of the Synagogue to its significance, both in terms of its tangible and intangible contributions. As set out in 'The Setting of Heritage Assets' (GPA3) 'the asset's intangible associations with its surroundings, and patterns of use' and 'intentional intervisibility with other historic and natural features' (which we take to include the celestial bodies) are relevant to the consideration of impacts on significance. We defer to the expertise of the Sephardi community on their traditions and the impact of the proposals on their ability to worship, but note the clear link to heritage significance raised by this point. In addition to the harm to the Tower of London and Bevis Mark Synagogue, we have also

	previously set out how the proposals would harm the significance of Holland House and the Creechurch Conservation Area. For the purposes of the NPPF, we find that the harm to the former would be in the middle of the range of 'less than substantial' and in the lower part of that range for the latter. Historic England continues to object strongly to the current proposals. We consider they would harm designated heritage assets of the highest possible significance, including the Tower of London and Bevis Marks Synagogue, contrary to planning legislation, policy and guidance. We do not support the development of a building of the scale proposed in this location due to the inevitable harmful impact it would have on the historic environment. We consider that the reasons for refusal for the previous application remain entirely applicable to these proposals. That application was refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. A second reason for refusal was the overbearing and overshadowing impact on the synagogue and its courtyard. The current proposal would result in a worse impact in this case. <u>Recommendation</u> Historic England strongly objects to these applications. We recommend that they are refused or withdrawn. We will update the Department for Culture, Media & Sport (DCMS) in its role representing the UK State Party to the 1972 World Heritage Convention, about the recommendation in your report and the decision of your Planning

	Committee. This is in order that they can update UNESCO World Heritage Centre on this case in accordance with Paragraph 172 of the Operational Guidelines. We have not authorised the granting of listed building consent and will review our position on that matter after your Planning and Transportation Committee has met. Officer response: The matters in the Historic England objections are addressed in the Tall Building, Architecture, Urban Design and Public Realm, Heritage and Strategic Views and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. Historic England have withheld the listed building consent authorisation letter for this case and have not issued a direction, meaning that whilst the City can resolve to grant the LBC, the City will not be able to issue the LBC unless and until such authorisation is provided. Historic England have confirmed they are withholding the authorisation because they object to both proposals. Historic England will be updated and informed of the decision of the committee. Please note that the ICOMOS Technical Review relating to the previous application at 31 Bury Street is included in the background papers.
Historic Royal Palaces (13 May 2024 and 21 November 2024)	As guardians of the Tower of London WHS we write to object to the revised proposals for this site. It is evident from the submission material that the proposed development would have a significant damaging visual effect on aspects of the 'Outstanding Universal Value' (OUV) of the Tower WHS. On the basis of the information available on the City's website, our comments on

	the proposal are set out below and we would ask that these are considered in the Council's determination of the application. On 19th November 2020 we objected to the previous application for this site (20/00848/FULEIA) for which ICOMOS conducted a Technical Review and for which Planning Permission was refused. In our view, the reduction in the height of the building from 48 storeys to 43 storeys is not sufficient to mitigate the harmful impact on the OUV of the WHS and overcome the previous reason for refusal in this regard. Particularly on the attributes of the Landmark Siting of the Tower of London and on the Physical Dominance of the White Tower. In the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge it is imperative that adequate visual separation is maintained between the City Cluster and the White Tower silhouette. The proposal retains just a sliver of sky space to separate it, but of course this view, like any other, is not static: move a few metres north and the proposal would appear to rise directly out of the White Tower. The LVMF guidance for view 10A.1 states that: 'The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower' Where it has been compromised its visual dominance has been devalued.' Regarding the background to the Tower, the LVMF guidance notes, 'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should

	not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site'. It should be borne in mind that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The new proposal for Bury House, would still inevitably increase the existing compromise of the free space around the White Tower. In Historic Royal Palaces' view, the damaging visual impacts are also evident in the dynamic journey across Tower Bridge and in the local views from within the inner ward of the Tower identified in our Local Setting Study 2010. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVA views 22 and 23), increasing the visual intrusion of the modern city skyline into the inner ward. A key impact of the proposed development would be that it would inevitably extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the burgeoning City. Although there has been a minor decrease in the proposals' height, it still creates an abrupt vertical cliff edge in LVMF 10A.1, rather than a stepping down into the 'foothills' of the Cluster. This is a contradiction in the principles being set out for the Cluster and the proposal is also still high enough to suggest that there should be a further continuation of the downward slope of the Cluster towards the White Tower – which over the years has pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme.

	You will note that in their 2022 Technical Review, ICOMOS restated the position from the 2019 Review that “the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable 30 City of London ref: 18/01213/FULEIA 12 approach to allow further negative visual impact on the property’s integrity when it is already threatened.” This position still stands for the current application and the impact of the development as proposed would be of significant heritage harm to the setting of the Tower of London and the Outstanding Universal Value of the World Heritage Site. On this basis the proposals are contrary to the policies of the Local Plan, London Plan and NPPF, whilst the scheme does not deliver sufficient public benefits to outweigh the level of harm created. The Planning Statement submitted with the planning application relies significantly on the draft policies of the City Plan in seeking to justify the excessive height and position of the proposal. However, given that the draft plan remains at an early stage of preparation, having not been submitted or tested through examination, with significant objections remaining to the tall buildings policies and proposals in the draft document, it is evident that limited weight can be attributed to the draft plan in the determination of the application at this stage. Historic Royal Palaces therefore objects to the proposed development, which would be harmful to the OUV of the Tower of London WHS and we ask the City of London to refuse the application.

	<u>The letter received on 21 November 2024 stated the following:</u> HRP remains strongly of the belief that the proposed development would significantly harm the Outstanding Universal Value (OUV) of the ToL WHS by virtue of the position and height of the proposed buildings and their impact on key views and the ToL. Growth of the City Cluster The growth of the CoL tall buildings cluster over the last 15 years, particularly the rapid development of new high-rise buildings, represents growth beyond that which was first envisaged when the LVMF was first published in 2012. The growth in tall buildings has resulted in cumulative impacts which HRP considers are threatening the OUV of the ToL WHS. HRP considers the emerging CoL Local Plan to 2040, which proposes additional height in the cluster, would further exacerbate the harm to the OUV through its promotion of an expanded eastern edge to the cluster and additional height. HRP believes that the Bury House development, along with the emerging CoL Local Plan 2040, to be a significant threat to the status of the WHS and as such maintains its objection both to this application and the emerging City Plan 2040. Harm to the OUV of the ToL WHS HRP remains of the view that the proposed development would harm the OUV of the ToL WHS. The original representation (May 2024) set out the unacceptable impact of the proposals on views of the Tower of London from Tower Bridge (LVMF 10A.1), in the dynamic journey across Tower Bridge, in the local views from within the inner ward of the Tower (in particular the view north-west from the centre of Tower Green over

	the roof of St Peter and Vincula), and on views of the White Tower, which is compromised by the erosion of the visual separation from the emerging City Cluster. This is contrary to the guidance of the LVMF, in relation to View 10A.1 which states that <i>‘Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer’s ability to appreciate the Outstanding Universal Value of the World Heritage Site’</i> (LVMF para 186). HRP notes the Townscape Consultancy response to the HRP comments made in May 2024. However, HRP maintains its position and does not agree with the conclusions in that response. In relation to View 9 in the TVIA (LVMF View 10A.1), HRP does not agree that ‘in the cumulative condition the height of the proposed development would better mediate the cliff edge caused by the consented scheme at 100 Leadenhall’. HRP considers the height would in fact exacerbate the abrupt vertical cliff edge in this view, resulting in a domineering and overbearing relationship to the ToL White Tower in this view. In relation to the Townscape Consultancy comments on View 22, from the ToL Inner Ward, HRP maintains its comments. While the wire line shows the proposed development occluded in this view, the cumulative impact view in the TVIA clearly shows a development visible over the top of the Royal Chapel of St Peter and Vincula. This further highlights HRP’s concerns about the growth of the city cluster overall and the damaging impact this is having on the ToL.

	<u>The 'Policy Considerations' and 'Changing policy context' are included in the background papers.</u> Misrepresentation of HRP comments on the emerging scheme HRP notes the statement in the Planning Statement (para 2.30) which refers to the way in which the 2024 submission seeks to address the reasons for refusal of the 2020 scheme: that <i>'The Applicant has also worked with key stakeholders including the GLA, Historic Royal Palaces ('HRP') and Historic England ('HE') to address the second reason for refusal. In this regard, HRP feedback acknowledged that there was "much to welcome in the new design proposals, particularly in respect of the existing incongruous extensions to Holland House, bringing public use to Holland House, and the reduction of height and introduction of shoulder elements to the tall building", which were described as helpful in key views. It was acknowledged that the "height of the massing would reestablish a softer edge in the foothills of the City Cluster that would mitigate to some extent against the 'cliff edge' created by consented developments"</i>. The Planning Statement concludes on this point (para 2.31) that there is <i>'consensus from the GLA, HRP and the HE that the height reduction represents a positive change from the previous scheme, but some concern remains in respect of the overall height of the scheme.'</i> HRP takes issue with this presentation of its view of the current scheme, which overstates its assessment of the advantages of the current scheme compared with the previous rejected scheme, and suggests that its remaining concerns are minimal and entirely addressed in the Heritage Assessment, HTVIA and Design and Access Statement submitted as part of the current application. The quotes presented in the Planning Statement are from an email exchange

	immediately following an online presentation of the scheme by the Applicant to HRP, and omit other important issues raised by HRP in that email, including that <i>'the massing in LVMF view 10A.1 (from the northern bastion of Tower Bridge) still appeared tall and close to the White Tower'</i>. This position was set out in more detail in HRP's follow-up formal objection letter dated 13 May 2014. Historic Royal Palaces therefore continues to strongly object to the proposed development, which would harm the OUV of the Tower of London WHS and which therefore does not comply with CoL adopted or emerging Local Plan Policies, the LVMF and NPPF. We therefore request that the City of London refuses the application as currently presented. <u>Officer response:</u> The matters in the Historic Royal Palaces objections are addressed in the Tall Building and Heritage and Strategic Views sections of this report.
Surveyor to the Fabric St Paul's Cathedral	The proposals involve the construction of a new tall building to Bury Street, on the eastern end of the cluster. Whilst the development site is separated visually from the Cathedral by the bulk of the Cluster, the proposals will still be appreciable in key views of St Paul's (as identified within the Heritage, Townscape and Visual Impact Assessment - HTVIA) and thus form part of its setting. We would therefore query why an assessment of the significance of the Cathedral (including the contribution made by its setting) and subsequent heritage impact assessment was not explicitly included in the application documents, either within the HTVIA prepared by The Townscape Consultancy or the Heritage Statement prepared by KM Heritage. We would suggest that such assessment should be included in the submission

	documentation as a matter of due course given the exceptional significance of the Grade I listed building and the evolving nature of its setting. If this assessment is not included, we consider that explicit mention should be made of why the Cathedral was scoped out of assessment in order to fully understand the extent of potential heritage impact. We do, however welcome the inclusion of key views of the Cathedral outlined in the ‘Visual Assessment’ section of the HTVIA. Whilst we understand that the proposals are located on the eastern side of the cluster and a ‘partial’ ZTV is included as an appendix to the HTVIA, the inclusion of a ZTV that covers a wider area would be of great assistance in understanding the extents of potential visual impact, and why certain strategic views (such as view 15B.2) were not taken forward for assessment. Fleet Street views are not included within the HTVIA. However, the Processional Way along Fleet Street is an incredibly sensitive area of the setting of the Cathedral in terms of potential heritage and visual impact. We would therefore also seek to be assured that there is absolutely no visual intrusion within views of the Cathedral from Fleet Street. Wider Considerations: Bevis Marks We have confined our observations on this application to our primary locus (ie concern for the heritage and setting of St Paul’s) and our well established planning application review methodology. However we also feel we would be remiss in not making mention of the evident impacts that this major development proposal has on both the Tower of London (WHS) and Bevis Marks Synagogue. The City Planning and Transportation Committee refused consent for an earlier proposal – which,

	to most observers, is more or less similar to the current application. The committee determined that the impact on the heritage and setting of two highly significant and sensitive Grade 1 listed heritage assets were found to be unacceptable. Accepting that other commentators and critics, including Historic England, will be better placed to advise Planning Committee on the methodology and evaluation of impacts of this development on Bevis Marks especially: the main observation that we wish to add to our comments here is in relation to the definition and understanding of ‘setting’. There is very good guidance from HE on evaluation and consideration of managing significance, which includes ‘setting’ in GPA 1 and 2. We feel that it is important to note that, whilst the Tower and St Paul’s are (in different ways) privileged with specific heritage management policies that broadly recognise these internationally significant heritage assets, Bevis Marks has to argue a case for ‘Protection, Preservation and Celebration’ within the rubric of the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990. All participants will rightly be concerned with seeking a better and shared understanding of the heritage setting of the Synagogue and, to date, it would appear that the regulators and proposers of this scheme have not yet arrived at a shared understanding of setting and the significance thereof. This important consideration might have been addressed by EIA Scoping. Where the interests of St Paul’s and those of Bevis Marks intersect, we suggest and as noted above, is that this application before committee does not appear to be supported by sufficient or proportionate evidence and expertise in relation to the full and correct evaluation of the heritage context into which this major project intrudes. We

	would therefore urge officers and Committee to allow for these necessary data to emerge to inform any determination. Conclusion We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward. We would be happy to review any additional information submitted to better understand potential impacts. Officer response: The matters raised above are addressed in the Tall Buildings and Heritage and Strategic Views sections of the report.
Twentieth Century Society (letter dated 17 May 2024 and email dated 11 November 2024, maintaining their objection)	It is the view of the Society's Casework Committee that the proposed 3-storey extension to the roof of Holland House would seriously harm the significance of the Grade II* Holland House. The 3 additional storeys would add considerable heaviness and bulkiness to the building's roofline. This extension would change the building's proportions and upset its balance, making it appear top heavy. While stepped back, it would still remain highly visible and impactful. This is illustrated in the applicant's HTVIA views 42, 43 and 60. The proposed extension would also have a harmful impact on the building's fabric and on the character of its interior spaces, namely through the infilling of its lightwell. The Society also has serious concerns about the proposed ground plus 43-storey office tower development to Bury House and its impact on the significance of Holland House. The proposed redevelopment would physically impact on the fabric of Holland House. Original rear floor slab and wall would be lost to connect Holland House with the proposed development. This part of Holland House has already suffered fabric loss as a result of the Bury House development in the 1960s and we are concerned that even more fabric would be removed as part of the current

	application, we are also concerned about the proposed insertion of a large stair to connect the ground and first floor level and its impact on the interiors here. We have concerns about the cumulative impacts of previous and proposed changes on the significance of this Grade II* listed building. The proposed ground plus 43-storey office would also clearly impact on the setting of Holland House – it would rise up directly behind the building and would appear to overshadow it. This is illustrated in the applicant's illustrative CGIs and views within its HTVIA. We accept that the proposed height of the office has been reduced from the previous application (which proposed a ground plus 48 storey tower) but a reduction of five storeys has done little to reduce its impact on the surrounding built environment. It was on account of this impact on heritage that the previous scheme was refused, the planning/heritage context has also changed since the previous application. This area a very recently been designated the Creechurch Conservation Area which makes the site even more sensitive to change and even harder to justify such tall development here. These aspects of the scheme would majorly harm the significance of Holland House. We do not feel that this harm is mitigated by the few positive interventions proposed as part of the scheme, which includes restoring the elevations, replacing non-original windows with units closer to the originals, reinstating the blocked-in Bury Street entrance and conserving original interior finishes. There benefits could be delivered through a scheme which has a much less harmful impact on the site's heritage, we would seriously challenge the applicant's claim that remedial work to the elevations (which has already been approved by the local authority) could only be delivered through the wider redevelopment of the site (we refer to paragraph 2.32 of the planning statement).

	For the reasons outlined in this letter, the Society strongly objects to the proposal and recommends that the local authority refuses these damaging applications. We do not object to adapting Holland House for office use nor to the redevelopment of the Bury House site in principle but take issue with the approach proposed and would like to see a more conservation-led scheme forward. <u>Officer response:</u> Comments noted and are addressed in the Architecture, Urban Design, Public Realm and Heritage sections of the report.
The Victorian Society	Strongly Object. Significance and Harm Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage. It is considered a key transitional building between the Art Nouveau and Art Deco styles, noted for its faience cladding, its sculpted corner resembling the bow of a ship, and its elaborately tiled entrance lobby. The heritage asset also forms a key building within the newly established Creechurch Conservation Area. Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building positively contributes to the immediate setting of Holland House and the Creechurch Conservation Area. The four-storey extension to both Holland House and Renown House is excessive and top-heavy, disrupting the careful architectural proportions of both buildings. The extension would also result in the loss of historic fabric, including the loss of stone chimney stacks on Renown House and the

	complete removal of the top floor of Holland House, causing less than substantial harm. To accommodate an open connection with the proposed new tower at No. 31 Bury Street, further losses to Holland House are proposed, including the rear wall, the insertion of a large new staircase, and the enclosure of a light well. Listing applies to all the building's fabric; the cumulative effect of these changes would heavily reduce the integrity of this heritage asset. Renown House will lose all its interiors, roof mansard, and stone chimney stacks. New floor levels inserted to accommodate the connection with the proposed tower at 31 Bury Street and Holland House would not align with existing windows. The proposed interventions aggressively attack the integrity and design of this non-designated heritage asset. The construction of a 43-storey building at 31 Bury Street would negatively impact the surroundings in which these heritage assets are experienced. The scale of the proposal would have the effect of overpowering the assets by absorbing them into the wider proposal, affecting the ability to appreciate the individual significance of both Holland House and Renown House. Creechurch Conservation Area The proposed scale and design of the development would have a far-reaching effect on the appearance and special architectural and historic character of the Creechurch Conservation Area, defined by intricate lanes and medium-rise buildings. This proposal would compromise this character by introducing an inappropriate scale and materiality, affecting the predominant setting of a number of designated and undesignated heritage assets, causing less than substantial harm to this conservation area,

	and damaging one of the key aspects of its significance. 1990 Planning (Listed Buildings and Conservation Areas) Act: The application simply fails to adequately preserve a building of special architectural and historic interest due to the loss of historic fabric, disruptive additions, and the compromise of its immediate setting, in addition to the wider negative impact on a conservation area. <u>Officer response:</u> Comments noted and are addressed in the Architecture, Urban Design, Public Realm and Heritage sections of the report.
LAMAS - Historic Buildings and Conservation Committee	The LAMAS Historic Buildings Committee object to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area. 24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street) We have written on two previous occasions in 2021 expressing our objections to the planning applications submitted for 20/00848/FULEIA Bury House, 31 Bury Street, London, EC3A 5AR. As you will know, this scheme was subsequently refused in June 2022, with the reason cited as: 1. The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal).

	2. The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site, as highlighted by Historic England in their letter of objection. The City of London Local Plan January 2015; Policy DM 12.2 Development in conservation areas identifies that: Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. Contrary to that stated in the applicants DAS Vol 1; page 14, the proposed development is within the Creechurch conservation area. 24/00011/LBC (Holland House 1 - 4, 32 Bury Street) Holland House is a Grade II* listed building first listed in June 1972 and amended in September 1997. The scheme 24/00011/LBC proposes the partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys. The City of London Local Plan January 2015; Core Strategic Policy CS12: Historic Environment identifies the need: To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. Policy DM 12.2 Development in conservation areas, para 3.12.10 further identifies that: In the design of new buildings or alteration of existing buildings, developers should have regard to the

	size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale. Policy DM 12.3 Listed buildings states: 1. To resist the demolition of listed buildings. 2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting. Para 3.12.14 further identifies that: Where extensions are proposed, in order to be acceptable, they should be located where they minimise the effect on the listed building concerned, and should always be appropriate in scale and character. The bulk, height, location and materials of roof extensions will be particularly critical and should be appropriate to the period and style of the building and its setting. This has been reinforced by the establishment of the Creechurch conservation area, which encompasses both the Grade II* Holland House and the Grade I listed Bevis Marks synagogue. The application 24/00021/FULEIA for the demolition of Bury House and erection of a new building is, in our opinion, materially of little difference to the previous 2020 scheme. The committee therefore still remain of the opinion that: 1. The proposal for the 43-storey tower immediately adjacent to the grade I listed Bevis Marks Synagogue will still profoundly harm the exceptional significance of the Synagogue in its setting by further eroding its prominence in its immediate surroundings. The reason as stated in paragraph one of the letter of rejection therefore still relates.

	2. Whilst it is acknowledged that the proposed building has a slightly amended profile, we do not consider that this provides sufficient mitigation to change the less than substantial harm on the London View Management Framework view as stated in paragraph two of the letter of rejection. The application for listed building consent 24/00011/LBC for the partial demolition of the Grade II* Holland House and the construction of four further storeys would cause a significant detrimental effect on the Grade II* listed building, in contravention of Policy DM 12.3 Para 3.12.14 The proposed development is within the Creechurch conservation area, and in the opinion of the committee, will have a significant detrimental impact on the character and appearance of the conservation area, in contravention of Policy DM 12.2. For the reasons set out above, the LAMAS Historic Buildings Committee therefore continue to object to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area. Officer response: The matters raised are addressed in the Tall Building and Heritage and Strategic Views sections of this report.
Historic England, Greater London Archaeological Advisory Service (letters dated 2 April 2024 and emails received on 10 October 2024 and 7 November 2024	Assessment of Significance and Impact: The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains

confirming that the additional information did not affect the original advice)	have been lost due to deep basement construction or other groundworks. The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school. All three of the current buildings on the site have a basement. The deepest basement appears to be under Holland House although no OD height has been provided for it. Shallower basements appear to be present beneath Bury House and Renown House. The archaeological desk-based assessment (AOC 2023) submitted with the application suggests that the Bury House basement has removed all archaeological deposits to a depth of c 11m OD. No depth for the basement of Renown House has been provided but a similar level of impact may be expected. Remains of the Abbey previously excavated to the east of the site have confirmed that the lower parts of the Abbey remains extend to below 11m OD in places. It is also possible that deeper cut features of Roman date may also survive beneath the current basements. No archaeological evaluation or investigation has been previously carried out on the site to ascertain likely levels of truncation. The proposed development includes a basement under Bury House that will extend to four levels. This will cause complete truncation of any surviving archaeological deposits. In Holland House, no new basements are

	proposed but a crane base and new foundation will be inserted into the current lightwell. Renown House will retain its facade, which is likely to need propping. The supports for the propping are likely to extend below the current basement. Underpinning may also be required here. It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings. The proposed development will have a high impact on these potential remains. It is recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be implemented. A cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. The story of Holy Trinity Priory is of particular interest as little information about this site is available to view within the City. <u>Recommendations</u> I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider archaeological conditions could

	provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. Officer Response: The recommended conditions are included in the conditions schedule. A full assessment of the archaeological implications of the proposal are set out in the archaeology section of this report.
London City Airport (letters dated 19 March 2024, 15 October 2024 and 1 November 2024)	This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found to have the potential to conflict with London City Airport's safeguarding criteria. If the local planning authority is of a mind to approve this application, then London City Airport suggests a condition relating to the following are applied to any approval: - Building Obstacle Lighting Also, the following observations have been made: - City Aviation Authority Building Notification - City Aviation Authority Crane Notification Officer Response: The recommended condition have been included in the conditions schedule.
Heathrow Airport (letter dated 20 March 2024 and emails dated 9 and 31 October 2024)	No safeguarding objections to the proposed development. However, if a crane is needed for installation purposes, the applicant's attention is drawn to the following: CAA Crane Notification: Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification The following details should be provided before the crane is erected: • the crane's precise location • an accurate maximum height • start and completion dates Officer Response: The advice has been included as an informative.

London Gatwick Airport (letter dated 03 June 2024)	No response
NATS Safeguarding Office (email dated 15 March 2024)	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. Officer response: Comment noted.
Environment Agency (letters dated 26 March 2024 and letters dated 18 October 2024 and 15 November raising no further comments)	Based on the information provided the application raises no environmental concerns. The Environment Agency therefore have no comments on the application. Advice is given in respect of water resources and water efficiency. Officer Response: Comments noted. The Environment Agency's advice is available to applicant to take into consideration.
Natural England (letter dated 8 May 2024 and email dated 4 November 2024 stating that the advice provided in their previous response still applies)	No objection. Based on the plan submitted, Natural England considers that the proposed development would not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. Officer Response: Comments notes.
Environmental Health / Markets and consumer protection (letter dated 9 October 2024)	Raised no objections. Conditions are recommended including a Scheme of protective works during demolition and construction, including monitoring by officers, restrictions on servicing hours and roof terrace use hours, submission of an acoustic report and restriction on operational noise and plant noise, details of soundproofing, details of fume extraction, details of contamination investigations.

Environmental Resilience Officer (letter dated 14 March 2024, updated response 30 August 2024)	<u>Overheating and the urban heat island effect</u> Section 8.3 within the CCRSS covers the risk of heat stress and assesses the following hazards: - Increase in temperature may result in a risk of overheating and reduction in building user health and comfort levels within their internal environment (High Risk) - Increased in temperature may result in reduction in building user comfort within the external environment (Moderate Risk) - Increased temperatures will have a direct impact of the urban heat island effect (Moderate Risk) - High levels of sun exposure may cause UV damage to building fabric and reduction in material durability and robustness (Moderate Risk) - Increased risk of dust and damage results in increased repairs and maintenance (Moderate Risk) - Building degrading, subsidence and reduced robustness due to dry and hot conditions (Moderate / Low Risk) - Increased risk of damage to building materials (Moderate Risk) To manage the above risks, the CCRSS states that the following design features and techniques will be included: - Mechanical ventilation installed with heat recovery mechanisms and plant located away from pollution sources - Facade and building services have been designed with a fan coil cooling solution - Dynamic thermal modelling using TM49 DSYs has been conducted to demonstrate the Proposed Development is not at risk of overheating against the criteria of CIBSE TM52 and justify the inclusion of active cooling - An external (outdoor) thermal comfort assessment has been completed (using high resolution Computational Fluid Dynamics - CFD) to evaluate external thermal comfort conditions based on the design proposals. The assessment concluded that:

	• All ground level conditions were suitable for intended use, or no worse than the baseline conditions. • The Proposed Development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe. • Conditions for all existing off-site terraces are suitable for the intended use. • Conditions for all proposed terraces are suitable for the intended use - Air source heat pumps will be located at roof level, minimising the amount of heat being rejected to the external environment at low level, where heat absorbing surfaces are present - Building maintenance strategy will be implemented to check and treat materials for UV damage - Materials on exposed areas will be designed and installed to weather effectively - Structural foundations and frame have been designed to accommodate a range of soil stiffness values - All heat stress hazards residual risks have been assessed as Low. <u>Flooding</u> Section 8.1 of the CCRSS includes the risk assessment for flooding and includes the following hazards: - Rising sea levels could increase the risk of flooding to the building and the surrounding area (High risk) - Increased duration of prolonged rainfall could cause an increased risk of surface water flooding (Very High risk) - Increased risk of flooding causing significant damage to the development and requirements for weather proofing (Moderate risk) The CCRSS states that the proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year

	event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event. Based on the above, the CCRSS assesses the residual risk for flooding to the proposed development to be Moderate/low. Water stress Section 8.2 of the CCRSS includes the risk assessment for water stress and includes the following hazards: - Increased risk of drought (Moderate risk) - Increased duration of prolonged rainfall could cause impacts on structural stability within the building (Moderate risk) - Risk of material degradation due to extended exposure of building materials to increased moisture levels (Moderate/ low risk) - Increased risk of extended duration of water stress and high water costs (Moderate risk) In terms of risk management, the CCRSS states that the following design features and techniques will be incorporated to adapt and mitigate for the above risks: - Project will prioritise native, locally sourced plants for the public realm landscape strategy - Landscape strategy supported by ecologists and landscape architect's recommendations such as appropriate species which are resilient to periods of water scarcity - Roof drainage will be used for irrigation of green walls and roofing - SuDS in the form of blue roofs and tanks will attenuate rainfall - Site is not at risk from groundwater flooding - Lowest level basement slab will be designed for Grade 3 waterproofing which will protect against future risk - Internal linings proposed in retained basements

	- Efficient water fittings installed to reduce water consumption All water stress hazards' residual risks have been assessed as Low. The FRA & DS states that "roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants." <u>Biodiversity and pests and diseases</u> Section 8.4 of the CCRSS assesses the risk to natural capital and includes the following hazard: - Risk of loss of biodiversity and high quality green space (Moderate Risk) The CCRSS states this risk will be managed through: - Introducing increased vegetation on site, in green roofing, terrace planting and public realm planting - Habitat infrastructure such as bird and insect boxes to be installed - Project will prioritise native, locally sourced plants for the landscape strategy The CCRSS classes the residual risk as Low. Section 8.5 of the CCRSS assesses the risk of pests and diseases and assesses the following hazards: - Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to humans (Moderate Risk) - Increased temperatures mean new warm-climate pests migrate to the UK and spread new diseases to plants (Moderate Risk) The CCRSS states this risk will be managed through: - Implementation of a pest management plan or implementation of an accredited Pest Management program

	- Regular monitoring and maintenance of ventilation systems - Consideration of new warm-climate pests will be factored into final species selection for planting The CCRSS assesses the residual risk to be Moderate /Low. A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed. A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health through: • New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment; • Provision of flexible community/education/cultural space meeting an identified need in the area; • ‘City Cycles’ – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area; • A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above); • Provision of new open space at James’ Court and external building terraces providing much needed amenity provision;

	• Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment; • Inclusivity and accessibility as placemaking principles; • Building and landscape design considering sustainability and climate change, with ASHPs and a 'fabric first' approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity; • The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards • BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures <u>Food, trade and infrastructure</u> The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure. Recommendation: The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.
Lead Local Flood Authority	Raised no objections. Recommended 2 conditions: Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to

	this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s. Provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 123 m³ ; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: A Lifetime Maintenance Plan for the SuDS system to include: • A full description of how the system would work, it's aims and objectives and the flow control arrangements; • A Maintenance Inspection Checklist/Log; • A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

Air Quality (Memo dated 08.05.2024)	Email dated 2nd April states no further comments aside from those already sent across (can't see these), and AQ Positive statement is acceptable. - SJ – I asked DP9 to respond to Paul's comments dated from May (SJ 01/10/24) Officer Response: The recommended conditions have been included in the conditions schedule.
City Police	The City Police provided a number of comments and advice to the applicant. This includes ensuring there is sufficient access controls into different areas of the buildings and at different times, sufficient natural and formal surveillance and sufficient safety and management of accessible terraces. Officer Response: Details of security an anti-terror measures are recommended to be secured by condition and in the S106 agreement.
Transport for London (Infrastructure Protection, letters dated 9 April 2024 and 11 October 2024)	London Underground/DLR Infrastructure Protection has no comment to make on this planning application.
Crossrail Safeguarding (letters dated 25 October 2024 and 1 November 2024)	The application relates to land outside the limits subject to consultation by Crossrail Safeguarding Direction.
Active Travel England (emails dated 20 March 2024, 9 October 2024 and 30 October 2024)	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. Officer Response: TfL have been consulted on the application.
Royal Parks	Having reviewed the Heritage Statement submitted in support of this planning application, we believe that although the development may not be visible from The Regent's Park and St James's Park, it will be visible from Greenwich Park. This includes the view from the General Wolfe statue, which is a protected view, as set out in the London Plan. In light of our charitable objects, TRP is concerned that the additional massing of the proposed development would be detrimental to the views and visual amenity experienced by visitors to the aforementioned Royal Parks. We therefore object to this planning application and hope that our comments will be considered in your determination. Officer response: The matters are addressed in the Heritage and Strategic Views sections of this report.
Thames Water (letter dated 30 January 2024)	Waste Comments The proposed development is located within 15 metres of a strategic sewer. Thames Water requests a condition for pilling methods statement to be imposed. 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. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Measures should be taken to minimise groundwater discharges into the public sewer. There are public sewers crossing or close to your development. If significant work is planned near our sewers, it's important that the applicant minimizes the risk of damage. 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 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 significant works are planned near Thames Water mains (within 3m) they'll need to check that 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 proposed development is located within 15m of Thames Water underground water assets and as an informative is suggested to ensures that appropriate measures are taken into consideration. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to

	agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that a condition is added regarding potential water network updates to ensure sufficient water pressure and capacity. Officer comments: The piling method statement conditions and network updates to ensure sufficient capacity are imposed in the conditions schedule. Suggested informatives are also recommended.
City of Westminster (letter dated 3 April 2024 and 8 October 2024)	The City Council has considered the proposals and does not wish to comment.
London Borough of Camden (letters dated 20 March 2024 and 15 November 2024)	No objection to the proposal. The application site is a significant distance from the London Borough of Camden boundary. The development would have no impact on the significance of the protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental or ecological conditions. Officer comments: Comments noted.
London Borough of Tower Hamlets (letters dated 14 May 2024 and 11 November. In their second letter they state that they maintain their original objection)	LBTH previously voiced strong objections to a similar application at Bury House, 31 Bury Street, between 2020-2021 (City of London ref: 20/00848/FULEIA and LBTH refs: PA/20/02417, PA/21/00436, and PA/21/01930). These concerns remain. While it is noted that the current proposal now includes adjacent Holland House (Grade II*) and Renown House, our primary concerns pertain to the replacement building for Bury House. Despite minor adjustments, the replacement building maintains its design as a tall, slender tower situated to the southeast of the Gherkin. Although the maximum height has been

	marginally reduced from 197.94m AOD to 178.7m AOD, and a stepped form introduced to the upper sections, these modifications do little to alleviate the impact on the Tower of London World Heritage Site (WHS). As illustrated in LVMF View 10A.1 in Figure 5.4 of the Tower of London Heritage Impact Assessment, despite the reduced height and massing, the proposed development would still disrupt the clear sky gap between the City Cluster and the Tower of London, encroaching inappropriately and competing with the iconic White Tower. Consequently, LBTH maintains its objection to the proposals, expressing concerns that, even with amendments, the proposed development would significantly and detrimentally affect the setting of the Grade I listed Tower of London WHS and its townscape views. These proposals severely risk diminishing the ability to appreciate the Outstanding Universal Value of the Tower of London WHS. Officer response: Comments noted. The matters raised are addressed in the Tall Building, Architecture and Heritage and Strategic Views sections of this report.
London Borough of Richmond Upon Thames	No response.
Royal Borough of Greenwich	No response.
London Borough of Lambeth	No response.
London Borough of Southwark	No comments raised.
SAVE Britain's Heritage (letters	SAVE Britain's Heritage strongly objects to the above planning application for Bury House 1-4,

dated 1 May 2024 and 6 November 2024, stating that the revisions do alter the fundamental nature of the application and their views expressed initially are maintained.)	31-34 Bury Street on the grounds that this proposal would cause substantial harm to the Grade I listed Bevis Marks Synagogue and its setting, and the Creechurch Conservation Area which is designated to protect multiple highly listed heritage assets and their character. SAVE also strongly objects to the total demolition of Bury House on climate grounds. We further note that a previous scheme for a 48-storey tower at No. 31 Bury Street was already refused permission in 2022 (ref no. 20/ 00848/ FULEIA) on the grounds that the development would overbear and overshadow the Bevis Marks synagogue. For these reasons, this application fails to comply with national and local policy for preserving the historic and natural environment of the City of London, and so we call on the Local Planning Authority to refuse planning permission. Assessment 1. Substantial harm to Bevis Marks Synagogue SAVE considers that the proposed 43-storey tower at No. 31 Bury Street will cause substantial harm to the setting of the Grade I listed Bevis Marks Synagogue. The proposal will fundamentally alter the streetscape around this highly designated asset which is of exceptional historic value. The Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Further to this, Para 206 NPPF (2023) provides that any harm to the significance of a heritage asset, including its setting, requires clear and convincing justification. SAVE contests the applicant's claim in the Heritage, Townscape and Visual Impact Assessment [para 8.134] that "only the immediate setting of the Bevis Marks Synagogue contributes to its significance", to be insufficient to comply with Para 206. Historic

	England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic Environment (2015) sets out that, "setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage". We consider that the proposed 43-storey tower, which would be visible from within the courtyard of Bevis Marks synagogue, has a direct and substantially harmful impact upon the building's setting and secluded nature. The sky view from within the courtyard has religious importance and allows daylight into the synagogue's interior. We wish to highlight the reason for refusal of application 20/00848/ FULEIA which found that a tall building at No. 31 Bury Street would "affect the setting of the Grade I listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue". This proposed development contravenes local as well as national policy. Policy CS12(1) City of London Local Plan (adopted 2015) requires that development should safeguard the City's listed buildings and their settings. More specifically, Policy HE1 [Managing Change to the Historic Environment] of the emerging City Plan 2040 recognises that the Bevis Marks Synagogue requires, "special consideration and protection, given their outstanding architectural and historic significance and...the critical contribution of elements of setting to that significance." We call upon the LPA to refuse a planning application which fails to comply with national and local policy and contradicts the emerging City Plan 2040. 2. Substantial harm to the Creechurch Conservation Area (CCA) The application site, whilst within the City Cluster, is fully within the Creechurch Conservation Area which was newly designated in January 2024.

	Policy CS14(2) of the City of London Local Plan (2015) states that planning permission for tall buildings will be refused within inappropriate areas, such as conservation areas. Policy S12 [Tall buildings] of the emerging City Plan (2040) elaborates that “tall buildings must have regard to... the significance of heritage assets and their immediate and wider settings”. We strongly object to this proposal on the grounds that it would cause substantial harm in heritage terms to the special character and appearance of the Creechurch Conservation Area. This harm would fail to meet the duty to preserve the CCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. At 43- storeys, the proposed tower would overshadow a number of highly designated heritage assets, which include three buildings of the highest possible listed status, which the conservation area is designated to protect. We consider the tower, which would be located directly behind Holland House and Renown House, would diminish the primacy and appreciation of these buildings. The drastically increased scale from the present 7-storey Bury House would compound this harm. In the absence of a formal Appraisal and Management Plan yet to be adopted, we refer to The Proposed Bevis Marks/ Creechurch Conservation Area (2022) draft documentation which recognises that, “despite the proximity to the cluster of tall buildings in the eastern part of the City, the area under consideration has a remarkably consistent and harmonious low-rise scale of building” (p. 3, para 1.02). The erection of a tower within the CCA would erode its low scale, harmonious townscape. This is unsupported by local policy. Policy CS12(2) of the City of London Local Plan (2015) requires that to conserve the significance of the City’s heritage assets, the distinctive character and

	appearance of the City's conservation areas will be preserved and enhanced, while allowing sympathetic development within them. This proposed application cannot be considered sympathetic development. 3. Substantial Harm to Holland House and Renown House The works proposed to Renown House and the Grade II* listed Holland house (in the associated application 24/ 00011/ LBC) are strongly concerning. We recognise that the rooftop alterations to Holland House are later additions, not contemporaneous with the original 1916 building. However, they are sufficiently set back from the building's facade to be considered largely unobtrusive when viewed from the streetscape. The proposed 4-storey roof top extension is an increase in scale and massing which would overwhelm Holland House and detract from an architectural appreciation of the building. The extension of Renown House by a storey, and the realignment of the floor plates to connect with Holland House constitutes further, drastic alteration which, when as read a whole, amounts to substantial harm. Para 207 NPPF (2023) provides that, "where a proposed development will lead to substantial harm to...a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm". We do not consider that the purported public benefits from this development can outweigh the cumulative harm caused by these radical rooftop extensions, a harm which is further compounded by the proposed tower at No. 31 Bury Street. 4. Views of the Tower of London

	The development would adversely affect the setting of the Tower of London World Heritage Site by causing less than substantial harm to LVMF view 10A.1. Whilst we acknowledge a reduction in height from the previous application 20/00848/FULEIA, we do not consider this sufficient to mitigate the adverse impact on the setting of the Tower of London. Policy HC4 of the London Plan (2021) notes that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements, also stating that: “they should also preserve and, where possible, enhance viewers’ ability to recognise and to appreciate Strategically Important Landmarks in these views”. The scheme cannot be considered in compliance with this policy. 5. Unsustainable development This application cannot be considered sustainable development. The demolition of No. 31 Bury Street (Bury House) would generate an embodied carbon footprint on a scale that runs counter to Para 157 NPPF (2023) and Policy CS15 of the City of London Local Plan (2015) which provides that the demolition should be avoided through the reuse of existing buildings and their structures. This development would further contradict emerging policy which recognises the wider benefit in heritage terms of the retrofit first approach. The City of London Corporation is currently consulting on Planning for Sustainability Supplementary Planning Document (SPD). Chapter 3 [Retrofit and Reuse] states that, “in the City of London context, retrofitting existing buildings contributes to preserving and enhancing the sensitive character of conservation areas, creating an architecturally innovative environment, and contributing towards making

	the City a leading leisure and culture destination". We consider this application fails to meet national and local policy on sustainability grounds and runs counter to emerging guidance on sustainable development. Conclusion For the reasons outlined above, SAVE objects to this planning application on heritage and climate grounds, and we call on the Local Planning Authority to refuse planning permission. Officer response: Comments noted. The matters raised are addressed in the Tall Building, Architecture, Heritage and Strategic Views and Sustainability sections of this report.
Historic Buildings and Places	Object to the proposal. Holland House is a Grade II* listed building constructed between 1914-1916 and designed by the eminent architect Hendrik Petrus Berlage for a shipping company. Berlage was a major architect in the Netherlands and Holland House was a rare commission in England. Berlage took inspiration from the works of pioneering American architect Louis Sullivan. It is noted for its pronounced vertical ribs, faience cladding and its elaborately tiled entrance lobby, and is one of the first steel framed structures within the City. Holland House is also a key contributory building within the newly established Creechurch Conservation Area. The adjacent Renown House is a non-designated heritage asset constructed in 1912, designed by Delissa Joseph for the Bunge & Co import-export trading business. The building contributes to the setting of Holland House and character of the Creechurch Conservation Area.

	HB&P objects to the proposed four-storey extension to both Holland House and Renown House. It is an intrusive, bulky, and top-heavy addition to both buildings that fails to respect their proportions and scale. The extension would result in the loss of historic fabric, particularly within Holland House at roof level and the rear wall to provide open floors and connections to the new proposed tower at No. 31 Bury Street. The cumulative impact of the loss of so much building fabric, as well as the damaging additions has a considerably negative impact on the integrity of this heritage asset and its historic architectural interest. The construction of the 43-storey tower at 31 Bury Street would have a significant impact on the appearance and special architectural and historic character of the Creechurch Conservation Area. The concept of a tower with a conservation area predominantly characterised by low and medium height buildings would compromise this character and cause irreparable harm to the setting of several key listed buildings, including Holland House and the Bevis Marks Synagogue. Policy: The total inappropriateness of a tower within a conservation area is clearly stated in the City of London's Adopted Local Plan (2015), notably Core Strategic Policy CS10: Design, which requires "that the bulk, scale, massing and height of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces". Policy CS14: Tall buildings states "Refusing planning permission for tall buildings within inappropriate areas, comprising of conservation areas". Chapter 16 of the NPPF (2023) manages change within the historic environment. Paragraph 205 states that "When considering the impact of a

	proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation". And at Para 206: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification." Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Recommendation: The proposal is clearly contrary to the local plan and to national planning policy by virtue of the tower's scale and height, and by the extent and bulk of the alterations and additions proposed to the grade II* Holland House. It should therefore be refused. Officer Response: Comments are noted. The impact of the development on heritage assets is assessed in 'Design and Heritage' section of the report.
The Georgian Group (letter dated 8 May 2024 and email received on 24 October 2024 advising that the additional information does not address their original comments)	Summary The Georgian Group objects to the applications for Planning Permission and Listed Building Consent. The Group's statutory remit is 1700-1840 and it is only buildings within that period referred to in this letter. For buildings outside this period, the Group defers to the expertise of our sister national amenity societies. The location, height and massing of the proposed development would cause considerable harm to the significance of Bevis Marks, St Botolph's Church and the Creechurch Conservation Area. The proposed development is defined as a tall

	building and therefore in line with policy CS14 of the existing local plan should not be permitted within a conservation area. Consequently, the development would be contrary to policy D9 of the London Plan. The height and massing of the building would cause considerable harm to the three heritage assets referenced above and is therefore contrary to legislation as well as national and local policy relating to heritage assets. The Georgian Group is aware of the consultation on the proposed City Plan 2040 and will be making representations to address specific concerns with the plan. Proposals and Their Impact Bevis Marks Synagogue The courtyard wrapped around Bevis Marks should be seen as an extension of the building due to the vital liturgical function it plays in the workings of the synagogue. The courtyard forms the immediate setting of the building and allows visitors to appreciate the unique setting and appearance of the building. The setting of Bevis Marks contributes greatly to the significance of the building, allowing light into the synagogue which is integral to the practices of Judaism. The proposed development as shown within the submitted HTVIA would be a dominating visual intrusion on the courtyard and setting of the synagogue. Views 45a and 45b show the impact the proposed tall building would have on the setting of Bevis Marks and the synagogue. The height, massing and positioning of the proposed tower would have an overbearing impact on Bevis Marks harming the setting and the ability to experience the building. Owing to the impact the proposed tall building would have on the setting of Bevis Marks the

	level of harm would be towards the higher end of Less than substantial due to the importance of the setting and the potential for reduced light. St Botolph Without Aldgate The spire of St Botolph's church is prominent within the local environs and views within the Creechurch Conservation Area. It is identified within the City of London Protected Views SPD as being a church with a 'skyline presence'. The prominence of St Botolph's spire can be appreciated from along Aldgate High Street looking West and from the Minories looking North. Kinetic views of St Botolph's and its spire are permitted when moving around the Creechurch Conservation Area and the wider surroundings which all contribute to the significance of the building. The applicant has provided views towards the church within the submitted HTVIA on pages 189-194 and identified as views 38 and 39. View 38 is situated along Aldgate High Street and shows the proposed development rising above One Creechurch Place, a building which harms the setting of the church and detracts from the interest of the Creechurch Conservation Area. The cumulative view shows the proposed tall building grouped in with 100 Leadenhall Street and 1 Undershaft. The height, massing and proximity would challenge the landmark quality of St Botolph's Church which is more evident within view 39 situated further east along Aldgate High Street. The impact of the towers would be further exacerbated in kinetic views along Aldgate High Street where the proposed development would be visible in the skyline behind the church. The positioning of the tower in relation to the spire of St Botolph's would challenge its presence on the city skyline and be a distraction in views down Aldgate High Street. Both the presence of the spire and views towards the

	church contribute to its significance and therefore the proposed development would cause an element of harm to St Botolph's Church. This harm would be at the low-middle level of less than substantial harm. Creechurch Conservation Area Views within the Creechurch Conservation Area contribute considerably towards its significance and allow for the special interest of the area to be appreciated. As referenced above concerning Bevis Marks and St Botolph's, the impact on those individual assets is similarly applicable to the wider character and appearance of the Creechurch Conservation Area which the proposed development would cause harm to. The special interest associated with the Creechurch Conservation Area is closely related to the three places of worship situated within the area. The proposed development would harm the ability to appreciate two of those in Bevis Marks Synagogue and St Botolph's Church which fall within the Georgian Group's statutory remit. The Group defers to the expertise of our sister National Amenity Societies on buildings which fall outside of our remit. A further characteristic that contributes to the special interest of the conservation area is the proliferation of historic open spaces including the courtyard of Bevis Marks Synagogue. The proposed development would have a negative impact, as referred to above, on the courtyard of Bevis Marks, and the churchyard of St Botolph's owing to the impact on their setting which in turn would cause harm to the character and appearance of the Creechurch Conservation Area. It is evident from the views submitted within the HTVIA that the proposed development would pose an incongruous element to the area and

	would harm the prevailing character and appearance of the Creechurch Conservation Area. The level of harm would be at the upper end of less than substantial harm, boarding on substantial. The Georgian Group's Recommendation The proposals would cause harm to the significance of Bevis Mark Synagogue, St Botolph's church and the Creechurch Conservation Area and would therefore be contrary to legislation as well as national and local policy as set out above. The Georgian Group recommends the applications for Planning Permission and Listed Building Consent be refused by your local authority. In determining this application, you should bear in mind the statutory duties contained within sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990. Officer response: Comments noted. The matters raised are addressed in the Tall Building, Architecture and Heritage and Strategic Views sections of this report.
Conservation Area Advisory Committee	The Committee strongly objected considering that the development proposals would result in the gross overdevelopment of this site in the Creechurch Lane Conservation Area, with a significantly negative impact on the character and appearance of the immediate Conservation Area and its setting. The proposals were considered to be highly damaging to the local townscape quality in the nearby streetscene context, with harmful consequences for important listed buildings that were in close proximity. The lack of architectural quality and refinement of the

	proposals was noted, together with their significant negative impact on wider townscape views and heritage context of the site's City/central London location. Officer Response: Comments are noted. The impact of the development on heritage assets is assessed in in the Tall Building, Architecture and Heritage and Strategic Views sections of this report.
Society for the protection of ancient buildings (letters dated 14 May 2024 and 6 November 2024, reiterating their objection)	The SPAB has been made aware of the above application and is writing to register its strong objection on the basis of the serious harm that would be caused to the Bevis Marks Synagogue and the Creechurch Conservation area. The proposal for a 45 storey office block at 31 Bury Street bears striking similarities to the highly controversial scheme which was refused by your authority in 2022. The major area of difference would appear to be the justification offered by the applicant for the scheme. Much is made of the new building's sustainability credentials, the economic benefits that would flow from it, and the provision of space for a variety of community uses. In our view, these arguments are tenuous at best and do not provide adequate justification for the substantial harm that would be caused to the Synagogue and the conservation area. Any new building of the type proposed would be expected to demonstrate solid sustainability credentials, so this cannot be considered as a determining factor when weighing justification against harm to an exceptional heritage asset. Also, and quite simply, the most sustainable building is one that already exists and we cannot see that the applicant has fully understood or explained the total carbon lifecycle cost of the proposed development. We are also not convinced that there is a requirement for community usage on the scale envisaged by the applicants, and indeed the location of our own offices in the City of London allows us to

	witness on a daily basis the many underused and often cavernous ‘community’ spaces that now occupy the ground floor of tall buildings at the expense of genuinely useful and affordable small scale businesses and community premises. The previous application was rightly refused by your Planning Committee based on the serious harm that would have been caused to the Synagogue. To that harm must now be added the very damaging impact on the newly designated Creechurch Conservation Area that would result if the application were granted. The height, scale, and mass of the proposed tower would overwhelm the Conservation Area and cause a high level of harm to key views. We cannot think of any precedent that would support your Authority in granting a permission that would be so clearly in contravention of the requirement of Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that special attention must be paid to the desirability of preserving or enhancing the character or appearance of the area. Indeed, doing so would set a very damaging precedent. The SPAB urges that the application be refused by your local authority. Officer Response: The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. This offer is considered being unique taking into the wide variety of uses and flexibility of space. The benefits of the proposed development against the identified less than substantial heritage harm are assessed in the Assessment of Public

	Benefits and paragraph 208 NPPF balancing exercise section of the report. The Whole life-cycle carbon emissions of the proposed development are assessed in the Sustainability section of the report.

Letters of Representation

56. One thousand, four-hundred and twelve (1412) letters of objection have been received from members of the public, and various organisations.

57. The responses from non-statutory organisations who have objected are set out below:

Example representations from (non-statutory) organisations, groups and individuals (objections)	Comments and Officers Response to Comments
Rabbi Morris (Bevis Marks Synagogue)	I'm writing to object in the strongest terms to the proposed redevelopment at 31 Bury St. I write as a private resident in the City of London and as the rabbi of the Bevis Marks Synagogue. I object due to the substantial harm the proposed tower would have on the functioning and viability of the synagogue, its Heritage Centre, its enormous heritage value, and on me as a local resident. The developers treat the synagogue as a heritage asset but fail to address the harm their proposal would cause to the synagogue's primary function as a house of worship and community space. The harm caused by this proposed development, both in its own account and due to the cumulative effect of previously built and consented tall buildings around the synagogue, puts at risk the core purpose of the Bevis Marks Synagogue as a fully functioning place of Jewish worship. Thus, the harm that

	puts this at risk must be classified as substantial harm, or even total loss of significance. Before delineating my concerns, it is necessary to state that this process has caused significant distress within the Jewish community. Any consultation would be challenging, but to have to repeat this process for an application which is clearly inappropriate and has already been rejected is oppressive in nature. In fact, this is now the fifth consultation that our community has needed to engage in over these matters over the past two years. Each consultation further drains our resources and places an immense burden on our community. We are disappointed that repeated efforts to work collaboratively with the Corporation have failed to result in policies that prevent this kind of harmful application from coming forward, something which we earnestly hope can still be rectified. Officer Response: The comments are noted and mainly addressed in the Heritage, Environmental Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. It should be noted that the LPA's role is to assess the applications that are submitted for determination. The LPA cannot control or preclude the submission of an application. With regard to the formation of the local policy framework, it is noted that this is outside this application process and there are separate guidelines and legislation assessing its processes and procedures. For clarity, each time we seem to have achieved a desired result, the Corporation has pulled back. 1. When proposing a Conservation Area, there was an inexplicable attempt by the Corporation to exclude 31 Bury St from this area. 2. Only weeks after adopting the CA with 31 Bury St included, the Corporation published its draft local plan which proposes to remove a previous

	restriction on tall buildings in Conservation Areas. 3. In putting forward an 'immediate setting' protection scheme for the synagogue in the draft local plan (a concept invented by the City, which has no legal status), the City has attempted to deny the impact of a tower at 31 Bury St on the synagogue, despite robust professional representations made by scholars to explain the harm that a tall building at that site would cause. While the policy gives the impression of protecting the synagogue, in effect it justifies substantial harm to it. In total, these moves may be construed by some to be in support the applicant, despite the harm their proposal would cause to the synagogue. I hope this has not been willful, but it does reflect a general ignorance for Judaism and Jewish culture, a serious inadequacy for the City which I hope this consultation will help with addressing. I now attempt to explain my views in an organised manner. Officer Response: Comments noted. It is not considered that this report and the assessment of the current application is the appropriate process to consider or comment on the formulation of Planning Policy or on the designation of Conservation Areas. In determining the application the CoL must comply with the Public Sector Equality Duty, in accordance with section 149 of the Equality Act 2010. That duty is considered later in this report. 1. It is difficult to overestimate the significance of Bevis Marks Synagogue as the first purpose-built Jewish house of worship in England following the 1656 resettlement. It is also the only non-Christian house of worship in the City of London. Finally, and perhaps more importantly, due to the Holocaust and other Jewish expulsions in other places

	around the world, it is the only surviving synagogue in the world to have maintained regular worship dating back to 1701. It is therefore of the highest significance locally, nationally and internationally. 2. Furthermore, the synagogue maintains a unique form of Jewish worship, that of the Spanish & Portuguese Jews. Many of its melodies, traditions and rituals are preserved only within this congregation, making its maintenance of great importance to the preservation of its unique intangible heritage which would otherwise be lost. Officer Response: These comments are noted and are taken into account in the assessment set out below. 3. The synagogue receives low levels of light, but just enough to maintain Jewish worship which requires sufficient light for young and old alike to be able to read hundreds of pages of prayers. However, it cannot absorb further reductions before the maintenance of this worship becomes untenable. The noticeable impact on light reduction from 1 Creechurch makes clear that this impact is real. The developer's admittance of reduction in our light levels affirms this reality. However, its dismissal of these reductions as minor or negligible is detached from the reality we face where further reductions are unacceptable as the cumulative impact of yet another reduction cannot be further tolerated. When light levels are poor, each further reduction, even amounts that in other contexts would be considered minor, in this context will be perceptible and several damaging. Without doubt then, with respect to internal light levels, the proposed tower would cause substantial harm, by risking the viability of use of Bevis Marks Synagogue for its original purpose, as a place of Jewish worship.

	Officer Response: Comments noted. The impact of the development on the internal light levels of the Synagogue is assessed in the Daylight, Sunlight and Overshadowing section of this report. This takes into consideration impacts of the consented and non-consented schemes. 4. As reported during the last application by Dr Joseph Spitzer, president of the Initiation Society which oversees Jewish ritual circumcision in the UK, any further reduction in light levels will make it impossible to continue to safely carry out ritual circumcision, a core marker of Jewish identity. The existence of multiple historic circumcision chairs in the collection of Bevis Marks Synagogue testifies to the long history of this ritual being performed at Bevis Marks Synagogue, as it continues to be maintained at the synagogue even until today. Rendering the performance of this important Jewish marker impossible at Bevis Marks Synagogue would surely be a substantial harm. Officer Response: The above matter is assessed in the Daylight, Sunlight and Overshadowing, Heritage and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. 5. The location of the proposed tower along the southern horizon, adds to the substantial harm it would cause to the use of Bevis Marks Synagogue as a synagogue and to our worshipping community. Each month, Jews gather outside after dark to recite kiddush levana, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer. This is a direct obstruction to our freedom of worship as we have enjoyed it in this place since 1701.

	Officer Response: The impacts of the development on the visibility of the night sky and moon are assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. 6. The courtyard is also an important part of the community space, as a location where we celebrate festivals (such as Succot), hold receptions (for weddings and after services) and conduct events (such as BBQs and socials for City workers). The overshadowing of this space would significantly harm the amenity use of this space, particularly during the Spring/Summer months when it is more often utilised. Officer Response: Comments noted. The impact of the development on the courtyard of the Synagogue is assessed in the Daylight, Sunlight and Overshadowing section of this report. This takes into consideration impacts of the consented and non-consented schemes. 7. The courtyard is also an essential part of the visitor experience of our new visitor centre. It is where visitors will first enter, purchase admission, begin their audio guide, study a bronze map of the site and surrounding area, and study the exterior of the synagogue. The courtyard is a destination in its own right, not just a passage to the synagogue. The courtyard will also be used as part of our cafe. A decrease in amenity of this space risks the viability of our new venture, which in turn places the future viability of the synagogue at risk. It is a shared human experience that people don't tend to enjoy spaces that are in the shadows. As such the proposed tower would make the space unwelcoming and unappealing to visitors and community members alike, removing its significance. This impact must be considered significant harm.

	Officer Response: Comments noted. The impact of the development on the light levels of the Synagogue's courtyard is assessed in the Daylight, Sunlight and Overshadowing section of this report. 8. Developers have admitted that the proposed tower would reduce light levels in the Beadle's House, but have discounted these harms due to their identification of the upper floors as bedrooms. However, on account of the bright light in these upper floors, they are utilised throughout the day as rooms for reading (with reading chairs), a key need for a rabbi as study is a religious requirement, and as a playroom for the rabbi's family. The Beadle's house is therefore used throughout the day and reductions in its remaining best light must be considered a significant harm to both a resident and to the heritage of this historic property. Officer Response: The impact of the development on the light levels on the nearby residential properties including 2 Heneage Lane is assessed in the Daylight, Sunlight and Overshadowing section of this report. 9. A near identical tower proposal for this site was rejected in 2021. The reason cited on that occasion was the harm it would cause to the synagogue's setting. This new submission is little changed in any way that reduces the harm it would cause to the above as it would continue to dominate and overshadow the synagogue site, detracting from the significance of the synagogue and its courtyard. Officer Response: The previous decision and the importance of consistency in decision making is material and should be taken into account in making a decision on this application The previous decision is considered later in this report. Assessment

	of the impacts of the development on setting of the Synagogue are assessed in the Heritage section of this report and those related to overshadowing of the courtyard in the Daylight, Sunlight and Overshadowing section of this report. 10.Indeed, since then, the City of London established the Creechurch Conservation Area, further increasing the threshold for allowing harm to sites within the CA, most notably the Grade-1 listed Bevis Marks Synagogue. 11.Beyond this, the Conservation Area report identified as significant the townscapes down Heneage Lane and down Mitre St, both of which culminate in Bury House. The report noted the sense of coherence of these streets due to the similar scale of the buildings along them. A tower at 31 Bury St would destroy this historic character and is therefore completely out of step with the new Conservation Area. As such, it would cause significant harm to the Conservation Area as a whole. Officer Response: The abovementioned matters are assessed in the Heritage section of this report. 12.Most clearly, there is a provision in the current local plan that bars tall buildings in Conservation Areas, making it difficult to understand how this application moved beyond the pre-app stage of planning. Regardless, for this reason alone it should be refused out of hand. Furthermore, the possibility that this policy may be removed from the Local Plan 2040 has no bearing at this point, especially when considering that it is not without considerable controversy, which according the planning guidelines means it cannot be relied upon at this stage in the local plan process before adoption.

	Officer Response: The emerging plan is a material consideration. Paragraph 48 of the NPPF states that “Local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).” It is considered that at this stage (following Reg 19 public consultation and prior to examination in public) the emerging City Plan 2040 carries limited weight to the determination of this application. 13. Furthermore, that Local Plan states that while the eastern cluster is designated for tall buildings, not every site within it will be appropriate for tall buildings. If this isn’t the case example for that I can’t understand where it wouldn’t be acceptable. Officer Response: This matter is addressed in the Architecture, Urban Design and Public Realm section of the report. 14. For the purpose of clarity, I wish to confirm the near-constant anticipated use of the synagogue site for religious, communal and tourist purposes. Some of this may not be self-evident due to the impact of covid and the launch of our NLHF supported redevelopment project which began in 2020 and continues. As a result, we’ve had to step back from much of our usual activity, in anticipation of a large increase in activity from

	pre-2020 numbers. This will include daily worship, both in the morning and midday, and on the Sabbath and Jewish festivals. Furthermore, we will regularly conduct evening events, and weekend weddings. Finally, our visitor centre will be opened Sunday-Friday, welcoming at least 25,000 visitors a year including thousands of local school-children. All of these activities will be harmed in different ways by the proposed tower. Officer Response: Comments noted. The functions of the Synagogue have been considered throughout the report assessing the impact of the development on the Synagogue, its amenities and its functions, as a place of worship and visitor centre. 15.It is unconscionable that at a moment when Bevis Marks Synagogue is about to embark on a new chapter of vitality in its storied history, that the City of London would approve a development that puts its very future at risk, and certainly places it in a more challenging situation. This would be far from celebrating the synagogue's heritage and ongoing contribution to the City of London. Officer Response: Comments noted. Consideration of the impacts onto the Synagogue as a place of worship, heritage asset and as a visitor centre are considered in the main body of the report. The decision about the acceptability of the proposed development is yet to be made at the PASC committee. 16.The synagogue as a whole should be seen as one of the best expressions of the 'Destination City' vision, and harm to it must be avoided. Officer Response: Comment noted.

	17.The generic public benefits offered by the developers do not in any way counteract the substantial and enduring harm their proposed tower would cause to the synagogue and its functioning as a living place of Judaism, one of the most unique synagogues in the world. Permission would further chip away at the ability of Bevis Marks Synagogue to function as a synagogue, placing it at existential risk of becoming yet another 'heritage asset'. Once the unbroken chain of worship is broken, it can never be repaired, and all that Bevis Marks Synagogue is and represents will be lost to history. Officer Response: Comment noted. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less than substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. 18.With further regard to the proposed benefits made by the applicant, making use of lower floors for charities does not justify the construction of a tower. These benefits could equally be offered even with a shorter building, just as they are currently being offered to charities with the current Holland House building. Furthermore, the charity space is in Holland House, which is adjacent to Bury House. Just because the developers own both properties, the use of Holland House does not constitute a public

	benefit to the Bury St application that should justify the substantial harm that Bury House would cause to the Bevis Marks Synagogue. In addition, the use of this space by non-local charities does not justify harm to a local community (Bevis Marks) who should be the primary concern of neighbouring developers, not sidestepped as this proposal tries to do. Finally, these benefits are not unique, and could equally be offered in any other scheme. Therefore they are not a justification to cause harm to the functioning and setting of the synagogue, a site that irreplaceable and altogether unique, and is of the highest level of significance. Officer Response: It is noted that none of the current meanwhile uses are secured or controlled by condition or obligation for charity purposes and therefore, these charity uses can cease at any time. Furthermore, the local planning authority can only assess a development that is before them for determination. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less than substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. In sum, this scheme is so ludicrously inappropriate that I can't believe developers have not withdrawn their application. If we were in a court,

	I'd ask the City to throw out the application as frivolous. Save that, I implore the Corporation to refuse this application and once and for all protect the integrity and future of Bevis Marks Synagogue.
Roger Hephher, on behalf of the S&P Sephardi Community (15 May 2024, 15 November 2024 and 28 November 2024)	Officer comment: A summary of the letters is included below. Full versions of these letters are provided as part of the background papers. <u>The letter received on the 15th May is summarised below:</u> The proposals will have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and an unacceptable impact upon other heritage assets in the vicinity. A previous application at this site (ref. 20/00848/FULEIA) was refused only two years ago on the basis of harm to Bevis Marks Synagogue and to the Tower of London World Heritage Site. Put simply, the revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it. On this basis and in accordance with planning policy, the applications should be refused. Officer Response: The position of the S&P Sephardi Community is noted and is taken into consideration in the assessment set out below. The previous decision and the importance of consistency in decision making is material and should be taken into account in making a decision on this application. The previous decision is considered later in this report. - Bevis Marks Synagogue is a significant building, with outstanding communal, architectural, artistic, historic and archaeological significance. It has been continuously in use for worship since its construction. - The Synagogue's courtyard is of value due to its use as a social and religious space, for gathering before and after services and for holding events. - The sky view at Bevis Marks is central to a number of rituals. The Jewish Sabbath concludes at the appearance of three stars which first appear in the

	darkening eastern sky. The beginning of each new Jewish (lunar) month is marked by the appearance of the new moon, at which time a special prayer (kiddush lebana) is recited. - There is spiritual significance of natural daylight within the Synagogue. The Synagogue has already experienced a substantial reduction in natural light as a result of the construction of other buildings. Further deterioration of the natural light will have profound implications for the religious value of the Synagogue as a spiritual space and house of Jewish prayer. Officer Response: Comments noted and are addressed in the Heritage, Daylight, Sunlight and Overshadowing and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. - A Heritage Assessment of the proposed development has been prepared by Alec Forshaw on behalf of the objectors identifying substantial harm to the Bevis Marks Synagogue and the Creechurch Conservation Area. Less than substantial harm has been identified in several other heritage assets. - It is also stated that the proposed repairs and renovations to Holland House should be regarded as routine and not a benefit. - The proposed reinstatement of Heneage Lane is at a different angle from the original lane and it would be gated and closed at night. - The proposed reinstatement of St James Court significantly reduces the size of the existing open courtyard Officer Response: The impact of the proposed development heritage assets is assessed in the Heritage section of the report. - The fact that the Synagogue is already going to experience loss of daylight is not an argument in favour of the Applicant; rather, it demonstrates the need to protect the precious remaining daylight and for the current proposals to come under even greater scrutiny. - No account is taken of the fact that the Synagogue is illuminated primarily by natural light and by

	candles, or that the reading of printed scripts is fundamental to worship. - The loss of nearly a fifth of the sunlight within the courtyard cannot rationally be considered to be of little consequence in the context of an already very low level of sunlight. - No consideration is given to the fact that the synagogue is a centre of a thriving community and the courtyard is used for several religious events and to view the heritage asset. Officer Response: The abovementioned comments are assessed in the Daylight, Sunlight and Overshadowing and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. - At Bevis Marks, the view of the passage of the moon across the night sky is highly symbolic and intimately related to the traditions and rituals of the Synagogue, and is a most important aspect of the heritage value of the building. Officer Response: Comments noted and are addressed in the Heritage and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. - The Equality Statement is inadequate in assessing the proposed impacts of the development on the operation of the Synagogue. - Not only does the Equality Statement demonstrate a lack of understanding of the impact of the proposals on the Synagogue. It implies that the impact of the proposals on the Synagogue is outweighed by other factors such as the increased provision of commercial floorspace. Officer Response: The City, as a public authority, in exercise of its functions, has given due regard to the need to: a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act; b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it; and c) Foster good relations between persons who share a relevant protected characteristic and persons

	who do not share it. The abovementioned matters are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. - The operational jobs are capable of being achieved on many other, less sensitive, sites. - There is no convincing evidence that the existing building is incapable of re-use. - There are many other less sensitive sites where a high quality tall building could be delivered. This urban block, which is part of a Conservation Area, does not need "transformative reimagination" - The community workspace is a potential public benefit, though it is unclear whether it would meet a specific need. It could also be delivered on another, less sensitive site. - The community, multi-faith, cultural and education offer is a public benefit that can be delivered elsewhere. - There is no shortage of flexible retail space in the City. - There is no need for public realm enhancement within what is a Conservation Area. - A sensitive re-use of the existing buildings could achieve a substantial increase in BNG. - The package of public benefits proposed by the applicants are typical benefits which any major commercial scheme would be expected to deliver. Officer Response: The proposed uses and public benefits of the proposed development are discussed through the report and in the in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. <u>The letter received on the 15th November included the following additional information:</u> - A daylight/sunlight study. The assessment of the lighting levels was carried out between 26th February 2022 to 2nd April 2024 using two illuminance meters. - Responses to the letter prepared by the Applicant's agents DP9 dated 27th September 2024, specifically in relation to the GIA Lunar Transit Study; - A letter from Professor Barry Stiefel, Professor of Historic Preservation & Community Planning at the

	College of Charleston, regarding the significance of the sky view for Bevis Marks Synagogue; and - The findings of a review of the applicant's Equalities Statement prepared by the barrister Claire Nevin. Generally the position remains that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it. Officer Response: The position of the S&P Sephardi Community is noted and is taken into consideration in the assessment set out below. The objector considers that the applications should be refused for the following reasons: 1. The impact upon the Synagogue (the first previous Reason for Refusal) has not been overcome; the new scheme would be little different from the previous one in its impact. There is now even stronger evidence of adverse impact, including a better articulated objection concerning the heritage/religious/cultural significance of the sky view, and empirical evidence of poor daylighting. Officer Response: Officers address the abovementioned matters primarily in the Heritage, Daylight, Sunlight and Overshadowing and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. 2. The impact on the World Heritage Site (the second previous Reason for Refusal) has not been overcome; the modelling of the new scheme is a little different, but it still has more-or-less the same substantial impact on a very important view of the Tower of London.

	Officer Response: Officers respond to matter in the Heritage sections of the report. On both abovementioned points the heritage harm against the public benefits are assessed the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. 3. The site is now in a Conservation Area, meaning that the scheme's heritage impact (especially on the Synagogue, which is in the same CA) should be given even more weight. City Plan Policy CS14 is very specific in saying that tall buildings proposed in Conservation Areas will be refused. Officer Response: Officers respond to matter in the Heritage sections of the report. 4. The claimed heritage benefits amount to nothing of substance: it is ridiculous to claim that a 43 storey tower will enhance the Conservation Area, and adding a 4 storey upward extension to Holland House represents harm to that heritage asset, not sensitive restoration. Officer Response: This matter is addressed in the Heritage sections of the report. 5. The claimed other public benefits must be viewed with deep scepticism, and certainly don't amount to something to which "very great weight" should be attached. For example, the three storeys of "public access" appears to be nothing more than a meanwhile use. Officer Response: The proposed uses and public benefits of the proposed development are discussed through the report and in the in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. 6. Insofar as there could be some heritage/public benefit, no attempt has been made to demonstrate that the proposed development is the minimum necessary to achieve it. The applicants maintain they are not running an enabling development argument but, in fact, they are. They are arguing to be allowed to erect a building that is specifically contrary to development plan policy, on the basis

	that their claimed public benefits outweigh the policy presumption and other material considerations. The planning system should only ever accept such an argument if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits. Officer Response: The Applicant has confirmed that they are not putting forward an enabling development argument and the local planning authority has not assessed the proposed development as such. The proposed development involves three building, of which one is a listed building. Any heritage harm identified that is less than substantial is assessed against the public benefits of the development. These are discussed in several sections of the report, including the proposed uses, section, the heritage section and the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. Spatially, these benefits are delivered in all three buildings of the proposed development. Furthermore, the local planning authority can only assess a development that is before them for determination. 7. The building is believed to be substantially unviable, and the small size of the site is such that it is unlikely a tall building would ever be viable, let alone one that relies upon substantial expenditure upon public benefits for its justification. Planning permission should not as a matter of principle be granted for developments that are unlikely ever to be built (or unlikely to be built except with significant amendment of the proposal and/or the package of claimed benefits which accompanies it). Officer Response: A viability assessment has not been requested to accompany the application, as this is not a policy requirement for this type of development. It is considered reasonable to assume though that the proposed development has been tested commercially for its viability by the Applicant. Without any evidence being provided by the objector, the local planning authority cannot come into conclusion based on assumptions.

	The objector concludes that the additional information produced by the applicant or their agent in response to our previous objection do not change their position as set out before. The previous application at this site was correctly refused on the basis of heritage harm including to Bevis Marks Synagogue. The level of harm is now significantly greater because a new heritage asset - the Creechurch Conservation Area - has come into existence, and because the significance of the sky view is now better understood. The revised proposals do not begin to overcome the heritage harm or deliver sufficient public benefits to outweigh it, let alone to justify a clear conflict with City Plan Policy CS14. Officer Response: The comments are noted and is taken into consideration in the assessment set out below. The previously refused application has been taken into consideration for the assessment of the current application. Matters in relation to the level of harm of the proposed development on the identified heritage assets is assessed in the heritage section of the report. The impact of the development on the visibility of the sky and the moon are assessed in Heritage and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. <u>The letter received on the 28th November included the following additional information:</u> - An assessment of the impact on the Synagogue of the proposed development in Heritage/Townscape terms, prepared by Donald Insall Associates (Appendix 1); and - A paper by Rabbi Shalom Morris providing further contextual detail on Bevis Marks Synagogue and its setting (Appendix 2). Heritage/Townscape Impact Assessment Donald Insall Associates has been instructed by The S&P Sephardi Community to prepare a professional third party assessment of the heritage impacts of the proposals, particularly the impact of the proposed development on the significance of Bevis Marks Synagogue. The report finds that, in summary, the proposals for the Bury

	Street tall building have a serious adverse impact on the setting and by implication on the special architectural and historic interest of the Grade I-listed Bevis Marks Synagogue. Guidance on assessing heritage significance in the NPPF (2023) and PPG (2019) defines significance as <i>‘the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting’</i>. This report finds that the significance of the building relates to its architectural quality and its historic significance: it has outstanding historic interest as the oldest purpose-built and continuously-operational synagogue in the UK, and it has special architectural interest as an accomplished Georgian building, but also as a building where this historic use is manifest in the fabric, including its generous extent of fenestration, as well as its courtyard setting which frames the building and allows community and religious activities to take place. The report concludes that the proposals for a tall building close to the site would cause a high level of harm to the significance of the Grade I-listed synagogue. This harm would result from overshadowing which would efface or seriously affect historic elements of the spatial quality of the architecture, namely the bathing of the interior in light from the south; harm the setting of the synagogue through dominating its important southern backdrop and preventing views to the sky and the moon; and finally, potentially jeopardise or at least diminish the use of the building by the community through reducing its ability to serve as a religious centre through reducing light to the interior and the ability to carry out certain services, including the Kiddush Levana which rely on views of the moon and, therefore, an open sky setting. Officer response: The matters raised above are addressed mainly in the Heritage and Strategic Views, but also in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. Setting Study Rabbi Shalom Morris has prepared a study of the setting of Bevis Marks Synagogue, with reference to its specific

	cultural and religious context and Jewish sources. The report draws on sources including Jewish religious law and the communal records kept at the Metropolitan Archives, alongside discussion of the community over time and how it operates today. Reflecting on these sources, the report explains the wide-ranging harm that the proposed tower would cause to the significance of the Synagogue, in terms of harm to: • The original architectural intent of the Synagogue's design; • Religiously important sky views; • Interior light levels necessary for prayer; • The purposeful functioning of the architecturally significant windows; • The amenity of the communally important courtyard; • The meaning of the Synagogue's name; and • The economic viability of the site. Officer response: The matters raised above are addressed in the Heritage and Strategic Views, Daylight, Sunlight and Overshadowing and in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. Normally matters such as the financial impact on a neighbouring business or property values are considered to be private matters and not material planning considerations. Even if the view was taken here that income generation was relevant because of the listed status of the building, there is no evidence to suggest that the development is likely to impact on the number of visitors the synagogue will receive or the number of weddings held, and this would be difficult to quantify with any accuracy through a viability review. The documents enclosed further support our client's position that the proposals would have a substantial and wholly unacceptable impact on the historic, Grade I Listed Bevis Marks Synagogue and the Creechurch Conservation Area within which it sits; and a less than substantial and unacceptable impact upon other heritage assets in the vicinity. The revised proposals do not overcome this heritage harm or come anywhere close to delivering sufficient public benefits to outweigh it.
Board of deputies of British Jews	I am writing to you, as I was forced to write to your predecessor in 2021, to object formally to this

	planning application which, if approved, would have a detrimental impact on the Jewish community's beloved Bevis Marks synagogue, the oldest continuously used synagogue in Britain which dates from 1701. This most recent planning application is no less harmful than the earlier one which thankfully was rejected, following widespread opposition. I write as President of the Board of Deputies of British Jews aware that my organisation, founded in 1760 to represent the Jewish community throughout the country, emerged from those Jews of Spanish and Portuguese heritage such as the founders of the Bevis Marks Synagogue. Modern British Jewish history was born at Bevis Marks when Jews first returned to this country following our expulsion in the 13th Century. It offered a safe haven to those who came from overseas and that feeling very much remains to this day. The synagogue is also the legacy of those who came before me in leading the community, and whenever I am at Bevis Marks I am humbled by that fact. At 45 storeys, the proposed building would destroy the southern sky view, which is an essential part of the setting of the synagogue and is important for the intangible qualities it contributes to our religious ritual. Not only will it shroud the building in shadow, but it will have a direct impact on the local communities weekly Sabbath rituals. In Judaism, it is essential that we judge the coming of the Sabbath, and the end of the Sabbath, by our view of the night sky and the visibility of the stars. Should this development go ahead, the view of the moon's passage across the sky, and many of the celestial bodies, would be blocked. Lastly, the synagogue, which is a Grade 1 Listed building will lose its character and significant beauty as a result of the proposed development. To add further insult to injury, the area has recently become the Creechurch Conservation Area, and this proposal flies directly in the face of the principles of conservation. I would urge you to

	share with those who will make the relevant decisions, how important the Bevis Marks Synagogue is both to the UK Jewish community, to the City of London, and to the UK as a whole so they can come to the best decision regarding our shared heritage and reject this application. Officer Response: Comments noted. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The impact of the development on the Creechurch Conservation Area is assessed in the Heritage Section of this report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.
Foundation for Jewish Heritage	I am writing to register the Foundation for Jewish Heritage's strong objection to the above application. Our objection relates to the negative impact that the proposed development would have on the Grade I listed Bevis Marks Synagogue (NHLE List Entry Number: 1064745). Bevis Marks is the oldest surviving synagogue in the UK and is arguably the most important Jewish heritage site in the country. The Synagogue is of exceptional significance both to the UK's Jewish community and in the history of the City of London, in which Sephardic Jews played a pivotal role. In respect of the previous application, our trustee Esther Robinson Wild wrote a comprehensive objection dated 01.02.21. All of the points made in this document apply to the new application. In addition, we would like to make the following

	points in support of our objection to the new application: 1. The alterations made to the proposal since the previous application do not address the grounds on which it was refused, including the unacceptable impact on the Synagogue. We welcomed the planning committee's refusal of the previous application and can see no reason for this decision to be undone by the new application. Indeed, the subsequent creation of the Creechurch Conservation Area and the widening of the new proposal's footprint strengthen the case for refusal. 2. The Foundation's previous objection stated that we expected a robust and thorough assessment of the significance of a Grade I listed heritage asset which may be impacted by a major development of this nature and that we were concerned by the absence of such. We remain concerned that no such assessment has been adequately carried out. The Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment submitted with this application includes a single page heritage assessment devoted specifically to Bevis Marks Synagogue (sections 8.124-8.139). It includes no attempt to assess the evidential or communal significance of the site, points raised in our previous objection. The assessment is incomplete and inadequate for a Grade I listed site of outstanding historical interest. We again call for a thorough Statement of Significance for Bevis Marks Synagogue to be prepared along with a robust assessment of potential harms to significance caused by the proposed development. 3. We fundamentally disagree with the assumption of the heritage assessment that the setting of Bevis Marks Synagogue makes no contribution to its significance, and that therefore the proposed development would result in 'no harm' to significance. We fully support Historic England's position that the setting does in fact contribute to

	the significance of the Synagogue. We believe that the proposed development will cause substantial harm to the setting of Bevis Marks Synagogue. 4. The proposed development sits within the Creechurch Conservation Area, which was created in part to achieve ‘Fuller recognition of the Jewish history of the locality’ (Creechurch Conservation Area Proposal, City of London Corporation, December 2023). The application must be determined in accordance with the City of London Local Plan 2015. Core Strategic Policy CS14: Tall Buildings clearly states that the City will refuse planning permission for tall buildings in conservation areas. The proposed development would contravene both CS14 and DM12.2 which states that development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. 5. The proposed development would mean that the Synagogue’s courtyard would be overlooked to an unacceptable extent. The visualisation of the view from the courtyard submitted with the proposal (Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment, View 45a proposed, pp211-212) shows how there would be views into the courtyard from the majority of floors of the proposed Bury House. The Synagogue courtyard was designed as a secluded, peaceful and private space for spiritual practice. and has been used in this way for three centuries. The overlooking of the courtyard would represent a very substantial change to the privacy and intended atmosphere of the space. While we agree with the Environmental Statement that the change to the view from and into the courtyard will be ‘large’, we strongly disagree with the assessment of the view as being of only ‘medium’ sensitivity, and find it difficult to understand the conclusion that the effect would be ‘moderate’ and ‘beneficial’. 6. The Foundation for Jewish Heritage is concerned with the conservation of Jewish built heritage. It is not a religious organisation; therefore we defer to

	the congregation of Bevis Marks Synagogue in assessing the impact of the proposal on their religious practice. We fully support the congregation's position that the proposed development would have a serious, negative impact on their ability to carry out religious rituals. We hope that the reasons for our objection will be considered in your determination and would welcome the opportunity to provide further comments if needed. Officer Response: Comments noted. The amendments from the previously refused application are discussed in the proposal section of the report. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The impact of the development on the Creechurch Conservation Area is assessed in the Heritage Section of this report. In terms of loss of privacy, officers do not consider that there would be any more risk and loss of privacy than the existing situation as there are already a number of tall buildings, which are in close proximity to the Synagogue.
Office of the Chief Rabbi	As you will know, Bevis Marks is the oldest synagogue in the UK in continuous use, and a deeply resonant symbol of the history of British Jewry. In the 320 years since the Bevis Marks Synagogue was built, the Jewish community has become a valued part of the fabric of British society. Bevis Marks was one of the first major synagogues to be constructed following the resettlement of Jews in England in 1656. It has stood as a reminder of that history, and of how much has been achieved since members of the Jewish faith were permitted to return to this country.

	I have been troubled to read that there is now another proposed development on the doorstep of the synagogue, with very limited changes to the original proposal, with the potential to significantly affect the natural light that can reach the building. This will, in turn, disrupt prayers taking place inside, and the use of the courtyard outside. It would have a notable impact on the atmosphere that Bevis Marks is so famed for around the Jewish world, to the detriment of those worshipping there. Beyond this, by further reducing views of the southern exposure sky, this proposal would have implications for worshippers at Bevis Marks wishing to recite the monthly prayer kiddush levanah, recited after nightfall upon seeing the waxing moon in the sky. The granting of permission to this proposal would therefore be a regrettable development with implications for rights of religious practice, precisely in the place where Jews first enjoyed these rights in England following the 17th century resettlement. That would be a tragic irony. It was my hope that the City's new Creechurch Conservation Area would serve to protect Bevis Marks Synagogue from this type of scenario. I am disappointed that this seems now not to be the case. I trust that this can be rectified with some adjustments in the new local plan, ensuring that the synagogue's southern exposure remains unobstructed. Thank you for your consideration of this matter. Officer Response: Comments noted. The amendments from the previously refused application are discussed in the proposal section of the report. The impact of the proposed development on the Bevis Marks Synagogue as a place of worship and as a heritage asset are assessed in the Heritage, Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act

	2010) sections of the report. The impact of the development on the Creechurch Conservation Area is assessed in the Heritage Section of this report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report.
Senior Rabbi Joseph Dwek of The S&P Sephardi Community	You will no doubt be aware of the strength of feeling around this submission, and I share in that deep disappointment. As the Senior Rabbi of the S&P Sephardi community, the custodian of Bevis Marks Synagogue, I am aware of the severe distress this application has caused, the waste of community resources it has engendered, and of the complete disregard it has shown for the needs of the Jewish community. I've already submitted a detailed account appended to the synagogue's formal objection outlining the diminution of our religious practices that would result should this application be approved. Please see there for more information. But in short, the proposed tower would block out views of the southern sky necessary for Jewish worship, in particular the necessary views of the moon in the night sky for the Kiddush Levana prayer. Jewish tradition also strongly prefers that synagogue worship more generally include sky views, and clearly this was intended in the original design of the Bevis Marks synagogue with it numerous windows. This would no longer be possible should the tower at 31 Bury St be permitted. Finally, the further reduction in sunlight falling on the entirety of the synagogue site that would result from such a tower, would also harm the community's ability to worship as it has for over three centuries. This is both a breach of our religious rights, but it is also in conflict with the original design of the building, intended to be usable by daylight, which was an

	intentional departure from medieval buildings or houses of worship with stained glass windows. More fundamentally, it is shameful that our community is forced to campaign once again to protect Bevis Marks Synagogue, when it should already be abundantly clear that it is in need of protection from circumstances such as this. That the City of London has as of yet refrained from formulating policies that would prevent this harm from even being proposed is a dereliction in their duty of care, and it demonstrates a disdain and disregard for the well-being of the UK's oldest Jewish community. At a time of increasing Antisemitism in this country, I expect more from the City. I call upon the City to refuse this proposal without caveat and ensure the long-term protection of Bevis Marks Synagogue. Officer Response: Comments noted. The daylight impacts of the proposed development on the Bevis Marks Synagogue as a place of worship are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report. In relation to the formation of the City of London Planning Policies, it is noted that these are being prepared and assessed for their soundness under a separate process to that of the planning application process. It is therefore not considered pertinent that officers respond to matters relating that process as part of this assessment of this planning application.

	Although the impact that an application might have to a community is understood, it should be also noted that the local planning authority cannot stop an applicant for submitting an application for consideration.
Rabbi Dr Michael Hilton	Thank you for writing to me to seek my views on the above planning application. Reason for writing: the proposed building of 43 above ground storeys will overwhelm the nearby Bevis Marks Synagogue which is the oldest synagogue in Europe in continuous use. I have attended for worship on an occasional basis for the past forty years. The synagogue received a grant of nearly £2.8 million from the National Heritage Lottery Fund for restoration work and the conservation of collections. Work is now almost complete, and will include a museum and heritage exhibition, whilst the synagogue will continue to serve the community through prayer services. Astonishingly, daily worship by the Minister (on his own) was able to continue right through the Covid lockdowns, and the synagogue has remained open during the subsequent building works there. It seems perverse, to say the least, to spend public money on conserving the synagogue and at the same time to destroy its wider setting with a tower block directly to the south 43 storeys high. Reductions in light, described by the developers as 'negligible', will none the less impact the reading capacity of older users of the synagogue with poor eyesight, of whom there are many. In addition, construction of the four basement levels threaten the stability of the synagogue building, since it is 323 years old and like all buildings from that period, has shallow foundations. The published heritage plans for the City state that the surroundings of Bevis Marks Synagogue should not just be preserved, but enhanced. In contrast to this, the enhancements and green features

	described by the developer will have no impact on the Synagogue at all. The envisaged City Plan 2040 has a whole section (S11) on "Heritage and Tall Buildings." It begins with the words: Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets; Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness Please note also the following four specific references to the synagogue: 11.1.1 There are a large number of designated heritage assets in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17th century home on Cloth Fair, the unique early 18th century Bevis Marks Synagogue, and Wren's iconic St Paul's Cathedral and churches, to modern buildings by renowned architects. On tall buildings: 11.1.7 Applicants will be required to undertake a comprehensive heritage assessment proportionate to the scale of their site and heritage asset to understand ways in which their proposal could contribute towards the enhancement and enjoyment of the historic environment. 11.2.1 The City Corporation has identified "immediate setting" areas around The Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of elements of setting to that significance.

	Policy HE1 6 Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be considered. Policy HE1 8 Development in the defined immediate setting of Bevis Marks Synagogue and The Monument should preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets. 14.6 Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue. Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue's setting are preserved and enhanced. Three of the paragraphs quoted above mention the 'immediate setting' of the Synagogue. A Policy Paper (Policy Paper: Bevis Marks Synagogue - Immediate Setting January 2024) explains that the 'immediate setting' means only the buildings adjacent to the synagogue, not those in the wider area, however close by they may be. The paper contains valuable information on the architectural history and significance of the synagogue, which should be drawn to the attention of the Planning Committee. However, the Policy Paper does also comment on the Synagogue's wider setting and argues that this too must be carefully managed: the introduction of tall buildings, which is a relatively recent development in the context of the history of the building, has changed the character of the setting above the courtyard by introducing built form and activity into an area that was previously sky space. This has altered the sense of

	seclusion that is an important element of the significance of the synagogue, both functionally and symbolically. Additionally, there are recently consented schemes for other tall buildings, some of which are currently being implemented... further development that has the potential to reduce the sense of seclusion offered by the Immediate Setting of the courtyard framing the Synagogue has to be carefully managed. Although not technically part of the 'immediate setting' of the synagogue, the Proposed Development is so overwhelmingly tall and close to the Synagogue that in reality it will affect the immediate setting far more than the existing tall buildings visible from the courtyard. The heritage implications are profound. Please see below for my remarks on the importance of daylight and a view of the sky for traditional Jewish worship. The synagogue was designed by a pupil of Sir Christopher Wren and deserves as much environmental protection as the City's Wren Churches, to which it is comparable in scale and standard. In my travels round Europe I have visited many historic synagogues and seen none hemmed in and overshadowed by such a close and tall building as is here proposed. If they accept this proposal, the planning committee would be ignoring the City's stated objective and current and past practice of seeking to preserve and to enhance the setting of heritage assets. Aldgate Square, a few metres away, enhances the setting of St Botolph's Aldgate and by providing leisure space, ensures that people stop to admire the Church. On the other side of the synagogue, the setting of St Helen's Bishopsgate has also been enhanced by new open space at the Gherkin Plaza. Contrast the synagogue, which will be hemmed in as if the City were ashamed of it. I invite members of the Planning Committee to consider how the development will enhance the setting of the synagogue as their policies

	require. In view of the importance of heritage in the centre of one of the world's oldest cities, and the huge importance of tourism to the city, questions need to be asked about how these considerations are considered by the Planning Committee and in particular whether there is specific heritage representation on or to the group. Environmental Impact References below are to paragraph numbers in the 'Environmental Impact Statement' by Trium. The new documents submitted on behalf of the developers repeat the erroneous argument previously used that because the setting and the light levels in and around the synagogue have been compromised in the past, it is somehow acceptable to compromise them still further. None of the documents submitted discuss the right of the congregation to enjoy freedom of worship in the way they and their predecessors have done at the synagogue for the past 320 years. Of the three daily Jewish prayer services, two of them, the morning and afternoon prayers, have to take place during daylight. This does not simply mean during daylight hours but in a setting which has natural light. This idea goes back to the Bible, where it is written (Daniel 6:10) "Daniel went into his house with the windows open in the upper chamber facing Jerusalem, and three times a day he kneeled upon his knees and prayed and gave thanks before his God." The medieval commentator Rashi explains that through windows we can see the sky, and remind ourselves of our submission to heaven (comment on the Babylonian Talmud Berakhot 34b). From this you can see the importance of not shutting out or inhibiting the view of the sky from a synagogue. It also explains why the architect of Bevis Marks synagogue placed the windows high up, so that eyes could be raised heavenward during prayer. The beauty and purpose of this design will be frustrated and damaged by a view up towards new tall

	buildings. You cannot measure the value of the setting of a heritage asset with a light meter. None of the statements on behalf of the developers address this point. The Environmental Impact Statement submitted by the developers has 251 pages and contains over a hundred references to Bevis Marks Synagogue. In spite of the length of the report, there is no mention at all of the view of the new building from the synagogue courtyard. This is a serious omission. Furthermore, the Environmental Impact Statement was submitted before the Creechurch Conservation Area was established and therefore does not include any reference to the additional protection which one might expect this to provide to Bevis Marks Synagogue, to Holland House, and to the many other listed buildings nearby. The Statement details various meetings and similar application was refused in 2020 and details that a previous and very proposals which have taken place to ensure that the new application does not carry as much environmental impact. Unfortunately, the slight reduction in height and the slimmer top of the building will make little difference to Bevis Marks Synagogue. The report notes (9:100) that there will be a vibration impact on the synagogue during construction from pile driving, and that this will be increased when the auger hits the base of the hole. However, there appears to be nothing that describes the additional affect that vibrations will have on a building more than 300 years old. This is a serious omission from the assessment, especially considering the depth of the four basement levels. Vibrations spread and so the effect of pile driving at a greater depth can be felt further away. A well written report should give examples of vibrations from different levels, so that calculations can be made as to how many basement levels, if any, should be permitted in

	order to ensure that the synagogue's foundations are not damaged. On the question of sunlight, the report claims that the Synagogue courtyard currently receives less than 2 hours of direct sunlight on March 21st and September 21st each year. However, there appears to be no mention of indirect sunlight reflected from neighbouring buildings. I have noticed myself how much the light level in the synagogue changes suddenly and markedly on a day when there are many clouds coming across the sun, as the light is reflected off the building across the courtyard into the large upper windows at the west end of the synagogue. Indeed, this dappled sunlight, coming and going through the windows and illuminating the dark wood throughout the synagogue creates a very beautiful effect. It is therefore alarming to read an impact assessment which does not even consider this. On the question of daylight, the report makes the same error as the 2020 report, arguing that because the amount of daylight is already very low, the effect of reducing it further will be high in percentage terms, but negligible in real terms. This is tantamount to saying that because the synagogue is already too dark, it is acceptable to deprive it of even more light. The argument places the legal technicalities above what happens in real life. If I am struggling to read my prayer book on a dark day in the synagogue, even the tiniest further reduction is going to affect my reading adversely. When the light is already below par, there is no such thing as a negligible further reduction. The whole argument is a false one. The fact that the report repeats this same argument many times does nothing to enhance its case. Furthermore, it is a known fact that eye problems increase, and eyesight diminishes, with age. The reduction in daylight woefully described as 'negligible' will therefore have a disproportionate impact on older members of the congregation, of

	whom there are many. This constitutes discrimination on the basis of age, which is illegal under the terms of the Equality Act 2010. It is not sufficient for the developers merely to consider an 'average person' when assessing the light impact on a building with a high proportion of older users. Furthermore, the higher reduction in light at upper levels is discriminatory against women users of the synagogue; the effect on those with reduced eyesight is discriminatory against less able users; and the whole project disadvantages the Jewish community which has no other synagogue within the City of London. Similarly, the question of overshadowing is dismissed on the grounds that the Synagogue courtyard is already in shadow, and therefore only a very minimal portion of the Proposed Development shadow hits the ground (10:174) at any time of the year. This ignores the fact that shadows make a difference above ground level as well, and will reduce the amount of light coming through the upper windows, especially those at the western end and the south west corner which currently provide a considerable proportion of the Synagogue's light. Paragraph 15:9 of the report states that during demolition and construction, the Proposed Development will have significant adverse effects on the Synagogue as a result of the use of heavy machinery and tall cranes and the erection of other infrastructure needed for construction, such as scaffolding, hoarding, mobile cranes, site lighting, temporary site offices and facilities. The section of the report on mitigation does not mention the Synagogue, and there is no assessment at all of whether or not this could cause irreparable damage to such an old and fragile building. Summary The Proposed Development application does not take sufficient account of the City's existing and anticipated heritage policies, nor does it take

	account of Conservation Area policies which require any new development to enhance the setting of the synagogue. The Proposed Development discriminates against older people and other protected groups by dismissing as irrelevant small reductions in the light in a building used for the reading of books. The new building will have a negative visual and overshadowing impact on the synagogue and its setting and context within the City townscape. Pile driving during construction may cause damaging vibrations. I am against this planning application. Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) section of the report. Matters relevant to equality impacts of the development are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. It is also noted that the applicant has submitted an Equality Statement which has been third party reviewed. Overall, the third party reviewer considers that the scope, methodology and findings of the EqS, and the mitigation and enhancement measures to mitigate the potential impacts, are appropriate to the potential impacts on protected characteristics arising from the Proposed Development.

	The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.
Reverend Laura Jorgenson of St Boltoph without Aldgate	Objection to planning application 24/00021/FULEIA (Bury House 1-4, 31-34 Bury Street) and 24/00011/LBC (Holland House 1-4, 32 Bury Street). I write on behalf of the St Botolph without Aldgate PCC to object to the above planning application. Bevis Marks, the only dedicated non-Christian place of worship in the City of London, has been a centre of worship and community for three hundred years. It is more than a 'heritage asset'; it has a beating heart of people, many of whose families have worshipped there for generations, some since the synagogue has been built. In recent years the synagogue has been fighting for its very survival. Building a tower which will cast the Synagogue and its courtyard into shadow, taking away the view of the sky is not merely a matter of light, but also of ritual - of their ability to worship in the building, and of particular importance to the congregation are the prayers at the appearance of the new moon, which they will no longer be able to do if this development goes ahead. As a neighbouring friend and colleague St Botolph's is keen to support and encourage the congregation

	at Bevis Marks in their life as a vibrant community, with a future, including their new Education Centre which will bring thousands of school children to the City. We have deep concerns that should this development go ahead, instead of a living community, Bevis Marks will ultimately instead a place of remembrance of the historic Jewish communities in the City. Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report. The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report.
Reverend Dr Malcolm Torry, St Mary Abchurch	I am writing to object to the proposed new building and extensions of buildings that are the subject of planning application no. 24/00021/FULEIA and listed building consent 24/00011/LBC. On the 18th of April, Rabbi Morris of the Bevis Marks Synagogue was invited to attend the City Deanery Clergy Chapter to tell us about the planning application for a 44 storey office block just a few metres from the synagogue. He explained that a very similar application had previously been rejected by the Planning Committee; that a Conservation Area had been

	proposed, but that the site of Bury House had been omitted from it; and that when that site was then included in the Conservation Area (which unusually still seems to permit new tall buildings) the new City Plan document relating to the Bevis Marks Synagogue's 'immediate setting' (document ED-HTB29) did not include the site of Bury House, which is where the 44 storey block would be built: a tall building that would substantially impact the synagogue and so should surely be included in the immediate setting-which would in turn suggest that the planning application should be rejected. I notice that the buildings adjacent to Bury House have also been omitted from the 'immediate setting', yet the planning application proposes adding additional floors to these, which would also substantially impact the synagogue, suggesting that these buildings too should be included in the immediate setting-which would again suggest that the planning application should be rejected. Reverend Dr Malcolm Torry This morning I visited the synagogue and explored the surrounding streets. It was immediately clear to me that to locate a 44 storey building on the site of Bury House, and to add additional floors to adjacent buildings, would, in the context of existing tall buildings, completely hem in the synagogue and remove most of its natural light. This unique synagogue, a Grade I building that has been in constant use by the Jewish community for over three hundred years, and that unusually for a historic City building has its original interior intact, would experience significant harm, as would the community that uses it. I understood from Rabbi Morris that the developer has offered space for community use in the buildings that it now owns. What it might have failed to realise is that temporary community benefit can never substitute for permanent community and heritage harm, which is what it is planning to inflict on London's Jewish community and on its synagogue: an unconscionable thing to do,

	particularly at such a complex and difficult time for London's Jewish community. Please, for the sake of the City's heritage, and for the sake of its Jewish community, reject this planning application; forbid the building of new tall buildings in conservation areas; and do all you can to protect the precious heritage that the City of London Corporation holds in trust for London and its people. Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less than substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report. It is noted that the proposed community/cultural/education offer and the proposed affordable workspace would be secured by the S106 agreement for the lifetime of the development. The comments which call into question the professionalism and integrity of the Corporation's officers are unsubstantiated and strongly refuted. It is noted

	that any investigation relating into an accusation that there was an undue influence of developers on the City Corporation regarding the designation of the Conservation Area, would be a process that is carried out by a separate department of the Corporation in accordance with the relevant protocol. Having sought advice from the Comptroller and City Solicitor's Department it is clear that an investigation of this nature would only be carried out if there was evidence to support such a claim. It is not considered that this separate process would constitute a material planning consideration that would influence the assessment or decision making in respect of the current application.
Reverend Josh Harris, St Katherine Cree	As a local church leader, I object to this proposal because it involves direct and specific harms to the local Jewish community specifically, including restricting their freedom of worship by obscuring a key portion of the sky and reducing natural light levels to unsustainably low levels. I am proud to minister in the City of London, which we regard as an open, tolerant, civil place which hosts a diverse and international community. I am concerned that this development, if approved, will seriously undermine that reputation, at a moment when we should be particularly working to ensure the safety of the Jewish community. As Priest-in-Charge of St Katharine Cree, I am closely engaged with the local community in and around Bury Street including workers, residents, and those who access community services in our church. We have undertaken more than 1,000 face to face conversations with City workers in the last three years.

	In my view, the proposed community benefit of this development and the investment in Holland House is intangible and, on the basis of what has happened in similar developments, unlikely to be sustainable to operate - and seems to have required importing organisations with the offer of free space to give the impression of deep community engagement. There are few successful examples of this kind of space I know without an 'anchor institution' running them such as a church, major established charity like Toynbee Hall, or local authority. As someone with expertise in the local community's needs, I cannot see significant likely benefit from the plans to the workers and residents who we engage with in the existing local community. Our community was proud that the City has recently created a conservation area here, and we were looking forward to working with the City to celebrate this and to see how we can together enhance it. Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. The proposed community, cultural, educational, sports, amenity offer of the proposed development are assessed in the Land Uses section of the report. The benefits of the proposed development against the identified less than substantial heritage harm are assessed in the Assessment of Public Benefits and paragraph 208 NPPF balancing exercise section of the report.

	The impact of the proposed development on the Creechurch Conservation Area are assessed in the Heritage section of the report.
The Honorable Company of Master Mariners	Representation on 24/00021/FULEIA 1.1 Its background and purpose outlined above compel the HCMM to register an objection to this planning application centred on No. 31 Bury Street EC3. In this, it wishes to remind the City of London Corporation that on 7th April 2021, it objected similarly to the original application for this site, 20/00848/FULEIA. The HCMM did so not only in defence of the Bevis Marks Synagogue, the most directly impacted, but also the other heritage assets that would be affected by the development, not least those of Trinity Square and the Tower of London World Heritage Site with which it has particular association. These were also the key reasons given by members of the Corporation's Planning and Transportation Committee in refusing the original application at its meeting on 5th October 2021. Moreover, the HCMM later voted with the majority in delineating the conservation area around the Synagogue that now appears to have been ignored by the Corporation. As a City livery company, the HCMM cannot take lightly the need to respond in this situation. 1.2 'Skyscraper' is a term little recognized now as of maritime origin. In the days of square-rigged ships such as tea clippers racing to be first back in London in the 1850s and 1860s, every breath of wind was sought when becalmed. Extra sails would be added up the masts, the seventh and last being the skyscraper. Irony is thus added in this present context, but the HCMM again cites the City's maritime past and present in support of its objection to this revised application which offers only the most marginal modification. 1.3 In 2022, the Corporation launched Destination City, currently promoted as 'The City is the birthplace of London with a unique and diverse offer'. In fact, from the sea and Thames came the

	maritime trade out of which the City and so much more grew. Destination City will celebrate, promote, and support the Square Mile's unrivalled history and heritage. It is hoped that the embedded pages here, outlining a little of that 'unrivalled history and heritage', may illustrate the difficulty of attempting to reconcile the Corporation's apparent valuing of heritage with its contradiction as embodied in this application. 1.4 The estate agents' mantra, it is said, is 'Location, location, location', but the more appropriate term is 'context'. Without expertise in the fields of architecture and construction, the HCMM is content to defer to the conservation bodies and specialists. Instead, it is in particular regard to the wider significance and context of the application that it is opposed by the HCMM. 1.5 London, especially the City, is built on maritime trade with much of Britain's maritime past and present to be seen in EC3 alone. The maritime sector remains a significant business presence in the City while the City's worldwide standing as a banking, finance and insurance centre is in turn rooted in maritime trade. In 1694 with the Royal Navy's financial security the aim since re-equipping was needed yet its capitalization was beyond the Government. The Bank of England was established. The new bank attracted a loan of £1,200,000 (195,265,744 in 2024) raised by subscription. Links with the sea continue today to be commercially and strategically vital to the UK's economy and defence. Current events in the Red Sea demonstrate the rôle of and the country's reliance upon the Merchant Navy and Royal Navy. The supply chain does not consist of just the internet and motorways, some 95% of UK global trade being by sea. 1.6 The Destination City website lists 'Attractions; Experience; Food & Drink; Galleries; Green Spaces; Museums; Restaurants; Shopping; Stay; Theatres and Wellbeing' as the areas of interest on offer. Despite the unrivalled claim

	cited above, heritage is not mentioned. Further, the term appears only twice in the whole website, in referring to the City Visitor Trail which invites such to 'feast on the culture, history and heritage' while noting 'grand heritage hotels' are available. History itself fares little better. The City of London timeline within 'Our Story on the website records but one maritime date, publication of the first Lloyd's Register in 1764 and omits the two World Wars but does mention the Bevis Marks Synagogue's opening in 1701. 2.1 Similarly, what the application proposes for Holland House suggests indifference to its importance, the HCMM thus being obliged to oppose the application. Wm H Muller & Co, a Dutch shipping company, chose Hendrik Berlage to design its London offices in Bury Street. Known as the 'father of Modern architecture in The Netherlands, the result is said to have been the first steel-framed building in Europe. Berlage is believed to have taken inspiration from the work of American architect Louis Sullivan on a visit to the USA in 1911. External walls of grey-green terracotta or faience tiles, made in Delft and shipped in company vessels, top a black granite base. A merchant ship sculpted by the Dutch artist Joseph Mendes da Costa appears at the southeastern corner of the Grade II*-listed building. Construction of the office block, begun in 1914 and completed in 1916, was made possible during the First World War only by The Netherlands' neutrality. It is thought to be the sole building erected in the City during the War. 2.2 In turn, that provides another maritime link, this time with Liverpool Street station. The Netherlands' neutrality in the First World War allowed North Sea ferry services to continue, albeit resented by Germany. Among the refugees and occasional business passengers

	were those of more clandestine intent. Dutch operators' eventual withdrawal from the crossing left only the Harwich-Rotterdam sailings by the Great Eastern Railway Steamship Company. One of its captains was Charles Fryatt of the Mercantile Marine, renamed as the Merchant Navy in 1928. Several times from March 1915, German submarines ordered Fryatt to stop his unarmed ship but instead he made to ram the U-boats or outran them, outraging Germany. Around 0300 on 4th June 1916, German naval vessels stopped Fryatt and the SS Brussels outbound to Harwich. The ship, 45 crew, including five stewardesses, and 100 refugee passengers were taken to Bruges and interned. On 27th July, two hours after a summary court martial, Fryatt, despite being a civilian non-combatant, was shot by firing squad. On 7th July 1919 Fryatt's body was repatriated by Royal Navy destroyer, escorted by two more, to Dover and by train to Charing Cross. The purple-lined luggage van used had served previously for nurse Edith Cavell's coffin and in 1920 for that of the Unknown Warrior. On 8th, Fryatt's coffin was drawn by Royal Navy ratings on a gun carriage, a State funeral honour, to St Paul's for the service, hundreds of thousands lining the streets. The burial was in Dovercourt, Harwich, Fryatt's home. A hospital and pub there bear his name but reaction to what so many newspaper headlines declared as his 'murder' finds it too in Belgium, the USA, South Africa, Mauritius, Australia and New Zealand. In the Canadian Rockies, Mount Fryatt is close to Brussels Peak, named after his ship, while his memorial is on Liverpool Street station. The dedication reads 'From the neutral admirers of Fryatt's portrait appears on this in bronze relief. Beneath, the dedication reads for the first World War period, 'more than conduct and heroic death'. The Netherlands section of the League of Neutral States July 27th 1917, his brave Holland

	House's architectural features would be lost were this application approved. Officer Response: The impact of the proposed development on Holland House are assessed in the Architecture, Urban Design and Public Realm and Heritage sections of the report.
Lord Mann of Holbeck Moor HM Government's Independent Adviser on Antisemitism	I write to express my grave concern over plans to build a forty-five-story tower block next door to Bevis Marks synagogue (planning application reference: 24/00021/FULEIA). Bevis Marks, a Grade One listed building, is often heralded by the local community and beyond as Britain's 'Jewish Cathedral'. A building that has thrived for over three hundred years, it is a space of enormous historical and cultural significance. The fact that such a vital community hub is under threat by this development is deeply alarming. The plans have significant implications for the usability of the synagogue, as the building of a tower block along the southern side would totally destroy the setting. Not only would important elements of religious ritual (the view of the moon's passage and many of the celestial bodies) be blocked, the synagogue's natural light levels would be so obscured that the space would be rendered unfit for conducting worship. The historic nature of the synagogue prevents the installation of additional electric lighting as a feasible alternative, leaving no choice but to consider the space unusable. The City of London Corporation, as the municipal governing body of the City of London, has a duty to safeguard the right of the Jewish community to freely gather for worship without obstruction or difficulty. Facilitating the approval of such a development, threatening the vitality of such an essential community space, would fall short of recognising the importance of the synagogue, and in turn supporting London's Jewish community. The idea of building something similar next to St Paul's Cathedral would be inconceivable and inappropriate. The same levels of protection and preservation should be

	attributed to Jewish community spaces like Bevis Marks. At a time of rising levels of antisemitism, and increased fear and uncertainty amongst the Jewish community, the protection of their places of worship and community could not be more urgent. I hope you will take these concerns into account and reconsider the plans for this development, to ensure the life and legacy of Bevis Marks synagogue is protected. Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report. The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. It is noted that although both Grade I listed buildings, with defined immediate setting, the architecture, setting, location and presence on the wider London skyline of St Paul's Cathedral and the Synagogue are markedly different and in this respect both listed buildings and their setting are not directly comparable. Matters pertaining the equality impacts of the development on the Jewish community of the Bevis Marks Synagogue are addressed in

	the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.
Rachel Blake MP	I am writing to express my opposition to Planning Application 24/00021/FULEIA, which proposes the construction of a 43-storey building at 34 Bury Street. It is clear that this application will have a substantively negatively impact on worship at the Bevis Marks synagogue, the oldest synagogue in the United Kingdom, and the oldest synagogue in continuous use in Europe. This new office building would block out the daylight, and the appearance of the moon from the synagogue and its courtyard for much of the day. This would make it impossible to mark the coming of the new moon, key to Kiddush Levana, which has been practiced at Bevis Marks for nearly four hundred years. This application would therefore breach Policy DM 10.8 of the City of London plan, which states that: “To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance; It would also contravene the 2021 London Plan, which stresses in GG1 G that new buildings: “are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods.” These policies are made in mind with the City of London and Mayor of London’s public-sector equality duties under the Equality Act 2010, particularly where this regards fostering “good relations between persons who share a relevant protected characteristic and persons who do not share it”. It is clear that this development would contravene these duties, and therefore I believe that it be refused. Officer Response: The comments made are noted and are addressed within the report. The daylight, sunlight and overshadowing

	impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage, the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter, as well as other equality matters are assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.
Nickie Aiken – former MP	Having considered the latest application to develop 31-34 Bury Street, I believe it must not be granted permission. The proposal would have an unacceptable impact on the oldest continuous synagogue in Europe, Bevis Marks, while also having a detrimental impact on the wider Creechurch Conservation Area. It is important to consider the significant impact this development would have on Bevis Marks ability to function. The only artificial light sources within the synagogue are candles and a limited amount of electrical lighting that was installed prior to the building being listed. There are also sensitive issues like the recital of a special prayer at the beginning of each lunar month which would be lost as they require a view of the eastern and southeastern sky. The previous planning application for this site was refused because “The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development”. I do not see any reason why this new proposal would not still adversely affect Bevis Marks. In the Heritage Assessment of the previous application, it states “were the proposed development to be allowed it would render the

	designation of the Creechurch Conservation Area virtually meaningless and to have made the whole designation and consultation process a worthless exercise”. Now that the site does firmly sit within the newly created Creechurch Conservation Area, and as the plans do not significantly change from the previous application, I do not see how this development can be permitted. This development would cause substantial harm to the surrounding Creechurch Conservation Area and must not be allowed to go ahead. Officer Response: Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report. In terms of the night sky visibility and the moon passage the applicant has submitted a Lunar Transit Study, which has been third party reviewed. This matter is assessed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report. The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. The previous decision and the importance of consistency in decision making is material and should be taken into account in making a decision on this application The previous decision is considered later in this report.
Blackman Bob - MP	I object to this overdevelopment of the site which will dwarf Bevis Marks Synagogue. This will devastate Europe's oldest continuously used Synagogue.

	Officer Response: Comment noted. The impact of the development on the Bevis Marks Synagogue is assessed in several sections within the main body of the report.
Baroness Deech – Lords Member	It is disrespectful to the neighbourhood, to an ancient and significant building, Bevis Marks, even to non-Jews, to put this enormous building near it. It is essential to preserve and enhance Bevis Marks. Officer Response: Comment noted. The impact of the development on the Bevis Marks Synagogue is assessed in several sections within the main body of the report.
Zoe Garbett – Green Party Member of the London Assembly	I have been contacted by constituents from the Jewish community in London about this planning application and its potential impact on the Bevis Marks synagogue. Please accept my apologies for sending this letter after the deadline for comments –I was newly elected to my role as an Assembly Member just three weeks ago. The sole synagogue in the City of London and the oldest in the country, Bevis Marks synagogue has a totemic significance for Jewish people living locally, across London and in the rest of the UK. As one constituent in the neighbouring borough of Islington told me: “as an Islington Jew I sometimes attend myself but in any case have an emotional attachment due to its place in the community's history.” Preserving the character of the synagogue is vitally important in making the City of London a truly inclusive place for people of all faiths. While I appreciate that neither the synagogue or the proposed buildings are in conservation areas, the synagogue itself is a Grade 1 listed building of immense social and cultural value and as such should be protected from harm.

	My constituents, however, fear the proposed development will irrevocably impact the character of the synagogue, both during construction and once the development has been completed. These objections have been laid out by concerned residents and groups, as well as by the Protect Bevis Marks campaign. I urge you to give due regard to the many objections raised and recommended you do not approve this application. Officer Response: Matters pertaining the equality impacts of the development on the Jewish community of the Bevis Marks Synagogue are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report. The impact of the proposed development on the Bevis Marks Synagogue as a heritage asset and on the Creechurch Conservation Area are assessed in the Heritage section of the report. Other impacts environmental impacts of the proposed development on the synagogue and its community are assessed in the Environmental Impacts and in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.

Representations from members of the public (Objections)	Officers Response to Comments
Loss of light to the Synagogue	Comments noted. The daylight, sunlight and overshadowing impacts of the proposed development on the Bevis Marks Synagogue and its

• The Synagogue is lit primarily by natural light which is an important part of its attractiveness • This is the last remaining section of sky not blocked by high-rise buildings	courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.
Overshadowing to the Synagogue Courtyard • Remaining light is already limited, this will reduce further • Will impact not just worship but enjoyment of the building	Comments noted. The overshadowing impact of the proposed development on the Bevis Marks Synagogue's courtyard are assessed in the Daylight, Sunlight and Overshadowing, Overbearing Impacts and Public Sector Equality Duty (section 149 of the Equality Act 2010) sections of the report.
Loss of view of the moon in the night sky, and subsequent consequences to specific religious practice • The southern sky view is an essential part of the setting of the synagogue • Viewing of the moon and stars important for	A study assessing the impact of the development regarding the visibility of the sky and the moon has been submitted by the applicant. This Lunar Transit Study has been independently reviewed by BRE. Matter pertaining those impacts are addressed in the Public Sector Equality Duty (section 149 of the Equality Act 2010) and Heritage sections of the report.

Sabbath and festivals	
There is not a need for more office-space in the City • People are working from home and don't need office space • There is no demand for more offices • No ecological justification to build further high-rise offices • Many vacant offices in other areas such as Canary Wharf	The site within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The principle of the development would be supported by London Plan Policy SD5, which states that higher priority should be given to strategic functions such as offices within the CAZ, to meet demand for office space and facilitate London's continuing role as a World City. At the local level, the City of London's Eastern Cluster is identified in the Local Plan (2015) as having the capacity for significant growth in office floorspace through the delivery of tall buildings on appropriate sites. The intensification of office floorspace in a development of this scale would support the function of the Central Activities Zone and London's position as a World City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business as well as providing agglomeration benefits. Matters relating to the need of office space and the acceptability of the provision of a tall building in this location are assessed in the Principle of Development, Proposed used Architecture, Urban Design and Heritage sections of the report.
The Synagogue must not be harmed from construction work	Relevant mitigation during demolition and construction of the proposed development would be secured by conditions.
Comparison to Development Near St. Paul's • The development would not be permitted adjacent to St Paul's	It is noted that although both Grade I listed buildings, with defined immediate setting, the architecture, setting, location and presence on the wider London skyline of St Paul's Cathedral and the Synagogue are markedly different and in this respect both listed buildings and their setting are not directly comparable.

• Historic places of worship need to be respected equally • This is the only non-Christian place of worship in the City	
Concerns over damage to foundations of the Synagogue	Consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report. A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.
Site lies within the Creechurch Conservation Area where tall buildings are against planning policy • A need to protect the historic character of this area from more development • Not in keeping with the character of the area • Since the previous scheme was refused, the Conservation Area has been adopted and therefore the	The impact of the proposed development on the Creechurch Conservation Area is assessed in the Heritage section of the report.

proposed development is even more harmful	
The building will create further issues of wind tunnelling	Consideration of these impacts are contained in the Wind Microclimate section of the report.
Environmental impacts The demolition of buildings cannot be considered sustainable	Matters relating to sustainability and the redevelopment of the building at 31 Bury Street are addressed in the Sustainability section of the report.

58. Sixty-eight (68) letters of support have been received from members of the public and organisations, as set out in the table below:

Representations from members of the public (Support)
The building's design is attractive, fits in well with the surrounding cluster and creates a sensible step-down from nearby taller buildings - It is welcoming to see this project being revised and resubmitted. It will have a positive effect on the City's skyline. - When seen from vantage points around Tower Bridge, this proposal would appear to the right of a taller tower approved at 100 Leadenhall Street (22/00790/FULEIA). Its comparatively lower height would provide a more gradual transition between the Eastern Cluster and the low-rise buildings beneath it, balancing the view of the cluster as a whole. - It is aesthetically pleasing and constitutes a step down from the taller elements in the cluster. It will contribute to the visual coherence of the City cluster. London is a dynamic city and always changes. - The proposed design is attractive and modern, the slim profile is a welcomed addition - The building will fit in well with surrounding tall buildings in the area
Affordable workspace is a valuable asset for the area

• The provision of affordable workspace to small companies will be very beneficial to new and starting enterprises. At a time of increased cost of doing business, this is very welcome. • The redevelopment of Holland House offers a unique opportunity to support the unmet demand for affordable creative workspaces in the City. This initiative would not only benefit local artists and companies like ours but also contribute to the cultural landscape and attractiveness of the area.
A welcomed juxtaposition between old and new in the area will be enhanced by the design of this building • There are plenty of tall buildings in the City already, which have improved the place. The blend of old and new is part of its charm - there are plenty of churches and other religious buildings nearby which are abutted by tall buildings and are no worse for it. • London is all about the juxtaposition of old and new buildings. New modern buildings help to highlight old buildings, rather than detract from them. This is the case all over the City of London where historic buildings sit perfectly fine side-by-side with modern buildings.
A modern building that will positively affect the local economy and provide more floorspace in the City • The development is high quality design which will help maintain London's position as a premier financial centre and provide a net benefit to the local economy and wider UK economy.
The proposed building is a high-quality design that makes the most of the site potential
Workers nearby will benefit from the added amenities.
The building will provide cultural space which is needed in the City
Amenity space will add value to the area

Example representations from (non-statutory) organisations, groups and individuals (in support)	Comments

Param Singh – City Sikhs	I am writing on behalf of City Sikhs, a leading organisation that supports Sikh professionals across London, providing networking opportunities, cultural engagement, and community initiatives that foster a sense of belonging and diversity. We would like to express our strong support for the planning application for Holland House and believe this development will bring meaningful benefits to the City of London. A significant aspect of our support stems from the commitment to providing free-of-charge community spaces within the new and existing premises. Like many community organisations, City Sikhs often encounter difficulties in finding affordable venues in the city to host our events, which range from professional development workshops to cultural and social gatherings. This challenge limits our ability to connect with and support our members effectively. The inclusion of accessible community spaces at Holland House will directly address this longstanding issue. It will allow us to host more frequent and impactful events, benefiting not only our members but also contributing to the cultural richness and inclusivity of the City of London. By enabling organisations like ours to expand our reach and activities, the development will serve as a catalyst for greater engagement and collaboration within the Square Mile. We believe the proposed Holland House development will become an invaluable resource for fostering connections, promoting diversity, and strengthening community ties. Its potential to serve as a hub for cultural, educational, and professional initiatives aligns closely with the values we champion as an organisation. We hope the City of London Corporation will appreciate the far-reaching benefits of this proposal and approve the planning application.
Aslam Baccus - Halls4Jumuah	My name is Aslam Baccus and I am a trustee of the charity Halls4Jumuah in London. Our main purpose is to hire halls and venues across the

	City of London to provide muslim men and women working in the city with a place to perform their Friday prayers. At present, we are hiring six halls within the city, including Holland House in Bury Street, London, EC3A 3BP. We have been using the hall every Friday since the beginning of January 2024 and we manage the venue with the help of our on-site volunteers. To ensure the venue as well as the attendees are safe and capacity is kept under control, we record the names and phone numbers of anyone coming in to perform their prayers. Currently, we have an average of 40 people attending Holland House each week, using a hall that has the capacity to host 150 people. The venue is in an excellent location in London and our numbers are gradually increasing as more people become aware of its whereabouts. The owners of the building have been absolutely first class in providing our charity with their support to allow members of our community access to perform their weekly prayers, and we are always rest assured that the venue is clean, spacious and welcoming. We have benefitted greatly from a review of the proposed development plan and we feel that the idea of turning the Lower Ground, Ground and First Floors into spaces that can accommodate small and local charities as well as community based projects truly inspiring. We at Halls4Jumuah hope the project will be successful and full credit must go to the management of the building who are always a pleasure to work with.
Tony Richards – Museum of Diversity	On behalf of the Museum of Diversity, I am delighted to extend our warmest regards and wholehearted support for the establishment of BGO's multi-use cultural space at Holland House, as outlined in your cultural strategy plan for the City of London (CoL). We deeply admire the exemplary work that BGO has undertaken over the past few years, providing invaluable support to organisations like ours, thereby enhancing representation and diversity within the city. The cultural strategy proposed by BGO promises a rich tapestry of diverse offerings, poised to deliver unique and engaging experiences for those who live and work in the CoL. We believe

	that this initiative will set a new benchmark, not only within the City but also throughout Greater London, reinforcing its status as one of the world's foremost global cities. The Board of the Museum of Diversity and I acknowledge the significant contributions BGO has made in promoting cultural awareness and education within the CoL. The concept of a multi-cultural, multi-use space in London's financial district, tailored to best serve its community, attests to BGO's visionary outlook on the future narrative of urban life. This initiative highlights BGO as a pioneering institution fostering an environment where community voices can shape an agenda reflective of the needs of future leaders across London. Their commitment to growth, cultural enrichment, and educational advancement aligns profoundly with the values of the Museum of Diversity, cementing a strong partnership between our organisations. BGO is at the forefront of embracing change and fostering prosperity among the city's residents and workforce. As they pursue these goals, the presence of the Museum of Diversity will symbolise a significant step forward in our collective journey towards cultural appreciation and understanding. BGO's dedication to supporting diversity and cultural initiatives, as outlined in their cultural strategy, ensures the continuation of programmes that will enrich our societal fabric. BGO's development initiatives, particularly the planned redevelopment of Holland House, demonstrate their dedication to transformative projects that catalyse both economic and cultural growth. BGO envisions the Museum of Diversity as an integral part of the city's landscape, where history, technology, and humanity converge to inspire future generations through unique architecture and exhibits showcasing artifacts from diverse cultures worldwide. Furthermore, the City of London has a rich history of supporting the arts and museums, as evidenced by the success of the Museum of London and other institutions, which have become hubs of community engagement and cultural education. We foresee a partnership with BGO that will enhance our ongoing efforts to celebrate diversity, promote equality, and provide inclusive

	cultural education to all residents and stakeholders. The anticipated establishment of the Museum of Diversity in the City of London is expected to create approximately 300 employment opportunities across various levels, significantly advancing our community's economic landscape. Moreover, the initial phase of this project, with an estimated investment of £1.2 million, will serve as a cultural beacon and a collaborative nexus for partners dedicated to showcasing the rich tapestry of our shared human experience. The Museum of Diversity is ready to collaborate with the City of London to facilitate the establishment of BGO's cultural space at Holland House. We eagerly anticipate discussing the potential design and use of the space and are prepared to assist and support in their application or regulatory processes to expedite this exciting project. We look forward to the Museum of Diversity joining the tapestry of the City's cultural landscape and becoming a beacon of inspiration, learning, and unity. Together, we can create a future where diversity is recognised and revered.
Suzanne Gorman – East London Community Band	I am writing on behalf of East London Community Band in support of the planning application being brought forward by WELPUT for the redevelopment of Bury House, Holland House and Renown House. ELCB is a volunteer-run charity providing music-making opportunities for musicians of all ages and abilities. When it comes to performance spaces, affordable, secular spaces are very rare; we often hold our concerts in churches or school halls, which meet our budget but are often poorly lit, inadequately heated, and not fit for purpose. There is a notable dearth of spaces in the City to rehearse and perform free of charge. On the 29th August 2023, we were invited to tour the spaces within the historic Holland House and to have a discussion about how we could utilise these spaces in future. Following this, on the 27th October 2023 we held our first band music and community social evening on the first floor of Holland House, something which we will look to doing more in future. We currently rehearse in a former Victorian school which is only partially accessible, which is an increasing concern as

	some of our members have restricted mobility. It is a key objective of our organisation to make our sessions available at an accessible site. The proposed development would be especially welcome particularly as the proposals include an auditorium space in a great, central London location. I therefore welcome the proposed application in principle and hope the that the City of London Corporation will approve the proposals, which I hope will make a positive contribution to the long-term cultural success of the City.
Matthew Somerville – Wondering Minds	This is a letter which outlines the use of Holland House by community interest company Wondering Minds CiC for purposes looking to up lift the community. Wondering Minds are a community interest company who are committed to finding alternative solutions to the mental health crisis through art, storytelling and nature. We engage people in meaningful creative activities while building community, creating employment and creating radical therapeutic shifts in peoples lives. So far we have used the space at Holland House for a collaborative filmmaking course which brought together people living with complex mental health to engage with filmmaking and storytelling. The space was used to train people with cameras, allow them to shoot their films and create a community filmmaking screening in July where we brought over 50 people together to watch short films and have meaningful discussions around mental health and the importance of collaboration. Spaces like Holland House are so important to community building as there is very little space available which is free or affordable for people to come together. We have capacity to use HH permanently or on a short term let to create an office and creative hub where we can manage our community wellbeing projects, offer space to people who are in recovery. A space to come and be creative, set up an editing suite for our service users to make work, a location for filming for our participants and create drop-in sessions for people struggling with mental health to engage in creative activities.
Alex Feldman – deputy Headteacher at Dairy	As an experienced primary school teacher and school leader, I have seen my profession change wildly across the last two decades. We are no longer

Meadow Primary and Nursery School	individuals who impart facts to children from the hours of 9.00am to 3.15pm hoping that something sticks, we are now architects of the future responsible for all aspects of child development. All careers of the future start with a seed or an experience that is nurtured within a school setting. Making links with future careers and giving learning a purpose is the bedrock of successful education hence why our experiences at Holland House with Dr Sharon Wright have made such a difference to our children. Just travelling to Holland House helped build the cultural capital of our children. Coming from an incredibly deprived part of West London where most of our children are EAL (English as an additional language) and the progeny are part of an insular community that may not venture out the borough, travelling to Holland House was an eye opener. Getting on the Elizabeth Line, going up an escalator, walking through the City, gazing at the polished metal and glass, seeing workers that may look like them – this is inspirational for our children. Knowing that the financial heartbeat of the country can be reached in less than 30 minutes from Southall and becoming increasingly aware of the fact that the City of London could be a place of future employment frames the educational experience we hope to offer. Then there's the building itself – we teach the skills of comparison all the time in the primary curriculum – nestled next to the Gherkin and dripping in history. Our children had never seen anything like it: the aquatic tiles, the maritime theme echoed throughout, sitting in a boardroom from reclaimed wood – it's the closest some of our children have been to getting on a boat! Couple this with the role of shipping in the founding of Great Britain, it ties in with our fundamental British Values as well as providing a starting point for a conversation on the role of Empire and the decolonisation of the curriculum. The sheer space within Holland House lends itself beautifully to learning experiences for all ages. These workshops are what children remember about school, the people who give up their time and energy to actually guide and inspire – Sharon is the embodiment of this. At Dairy Meadow we were fortunate enough to run three workshops

	together across a two term period. We brought our school council and our Pupil Premium (the most vulnerable of risk of underachievement) children to have a tour of the building and supplement their DT and Skills Builder curriculum by designing sustainable work spaces of the future. The purpose of these visits were to: gain a potted history of London's financial centre, understand the jobs that occur in the city of London and contribute to the positive sustainable changes that they would like to see. A further workshop involved us taking all 53 Year 6 children for a 'world of work' immersion day. This involved meeting the team from Bentall Green Oak and having a series of presentations from inspiring individuals within the construction industry. All of our presenters were female which was an absolute surprise to our young ladies who are often subjected to cultural boundaries when thinking of further employment. From there we had a CV writing workshop and mock interviews! I don't know of any other primary school that has undertaken such an ambitious project, we really couldn't have completed it without the help of Holland House and Dr Sharon. I appreciate that this is just the experience of one primary school however you can not underestimate the impact these visits had for our children. Everything in London is getting more expensive and difficult – as a result the day to day worlds our children inhabit get smaller and smaller. It's only through events like I've mentioned that we can give the children the chance to envisage a life beyond their immediate future and encourage our future workers the chance to dream big. Happy to discuss anything that has been mentioned above, photos and pupil/staff voice available on request.

59. Sixty (60) representations have been received stating that they have not made a representation relating to the proposed or previously refused development and they want their names to be taken off the contributors list.

Policy Context

60. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
61. The City of London (CoL) is preparing a new emerging plan, the City Plan 2040, which has undergoing Regulation 19 consultation. The City Plan has been submitted to the Secretary of State and it is anticipated to be examined in public in Spring 2025. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
62. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of no or very limited weight and will not be referred to in this report.
63. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
64. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”. Other relevant sections of the NPPF are set out in the following paragraphs.
65. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
66. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
67. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
68. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
69. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
70. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
71. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
72. Paragraph 103 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
73. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 states that *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”*.

74. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
75. Paragraph 117 states that *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”*.
76. Chapter 11 of the NPPF seeks to achieve effective use of the land. Paragraph 123 advises that *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*
77. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*
78. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
79. Paragraph 136 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere

in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'

80. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
81. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
82. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
83. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
84. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
85. Paragraph 203 of the NPPF advises, "*In determining applications, local planning authorities should take account of:*
 - a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

- c) *the desirability of new development making a positive contribution to local character and distinctiveness.*”
86. Paragraph 205 of the NPPF advises *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
87. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
88. Paragraph 208 of the NPPF states *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”*.
89. Paragraph 209 of the NPPF states *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
90. Paragraph 212 of the NPPF states *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*

Statutory Duties

91. The Corporation, in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
92. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
93. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).
94. In considering whether to grant listed building consent the CoL is to have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses (section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990).
95. In considering the planning and listed building applications before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses.

Main Considerations

96. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
97. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.
98. The principal issues in considering this application are:

- a) The principle of development, including the appropriateness of the proposed uses, including the proposed office use, the flexible community/education/cultural/amenity offer and other flexible retain uses.
- b) The economic impacts/benefits of the proposal.
- c) The appropriateness of the site to accommodate a tall building.
- d) The impact of the of the development on the character and appearance of the area and the design of the building itself.
- e) The impact of the proposal on the Tower of London World Heritage Site.
- f) The impact on strategic views in the London Views Management Framework and on other strategic local views.
- g) The impacts of the proposal on the setting and significance of heritage assets.
- h) The proposed public realm benefits and cultural/community/educational offer
- i) The potential impacts of the development on buried archaeology.
- j) The impacts of the development in terms of accessibility and inclusivity.
- k) The impact on the development in highway and transportation terms and cycle parking provision.
- l) The impact of the development in terms of energy, sustainability and climate change.
- m) The impact of the development on ecology.
- n) The environmental impacts of the proposal including wind microclimate, daylight, sunlight and overshadowing, air quality, building resource efficiency, energy consumption and sustainability.
- o) The impact of the proposed development on the amenity of nearby residential and other occupiers.
- p) The impacts in terms of security and suicide prevention.
- q) The outcome of the Health Impact Assessment.
- r) The impacts of the development on fire safety.
- s) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
- t) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights.
- u) The requirement for the development to secure financial contributions and other planning obligations.

Principle of Development - Economic Considerations

99. The National Planning Policy Framework places significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. Significant weight is to be given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to the economic benefits will depend on the nature and

extent of those benefits in the light of any other planning considerations relevant to the assessment.

100. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
101. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
102. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprise Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
103. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. That policy does not require a decision maker to assign a uniform level of weight- the weight to be ascribed to the economic benefits depends upon the nature and extent of the benefits in the light of any other planning considerations relevant to the assessment. The NPPF (at paragraph 87) also states that planning decisions should recognise and address the specific locational requirements of different sectors.

104. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
105. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
106. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
107. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.
108. In terms of the Local Plan 2015 Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross

during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

109. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.
110. The application site is located within an area identified as the Eastern Cluster in the Local Plan 2015 and within the City Cluster Tall Buildings area identified in the draft City Plan 2040. The Cluster Policy area is defined by an illustrative diagram on the Policies Map in the adopted and a more detailed map in the emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements by, *inter alia*:
- Increasing the provision of attractive world class buildings that are sustainable and offer a range of office accommodation to cater for the needs of varied office occupiers;
 - Encouraging complementary uses including leisure, culture and retail to support the primary office function in this area and providing active frontages at ground level.
 - Requiring the provision of new and improved open spaces at ground level, free to enter publicly accessible spaces such as roof gardens and roof terraces, and cultural and leisure destinations and other facilities, that will provide additional public space and experiences for people working in the City alongside visitors and residents.

- Delivering tall buildings on appropriate sites in line with Policy S12 (Tall buildings) ensuring they positively contribute to the City's skyline, preserving heritage assets and their settings, taking account of the effect on the London skyline and on protected views;
- Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map). Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue's setting are preserved and enhanced.
- Protecting the City's businesses, workers, residents and visitors against crime and terrorism by promoting the natural surveillance of streets, open spaces and buildings and implementing area-wide security measures, funded in part through s106 planning obligations;
- Delivering a high quality public realm, maintaining the quality of the microclimate and increasing urban greening;
- Activating streets, spaces and public realm at the ground floor and improving wayfinding through the streets and alleys;
- Improving walking and cycling into and through the Cluster. Pedestrian movement should be given priority through re-allocation of road space on key routes during daytime;
- Ensuring the provision of high quality utilities and communications infrastructure and efficient use of the subsurface through early engagement and joint working between developers and utility providers;
- Ensuring an area wide approach is taken to security and estate management to ensure the safety and comfort of workers and visitors, with a high quality public realm and environment that reflects the status of the area;
- Introducing new approaches to freight, construction logistics and servicing and delivering improvements to public transport to ensure the City Cluster can accommodate the planned level of growth.

111. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporations 'Destination City' vision for the square mile.

112. The proposed development would provide a primarily office lead development, providing a significant uplift in the number of full time jobs; namely from 330 to

2,470 full time jobs, as well as a material uplift in the office floorspace; namely from 10,064 sqm to 34,584sqm. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan. The anticipated economic benefits of the proposed development are material and weigh in favour of the proposed development.

Proposed Uses

113. This section of the report provides an overview in respect of the layout and proposed mix of uses on the site before appraising the acceptability of the proposed uses:

- 34,584sq of office floorspace.
- Flexible retail space at ground floor, along the Heneage Arcade, Renown House and the southeast and southwest (near the open space) sections of Holland House at ground floor.
- 300sqm of learning spaces at the ground floor (northeast section) of Holland House
- 750sqm of workspace for small enterprises, including meeting rooms, workspace and event space at part ground and part first floor of Holland House (8 meeting rooms).
- 1,170sqm of flexible community/affordable workspace at part of the first floor of Holland House and first floor of Renown House (60 desk spaces).
- 750sqm of flexible creative/education/cultural floorspace at the lower ground and ground floors of Holland House, including 40sqm of gallery space.
- Provision of multi-faith space either at the lower ground of Holland House or at the first floor of the tower.
- Provision of rehearsal/event space/sports facilities at the first floor of the tower. The rehearsal/event space can provide 110 seats, which the space would be used for sports facilities including option such as a pickleball court, 3x3 basketball court, cricket nets, badminton courts and table tennis.
- Provision of workspace for cycle repairs (City Cycles) at the lower ground of Renown House, part of Holland House and the tower. This proposed use would generate up to 10 apprenticeships.
- Provision of 120 sqm of outdoor space (urban farm).

A breakdown of the existing and proposed uses (GIA) is set out below:

Land Use	Existing	Proposed
Office (Class E(g)(i))	11,339 sqm	34,584 sqm

Display/sale of goods other than hot food (E(a))	0 sqm	504 sqm
Flexible educational/ cultural/ community/ sports/ amenity space	0 sqm	1,411 sqm
Back of House/ Ancillary	0 sqm	4,794 sqm
Total	11,339 sqm	41,293 sqm

Provision of Office Accommodation

114. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.
115. The predominant use of the proposed development is as office space, comprising of 34,584 sq.m (GIA) of Office Floorspace Class E (an uplift of 24,520 sq.m (GIA) of office floorspace on this site. The office space is classified as Grade A office space.
116. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. The draft City Plan 2040, in Policy S4, seeks to deliver 1.2 million sqm net of new office floorspace; which approximately equates to 1.6 million square metres gross, in the period between 2021 and 2040. The apparent significant reduction in the 2040 City Plan compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.
117. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or

was permitted in the City. 370,000sq.m of flexible office floorspace was approved in 2022.

118. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000 – 770,000 sqm. The proposed development would deliver a considerable amount of this floorspace target providing an uplift of 24,520 sqm delivering 1.5% towards achieving the total office floorspace (1.6 million sqm gross) to be delivered by 2040 as required by the City Plan 2040. The site is central to the City's growth modelling.
119. The typical floorplate of the proposed tower would range between 350 and 580sqm for businesses of 50-60 people supporting smaller, start-up businesses. The proposal provides an option for potential office tenants who are looking for a smaller area that is not provided in a shared space in co-living office formats. The proposed smaller office floorplates would be able to provide office tenants with their own private entrance and dedicated floor rather than sharing with other tenants, which will ensure that the floorspace is attractive to a range of potential occupiers. The Future of Office Use (June 2023) which formed part of the evidence base for the emerging City Plan stated that "*Long term growth prospects appear good in our scenarios, with the City requiring 6 – 20 million sq ft of additional office space by 2042. Much of this will be high quality office space for smaller employers*". This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers
120. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space.
121. Policy OF1 of the emerging City Plan 2040 states that office developments should where appropriate, provide a proportion of affordable workspace suitable for SMEs. The proposed development includes the provision of 1,176 sqm of 'Community Workspace' at the first floor of Holland House comprising restored historic meeting room space and affordable office space with 60 desks which will be available at 50% of market rent for qualifying occupiers or zero rent for charities. This would fulfil the City's vision to providing inclusive workspace. The S106 agreement would include an obligation to secure and require further details of such provision.
122. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line

with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed Retail/Food and Beverage

123. Policy DM 1.5 encourages mix commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also supported by policy OF1 of the emerging City Plan.
124. The proposed scheme would provide 504 sqm of flexible retail/café space at ground floor level. The retail space would be accessed from several entrances at ground floor, along the Heneage Arcade, Renown House and the southeast and southwest (near the open space) sections of Holland House.
125. The policy requirement is for these 'town centre uses', as defined within the NPPF, to be provided primarily in Primary Shopping Areas, then Retail Links and then outside of them. The site is not within a Principal Shopping Centre or along a Retail Link as defined by the City of London Local Plan 2015 and the emerging City Plan 2040. Inclusion of main town centre uses in this location is in accordance with the local plan which encourages such uses relying on policy DM1.5.
126. The proposal would provide seven times more active frontage than currently exists. The provision of an active retail offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that "*The City Corporation will seek to make the City's retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City*". The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City's growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.

Cultural/Community/Educational/Sports/Multi-faith/Amenity uses

127. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's

communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:

- *Providing, supporting and further developing a wide range of cultural facilities.*
- *Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.*
- *Protecting existing cultural facilities where they are need.*
- *Providing visitor information and raising awareness of the City's cultural and heritage assets.*
- *Allowing hotel development where it supports the primary business or cultural role of the City.*

128. The emerging City Plan 2040 under policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.

129. Local Plan policies CS22 and DM 22.1 support the provision of community services. It is advised that development of "*new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*

- *where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;*
- *in locations which are convenient to the communities they serve;*
- *in or near identified residential areas, providing their amenity is safeguarded;*
- *as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses."*

130. Similar requirements are set out in policy HL5 of the Emerging City Plan, which expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered making a significant contribution to people's mental, spiritual and physical wellbeing, sense of community, learning and education.

131. Policy DM19.3 supports the provision of new sport and recreational facilities and encourages the provision of flexible space to accommodate a range of different uses that are accessible to all, at locations that are convenient to the communities, near existing residential areas, where they do not cause undue disturbance to neighbouring occupiers. Similar support is set in Policy HL7 of the emerging City Plan.

132. Policy DM 1.5 encourages mix commercial uses within office development. Complementary uses, include within others retailing, leisure, education and health facilities to contribute to the City's economy, character and appearance.
133. Strategic Policy CS22 supports the provision of health, social and educational facilities and opportunities for the City's residents and workers.
134. Functions of state health, education, creativity and cultural activities are also supported by Policy SD4 in the London Plan within the CAZ area.
135. As noted above, the proposed development would provide an area of 1,411sqm GIA of community, education, cultural, sports and amenity facilities, at lower ground, ground and first floor, primarily within Holland House. There will be two main parts of the proposed flexible space, the 'Holland House Hub', which would include classrooms, flexible immersive room and other rooms and the 'Creechurch Hall', which would be a multifunctional space for a range of uses including lectures, presentations, rehearsals space, sports area and multi-faith space.
136. The flexible spaces would be used for a variety of events, including charity, educational, cultural, social, multi-faith and corporate events and they are proposed to be free to use to qualifying users between 8am – 9pm on weekdays and 9am - 5pm on weekends, with private bookings outside those hours (save that Creechurch Hall will be available for 67.75 hours per week free of charge and for 13.25 hours for private hire during these hours). The majority of these uses have already been tested within Holland House through a collaborative process involving discussions with over 80 stakeholders, including education institutions, sporting organisations, charities, social enterprises and community groups, arts and culture organisations and multi-faith groups.
137. The provision of cultural/community/educational/amenity offers within development proposals is of increasing importance. The City of London contains a huge concentration of arts, leisure, recreation, community and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
138. A cultural plan accompanies the application in accordance with policy CV2 of the draft Local Plan 2040. The plan analyses the City's existing cultural

infrastructure and sets out how the proposal would support the City's continued role as a destination. Further details about the proposed plan are discussed below.

139. Through consultation with charities, educational institutions, sports organisations and arts, culture and faith groups, different needs have been highlighted, including:

- Provision of work experience opportunities in the City
- An accessible space for a school trip
- Active learning
- Affordable space to host events
- Meeting rooms and workspace
- Access to indoor sports facilities
- Space for community sporting events and tournaments
- Encouragement of the community to get more active
- Flexible event/rehearsal space
- Space that is available in the evenings and weekends
- Volunteer and sponsorship opportunities
- Calm and quiet space
- Auditorium space for services

Holland House Hub

140. A large area of Holland House, at lower ground and ground floors will be opened to the public for the first time to be used as venue for learning, creativity and culture. At ground level there will be an approximate area of 300sqm which would be mainly used as learning space for schools and community groups and it will split into two areas, the learning space and the exhibition centre. This would provide an opportunity for young people to experience the City of London and this historic building while getting informed about future career opportunities. This space would also be able to be used from local groups for hosting events.

141. Holland House Hub would be available all days of the week, between 8am and 9pm on weekdays (65 hours) and 9am till 5pm (16 hours) on weekends. It would therefore be available for a total of 81 hours a week. Of those hours 12 hours a week and 5 days a year would be available to be hired privately, resulting in 67.75 hours per week free of charge use.

142. Creative space is proposed at the lower ground. This would be 750sqm and would be available for creative, educational and cultural activities. An immersive room is proposed at the lower ground, providing a dedicated space where technology and history collide to engage visitors with the art and history of the

building, primarily supporting the educational programmes that are proposed at Holland House.

143. The cultural plan is also supported by 'week in the life' information for the Holland House Hub. The week table has been split into morning, afternoon and evening sessions for the weekdays and morning and afternoon sessions for the weekends. As this is proposed to be a multi-functional space, different uses are proposed at each session of the week.
144. The learning space would be used, within others, for educational workshops, school trips, work experience student visits, building future skills workshops, language lessons, Sunday church school, trustee meetings and it will also be available for booking for approximately 4 out of 19 sessions in a week.
145. The creative space would be used for several workshops, including art and design, artist drawing, global trade, educational and history of the building workshops, filming marketing material, creative hub sessions and programme events on Sundays.

Creechurch Hall

146. Creechurch Hall would consist of one area at the first floor level of the tower element. This would be a community led, flexible space designed to be used for multiple purposes, including rehearsals, performances, conferences, charity events, sports tournaments, faith events, and weddings.
147. Similar to Holland House Hub, Creechurch Hall would be available all days of the week, between 8am and 9pm on weekdays and 9am till 5pm on weekends, being available for 67.75 hours per week free of charge and for 13.25 hours for private hire.
148. The versatile space would be equipped with retractable seating providing 110 seats, fostering artistic growth and community engagement. It is intended that the space would be used to host faith groups, charity events, music and drama workshops, as well as providing additional space for nearby schools. The aim would be to create a space where ideas are shared, skills are developed and community gets together. The space would be provided free to community partners and would be able to be hired at lower than the market price privately.
149. The area would also be able to be transformed to indoor sports space with dedicated hours for each sport, offering the following facilities and equipment:
- Pickleball courts

- 3x3 basketball court
- Cricket nets
- Two badminton courts
- Eight table tennis tables

150. The 'week in the life' timetable shows an example of how the space would be used during the weekdays and weekends in the morning, in the afternoon and in the evening (excluding weekends). Within others there will be times dedicated for sports, community music workshops, fundraiser events, performances, Friday prayers and Sunday schools.

151. It is therefore considered that, subject to a Community/Educational/Cultural/Sports/Amenity Implementation Strategy being secured in the S106 agreement to secure a year-round Programme which would establish monitorable deliverables in curation of the spaces for education workshops, school visits, sharing of knowledge and skills, cultural activities and events, sports tournaments, faith, social and charity events, rehearsals and performances, which would respond to the needs of the local and wider area and be informed by a continuing dialogue with stakeholders, users, visitors, the local community and building users, the policies referred to above would be complied with.

Other associated public offer elements

Urban Farm/ Climbing Wall

152. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not immediately overlook residential premises; adversely affect rooflines or roof profiles; result in the loss of historic or locally distinctive roof forms, features or coverings; impact on identified views. It is also noted that public access will be sought where feasible in new development. Policy DE4 of the Emerging City Plan also requires that the roof terraces are visually integrated with the overall design of the building and they optimise the potential for urban greening.

153. At the ninth-floor terrace, on top of Holland House an outdoor classroom and accessible terrace for the tenants is proposed to be designed. This would be accessible via a dedicated lift and would be open to all tenants, including those using the community workspace. The rooftop classroom would be able to provide nurturing environment for learners to explore and urban greening. It is proposed that the Urban Farm would offer the chance to facilitate a small level of food production and partner with initiatives such as Capital Growth.

154. By reason of the orientation of the terrace, intervening tower element of the development and distance from the nearby residential properties, it would not overlook any residential units. This is further assessed in the 'Impact on the residential amenity' section below. The impact of the proposed development and roof terrace on the historic building, its roof profile and identified views is assessed in the 'Design and Heritage' section below.

155. The proposal also involves the creation of an outdoor climbing wall on the façade of the tower fronting St James' Court. This would be open to the public and would offer regular climbing sessions. This would encourage health and wellbeing and support the provision of new sport and recreational facilities and encourages the provision of flexible space to accommodate a range of different uses that are accessible to all.

Public Art/Cultural offer and Heritage

156. As noted above, Holland House and in particular an area of Holland House Hub would be used as art exhibition space for permanent and rotating exhibitions of City and Guild students and local artists to display their work. Furthermore, historical elements and artwork is proposed to be displayed along Heneage Arcade to educate public about heritage. Other art initiatives would include art competitions for local schools including one round hoarding design, provision of space for artists and creatives to host micro workshops and galleries and tours within the community space of Holland House. The provision of public art and all the abovementioned art initiatives would be secured via S106 obligations.

Ground level Public Realm

157. The proposed landscaped public realm, St James' Court, to the southeast of the tower element would provide an area open to the public at all times with seating to be used by workers, visitors and residents. Part of the area would be covered under the colonnade, incorporating local artist work installations.

158. A route through, Heneage Arcade, will be created traversing the tower at ground floor linking Bury Street with Heneage Lane, to reintroduce a historic City route. Along the new route through there will be retail units, activating the space.

159. Further details on the operation of the public realm would be secured through the cultural strategy and the public realm management plan.

Changing Place/ Public Toilet/ Drinking Fountain

160. London Plan Policy S6 states that large-scale developments that are open to public should provide and secure the future management of free publicly-accessible toilets suitable for a range of users, including disabled people and free 'changing places' toilets designed in accordance with the guidance in the British Standard BS8300-2:2018. Similar standards are set in policy HL6 of the emerging City Plan 2040. A widespread distribution of public toilets to support demand is also required by policy DM22.2 of the Local Plan 2015.
161. The proposed development would incorporate a 'changing place' accessed via the office reception along Heneage Arcade. The 'changing place', as designed appears to not meet the current British Standards. However, it is considered the ground floor area is not so constrained as to render it impossible to provide one that meets the minimum requirements in terms of dimensions and facilities. For that reason, it is considered reasonable that a condition is imposed ensuring that the 'changing place' proposed is provided in accordance with the British Standards. This facility would have to be made available to the public for the duration of the use of Heneage Arcade (between 7am and 11pm).
162. The proposed development also includes an accessible toilet between Renown House and Holland House. Further toilets, including an accessible toilet are proposed within Holland House. Although the toilets within Holland House would be accessible from the users of the visiting the Holland House Hub, the accessible toilet between the two buildings can be made publicly accessible. A condition will be imposed ensuring that this accessible toilet, which is easily accessed via the step free entrance of Renown House would be made available to the public for the duration of the operational hours of the area, between 7am and 11pm. The public facility would have to be advertised at the entrance of the building.
163. The provision of free drinking water at appropriate locations in new public realm is highlighted in both policy D8 of the London Plan and policy DE3 of the emerging City Plan. A drinking fountain is proposed to be installed along Heneage Arcade. A condition to secure the details and its provision for the lifetime of the development would be secured by condition.
164. Maintenance of the abovementioned facilities would be secured via a planning obligation in the S106 agreement.
165. Subject to the imposition of the abovementioned conditions, it is considered that the proposed development would be able to secure significant benefits to meet the needs of the area and its users and would promote equality of access to much needed facilities.

Cycle Repair space

166. The Proposed Development includes the delivery of dedicated cycle repair space at lower ground floor level within the tower element of the scheme and renown House. In particular, three cycle repair stations are proposed. This social enterprise would support young adults in offering bike mechanic training and jobs servicing the office tenants' bikes in addition to providing a street presence in Heneage Lane to serve the local community.
167. This offer would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community in accordance with policies CS4 and CS22 of the Local Plan.

Conclusion

168. It is considered that the proposal would deliver a compelling new community/educational/cultural/amenity/sports offer for the City that would align with the Destination City agenda. Final details of the operation and marketing of the spaces, uses and public art would be secured through the S.106 and as part of the Implementation Strategy. The proposal would therefore accord with policy CS11, CS22, DM1.5, DM10.3, DM19.3 and DM22.1 of the Local Plan 2015 and policies CV2, HL5, HL7 and DE4 of the emerging City Plan 2040.

Architecture, Urban Design and Heritage

169. The relevant local policies for consideration in this section are CS7, S10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, CS12, CS12, DM12.1, DM12.2, DM12.3 CS13, CS14, CS16 and DM16.2 of the Local Plan (2015) policies and HL1, S8, DE1, DE2, DE3, DE4, DE8, S11, HE1, HE3, S12, S13, S21, AT1, of the emerging City Plan 2040, and London Plan (2021) policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4 and GG1-6.

Principle of a Tall Building

170. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12 (1), >75m AOD) and London Plan D9 (A).
171. The application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4.

It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.

172. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the draft City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).
173. The application site is in the Eastern/City Cluster and as such is identified in these Plans as a suitable location for a tall building in the strategic sense; for the spatial purposes of London Plan policy D9 (B), the application site, due to its Cluster location, is in a location identified as suitable for tall buildings in the Development Plan. In its Stage 1 letter the GLA state that 'in line with London Plan policy D9 B (3)' the site is located in an area which is potentially suitable for tall buildings.
174. This location makes the application site important to the City's growth modelling, the significant majority of which will be accommodated in a consolidating City Cluster of tall buildings and would deliver 34,584 sqm (which is c.1.5%) of the required commercial space to meet projected economic and employment growth demand until 2040. This strategic quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
175. The proposal is in the proposed City Cluster Tall Buildings Area and would comply with the contour lines of the proposed City Cluster as set out in the draft City Plan 2040. The shoulder of the lowermost part of the massing would, in the language of draft policy S12, mediate successfully between the 90m and 100m contour lines which relate to that part of the site; and the top of the building, at 178.7m AOD, would sit comfortably below the 180m and 200m contour lines which relate to the rest of the site. As such, it would accord with the objectives of the proposed City Cluster contour lines, which are to minimise the possibility of harm being caused to the settings and significance of the three Strategically Important Landmarks, including the WHS.
176. At a more local level, the proposal is located in the Creechurch Conservation Area which lies within the City Cluster. Adopted Local Plan 2015 policy CS14 (2) states that the City will refuse planning permission for tall buildings within 'inappropriate areas' including conservation areas. Thus, at this level, the application site would be inappropriate for a tall building because it is in a conservation area. For clarity, this aspect of the policy is not included in the draft City Plan 2040.

177. The proposal would be in the Eastern/City Cluster Key Areas of Change in both the 2015 and 2040 Plans. Whilst it draws in-principle support from the fact that the site lies within the identified Cluster, the proposal would conflict with Local Plan policy CS7 (3), due to its location also within a conservation area, and with emerging policy S21 (5), as it does not preserve the significance of grade II* listed Holland House. In respect of the latter, the City Plan 2040 is about to undergo Examination in Public and consequently its provisions can be afforded only limited weight.
178. Because of the conflicts with Local Plan policies CS7 (3) and CS14 (2), the proposal would not be a site or in an area identified as suitable for a tall building, and this would mean that the proposal would not comply with D9 B (3).
179. In *R (oao LB of Hillingdon) v. Mayor of London* [2021], the High Court held that London Plan policy D9 B was not a pre-condition or 'gateway' to the application of the criteria in D9 C. In other words, even where a proposed tall building falls outside an area identified as suitable in a Development Plan under part B, the impact of the tall building as set out in Part C should still be considered.
180. As such, an assessment against London Plan policy D9 (C) and (D) is made below, with reference to other sections of this report for more detail. It is found that the proposal would largely satisfy the criteria in (C) and (D) and, most relevantly, the proposal would not cause harm to the significance of the Creechurch Conservation Area.
181. As such, the proposal is considered to comply with London Plan D9 C and D, but would conflict with D9 B (3), Local Plan policy CS7(3) and CS14 (2). This conflict with a Development Plan policy is addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.
182. The effect of policy CS14 (2) is to indicate that planning permission should be refused for tall buildings within a conservation area, being an inappropriate area for the purposes of the application of the policy. The policy does not require that every application for a tall building in a conservation area must be refused; other factors should also be considered. After considering the impacts of the proposed tall building in the assessment that follows, and in particular because it has been concluded that no harm would be caused to the conservation area as a result of the proposed development, and as the London Plan policy D9 C criteria area satisfied, officers consider that the principle of locating a tall building on this site in the defined Eastern Cluster is acceptable, notwithstanding the conflict with CS14 (2). The proposal is supported by adopted policy CS1, which seeks to ensure the Cluster can accommodate the Plan's significant growth in office and employment floorspace, whilst drawing support from CS14 (1) (Tall Buildings),

which seeks to consolidate tall buildings where they are least impactful on the strategic heritage and character of the CoL and London. This balance is at the heart of the design-led optimisation of site capacity when assessing this against wider heritage and design policies.

183. The GLA Stage 1 Letter states defers judgement on London Plan Policy D9 until stage 2 of the decision making process (this occurs once the application has been considered by the local planning authority).

Tall Building – Impacts

184. The site is in the centre of the City Cluster, a carefully curated collection of tall buildings which serves as the heart of the City and London's financial and insurance industry. The City Cluster is an established part of the City's and London's skyline and its long-term consolidation and curation is anticipated under the draft City Plan 2040. The relationship of the proposal to the composition of the City Cluster has been carefully considered in a range of long, mid-range and immediate views.

185. This section assesses the proposals against the requirements of policy D9 (C) (1-3) and (D) of the London Plan. The visual, functional, and environmental impacts are addressed in turn. Further assessment follows on below in the 'Architecture and Urban Design' and 'Strategic Views and Heritage' sections.

Visual Impacts

186. At ground plus 43 storeys (178.7m AOD), the proposal would be one of the lower towers in the City Cluster, commensurate with its status as a tower proposed at the Cluster's edge rather than its centre. Comparison is given below with the other existing and consented tall buildings in the Cluster (in descending AOD height order), with the proposal noted in **bold**:

- 1 Undershaft: 304.9m (2016 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate: 284.68m (resolution to approve)
- 100 Leadenhall: 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m

- 30 St Mary Axe (the 'Gherkin'): 195m
-
- Leadenhall Court: 182.7m
- Bury Street proposal to which this report relates (178.7m)
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m

187. The impact of the proposals upon the City and wider London skyline has fundamentally informed the design-led optimisation of the site and officers support the overall form and massing strategy. This represents an efficient use of the site, that would form part of the heart of a dense, consolidating cluster of tall buildings including 122 Leadenhall Street (the Leadenhall Building), 22 Bishopsgate, 55 Bishopsgate, 100 Bishopsgate, 100 Leadenhall, 30 St Mary Axe and Tower 42.

188. The proposal would take the form of a pale blue faience tower massed in three stages: broadest at its base, then slenderer in its middle section and slenderest in its topmost stage which reach approximately the height of the Gherkin. Its height and massing have been fundamentally informed by the most important view it has the potential to affect: that from Tower Bridge of the Tower of London World Heritage Site, although consideration has been given to its presence in a great number of other views too, as set out the sections below. The height and massing proposed would ensure the proposal reads as clear endpiece to the eastern edge of the Cluster, of a height commensurate with its position at the edge rather than the centre.

189. In relation to long range views D9 C (1; a; i), the proposal would form a clear endpiece to the eastern edge of the City Cluster. As such it would be clearly visible in the long-range views from Greenwich and Blackheath, positioned in front of the Gherkin. Due its position, it would otherwise be largely or fully occluded by the existing Cluster buildings in the views from the northern hills. As such, the siting and height of the proposal would ensure it reinforces the edge of the Cluster rather than creating a more conspicuous change in these views; as such, the development would comply with Policy D9 C (1 a; i)

190. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), much of the comments and objections from statutory consultees, including from Historic England, Historic Royal Palaces, the GLA and others relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

191. In both baseline and cumulative scenarios, in mid-range views particularly from the south-east, east and north, the proposal would appear on the eastern edge of the Cluster, intrinsic to reinforcing and defining its overall silhouette and form. From Tower Bridge and The Queen's Walk, it would appear as a clear endpiece to the emerging Cluster, of a scale commensurate with its position as an edge rather than more central component of the Cluster. From the east, including from Whitechapel Road and Commercial Road, the development would also be perceived as part of the Cluster, standing at a clearly subsidiary scale before the taller buildings at the apex of the Cluster, while in views from the north, including from Shoreditch High Street, it would be less visible, glimpsed as part of the Cluster's stepping down to the east.
192. Due its position on the eastern edge of the Cluster, the proposal would be mostly screened in views from the south west and west, glimpsed in some of the views from the Thames bridges but otherwise largely occluded. In views from Fleet Street, the development would be completely screened by existing buildings in the Cluster, maintaining the primacy of St Paul's Cathedral.
193. From these mid-range distances, the observer would begin to experience the elegant form of the proposals, with its sophisticated pale blue faience becoming apparent and edging the Cluster with pleasing solidity. The highly distinct façade of the building would calmly stand out from the rest of the fully glazed buildings in the Cluster and help to emphasise its status as an edge component. In relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).
194. In relation to immediate views, London Plan D9 C (1; a; iii), the proposal would be located in the western zone of the Creechurch Conservation Area where it meets the heart of the City Cluster. The tower element of the proposal would, in the majority of local view experiences, such as from Gherkin Plaza, Bevis Marks, the Synagogue Courtyard and Aldgate Square, be seen rising behind the low-rise buildings in the foreground of these views in a manner entirely characteristic of this intensely developed part of the Cluster. Its pale blue faience elevations would form a high quality new addition to this dynamic townscape character. The tower element would be seen coming to ground in the views along Creechurch Lane and along Mitre Street, where it would be seen to form a high quality new landmark in the locality, particularly in the views along Mitre Street. have a landmark quality.
195. The proposed development has been designed to activate the ground floor and to optimise inclusive public realm around the footprint of the tower element through Heneage Arcade and James' Court; it would bestow new uses upon the lower levels of Holland House and Renown House and open them up to a wider demographic. The building would provide new and interactive frontages on all sides of its tower element, that would be of pedestrian scale that engage and

acknowledge the historic context and specifically the neighbouring medieval churches. Active frontages, urban greenery and high-quality architecture would invite people to the site as a destination, place to linger or connection route through this eastern edge of the Cluster. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

196. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would be an important and clear endpiece to the eastern edge of the Cluster in key views from the south, south-east and east, playing an important role in consolidating the Cluster's skyline view and presence when seen from these areas.
197. In this, and like other conspicuous Cluster schemes, it would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital, where the Cluster identifies the original commercial heart of London since Roman times.
198. As assessed elsewhere in this report, at a macro character and identity level, the consolidation of the Cluster achieved by the proposal would allow the observer of strategic views to better orientate themselves, assisting in a recognition and appreciation of other strategic London landmarks as part of a more coherent whole. In local views the proposal will assist in consolidating the Cluster form so that its form can be further reinforced. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).
199. In relation to D9 C (1; c), the architectural quality and materials are exemplary and would be maintained through the life span of the proposal and this is elaborated upon in the 'Architecture' section below. The tower would be visually split into four main parts: the triple-height base incorporating the Heneage Arcade, the podium block, the slenderer tower above and the slenderest crown element of the tower. This stepped profile would achieve an elegance, particularly in views from the south and south-east, that would be enhanced by its dressing in high-quality and subtly articulated pale blue faience elevations. The roof extensions to Holland House would be highly discreet in relation to the important original views of the building, and of a recessive and high-quality terracotta presence in longer views. Overall, the architecture is clearly well-considered in the round and of a high quality, would be visually distinctive and an attractive addition to the skyline in of itself, compliant with D9 C (1; c).

200. In relation to D9 C (1; d), a full assessment of impact with regards to heritage assets is detailed in the Heritage section of the report. Officers have identified that the proposal would cause a low level of less than substantial harm to the significance of Holland House (grade II* listed) through the roofing over and infilling of part of its atrium.
201. Historic England have identified harm arising to a number of heritage assets, at the middle to low range of less than substantial, including the Tower of London WHS, Bevis Marks Synagogue, Holland House and Creechurch Conservation Area. Their conclusions on harm to the WHS and the Synagogue are shared by many other objectors.
202. The GLA have identified that the proposal would cause less than substantial harm, from the middle to the low range, to a number of heritage assets. They state that “The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to designated heritage assets. Nonetheless, further information is still needed to confirm impacts in full. The final NPPF paragraph 208 balance will be carried out at the Mayor’s decision-making stage.
203. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for the proposed development. The development would optimise the capacity of the site and deliver an essential contribution of required office space as is set out in the office section of this report. To optimise the site, while minimising harm, alternatives have been explored, including numerous iterations of the height and massing profile of the tower in order to arrive at a comfortable presence in relation to the Tower of London WHS, and the quantum, positioning and architectural design of the roof extensions to Holland House and Renown House.
204. While the adverse heritage impacts to Holland House are not entirely mitigated, they have been minimised by a design-led approach which has included the exploration of alternative forms of development; the proposal is considered to strike the right balance between conservation and growth in optimising the site and clear heritage and public benefits flow from the development and outweigh the harm identified. This is detailed in the planning balance section of the report. As such the proposal is considered to comply with D9 C (1; d).
205. In respect of D9 C (1; e), the proposal’s siting at the eastern edge of the Cluster means that it would be visible to varying degrees of prominence in relation to the Tower of London WHS. As mentioned, this has been the focus of many objections to the proposal, including from Historic England and Historic Royal Palaces. The proposal has been found through detailed analysis, referred to later in this report,

not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. In relation the view from Tower Bridge, the focus of the objections and where the juxtaposition between the proposal and the WHS is acutest, the proposal would have a slender, tapering profile which would be appropriately deferential to the WHS and be commensurate with its status as an edge component of the Cluster. Officers consider that the proposal's strategic siting within the long-established and consolidating Cluster backdrop, and its intervening distance from and height in relation to the WHS, would mean that it would preserve the OUV of the WHS and comply with D9 C (1; e).

206. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. It would form a clear eastern endpiece to the consolidating City Cluster. Due to its location at the eastern edge of the Cluster, its distance and intervening built fabric layering, as well as its strategically driven height aiming to consolidate the cluster, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).
207. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered at its worse to be minor adverse but the effects are not significant, as discussed in the relevant section in this report. Further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9 C (1; g) of the London Plan.
208. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with Local Plan policy D9 C (1; h).

Functional Impact

209. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants and are considered to be in accordance with London Plan Policy D9 C (2; a).
210. The proposed servicing strategy would utilise the existing servicing area of Valiant House. Vehicle bays for servicing and deliveries would be positioned towards the northern edge of the site, off Heneage Lane, these loading bays would provide access to the building management facilities within the basement of the site through goods lifts. This arrangement and positioning of the servicing bay is considered to be the most suitable position for unloading/loading activity considering the other edges of the site, where pedestrian footfall is likely to be higher and where there could be a greater degree of conflict between users.
211. The proposed Framework Delivery and Servicing Plan includes significant consolidation. The FDSP would ensure that deliveries are managed and time-limited for safety. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). The servicing bay, and the associated hours of operation, have been considered to minimise the impact on the surrounding public realm and pedestrian routes. Out of hours servicing, and the hours of closure on the Heneage Arcade, would work in conjunction with pedestrian desire lines. Further details in respect of the servicing approach are set out in the Transportation section of this report.
212. Entrances at ground floor level would provide access to the public and office spaces throughout the building. The entrance doors would be set into glass façades to enhance transparency and extend the external public space into the ground floor receptions and retail spaces. The public 'heritage lobby' entrance doors and reception lobby for access the publicly accessible areas and the office floors would be positioned on the Heneage Arcade, furthermore, the lobby's and lifts have been sized to accommodate visitors to the building. This access arrangement, off Heneage Arcade, would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. This is in accordance with D9;C;2;c.
213. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as a result of the development. The impact will require some interventions to the highway which will be developed in detail as part of the S278 agreement. The S106 agreement will require the developer to enter into a S278 agreement with the City of London to

undertake any works to mitigate the impact of the development in accordance with (D9;C;2;c).

214. In particular, the provision of cultural space, community space, educational space and office floor space will promote the creation of jobs, services, facilities and economic activity will act as a catalyst for future growth and change in the locale in accordance with (D9;C;2;e).

215. With the imposition of conditions, no adverse effects have been identified on the operation of London's aviation navigation and the proposals have also been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).

Environmental Impact

216. In regard to D9 C (3; a) the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions and would not compromise the comfort and enjoyment of the public realm at ground floor level. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report. It is considered the proposal would meet the environmental considerations of Policy D9 C (3).

Public Access

217. The policy states that publicly accessible space should be incorporated into tall buildings, where appropriate, particularly more prominent tall buildings where they should normally be at the top of the building. In this instance, given the context of the Reasons for Refusal of the previous scheme, officers consider that the provision of an elevated viewing gallery would not be appropriate in this location. Instead, the proposal would turn over significant areas of the lower levels of the site to a wider demographic.

218. Heneage Arcade would be a new public thoroughfare positioned such as to re-open a lost historic street; portions of Holland House, at the lower and upper levels, would be dedicated to educational, cultural and community spaces. These spaces would be accessible and free of charge to the public for 81 hours per week with 67.75 hours per week free of charge use, despite being free of charge, officers believe this satisfies the intent of the policy, the necessity to book space within

these uses is appropriate given the nature, function and use type of the publicly accessible space. Access would be provided via the historic entrances to Holland House and the new lobby off the Heneage Arcade with legible portals to each of the relevant uses. As such, the provision of publicly accessible uses in the development would be in accordance with D9 D.

Tall Building, Principle, Conclusion:

219. Overall, Officers considered the site to be acceptable for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, C and D, Local Plan policies CS7 (1,2 and 4-7) and CS 14 (1 and 4), draft City Plan 2040 S12 and S21.
220. It is recognised that, due to the proposal's location within the Creechurch Conservation Area, there would be a conflict with CS7 (3), CS 14 (2) and therefore London Plan D9 (B). This conflict with Development Plan policy is addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Architecture, Urban Design and Public Realm

221. The proposal would be a distinguished and sophisticated addition to the City Cluster. It would have excellent sustainability credentials, be aesthetically pleasing and enhance the public realm in and around the site. The proposals would positively transform the wider area. Providing new, active ground floor uses and pedestrian routes, the proposed building would stitch into the fabric of the surrounding urban grain, complementing the local neighbourhood. Visually, the existing building (31 Bury Street) is tired, and has limited architectural value, its replacement would improve its function and appearance. The Grade II* listed Holland House would also be altered, with judicious roof level additions to increase the height by several floors, and similar alterations to its neighbour Renown House, there would also be alterations to the facades, entrances and interiors.
222. The scheme would provide best in class office floor space, a new retail arcade, a pocket park, publicly accessible spaces and uses within the building, including a rehearsal space at 1st floor level and high-quality shower, changing and cycle facilities to encourage active travel.
223. The Grade II* Listed Holland House would be opened up to a much wider demographic through the provision of cultural and community uses, the proposals

would deliver a campus of civic facilities. These uses would provide space for community groups, schools, faith groups, community workspace, rehearsal and events space, sports facilities and accommodation for SME's. This broader demographic would be able to see its exceptional and vibrant interiors, accessible through a 'heritage lobby' from the proposed retail arcade. A new, attractive roofscape to Holland House would replace the unsympathetic 1960s and 1980s alterations, in addition, works to upgrade the fire safety and accessibility credentials of the building, with further works to the façade of the building and restoration of the historic fabric, would dramatically improve the function and condition of the Grade II* listed building.

224. Renown House would undergo several changes, it would have an additional 2 storeys, designed and modelled in a sensitive manner to continue the appearance of the façade below, the extension would read as a sympathetic addition to the local townscape, the height and mass of this extension would positively rationalise the building heights of its mid-height neighbours. Between Renown House and the proposed tower on 31 Bury Street, a small pocket park referred to as, "St James' Court", would have an outdoor climbing wall on the façade of the building, a dramatic, unique and playful moment in the City of London, bringing sport and activity to the heart of the cluster.

225. The proposals would offer far more to the surrounding area than the existing buildings, and would positively contribute to an active and vibrant City Cluster. The proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth the Central Activities Zone, providing employment and complementary commercial, cultural and community uses. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-3,5,6: growth which is socially, economically and environmentally inclusive. The proposal is at the heart of the strategic function of the City Cluster, to accommodate substantial growth in accordance with Local Plan Policies CS7 and London Plan Policies SD4, SD5 and E1.

226. The proposed development would provide 1.5% of the projected demand for office floor space in the City, and the proposals sought to optimise this delivery in a Plan-led approach which seeks to accommodate growth within the City Cluster. This long-term approach has created an evolving character and context of tall buildings, to which the proposal has been designed to respond. The GLA acknowledge the intensification of office floorspace would support the function of the Central Activities Zone and London's position as a World City, and the proposals are supported in land use terms. The GLA also acknowledge the location of the site in the City of London Eastern Cluster as a suitable location for tall buildings, and that the proposal represents high quality architecture, despite

some concerns with impacts on heritage assets and the design of the ground floor of the building.

227. The proposal would accord with the design-led approach of London Plan Policies D3, delivering a design solution making effective use of limited land resources, in accordance with strategic Local Plan Policy CS10 and Draft City Plan Policy S8. Various alternatives have been explored, including the 2020 refusal, and iterations of the height, massing and façade treatment have been explored by the applicants with planning officers.
228. The site is part of a dynamic, dense urban townscape, fundamentally characterised by its proximity to other tall buildings, conservations areas and listed buildings, as well as being a pivotal site central to several pedestrian routes connecting key landmarks and destinations across the Square Mile. The site is towards the eastern edge of the cluster with numerous completed tall buildings in the vicinity including the Leadenhall Building (No. 122 Leadenhall Street), 22 Bishopsgate, 6-8 Bishopsgate, 100 Bishopsgate, 40 Leadenhall Street, Bevis Marks House, 70 St Mary Axe and 115-123 Houndsditch. These large and tall modern commercial buildings are contrasted with characterful pockets of historic townscape: the defining ‘genius loci’ (‘spirit of the place’) of the Cluster. This contrast gives the City Cluster a charisma which is unique.
229. The immediate historic townscape includes the Grade II* listed Holland House (on site), Bevis Marks Synagogue (Grade I) and 38 St Mary Axe (Grade II) sit to the north and northwest respectively. The Leadenhall Street Church of Katherine Cree (Grade I) and 2-16 Creechurch Lane (Grade II) are to the south, The site is within the Creechurch Conservation Area, further afield, the St Helen’s Place Conservation Area, the Lloyds Avenue Conservation Area are in the wider vicinity. To the west, 30 St Mary Axe (a non-designated heritage asset), by Foster and Partners, is an example of an early 21st century office building of the highest architectural quality. The proposal would be consistent with the character of striking juxtapositions of old and new, it would be a new addition to and an extension of this character.

Comparison with the previous application (20/00848/FULEIA)

230. The previous application for a similar tall building on the site was refused in 2022, the proposals represent a new design approach for the site, but include a similar yet smaller tower, this application also brings in the adjacent buildings into the application, Renown House and Holland House. Architecturally, the facades of the tower are similar to the previously refused proposals, although the height and

massing has been reduced. The proposal must be considered on its own merits, however regard must be had to the previous decision and to the principle of consistency in decision making.

231. The previously refused scheme was ground plus 48 storeys and 197.94m+AOD while the proposed is ground plus 43 storeys and 178.7m+AOD. Both schemes take the approach of a rectilinear block with a slender tower element towards the south of the site, and a 'backpack' of mass at mid height towards the north of the site; the previous proposal's massing stepped once in the middle of the building, it was made of two rectangular forms. The current application steps back and chamfers at the top of the building, thinning out the tower towards the top on the northeast corner. Towards the middle, the proposals has a similar, but slightly lower rectangular block.
232. Both the previous and the current proposal have a similar architectural approach for the tower, a largely solid facade with strong horizontal and vertical elements, the façade would be made up of a combination of light and dark blue terracotta; the approach is broadly very similar, though with small yet crucial differences in emphasis. The previous proposal was more emphatically vertical, whereas the current proposal has more accentuated horizontal elements which is considered to assist with softening its presence in views of the World Heritage Site.
233. Both applications have a similar approach at ground floor level (although the previous application only included 31 Bury Street within the application boundary), by creating a pedestrian arcade through the centre of the building, lined with active uses. As previously discussed in the paragraphs above, the current application would include Renown House and Holland House, and a new 'heritage lobby' positioned on the pedestrian route through 31 Bury Street would be provided, there would be significant positive alterations, making the buildings more outward facing and inviting members of the public, a key distinction between the two applications and a benefit to the wider area. Holland House is Grade II* listed, and Renown House is a non-designated heritage asset, the impacts on these heritage assets is explained in more detail later in the report.
234. Holland House would have additional floors added to the top of the building, each additional floor would consequentially set back from Bury Street towards the centre of the block, this would replace the existing unsympathetic rooftop extensions, architecturally designed to be recessive to the architecture of the GII* listed façade. Furthermore repairs to the existing listed facades, restorations of the historic interiors, alterations to party walls and internal core alterations would be required to upgrade the building and integrate it into the wider development site. Renown House would also have additional storeys and a new contemporary mansard roof, in addition to other minor façade works and internal alterations

which would help facilitate the delivery of office floor space and cultural spaces within the respective buildings. In addition, the provision of the outdoor climbing wall in the James' Court public space is a new aspect of the proposals. Overall, the proposals would deliver a development which is mixed use, offering social and economically inclusivity to the wider area. . It is the view of officers that, as a result of the differences identified in this report, the current scheme can be distinguished from the previously refused scheme, and from the reasons which lay behind that previous decision.

Architecture

235. The proposed architecture distinguishes itself through a thoughtful and contextual articulation of base, middle and upper sections, delivering a coherent, well-proportioned building with a strong overall sense of architectural integrity. The modelling, detailing and materials are accomplished, resulting in architecture of the highest quality as befitting the City skyline. On a challenging site it works successfully at various scales and is designed to read as three elements – the ground floor public levels, a mid-section block and a slender tower above.
236. The proposed height and massing is consistent with the long-term evolution of the City Cluster, which has sought to influence development so that a considered, coherent overall shape and composition to the skyline presence of tall buildings is achieved. The height of the proposed development has been reduced such that, compared to the previously refused application on the site, the proposal would now read unmistakably as an edge instead of more central component of the Cluster.
237. It would be a clear continuation of the macro-level stepping down of the cluster towards the east, the site would act as a mediator between the lower rise context to the east and the City skyline to the west. In the baseline scenario, the proposed building would loosely follow the existing silhouette of 110 Bishopsgate (the Heron Tower), although it would appear taller in views from the southeast, the additional height would pop up to a limited degree in views from the Southbank and Tower Bridge, although not to an extent which is unusual for the cluster. In the cumulative scenario, the tower at 31 Bury Street would play an important role in the mediating between cluster and the lower buildings to the east, particularly when compared to 100 Leadenhall and 1 Undershaft, consultees have raised concerns and/or objected to the proposals based on its height and its relationship to its context, this is discussed in more detail in the views and heritage section of the report. It is the view of officers that the proposed tower would contribute to the composition of the Cluster in providing an important graduation against its neighbouring group of tall buildings.

238. The height of the proposed building would complement and highlight the City skyline in strategic and distant views, maintaining an iconic townscape character for London. Rounding off this Cluster at its edges is essential to reinforcing the familiar pattern of buildings stepping up towards the centre, making the Cluster a distinct and striking feature of the City's skyline.
239. The proposed building would be the first tower in the City to be clad entirely in faience, giving it a unique presence. The Cluster of towers comprises a rich and eclectic collection of towers, each with its own unique architectural character, resulting in a dynamic collection of individuals which combine to create a coherent Cluster. The proposal complements this key characteristic.
240. Above the ground floor, the architectural treatment of the proposed building comprises a series of pale blue faience bays with scalloped, ribbed spandrels, set between smooth columns and mullions which would create refined articulation across the façades. The sides of the rectangular window openings would incorporate vertical natural ventilation louvres, successfully integrating sustainable passive ventilation systems, with a 40% solid to glass ratio, to minimise solar heat gains. The pale blue hue of the faience has been selected to sympathise with, but be distinct from, the hues of other tall buildings within the City Cluster, ensuring that in views of the Tower of London World Heritage Site, the proposed building is identified as a sophisticated new addition to the Cluster. Specifically, the colour was selected to appear distinct from the buff masonry of the World Heritage Site and is considered to be a more neutral edge to the Cluster than the darker 110 Bishopsgate building.
241. At the uppermost floor levels, the double order at mid-level would recur across the uppermost office floors, this change in height of the fenestration occurs from when the massing steps inward and the tower becomes slenderer. Above these, the three-storey plant room is housed in a triple order echoing that of the ground floor but executed to a simpler pattern, a successful visual termination of the design. The mirroring and echoing of these architectural devices give the overall architectural design a cohesion which would further distinguish it on the skyline and in the local townscape. The parapets of both the mid-level 'shoulder' and the top of the building are subtly broken by the columns terminating above them to add further architectural modelling and interest. The location of plant and greening in the uppermost three storeys will cause minimal light spillage and appear restrained when seen in conjunction with the World Heritage Site.
242. From the first-floor level to the twenty-second-floor level, the massing largely follows the footprint of the building Bury House. At the twenty-second floor level there would be an external terrace. From the twenty second floor to the thirty fifth floor, the area above this northwestern terrace, the building would step back, the tower would step back again at level thirty seven. Additional terraces would be

provided at level thirty six and forty one. The provision of these terraces contributes to the provision of high quality office floor space, and the massing has been sculpted in an integral and organic architectural manner whilst responding to strategic views of the Tower of London and other sensitive views.

243. The tower base would take the form of a 'triple order' of faience columns wrapping around the building from the south-west to the north-east, rooted in a granite plinth and rising to a strong cornice line which would be a focal point for further public artwork. This 'triple order' device builds upon architectural precedent elsewhere in the locality and would relate the building appropriately to its townscape. The faience of these areas would be executed in a darker blue hue to further differentiate them from the upper storeys. Their colour tone, materiality and modelling would ensure the proposed building relates appropriately to its local setting at street level; the Creechurch locality here is characterised by a number of unlisted brick and terracotta historic buildings and the sophisticated faience of the grade II* listed Holland House.
244. Holland House would be extended at roof level to provide additional accommodation within the building, this would replace the indifferent 1960s, low quality rooftop additions. Attractively modelled, finished in faience, these upper layers would read as a lightweight top when seen in glimpsed views from the southside of Gherkin Plaza. This rooftop extension would be setback from the main, western façade, respecting the primacy of the ordered yet decorative main façade, and would be scarcely visible in the original, oblique views of this façade along Bury Street. Façade repairs to the listed building would maintain the historic façade and internal alterations would integrate the building with the wider development, allowing the building to accommodate public uses which contribute positively to the surrounding area.
245. Renown House would also be extended, it would have additional floors on top, and a new contemporary mansard, with the new facades following the architectural treatment of the existing façade below, the fenestration and materials would match the existing condition. This extension would create a more uniform approach to this city block, bringing the building heights closer together in a more coherent manner. There would also be internal alterations to combine Holland House and Renown House, as part of providing the mix of uses which would contribute to the wider positivity of the development.
246. The alterations to Holland House and Renown House are discussed in more detail in the heritage section of the report.

Active Uses and Ground Floor Public Realm

247. The proposed development would transform the site into a vibrant hub for the community, with a focus on public access, vibrancy and connectivity. At the heart of the scheme is the creation of inviting and engaging publicly accessible spaces at the base and lower floors of the buildings, both on the pedestrian route through the tower, 'Heneage Place', and Holland House and Renown House, offering opportunities for community use, sport, learning and education that appeal to Londoners and visitors alike. Additionally, the development would offer flexibility to workspaces and cultural areas and reimaged and new public realm, situated within the historic interiors of Holland House. The provision of these new publicly accessible areas would add a variety of activity to the centre of the cluster, the proposals would deliver a more dynamic and varied offer of uses to its surroundings.
248. The existing building forms an irregular, impermeable block with inactive frontages to Heneage Place, Creechurch Place and Bury Street. Between it and Holland House on Bury Street there is a small, recessed area of open space with some poor-quality planting. At ground floor level, the proposed building would replace the impenetrable site with a permeable ground floor plane with increased public realm, planting and active frontages.
249. Despite the relatively small site footprint, the proposed building would provide 619 sqm of new external public realm at ground floor level as compared with the existing 352 sqm. The chief feature would be a new public pedestrian route running north-south, 'Heneage Place' which would reinstate the lost south-western end of Heneage Lane. The 'Heneage Arcade' would be generous in scale, paved in York stone to blend seamlessly into the City's existing public realm. The generous scale will draw the eye and attract the public from numerous vantages. The ceiling soffit would be eye-catching with a sense of rhythm created by the architectural 'ribs' that would further draw pedestrians through. The arcade would draw inspiration from the established tradition of covered walkways elsewhere in London and would be flanked internally by retail units, to create a new mixed-use arcade destination for the locality and the wider City, this would be complemented by a rear access point to the cultural and community uses hosted within Holland House. It would significantly raise the quantum of active frontages, making a strong contribution to the local vibrancy of the area and providing shelter in inclement weather and during hot summer days.
250. GLA officers have argued that the arcade should be opened up, to create an open colonnade through the area, City officers believe the applicant's vision for the route is the most appropriate for the site's context, it follows a key characteristic of the City's public realm where narrow streets and alleys stitch together routes and public spaces. An open colonnade with a cantilevered space is not considered by officers to be an appropriate design solution for this area. The

London Review Panel and the GLA have suggested this route should be open 24 hours a day and be publicly accessible, the hours of operation of the route would be 7am-11pm.

251. A public realm management plan will be secured through the s106, to agreement the maintenance and management of the public space and the rules governing it, with the intent to maximise public access and limit rules governing the space insofar as reasonably possible.
252. The arcade would be enriched by a curated and flexible programme of permanent, bespoke architectural sculpture integrated into the structural members, portraying local and City-wide historical and contemporary themes, including interpretation of the former Holy Trinity Priory which survives below the wider area. This would be developed in collaboration with craftspeople studying at the City & Guilds School and the Sculpture in the City initiative and would constitute not only a major new piece of public art but also make the Heneage Arcade a cultural destination in its own right. Furthermore, a free drinking water fountain would be provided in the public realm. The details of this would be secured by S106 obligations.
253. At the southern exit of Heneage Arcade, the existing, rather drab open space between 31 Bury Street and Holland House would be reimagined as a pocket park, 'James' Court'. This would help to increase the area of public realm at the heart of the dense Cluster, opening up the entire ground floor plane on the south-west part of the site to pedestrians, as well as, creating a new amenity space for people in the locality. It would host the theatrical climbing wall, hanging above the space, adding visual interest to the area, encouraging physical exercise by being visibly on display, a unique offer to the cluster which is likely to appeal to a wide demographic. The new James' Court would also increase the quantity of urban greening in this location, with a generous nine-storey high green wall rising above the pocket park on the proposed building creating a humane, gentle environment conducive to public use.

Optimising Active Travel

254. The proposals would have an impact on the appearance and function of Creechurch Lane and Bury Street, the development would generate pedestrian footfall in particular, as addressed in the Transport section of this report and Strategic Transport Report. Cycle movement is also expected to increase in the vicinity of the site. There would be an impact on the townscape and heritage assets, as well as some microclimatic impacts.

255. The execution of highway works would be provided for in a s278 Highways Act 1980 agreement, secured through the s106, which would include works on Creechurch Lane and Bury Street to mitigate these impacts, in accordance with Policy VT1 of the Draft City Plan 2040 and T4 of the London Plan 2021. This s278 agreement would include alterations to the physical infrastructure on the street, including alterations to the pavement kerb lines and upgrading the surface materials to York stone for the footways and granite setts for the carriageway in accordance with the CoL technical palette of materials.
256. These interventions would represent an improvement to the environment for pedestrians, both in terms of its functional design and visual amenity, the existing pavement and surfaces are in poor condition. Creechurch Lane and Bury Street currently below the standards of neighbouring streets, the paving materials are inconsistent and low quality, and the carriageway prioritises vehicles over pedestrians, in an area where vehicle movement volumes are low. The immediate vicinity of the site has active ground floor uses, including pubs and restaurants, upgrading the physical infrastructure of the street will improve the attractiveness of the streetscape. The City Cluster Vision 2019 identifies this area and the proposed enhancements are broadly in accordance with what's set out in the strategy, these works are considered to be a benefit of the scheme which would mitigate the impact of the development and enhance the surrounding area. Furthermore, the proposed 'City Cycles' facility in the basement of the building would provide maintenance and repairs services for those who cycle, encouraging active travel through enhancing convenience and amenity for user.

Public Access

257. Publicly accessible space would also be created within the building. As well as the north-south entrances to Heneage Arcade, the middle bay of the proposed building's Creechurch Place elevation would incorporate a focal entrance aligned on Mitre Street which would lead directly to the main office entrance for accessing the upper floors.
258. The Creechurch Place entrance would also provide access, via staircase and lifts, to the 'Creechurch Hall', a series of new publicly accessible intended to be analogous to a village hall or community centre. It would provide a bookable, inclusive and free for all new space for public use, targeted at individuals, community groups and other organisations from the locality and beyond, including from those more economically disadvantaged areas around the City fringe. The space has the potential to serve a rich, diverse community from all backgrounds

in a socially and economically inclusive manner. Access from the ground floor would connect to lifts and the ground floor of Holland House and Renown House, from these areas people can take the stairs or lifts to the other spaces and uses across the proposed tower or through the internal circulation of Holland and Renown House. At first floor level, within the tower of Holland House, a large auditorium would provide capacity to host events, furthermore, the lower ground floor level would also complement the ground floor offer. The provision of community uses would be a significant provision to the locality and the wider City.

259. The elevations to lower floors of the tower would be treated differently from the rest of the building to reflect and celebrate their public status, particularly Heneage Place, other public uses would largely be located within the GII* listed Holland House, boosting its appeal as a destination. Overall, the proposals would integrate unique civic experiential offerings in support of the City's wider 'Destination City' initiative, providing a rich mix of public uses which would enliven the City Cluster as a vibrant, 24/7 destination. The people-focussed lower floors of all buildings within the application boundary and the varied cultural offer throughout the base of the building would create a rich tapestry of uses and activities, in accordance with London Plan policy D3, Local Plan policies CS10, DM10.1, DM10.3 and emerging City Plan 2040 S8.

Delivering Good Design and Design Scrutiny

260. Officers consider that the application process has adhered to the policy approach set out in London Plan D4 Delivering Good Design. In respect of D4 A, the applicant's evolution of site development was design-led to deliver high quality design and place making and this is detailed in the Tall Building, Architecture and Urban Design section of the report, it is also covered in the comparison with the previously refused application.
261. With regard to D4 B, the pre-application process including formal meetings, workshops using digital and physical visual tools, and site visits as part of the design analysis and interrogation to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.
262. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. Transport data has informed options and evidence for the provision of transport related infrastructure. Environmental microclimate, daylight and sunlight analysis informed the massing

and design treatment as well as the public realm and landscaping. Wider engagement by the applicant is set out elsewhere in the report. Part D4 C has been met and a detailed design and access statement has been submitted.

263. In respect of D4 D, the proposals have been to the London Review Panel, they have undergone a rigorous local borough process of design scrutiny as required by the policy. In addition, the applicants undertook preapplication engagement with a variety of stakeholders, including the GLA, Historic Royal Palaces, Historic England and others. The design and access statement sets out how the scheme has changed and evolved as a result of officer and stakeholder feedback, showing the evolution of the scheme and the 'moves' taken to respond to comments.
264. In relation to D4 E, parts 1-6, there has been a City level of scrutiny comprising extensive officer topic-based reviews over multiple pre-application meetings; external input has been provided by other experts as set out above. In addition, the applicants brought the scheme to the London Review Panel which was attended by experts from different disciplines, these comments were mindful of the policy context and clearly set out recommendations. The London Review Panel set out several recommendations which have been considered by the design team. City of London officers views on topics which the LRP comments have been set out elsewhere in the architecture, heritage and views section of this report.
265. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity and avoid deferring large elements of the development to the conditions. The recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard.
266. Overall, the application process has adhered to the policy approach set out in London Plan D4 Delivering Good Design.

Amenity Space and Terraces

267. The amenity terraces have been designed with adopted policy DM 10.3, and draft policy DE4 in mind, utilising the form of the building and integrated in its mass, would avoid any adverse impacts on identified views.
268. On the Bury House Tower at twenty-second floor level there would be a large external terrace, additional terraces would be provided at level thirty six and forty

one. The provision of these terraces contributes to the provision of high quality office floor space, and they have been designed as a distinct but fully integrated aspect of the building. These terraces would help to provide best in class office accommodation by providing amenity and break out space for the office occupants. Planting would be provided on these areas, to provide biodiversity and well-being benefits. They would have a negligible impact on long range views, small amounts of potential greening would provide visual interest at a high level where it is visible.

269. On the upper levels of the roofscape of Holland House, there would be terraces which provide amenity to the office occupants and the potential cultural partners of the building. These terraces would have limited visual impact, at range, balustrades would barely be perceptible, closer to the building they would be set back from the façade line of the building limiting visibility from street level. Where visible, viewers would see the balustrades, planting and landscaping. The planting would provide privacy, screening from overlooking and visual amenity, whilst providing a pleasant environment for the occupants.

270. The provision of the Urban Farm on the 9th floor level would accompany the proposed cultural and community spaces, it would facilitate a small amount of food production but would chiefly be used for educational purposes and partnerships with relevant organisations. This terraced area would further enhance the amount of green infrastructure, offering biodiversity gains and re-connecting people with the green environment.

Servicing, Plant Equipment and Integration into the Design

271. Facade maintenance and cleaning have been carefully considered. High level access from the main roof and intermediate terraces would be via permanently installed Building Maintenance Units (BMU). BMUs would be located at roof level. When not in use, the BMUs would be parked inboard and would not be visible. The systems are designed to be visually integrated into the architectural form when non-operational. Mechanical and electrical plant rooms would be distributed throughout the building and at the uppermost levels of the Bury St tower, largely concealed from view, where they do appear, they would be visually integrated into the facade design. The main plant levels would be located in the basement and on the upper levels of the tower. This is in accordance with Local Plan Policy DM10.1 (bullet 7) and Draft Policy S8(21).

Lighting

272. Lighting, in accordance with the City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be secured via condition. 125. Overall, the proposed building is considered to harmonise with the principles of paragraph 130 of the NPPF in that it is a building which is sustainable and beautiful, being a well-designed proposal which would enhance the City's architectural character and would be sympathetic to the character of the locality, function well and add to the overall quality of the area.

Conclusion on Architecture:

273. Overall, the architectural credentials of the proposed development would be excellent. It follows the best practice principles of urban design, combining office, public and cultural uses within a well considered built form, it would be finished in high quality materials. The design throughout integrates public amenities and cultural uses, befitting the pivotal on the edge of the City Cluster. Above all, a strong and compelling civic quality would be woven throughout the proposal. The proposals would not comply with policy CS14.2 of the Local Plan for the reasons set out in the above paragraphs, however the proposals would accord with London Plan policies D3, D4, D5, D8 and GG1-6, City Plan (2015) policies CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, CS16 and DM16.2, and Draft City Plan 2040 policies HL1, S8, DE1, DE2, DE3, DE4, DE8, AT1, the relevant NPPF design policies and National Design Guide.
274. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. It would improve the site's interfaces with and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

Strategic Views and Heritage

Tower of London World Heritage Site

OUV and Relationship to Setting

275. The impact of the proposal on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes: (i) an internationally famous monument, (ii) landmark siting, (iii) symbol of Norman power and (iv) physical dominance (of the White Tower); and, to a lesser extent, (v) concentric defences, (vi) surviving medieval remains and (vii) physical (historical) associative evidence.
276. Whilst the Tower of London comprises a scheduled ancient monument, various listed buildings and is within a conservation area (in the LB Tower Hamlets), it is considered proportionate and robust to consider the impact on OUV in order to draw a conclusion on the impact on these heritage assets.
277. The WHS Management Plan establishes a 'Local Setting', 'Immediate Setting' and non-spatially defined 'Wider Setting'; the proposal site is within the latter. The Local Setting Study (LSS) identifies those most representative views and/or viewing areas to and from the Tower of London which are deemed to exemplify the OUV and their components, with management guidance providing a baseline for assessing change. These representative views/viewpoints overlap with some LVMF viewing locations and these are assessed together here.
278. Importantly, the WHS Management Plan acknowledges the City Cluster as signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. Here is important recognition that the Cluster has an emerging, distinct identity and the relationship between the Tower and the Cluster is long-established, having existed for over half a century, forming a backdrop to many views of the Tower such as from within the Inner Ward.
279. In recognising the place of the Cluster in the Wider Setting, the Management Plan acknowledges (at para 7.3.18) that it will intensify as a distinct and separate element to the Tower. At para 7.3.27 it states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider

(i) their effect on the established Cluster, (ii) the space between it and the Tower, and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

280. The intervisibility between the royal Tower and the commercial City, over which it was intended to command and defend from the river approach, is an integral part of the attributes (i) to (v) of OUV outlined above. Both the Tower and the City are ancient entities with a rich ceremonial life accrued through hundreds of years of existence, giving them a unique sense of place both central to and yet set apart from modern London. In the case of the City, that original commercial purpose remains and contributes to a relationship between the two entities that is nearly one thousand years old and therefore of unique interest.

281. The impact assessment set out below uses the assessment framework in the Mayor's London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS guidance.

Impact on OUV/Significance

282. The proposal would have an indirect impact on the WHS, via change in its Wider Setting.

Objections

283. As set out in the Consultation section of the report, above, Historic England have objected to the impact of the proposals on the World Heritage Site, specifically in views from Tower Bridge (North Bastion and dynamic journey) and the Inner Ward. Others have objected to the Tower Bridge impact, including the GLA, Historic Royal Palaces, London Borough of Tower Hamlets and others. Historic Royal Palaces share the concerns about the proposal's impact on the Inner Ward and have concerns about its presence in views from other places. In coming to a view on these matters, officers have given these representations from expert stakeholders substantial weight; however, as set out in subsequent paragraphs below, officers reach a different conclusion on the impact of the proposal on the WHS.

Tower Bridge (10A.1)

284. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge). The view is of particular importance in appreciating the 'Internationally Famous Monument' and 'Landmark Siting' attributes of OUV.
285. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where this has been compromised its visual dominance has been affected. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT tower, Centre Point and Tate Modern (para 182).
286. In the foreground of this view, the Tower of London WHS forms an important visual centre of gravity, with its legible and consistent stretch of historic townscape and iconic silhouette of the White Tower. Due to the elevation of the viewing point and the topography of the City, the area of the WHS west of the White Tower does not form a historic skyline because the modern City is seen immediately behind it as a backdrop; in this area of the view the towers of the Cluster form a distinctive modern skyline.
287. Immediately adjacent in the view, and with visual separation between them, the White Tower and the eastern half of the WHS are seen against sky and so form a historic skyline. Much of the drama and interest of this view derives from this powerful contrast between the modern skyline of the City and the historic skyline of the White Tower and eastern half of the WHS immediately adjacent to one another. Indeed, the SPG implicitly acknowledges this by describing how the evolving Cluster 'will add considerably to the character and stature of the view' (para 187).
288. Historic England, Historic Royal Palaces and others have objected to the impact of the proposal on the OUV of the WHS in this view. Historic England claim that the proposal would create a 'cliff edge' that would present 'a greater distraction' in the view, in addition to making the Cluster 'increasingly overbearing overall.' This sentiment is broadly echoed by the other objectors.

289. Seen from here, the proposal would appear at the eastern edge of the Cluster, between the historic and modern skylines described above, providing an eastern endpiece to the baseline and cumulative Cluster form. The proposed building would be visible between 30 St Mary Axe (the Gherkin) and the White Tower against the backdrop of Heron Tower and Heron Plaza, which it would partially occlude.
290. The proposal would take the form of a pale blue faience tower massed in three stages: broadest at its base where it would mirror the existing silhouette of Heron Plaza, then slenderer in its middle section, as it rises upwards to maintain the sky gap between Heron Plaza and the White Tower, and slenderest in its topmost stage where it would step deferentially back from the WHS towards the Cluster. Rising to approximately the height of the Gherkin, the proposal would occupy a small area of clear sky space near the White Tower, though it would maintain visual separation between the Cluster and the WHS.
291. The baseline and consented (cumulative) Cluster of towers steps downwards from the centre at 22 Bishopsgate (and 1 Undershaft in the cumulative) in a deferential manner towards the WHS. This profile has been carefully negotiated through numerous planning decisions to mediate between the Cluster and the WHS. Under both baseline and cumulative scenarios, the height and stepped form of the proposal are considered to create a successful terminus to the Cluster when seen from this viewpoint and would be consistent with the long-term Cluster curation described above.
292. The LVMF SPG (para 186) seeks to maintain 'some' visual separation between the upper parts of the White Tower and the Cluster; the guidance in the Local Setting Study (LSS) for this view seeks to ensure that 'buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point'.
293. Although it would create, particularly in its middle section, a vertical edge or frame near the silhouette of the White Tower, this is not considered to challenge the iconic qualities of this silhouette or the gravitas of the WHS as a whole. The second stage of the proposal would rise approximately to the level of the weathervane of the south-west turret, below the terminus of the finial. At this point the proposal would step deferentially back towards the Cluster; though it would clearly be a new, taller element of mass in the background, it is considered that its profile would be sufficiently deferential so as not to dominate the White Tower or diminish its perceived scale by drawing that of the centre of the Cluster too close.
294. As such, the proposal is considered to successfully address the Reason for Refusal of the preceding scheme on this application site, which related specifically to this view. The refused scheme was considered to cause harm through its height, strong vertical form and proximity, which departed from the long-term curation of

the Cluster referenced above. In particular, it introduced a vertical edge adjacent to the White Tower that rose significantly higher than the Gherkin, drawing the overall scale of the Cluster much closer to the WHS. Whilst the proximity would remain the same with this revised proposal, the vertical edge or frame it would present to the White Tower would be considerably lower and crucially broken by the deferential step backwards of its topmost stage towards the Cluster, ensuring the proposal would be of a subsidiary scale commensurate with its position as an edge, rather than a central, component of the Cluster, and thereby consistent with its long-term curation. Moreover, the architectural approach for the current proposal has been crucially nuanced by introducing more accentuated horizontals, which help to further downplay the tower's verticality.

295. Furthermore, while the proposal would be visually proximate to the White Tower, it would clearly be physically distant and therefore clearly disassociated from, the WHS. The proposal would be read as a clear endpiece to a group of modern towers located at the centre of the Cluster some 500m away. In this, assisted by its horizontal emphasis and blue hues of its faience echoing the colouration and appearance of other Cluster buildings, it would be comfortably disassociated from the WHS, which would remain clearly legible and appreciable by the viewer. The WHS would be the closer and would remain the dominant of the two entities in this view.

296. For the aforementioned reasons, the proposal would, under baseline and cumulative scenarios, preserve the ability to appreciate the WHS as an internationally famous monument, that sense of its landmark siting in relation to the City and the physical dominance of the White Tower, the attributes of OUV that are particularly captured by this view. It would not 'dominate' the WHS, would not directly interact with the protected silhouette of the White Tower and would maintain visual separation between it and the Cluster, all in accordance with paras 183 and 186 of the LVMF SPG. The proposal would relate appropriately to existing skyline features and, in the way it would consolidate and 'complete' the eastern edge of the Cluster when seen from here, would support the Cluster's contribution to the character and stature of the view, in line with para 187 of the SPG.

297. The proposal would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 (3), emerging City Plan policy S11, HE1, HE3, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and the CoL Protected Views SPD.

Dynamic Journey across Tower Bridge

298. Historic England and Historic Royal Palaces have raised concerns about the impact of the proposed building in the sequence of views of the WHS as one proceeds northwards over Tower Bridge, approaching the WHS, and onto the northern bridge approach. Historic England are considered that the proposal would ‘leave less of the kinetic experience unimpacted... consequently the Tower would appear less apart from the City and its silhouette.’
299. The experience is identified in the LSS as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the LVMF 10A.1 viewpoint from the bridge discussed above. The identified aim is ‘to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than ‘lost in the City’, in which the scale of the White Tower is perceived as more prominent than the buildings surrounding it; and in which the military architecture of the Tower and its defences can be appreciated.’
300. Viewpoints corresponding to this experience have been assessed in the submitted application. Moving north, from the south end of Tower Bridge to the North Bastion, the proposal would appear as an eastern endpiece to the City Cluster which gradually draws closer to the WHS as one moves over the bridge. At the North Bastion, the proposal (and the Cluster) would appear as described in the section on 10A.1 above; beyond the North Bastion and onto the northern bridge approach, the proposal would continue to appear as part of the City Cluster which at this point in the journey has appeared behind the WHS.
301. Throughout this journey, the Cluster forms a long-established background presence that gradually draws closer to, then is seen (from the North Bastion) in poised juxtaposition with, and then gradually draws behind and moves beyond, the WHS. The proposal would be at its most prominent when seen from the North Bastion, as discussed at length in the paragraphs above; the juxtaposition between the two entities is at its acutest there. For the rest of the journey, the proposal would read as a comparatively modest (in respect of overall height) addition to the Cluster that would consolidate further and be well integrated with it; particularly on the northern end of the journey where, due to the lines of sight, the proposal would cease to read as the Cluster’s eastern edge and would instead become more ‘merged’ with the existing buildings in the field of view.
302. As with the specific viewpoint on the North Bastion, officers strongly consider that, throughout this dynamic journey, the viewer is always conscious of the fact that the WHS and the Cluster are two entities, historic and contemporary, that are physically separated by a considerable portion of low-rise townscape, including the Local Setting area, and as such visually separated in most of the viewing experiences, including from Queen’s Walk and much of the Tower Bridge

experience. Much of the drama and interest in this journey derives from the way in which the WHS remains the commanding focal point but is contrasted with, and set off by, the presence of the modern Cluster which underscores and enhances that ancient and overarching relationship between Tower and City.

303. Officers strongly consider that, having reached the northern bridge approach where the proposal and the wider Cluster has fallen in behind the WHS, the viewer is in no doubt that this is because the lines of sight, not the fundamental balance of this relationship, have changed; in moving across the bridge, the viewer has had ample opportunity in which to appreciate each of these entities on their own terms, as a contrasting pair, and the clear physical and varying amounts of visual separation which exists between them.
304. As such, in baseline and cumulative scenarios, officers consider that the proposal would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 (3), emerging City Plan policy S11, HE1, HE3, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan and Local Setting Study.

Queen's Walk (25A.1-3)

305. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower and is Representative View 10 in the LSS.
306. In this viewing experience, the WHS is the dominant centre of gravity and visual focus, with its sky-etched, iconic silhouette clearly recognisable and stand out from all other surrounding features. Accordingly, a Protected Vista from 25A.1 focuses on axis with the White Tower, which also benefits from a dynamically protected sky silhouette between the Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF SPG recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (para 413).
307. In this viewing experience, the proposal would appear at a significant distance away from the WHS, at the eastern edge of the Cluster in both baseline and cumulative scenarios. At no point in the viewing experience – from the Assessment Points or between them – would the proposal appear near the White Tower and only in the most easterly viewpoint (25A.3) would it appear behind the westernmost curtain walls of the WHS – but the impact here would be minimal,

given the existing modern buildings which already form a backdrop to this area of the WHS.

308. The observer would continue to recognise and appreciate the WHS as the Strategically Important Landmark, set apart from the City and not lost in it; the proposal would preserve the long-established dynamic between the WHS and the consolidating Cluster as two distinct, juxtaposed urban forms. In baseline and cumulative scenarios, the proposal would preserve the characteristics and composition of the view, all in accordance with the LVMF SPG (paras 414-5 and 418-422) and LSS guidance.
309. In baseline and cumulative scenarios, the proposal would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 (3), emerging City Plan policy S11, HE1, HE3, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and the CoL Protected Views SPD.

London Bridge (11B.1 and 11B.2)

310. This view is also identified as important in the WHS Management Plan and the LSS (Representative Viewpoint 11). The WHS is identified as the sole Strategically Important Landmark whilst Tower Bridge and HMS Belfast are identified as other landmarks. The rising ground of Greenwich and Canary Wharf are clearly discernible.
311. From both Assessment Points, in baseline and cumulative scenarios, the upper storeys of the proposal would be visible directly east of 20 Fenchurch Street. It would appear as closely integrated amongst, and a further high-quality augmentation and consolidation of, the Cluster. It would appear clearly disassociated from the WHS, which lies to the extreme east of the view.
312. As such, in baseline and cumulative scenarios, the proposal would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 (3), emerging City Plan policy S11, HE1, HE3, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and the CoL Protected Views SPD.

Other WHS views

Inner Ward, Tower Green and Scaffold Site

313. The LSS Inner Ward views are deemed to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. The LSS aims to maintain views illustrating the living tradition of the WHS, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated.
314. Under 'key issues' the LSS states that tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or affect the scale of the enclosing historic buildings. The associated 'Objectives and guidance' states that development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.
315. The LSS acknowledges the Inner Ward to have a range of views, and the submitted application provides a detailed and comprehensive assessment of the visual impact on this place. Being entirely occluded behind the Chapel of St Peter ad Vincula, the proposal would not be visible from the Scaffold Site viewpoint (LSS view 1). It would be visible (along with the existing towers of the Cluster) to varying degrees from other places within the Inner Ward; from the centre, the proposal would appear over the east end of the Chapel, while from the south side, the proposal would be glimpsed above the roof of No. 2 Tower Green. Further forwards toward the Chapel, the proposal would disappear again from view.
316. Historic England have objected to the appearance of the proposal in these views, which they consider would add 'further to the visual intrusion of various tall buildings in the City' and 'further diminish the self-contained ensemble...distracting from the Tower's remarkable sense of place'. This point of view is shared by Historic Royal Palaces and other objectors.
317. In these dynamic viewing experiences from the Inner Ward, in both baseline and cumulative scenarios, the proposal would be seen as part of the varied, eclectic City Cluster, disassociated from the WHS and subject to the aforementioned long-term curation to achieve a balanced and deferential relationship with the WHS. And these Inner Ward views are a kinetic experience, in which the buildings of the WHS are the foremost presence, seen in a variety of

endlessly charming juxtapositions. Occasionally in these views the towers of the Cluster can be seen on the City skyline beyond, but never to such a degree of prominence that upsets the sense of place in the Inner Ward, or the aforementioned juxtapositions between its buildings.

318. Where visible, in both baseline and cumulative scenarios, the proposal would appear as a subsidiary, recessive edge component of the Cluster. Its discreetly elegant architecture would shed rather than draw attention, especially when contrasted against the larger existing forms of the Cluster. As such, the proposal would maintain that balanced, deferential relationship between WHS and the Cluster and the recessive, occasional presence of the latter in the Inner Ward views.
319. In accordance with the guidance in the LSS, the proposal would (i) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and (ii) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in relation to OUV attributes and components, while the relationship between the WHS set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct, long-established backdrop entity.
320. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Inner Curtain Wall (S)

321. Views from the Inner Curtain Wall were assessed. The guidance in the LSS recognises it as a 360 degree viewing experience where the aim is to maintain an appreciation of the Tower as a riverside gateway, the historic relationship between the Tower and the river, whilst under the associated guidance seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.
322. From the identified viewpoints from the south section of the Inner Curtain Wall, looking northwards, the proposal would appear immediately to the east of the Gherkin and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the existing

Cluster. The height and stepped profile of the proposal would ensure it read as an eastern endpiece to the Cluster. It would assist in consolidating the Cluster's distinct urban form and separate, long-established identity.

323. With its substantive, rock-built architectural presence, the White Tower would continue to command the foreground of these views, while the WHS's relationship with the river would remain undiluted by the proposal. The LSS recognises that 'modern buildings provide a clear contrast between the historic Tower and contemporary city outside its walls' – an acknowledgement of the concept of the contrast between ancient and modern buildings helping to reinforce one another's presence and contributing to the Landmark Siting attribute of OUV and the component of this which is the established relationship between the WHS and the City beyond.

324. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Inner Curtain Wall (N)

325. The LSS, in assessing views from this place, acknowledges that this is a 360-degree experience and demonstrates a 'clear contrast between the historic Tower and the modern city outside its walls.' The identified aim is to (i) maintain views that reveal the relationship between the Tower and the City and (ii) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting, stating that such buildings, under the associated guidance, should continue to reveal the historic relationship between Tower and City and that clear views of the concentric defences should be preserved.

326. From the identified viewpoints from the north section of the Inner Curtain Wall, looking northwards, the proposal would appear immediately to the east of the Gherkin and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the existing Cluster. The height and stepped profile of the proposal would ensure it read as an eastern endpiece to the Cluster. It would assist in consolidating the Cluster's distinct urban form and separate, long-established identity. The concentric defences would remain pre-eminent and their appreciation undiluted.

327. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Main Entrance

328. The LSS acknowledges that this is a 360-degree experience which reveals the 'Tower's relationship to the river Thames and the City and emphasises the Tower's defensive architecture. The identified aims are (i) to maintain views which reveal the relationship between the Tower, the river to the south and the City to the north and (ii) enhance appreciation of the medieval military architecture of the Tower.
329. In the view from the Main Entrance, the proposed building, appearing to the east of the existing form of 40 Leadenhall Street and slightly lower than it, would consolidate and augment the eastern profile of the Cluster. In the baseline and cumulative scenarios, both the Tower's relationship with the City and Thames and the qualities and pre-eminence of its defensive architecture and their appreciation would remain undiluted.
330. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Other Views

331. In other the views and approaches to the WHS identified in the LSS, the proposal, though visible, appears as a peripheral feature on the skyline some distance from the WHS. The City Cluster has become an integral, long-established part of the setting and views of the WHS and the proposal would be consistent with this. In these other views and approaches, under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Conclusion – Tower of London

332. The proposal would preserve the OUV of the WHS and the ability to recognise and appreciate the WHS as a Strategically Important Landmark and would accord with the visual management guidance in the LVMF SPG.
333. The proposal's relationship with the WHS has drawn strong objections from Historic England, Historic Royal Palaces and others; whilst giving great weight to these representations, officers reach a different conclusion. At the heart of the matter are differences in opinion on the visual resilience of so famous a monument as the Tower and the ability of the average viewer to be capable of discerning between ancient and modern entities in the same field of view, comprehending the visual proximity and physical distance involved, and appreciating them individually and as part of an overall skyline.
334. Perhaps most fundamentally, officers consider that, for all the reasons set out in preceding paragraphs, the evolving City Cluster, and therefore the proposal, is consistent, in principle, with the ancient dynamic between Tower and City which is particularly enshrined in the OUV attribute 'Landmark Siting'. The proposal would appear as a new element of the Cluster, with varying degrees of prominence in the views of the Tower, but officers, for the reasons set out in the preceding paragraphs, do not consider that it would upset the balance of this existing relationship and cause harm to the WHS in the way objectors have claimed.
335. As such, the proposal would not harm the setting or significance of the Tower of London, whether in relation to the WHS or any of the component heritage assets which comprise it. The proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and significance, authenticity and integrity of the WHS, in accordance with Local Plan policies CS12, CS13 (3), City Plan 2040 policies S11, HE1, HE3, London Plan policy HC2 and HC4 and the associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and CoL Protected Views SPD. Although Officers conclude that the proposal would not harm the setting or the significance of the WHS, for good practice, DCMS will be notified about the scheme (see paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention).

London View Management Framework (LVMF)

336. The London View Management Framework (LVMF) designated pan-London views deemed to contribute to the capital's character and identity at a strategic level.

London Panoramas

337. The application site is not affected by the Protected Vistas designed by the LVMF, which crisscross the capital to protect views of the Strategically Important Landmarks (SILs) which, in the City, are the Tower of London and St Paul's Cathedral. The Protected Vistas impose height ceilings on the areas below them, and the application site does not fall into one of these.
338. However, the proposal's height means that it would be visible to varying degrees in some of the London Panoramas of which these Protected Vistas are part. In Views 1 (Alexandra Palace) and 2 (Parliament Hill), the proposal would be largely occluded behind the existing tall buildings of the Cluster; it would be fully occluded in Views 3 (Kenwood) and 4 (Primrose Hill). From Views 5 (Greenwich Park) and 6 (Blackheath Point) it would be more obvious, but would appear in front of 30 St Mary Axe (the Gherkin) and largely occupying its established silhouette on the skyline, and in so doing leading only to a minor change in the overall shape and hues of the Cluster.
339. The magnitude of change created by the proposal in these Panoramas would be ultimately minor and the proposal would accord with the LVMF SPG by assisting with the consolidation of the City Cluster, which is identified as a landmark in these views, preserving their composition and the viewer's ability to recognise and appreciate the Strategically Important Landmarks.

River Prospects

340. The proposal would be visible in some of the LVMF River Prospects, which unlike the Panoramas discussed above do not have an element of geometrically defined view protection, but instead are to be assessed qualitatively.

Waterloo Bridge (15B.1 and 15B.2)

341. In this famous sequence of views, St Paul's Cathedral is the commanding presence, with the historic townscapes of the Strand, the Temples and the Whitefriars immediately before and to the west of it while, to the east, the existing City Cluster of towers is seen as a dramatic, modern counterpoint to the Cathedral.

342. Seen from the north of the bridge (15B.1), the proposal would appear in the centre of the Cluster, partially occluded by the existing form of 122 Leadenhall Street (the Cheesegrater). It would assist with the consolidation of the Cluster, of which it would clearly read as a part, set away from and disassociated from the Cathedral. As one moves south over the bridge to the centre (15B.2), the proposal would become partly occluded by 1 Leadenhall Court; in the cumulative scenario it would be totally obscured at all points by the consented 100 Leadenhall Street scheme.
343. As such, the proposal would not draw tall buildings closer to St Paul's Cathedral, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paras 264-7 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified.

Gabriel's Wharf (16B.1 and 16B.2)

344. This viewing experience is similar to that of Waterloo Bridge, except that the lower position on the South Bank allows for more of an appreciation of the historic frontages of the Temples and Whitefriars; the Cathedral is again seen as the commanding presence and with greater sky space between it and the Cluster.
345. As with Waterloo Bridge, the proposal would appear in the centre of the Cluster when seen from here, but largely occluded by 1 Leadenhall Court. In the cumulative scenario it would be totally occluded by that building and the consented scheme at 100 Leadenhall Street. Accordingly, the proposal would preserve the setting of St Paul's Cathedral and that of the identified landmarks in this view, all in accordance with the visual management guidance of paras 280-81, 283 and 57 of the SPG.

Hungerford Bridge (17B.1 and 17B.2)

346. These views are, again, similar to those from Waterloo Bridge which lies further east, except that the overall field of view is greater and the Cathedral is seen as the central presence of a wider urban skyline. Due to the similarities between these views and those from Waterloo Bridge, the impact of the proposal would be

extremely similar to that described in the paragraphs above, but at a greater distance. Accordingly, the proposal would preserve the setting of St Paul's Cathedral and that of the identified landmarks in this view, all in accordance with the visual management guidance of paras 301,302, 304, 305 and 57 of the SPG.

Lambeth Bridge (19A.1)

347. Views downstream from this point includes a glimpse of the City Cluster, seen extremely distantly across South London. The proposal would be very largely occluded by 52 Lime Street (the Scalpel) with a slight portion of its uppermost storeys visible behind; it would be completely occluded in the cumulative scenario. As such there would be not impact on the setting of any Strategically Important Landmark or other identified landmarks in the view.

Conclusion – LVMF

348. The proposal would preserve settings of the Tower of London World Heritage Site and St Paul's Cathedral as the Strategically Important Landmarks and it would preserve the composition and characteristics of all the LVMF views assessed. Lighting will be managed to ensure the development would not command the focus or distract unduly after dark. The proposal would comply with London Plan policy HC4, Local Plan policy CS13 and draft City Plan 2040 policy S13.

Other Strategic Views (Local)

St Paul's Cathedral

349. The proposal is not located within the St Paul's Heights grid, would not be visible and would be out of scope of many of the Viewing Points identified in the Protected Views SPD (fig. 3).

350. It would be visible to minor degrees in the kinetic riparian sequences along the South Bank and from the Thames bridges, where its impact would be as described in the sections above on Waterloo and Hungerford Bridges and Gabriel's Wharf. The proposal would appear between existing Cluster towers or be screened by them and is located on the other side of the Cluster to the Cathedral. It would be a comparatively marginal presence in these views and would not affect the sky space between the Cluster and Cathedral or intrude into its backdrop.
351. The proposal would be concealed by 8 and 22 Bishopsgate and the Cheesegrater in views from Fleet Street and Ludgate Hill and would be almost entirely occluded by the Cheesegrater in views from the Golden gallery of the Cathedral.
352. The Dean and Chapter of St Paul's Cathedral have queried why a fuller assessment of the impact on the Cathedral was not undertaken and the methodology behind scoping in and out certain viewing positions. The scoping exercise is consistent with the position of the site on the eastern side of the Cluster and proportionately reflects the fact that, due to this siting and its height, the proposal has only comparatively minor degrees of visibility in views of the Cathedral. Officers have interrogated this thoroughly using 3D modelling techniques.
353. The proposal would cause no erosion of the setting of the Cathedral and would be consistent with Local Plan policy CS13 (2), draft City Plan 2040 policy S13 and associated guidance in the Protected Views SPD and LVMF SPG.

The Monument

354. The proposal site is outside the spatially defined views from the Monument which are protected under Local Plan policy. The proposal would be completely obscured in views from the north of the Monument viewing gallery; it would not be in the Monument's 'Immediate Setting' and would not therefore harm or obstruct important views from afar or locally.

City Landmarks and Skyline Features

355. The proposal would have the potential to affect views of historic City Landmarks and Skyline Features which, in accordance with CS13, should be protected and enhanced. These are addressed individually below:

St Botolph Aldgate

356. As a component of the Cluster's eastern edge, the proposal would be visible in views of this church looking west and there would be intervisibility between the proposal and the brick tower and obelisk spire. The proposal would rise to the base of the spire and form a modern new element behind the church when viewed from Aldgate High Street. This visual relationship would quickly change as the viewer moves westward; moreover, the proposal would clearly be read as part of the modern Cluster seen in the backdrop to the church, rather than appearing overly close or domineering. As such, the church's skyline presence would be preserved.

PLA Building

357. The proposal would be visible in views of the former PLA building, forming part of a backdrop of tall buildings of the Cluster when seen from various points, including the South Bank, Trinity Square and Tower Hill. Officers consider that the proposal would read as an edge component from the Cluster and clearly set apart from the PLA Building and, while visible in relation to it, the proposal would not conflict, compete or detract from the PLA Building's silhouette and its skyline presence would be preserved.

Tower of London

358. The proposal would be visible in views from and of the WHS, which have been discussed in greater detail above. Within these views, it has been found that the visual impact of the proposal would be acceptable and for the reasons set out in the paragraphs above, it is considered that views of this Landmark are considered preserved.

359. The proposal would protect views of relevant City Landmarks and Skyline Features in compliance with CS13 (2) and City Plan policy S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Elevated Public Spaces

360. The City Cluster forms a key element in a number of views from the elevated public spaces in the Cluster towers. Such areas are increasing in number and are proving to be highly popular and much-visited areas of elevated public realm, offering exceptional pan-London views.
361. In particular, the Cluster forms a dynamic element in views from the Skygarden at 20 Fenchurch Street and the roof terraces at 120 Fenchurch Street and One New Change. The impact of the proposed building has been assessed from these places. Due to its location on the eastern edge of the Cluster, it would be largely hidden by existing tall buildings. As such, the proposal, where visible, would appear as another dynamic addition to the Cluster, and would not detrimentally affect the viewing experiences from these places.

Neighbouring Borough Views

362. The proposal's appearance in views from neighbouring boroughs has been considered. In many instances the proposal's appearance would be very similar to the strategic views assessed above, and the impact would not change.
363. The London Borough of Tower Hamlets have objected to the proposal's impact on the view of the World Heritage Site from Tower Bridge, and this impact is assessed in detailed above; officers conclude that no harm would be caused by the proposal in this view.

Conclusion - Strategic Views

364. The proposal would be sited at the eastern edge of the City Cluster, which seeks to consolidate strategic levels of growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of

the City and London. As a clear endpiece to the eastern edge of the Cluster, the proposal would play an important role in defining this side of it as an overall composition and would represent a key act of its consolidation.

365. The proposal would preserve the settings and significance of the Tower of London World Heritage Site, St Paul's Cathedral and the Monument. The proposal would preserve the composition and characteristics of all relevant strategic views.

366. Overall, the proposal would comply with Local Plan policy CS13, draft City plan 2040 policy S13, London Plan policy HC4, the LVMF SPG, City of London Protected SPD and associated guidance.

Heritage

Direct and Indirect Impacts

Holland House

367. Offices of 1914-16, a rare example of the work of Dutch architect H.P. Berlage in Britain, his only work in the UK. Built for a German-Dutch shipping, steel and mining conglomerate (Wm. Muller & Co.) to serve as its UK headquarters at the time, the building is a striking landmark, particularly in its use of light coloured faience and subtle nautical theming, in addition to some arresting interior architecture. The building's grade II* listing reflects this architectural and historic interest.

368. It is unique in the city as an example of a skilfully crafted, fully faience-fronted building by a highly regarded architect whose work is rare in Britain, constructed in the middle of the First World War when building work had virtually ceased. The architect used some innovative and emerging architectural ideas and construction techniques, upon completion, its design pointed to the future of the office building.

369. As well as the principal frontage, architectural interest is found in the tiled interiors of the building at basement and ground floor levels, which survive as designed by Berlage, most of these interiors are intact, although the building has received many alterations throughout its lifespan.

370. When initially constructed, Holland House sat in and amongst a rapidly changing 20th century townscape, in which purpose-built large floorplate office buildings were beginning to emerge alongside the older, finer grain buildings. The

now lost Baltic Exchange (1908) sat opposite the site at 30 St Mary Axe, which has subsequently been replaced by the Gherkin in 2004. The wider area was a tight knit neighbourhood, with narrow streets and a strong sense of enclosure resulting from buildings which fully occupied their plot boundaries.

Architectural, Artistic and Historic Interest

371. The purpose-built office building is an interesting part of H.P. Berlage's portfolio, it is thought to take inspiration from American architect Louis Sullivan. Berlage is a renowned architect from the early 20th Century, also known for the Amsterdam Stock Exchange. The remarkable idiosyncratic design, innovation, use of materials, and construction techniques give architectural interest, detailed below.
372. Designed for the oblique views along the original narrowness of Bury Street, the strong verticals on the principal façade were an unusual design for the time period, giving the building a commanding and solid presence whilst incorporating a significant amount of glazing. The arrangement of the facade in this way, to maximise light to the interiors resulting from the narrow structural grid, is structurally 'honest' and points to the integrity, and clarity of architectural concept behind Berlage's work. Finished in high quality faience, the materials were shipped at "considerable expense" by Wm Muller & Co, to deliver the quality of building they sought to occupy. The horizontal, decorative faience spandrel panels denote the floor levels of the interiors behind, these horizontal panels are embossed behind the vertical protrusions, accenting the dramatic vertical emphasis.
373. Lower down the building, black granite plinths give the building a robust and sturdy base, the building was designed with privacy in mind, the lower windows are smaller and slightly raised, particularly at ground floor level, to give privacy to the building occupants. On the southwest corner, an art deco ship motif is a nod to the buildings mercantile associations.
374. The building possesses high architectural interest from the quality of its exterior, particularly its boldness and individuality in an era where conventional architectural styles were transitioning from classicism to modernism. Furthermore, much of the external appearance largely stems from the emerging architectural and construction techniques of the time.
375. Holland House also derives architectural and artistic interest from the ornate interior spaces. A painter from the 1930s, Bart Van de Lack, worked with Burlage on the intricate design of the entrance halls and circulation spaces at ground and first floor level, specifically the attractive flooring and ceiling. The interiors exhibit traces of the origins of early Art Deco design in the interwar period, a noteworthy aspect of the design aesthetic when considering the period of the building. The

other office floors were more utilitarian in appearance and have since been heavily modernised. The building's architectural and artistic interest makes a high contribution to its overall significance.

376. Holland House has historical interest due to its former use, it was a purpose built office building at a time of dramatic change in the built environment. The intended use of the building and its associations with the shipping industry are thematic of the City of London's urban morphology, representing a historical confluence of finance, maritime commerce and the built environment. The materials were shipped from Holland by Muller & Co's own vessels and the building was subsequently occupied by a shipping or commerce organisation, although the Munitions Disposal Board (part of the Government), occupied the building for a brief period during WW1. These historical associations, and the historic interest provide a moderate contribution to the significance of the listed building.

377. The building has been considerably altered over its lifespan, most significantly with the construction of Bury House in 1967, which saw the demolition of most of its eastern elevation to St James' Court. A party wall was reintroduced on the eastern elevation of Holland House, finished in Portland Stone. The construction of Bury House also resulted in the loss of St James' Court and the truncation of Heneage Lane. Throughout the latter half of the twentieth century the building was altered in a piecemeal fashion, with various internal works resulting in the loss of many of the original office interiors and the reconfiguration of parts of the floor plans and entrances; the windows and roof structures are wholly modern. Despite these alterations, a significant amount of the historic fabric with architectural and historic interest remains.

Setting and Contribution to Significance

378. Holland House has a principal frontage facing north-west onto Bury Street and a secondary frontage facing south-east onto a small open space off Bury Street, James' Court. Both facades are seen as part of a dense urban townscape, which is characterised by a juxtaposition of hyper-modern, high density commercial office buildings and a lower density varied historic townscape, the site is closely neighboured by the tall buildings of the Cluster with the Gherkin, opposite, prominent in the foreground of views of the principal frontage and a prominent backdrop to the building's secondary elevation.

379. Holland House was designed to address the oblique views available along Bury Street before the loss of the Baltic Exchange and the creation of the more open Gherkin Plaza. The narrow street and the lustrous, exquisite faience and projection of the closely spaced chamfered piers made the building appear solid in oblique views despite being highly glazed. Accordingly, the narrow zones

around Bury Street from which these views are possible are considered to make a positive contribution to significance by illustrating the original design intent; this is also illustrated by the existing form of Renown House, which pre-dates the listed building and led to its configuration around it; stylistically the two buildings are leagues apart yet they were constructed in the same decade, which in turn illustrates the stylistic context then prevailing in the City. Accordingly, Renown House is an element of setting which contributes positively to significance.

380. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening up longer views of Holland House across the north-east and south-east corners of the new Gherkin plaza. As stated, the original, narrowly oblique views of the façade along Bury Street contribute to significance. Historic England have stated that the views from the Gherkin Plaza give an enhanced ability to appreciate the significance of Holland House, but this was not how the building was originally designed to be seen; the strongly vertical design and ordering of the façade were not created for these perspectives and do not have the same force in them. As such, officers consider that these views, whilst they allow the building to be observed from new angles, do not specifically contribute to significance.

Impact

381. The proposed works to the exterior would include necessary repair works to address the mild deterioration of areas of heritage significance. The south and west facades have varying degrees of damage to the faience, there is minor deterioration to both the external material and the steel structure behind. Some of the faience tiles have been secured by green netting on the top of the building. The repair works to the façade are necessary and the application would safeguard a part of the building of the highest significance. It is therefore critical that the works are an accurate replication to avoid any visual disparity in the completed works, these details would be secured through condition. The applicant would be required to appoint a specialist contractor, repair and replace concrete downstands and beams, replace 'fake' terracotta and spandrel panels, clean the façade with specialist advice, with new works and finishes to make good of the existing fabric and match the existing adjacent work with specific regard to be had to the methods used, materials, colour, texture and profile. Existing, original bricks will only be replaced where absolutely necessary. These alterations would preserve and enhance elements of the historic fabric of the building which substantially contribute to the building's significance and would result in a minor enhancement overall.
382. The original Crittall windows have been removed, the current window frames are non-original, and are therefore of no heritage significance, these would be replaced by modern aluminium framed substitutes across all facades, the original

form of the windows would be respected using Crittall frame units. On the eastern elevation, the external materials would be repaired and replaced with reinstated glazed bricks, to replace modern alterations and use materials which would have been originally used, the existing Portland Stone is a non-original feature which was implemented in earlier alterations, this elevation is considered to detract from the buildings significance, the alterations would represent an improvement.

383. The former tenants access on Bury Street has been closed off, again by earlier alterations, the existing fabric here is of neutral significance, the proposals would reinstate the access point and provide an additional tenants entrance, following the original design intent, this would represent a positive contribution to the buildings significance. The package of façade alterations set out above would make positive steps to restoring the building to its original appearance, supporting the integrity of the original architectural design. The façade alterations are considered to contribute positively to preserving elements of the building which make a substantial contribution to its significance. They would result in a minor enhancement to significance overall.
384. The rather clumsy 1960s, 70s and 80s alterations above level 5 of Holland House would be replaced with 3 additional floors, plus an additional floor which partially covers the plan extent. The 1960s rooftop additions are an element of the building which currently detract from its heritage significance. The 5th floor would be slightly set back from the building line of the architecturally significant facades below, it would follow the line of the existing extension, but it would be slightly taller, this additional floor to ceiling height would follow the proportions of the existing facades below. Furthermore, the extension at 5th floor level would extend on to the roof of Renown House in part, this would maintain the strong cornice reading on the existing roofscape.
385. On floors 6 to 8, the façade line would step inwards from the principal façade at each level. The 20th Century Society, the Victorian Society, Save Britain's Heritage and Historic Buildings and Places and others have objected to the application, their objections (in part) relate to the additional storeys, which they state would have a negative impact on the listed buildings fabric, ability to appreciate significance and/or its setting.
386. These floor levels would be clad in a light-coloured pre-cast concrete, following a loose interpretation of the geometry of the existing facades of heritage significance below, the scalloping and shaping of the vertical elements would echo the character of the façade below and complement it. The stepping of the elevations and the light colour, would read as detached alterations at a high level, appearing as recessive, high quality additions in longer range views, they would have limited visibility.

387. Where they are visible, they would appear a well-considered design response. These additional storeys would have very minimal visibility in the oblique views for which the building was designed, and would only be visible in views where the original elevations of Holland House were never intended to be seen, in views from Gherkin Plaza. As set out above, these views do not contribute to the ability to appreciate Holland House's significance, therefore, these additions are considered to have a neutral impact on the buildings significance overall.
388. At the topmost 8th floor, the proposed terrace and greening would provide visual interest at a high level. The façades on these new elevations would be finished in white glazed concrete, this is considered to be an appropriate material palette to reflect the existing elevations whilst also respecting the primacy of the facades below.
389. The rooftop alterations listed above would have no negative impact on the ability to appreciate the historic facades lower down the building, they would be an improvement on the current, more recent and low quality rooftop alterations, it is the original facades give architectural interest and make a substantial contribution to the significance of the listed building, these original facades would retain their primacy. However, the rooftop additions would result in the partial infilling of the existing atrium, which would cause a degree of harm to the listed building and is discussed in more detail below.
390. Internally, Holland House would be combined with Renown House and the tower element of the proposal on the 31 Bury Street site, with which it would share a core and various functional elements. This principle of combination would take some of the functional pressure off the listed building, boosting its occupational density, improving the tenant services, improving the sustainability and M&E standards, providing accessibility/DDA compliance, providing end of trip facilities for the buildings occupants and upgrading the building to meet modern fire regulations. Whilst of course the current proposal is not the sole way of delivering some or all of the benefits above, these would flow from it.
391. The proposed internal works would include alterations to re-imagine the use of the heritage asset, plus necessary works to upgrade the building to meet modern standards. Overall, the alterations would enable the building to accommodate publicly accessible uses, inviting the wider public into the interior of the listed building for the first time in its 100-year history, in addition to providing more office accommodation.
392. The existing building at 31 Bury Street would be demolished and the new core located at the point where it linked to Holland House. Here, the proposal would result in some loss of floor slab and associated structure to Holland House, between floors LG to 5, which are of no heritage significance. Most of this area

was altered in the 1960s when Bury House was created and it is considered the most appropriate location for the core and the interconnections between Holland House and the tower element of the proposal.

393. The 20th Century Society, the Victorian Society and Historic Buildings and Places have objected on the basis of these alterations. As set out above, the fabric that would be lost in these areas makes a low contribution to significance. The building was listed after these alterations were made, nevertheless, the buildings' significance and heritage value lies in the quality of the external facades and the ornate internal decorative features, neither of which would be markedly affected through the creation of the shared core.
394. The interconnection between Holland House and Renown House by the removal of the party wall would create a larger floor plate. This enables the productive use of an otherwise limited and constrained space within Renown House and the party wall fabric that would be lost as a result of this alteration is considered to be of no heritage significance, the position of the party wall being maintained with nibs so that the original separation would remain legible.
395. The greatest single change to the interior would be the infilling of the atrium at level, creating bigger floor plates and accommodating the roof extensions above. The lower levels of the atrium would be preserved and would form a new internal space, although the functionality of the atrium as a way of bringing natural light into the building would be lost. As such, the proposals would result in a low degree of harm to the significance of the building by removing an element of its floorplan and original functional design.
396. At basement level, openings would be made in the existing, modern window apertures to provide direct access into the lower levels of the atrium, these modern apertures have no heritage significance. In this area the glazed brick wall surface would also be repaired to match the original. These alterations are considered to have no impact on the listed buildings significance.
397. In the heritage lobbies at ground and first floor, the decorative tiles will be cleaned, repaired and re-instated where lost, these are a key part of the buildings significance. The modern doors to the stair core will be replaced with Crittall replicas of the original design, to re-instate the design intent of the original architect in fabric that has previously been lost. In addition, a new lift car in a metal cage enclosure will be added to replicate the original design. A new stair core will be introduced to improve circulation between the basement and ground floor levels, the Victorian Society have objected to this aspect of the proposals, this alteration will remove fabric which is non-original and that currently detracts from the building significance. These elements of the proposal would re-present the

heritage lobbies in a more sympathetic manner and would result in a minor enhancement overall.

398. At first floor level, the panelled boardrooms will be repaired if necessary, some modern additions, such as carpets, will be removed to reveal the original tiles floor finish, and the modern boarded ceiling will be removed to reveal the original. These works will reverse unsympathetic changes which resulting in the loss or covering up of original elements, these changes would make a positive contribution to the buildings significance, in addition, new publicly accessible uses within these areas will give the public the opportunity to appreciate these elements of the building, enhancing the ability to appreciate the buildings significance.
399. In the modern office areas on floors 2-5, some of the 1980s stud walls will be removed and the interiors will be refurbished, this occurs in areas where there is no historic fabric of interest, these works will therefore have no impact on the buildings significance.

Indirect Impact – Setting

400. In views of the principal west façade of the listed building from and across Gherkin Plaza, the proposed tower would appear behind Holland House, occupying clear sky which presently exists as a backdrop to the west façade, introducing a prominent new element above the listed building the view. Historic England, LAMAS, the 20th Century Society, the Victorian Society, SAVE and Historic Buildings and Places have objected to the application and consider that the proposed building would diminish the appreciation of Holland House and have identified harm to the significance of the listed building as a result.
401. Officers do not concur with the conclusion of these objections in relation to the tower's indirect impact on the setting of Holland House. The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. Moreover, as previously set out, these newer views of the listed building across the Gherkin plaza make no contribution to the significance or appreciation of the listed building.
402. The tower would be barely visible in the areas of setting from which the original oblique views across Holland's House principal Bury Street elevation, which contribute to significance, are possible. The tower element would be more prominent in the oblique views from the junction of Bury Street and Creechurch Lane along Holland House's smaller, secondary façade to that part of Bury Street. The lower levels of the tower would obscure a sliver of this elevation, but it would

remain discernible in the view and would come into greater prominence as one moves towards it along Bury Street.

403. Accordingly, it is considered that the proposed tower would not cause harm to the setting and therefore significance of the listed building.
404. Renown House would be extended by 2 floors, with an additional full floor above the cornice line in the form of a mansard roof. Renown House does not form part of Holland House's listing, but is an element of setting which contributes positively to significance, chiefly because of the stylistic differences between the two. Some consultees have objected in relation to this additional mass, arguing it would have a negative impact on the setting of the listed building.
405. The proposed mansard roof and the new facades of the extension are considered to be attractively detailed, and are sympathetic to the facades of Renown House below. The 2 storey extension and new mansard roof would replace the existing attic storey (overtopped with a lift overrun), in a more coherent manner. The mansard would follow a more contemporary design, differentiating it from the traditional design of the facades below. The overall design of the extensions to Renown House would maintain the existing qualities of its relationship with Holland House; the interconnections between them would be sufficiently disguised so that the two would continue to read as separate buildings originating from different times, executed in different styles, preserving this important quality of the setting of Holland House.

Conclusion

406. In conclusion, the proposed development would result in minor degrees of harm and enhancement to Holland House. The alterations to re-present the external facades and internal heritage lobbies would result in a low level of enhancement to significance and are considered heritage benefits. The infilling of the upper levels of the atrium would result in a low level of harm to significance. The provision of public access to the heritage lobbies would result in a minor enhancement of the ability to appreciate significance.
407. Officers consider that there is clear and convincing justification for the harm that would be caused to the significance of the listed building. The works proposed which result in that harm would assist in unlocking benefits in the scheme and that the scheme would, overall, strike the right balance between conserving the main areas of the building's significance and reimagining it for the future. The benefits would not be achieved without the interventions which result in that harm. The heritage harms and heritage benefits identified are considered as part of the overall planning balance set out later in this report.

Creechurch Conservation Area

408. The proposal site is located within the Creechurch Conservation Area, near the western edge of the conservation area where it meets the City Cluster. As set out above, the site forms the southern half of a street block which includes Holland House and Renown House, the principal frontage of which forms part of the CA's western boundary along Bury Street.
409. On its east side, the proposal site includes 31 Bury Street which faces the group of characterful C19 and C20 warehouse buildings which are particularly distinctive elements of the conservation area and forms a terminus to the view looking west along Mitre Street.
410. On its north side, the proposal site is framed by 33 Creechurch Lane, Heneage Lane, Valiant House and Copenhagen House; the Synagogue and its courtyard lie beyond Valiant House to the north.

Character, Appearance and Significance

411. The conservation area was designated in January 2024. While no Character Summary and Management Strategy SPD has yet been adopted, the CCA Proposal (December 2023) document approved by Planning and Transportation Committee and Court of Common Council assesses the special interest and character and appearance of the conservation area.
412. Of the buildings that comprise the proposal site, the CCA Proposal notes (section 3.2) that No. 31 Bury Street 'is not considered to possess inherent interest, but is important in framing Heneage Lane'; that Renown House is a 'characterful survival of a small-scale, early 20th-century office building...it has good quality carved stone detailing and makes an effective contrast with the adjacent Holland House'; that Holland House 'has a very high quality of detailing and execution and is one of the architecturally standout buildings in the locality'.
413. Furthermore, the CCA Proposal sets out (section 4.2) the overarching summary of special interest of the conservation area. This comprises the attributes:
- Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern;
 - A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City;
 - Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since the resettlement and now the oldest in the UK), St

Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church);

- Strong and continuing associations with the Jewish community following resettlement in the C17, exemplified by the presence of Bevis Marks and the site of the First and Great Synagogues;
- A place of contrasting architectural scales, juxtaposed dramatically with the backdrop of tall buildings in the City Cluster.

414. Officers consider that the proposal would have the potential to affect attributes (ii), (iii) and (v). It is relevant to note that none of the objections to the impact of the proposal on the conservation area have taken this approach; they rely on generalised perceptions of impact rather than assessment against these formal attributes endorsed by Planning and Transportation Committee.

Setting

415. The setting of the conservation area is sharply contrasting, with the heart of the City Cluster of tall buildings neighbouring immediately to the west, acknowledged by attribute (v) listed above, which this element of setting supports to a minor degree. To the north and east are the fringe areas of the City, which make a neutral contribution to setting because the architectural character and historic environment is quite fragmentary; the same is true of the south. While the Lloyd's Avenue CA lies close by to the south, it possesses few affinities in architectural or historic character with Creechurch.

Impact

416. The proposal's visual impact on the Creechurch CA is the subject of numerous objections from the City's Conservation Area Advisory Committee (CAAC), Historic England and others. In particular, the CAAC's strong objection asserts that the proposal would result in 'gross overdevelopment... with significantly negative impact on the character and appearance... the lack of architectural quality and refinement... was noted, together with their significant negative impact on wider townscape views and heritage context.' These comments generally capture the objections on this theme; the full representations made have been considered by officers, and should be referred to.

417. The demolition of 31 Bury Street is not considered harmful in principle, noting its essentially neutral contribution to the CA. The provision of the Heneage Arcade across the footprint of this part of the proposal site is considered a minor enhancement of the character and appearance of the CA, by reinstating the lost extent of Heneage Lane; Historic England agree on this point. The roof extensions to Holland House and Renown House are not considered harmful in principle; in

relation to the CA, officers' conclusions in respect of these elements are as set out in the Holland House section above.

418. In many of the longer views of and through the conservation area, such as from Aldgate looking west, or at the bottom of Mitre Street looking north-west, the tower element of the proposal would appear as closely associated with the existing towers of the City Cluster within which the CA is partially embedded. This would be true of closer views from within the CA where only the tower element of the proposal is visible, such as of Bevis Marks Synagogue from within the courtyard, or from Bury Street looking obliquely across Holland House. The proposal's impact on views of the Synagogue is assessed in greater detail in the section below; the conclusion reached there would apply to the proposal's impact on this element of the CA.
419. In views of the proposal along Heneage Lane, Mitre Street and looking south along Creechurch Lane, the tower of the element would be seen coming to ground; in these specific views it would read as part of the City Cluster than of the CA; it would clearly be disassociated from the historic scale of the CA.
420. In the view looking north along Creechurch Lane and away from the City Cluster, the tower element of the proposal would read as a more pronounced departure in scale from the relative consistency of the group on the north side of the street and the south side, which includes the characterful warehouses noted in attribute (ii). However, this would be mitigated to an extent by the visibility of 70 Bevis Marks and, in the cumulative, Bevis Marks House, and the contrasting scale of the proposal would elide with attribute (v) of the CA's special interest set out above.
421. In summary, therefore, when considering the impact of the proposals on the significance of the CA, officers reach a different conclusion from the various objectors on this matter, whilst attaching great importance to their views. The proposal would not conflict with any of the attributes of special interest set out above and would result in a modest degree of enhancement to special interest through the provision of the Heneage Arcade.

Indirect Impacts – listed buildings

Bevis Marks Synagogue

Significance

422. Synagogue of 1699-1701 by Joseph Avis. This is the oldest Synagogue in the country and survives to a remarkably little-altered degree. Avis had links to Wren's office and, architecturally, the building reflects the simple vernacular of some contemporaneous City churches and nonconformist chapels. Of a simple, rectangular plan form with simple red brick and Portland stone elevations with a pitched, slated roof behind a plain parapet. The principal, west elevation is symmetrically composed around the centered, main entrance door, flanked by two tiers of windows which run around the building, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense urban location. Above the entrance door is a tablet with the Synagogue's name etched in Hebrew: 'The Gate of Heaven/Sky'.
423. The interior is a single, double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers. The plan form, fixtures and fittings are largely of 1701, barring some minor later additions such as early C20 electric lighting. This place plays host to the religious traditions of the Sephardi Jewish community in Britain, known as *minhag*. Whilst practice here shares common worship and liturgical practice with other Jewish communities, for example reading from the Torah, there are particular rituals unique to this Synagogue (the *mitzvot*), such as the use of specific sung melodies by the *Hazan* in the reading of the Torah, which have been passed from generation to generation of the Synagogue's community.
424. It is a rich and intricate manner of worship, which cannot be experienced anywhere else, in a building of great age and rarity in a national context. Accordingly, this very old and rare intangible inheritance is considered to be of exceptional historical and communal interest; the building is of outstanding architectural, artistic and historic interest.

Contribution of Setting

425. The building retains its original setting, albeit with more recent buildings on some of the surrounding plots, located in an undemonstrative, off-street location in a private courtyard. It has no direct street presence except its south-east elevation to Heneage Lane, a quintessential city alley, on which the Synagogue manifests as a plain brick elevation pierced with three prominent, round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the former Vestry and Beadle's House fronting the north side of Heneage Lane and seen obliquely from Bevis Marks.
426. The inspector who reported on the Tulip proposal stated (at paragraph 14.52 of his report, with which the Secretary of State agreed):

“Bevis Marks Synagogue (Grade I) is listed largely for its age, rarity and internal features. This does not mean that its setting is necessarily unimportant, but in this case it is largely limited to what can be experienced from within its courtyard.”

427. Otherwise, the principal approach to the Synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, consisting of two narrow rectangles of paved area flanking the Synagogue’s north-east and north-west elevations. Within the tight confines of this space, the Synagogue is a massive, commanding presence. The courtyard acts as an extension of the Synagogue, a place where people can gather before and after services (and indeed the last place males and females can interact before entering for worship). There have been recent alterations to the courtyard including the construction of a ramp and steps to the new museum in the western arm and two booths, for ticketing and security, inside the entrance and in the eastern arm. Seen from the courtyard, the Synagogue is hemmed in by other buildings of a similar historic scale and mostly of the same brickwork materiality, including the former Vestry and Beadle’s House which directly adjoins it to the east. There is a specific sense of an architecturally reserved and deliberately secluded setting.
428. Bevis Marks was the first purpose-built Synagogue in Britain following the formal resettlement of the Jewish community after centuries of exclusion. Its discreet, secluded setting is considered to be powerfully representative of this, making a strong contribution to the building’s significance; the importance of the relationship between the Synagogue, its courtyard, Heneage Lane and Bevis Marks cannot be overstated. Consequently, it is proposed that these elements of setting form part of a bespoke Immediate Setting policy area in the City Plan 2040 to recognise and help preserve these qualities. For clarity, the application site is not within this proposed Immediate Setting policy area.
429. The sense of privacy, seclusion and reservation, coupled with the tight urban grain of this area of setting, means that the Synagogue is experienced through a series of informal vistas and closeups, rather than formally recognised views. However, it has been argued by S&PSC and other objectors that there is a ‘sky view’ of the Synagogue from the entrance to the courtyard, where the building is seen with clear sky above, which is important for religious and spiritual reasons.
430. Moreover, it has been argued by the Rabbi of the Synagogue and other objectors that the sky and views of it are especially significant for the Sephardi community, holding ‘practical and symbolic’ significance in the view of one authority (part of their objection dated 15 November). Officers do not profess expertise in these areas of religious history and practice and accept the view of these sources that the sky, in general terms, holds significance for the Jewish community in general and the Bevis Marks community in particular.

431. However, when it comes to translating this into a consideration of the Synagogue's setting as a listed building, officers take a different view to the various objectors. Clearly, it follows from the general significance that the sky holds to the Bevis Marks community, and the very name of the Synagogue ('The Gate of Heaven/Sky'), that there is a general affinity between the Synagogue and the sky or heavens. However, this is a dynamic which is true of many places of worship, many of which arguably express this more obviously through the use of architectural elements such as spires and pinnacles to create a skyline presence. As such, officers do not consider that the Synagogue's general affinity with the sky or heavens necessarily translates into a specific view of the Synagogue requiring the preservation of open sky. The sky is visible above the Synagogue in various viewing points from within the courtyard. It is to be noted that no formal designation or identification exists, or ever has existed, of the 'sky view' described by the objectors in relation to the Synagogue's heritage significance.
432. Officers therefore consider that, when it comes to identifying and quantifying elements of setting, what is clearly more tangible, unique and more important to the heritage significance of the Synagogue, as a listed building, is the special sense of seclusion described above, and it is this element of setting that is considered to make the greatest contribution to significance.
433. Further to this, it has been argued by the Rabbi of the Synagogue that the building was deliberately designed to have "prominence in relation to the buildings in view all around it. This prominence was not achieved in the manner of church spires, but through the massing of the synagogue itself in contrast to the buildings around it. This prominence is only maintained by ensuring its scale continues to dominate its surroundings, by carefully managing visible growth around it."
434. Officers fully agree with this statement: the Synagogue is a very prominent presence in the tight confines of the courtyard, easily commanding the space, and obviously the most prominent of the buildings which frame the courtyard around it. Officers have proposed the aforementioned 'Immediate Setting' policy area around the synagogue and its courtyard buildings to capture this very important quality. While some of the existing courtyard buildings around the Synagogue are presently higher than it, as a result of modern redevelopments in the intervening centuries since it was constructed, the Synagogue, through its powerfully simple architecture and massing, continues to be the most prominent building seen within the tight confines of the courtyard.
435. The Synagogue and its courtyard are located within the City Cluster and a number of existing and consented tall buildings are or would be visible from within the courtyard, notably (E-W) One Creechurch Place, 40 Leadenhall Street, 100 Leadenhall Street (consented), the Scalpel, the Gherkin, No. 6 Bevis Marks and

Bevis Marks House (consented). Otherwise, there is an open sky setting over the Synagogue and its courtyard. The narrowness of the spaces from which the Synagogue is seen makes it a commanding presence; many of these existing tall buildings are not immediately in the field of view and can only be fully appreciated by deliberately looking upwards.

436. While the contrast between the scale and character of the Synagogue and its taller modern setting is very noticeable, the contrast between the historic ensemble of the Synagogue and these new buildings is entirely characteristic of this part of the City, in which ancient and hypermodern buildings are frequently juxtaposed and throw one another into sharp relief. Seen from the courtyard, these modern tall buildings are perceived as being part of the modern City at a crucial remove from the secluded confines of the courtyard. They do not affect that prominence which the Synagogue has in relation to its courtyard setting identified above. With its fundamentally different scale and architectural character, this wider setting of the Synagogue is considered to make a neutral contribution to its significance.

Impact

437. The impact of the proposal would be indirect, via change in its wider setting, rather than direct and physical; the Synagogue would not be directly affected, its fabric would remain untouched, and the important sense of seclusion created by those elements of setting identified above would be preserved.
438. Given the secluded, off-street siting of the Synagogue, there would be little to no interface between it and the proposal before the observer reaches the courtyard. The exception would be in the sharply oblique views along Heneage Lane, where the lower stages of the proposal would be seen at the end of the existing Lane above the proposed Heneage Arcade. Here, it would appear as a bookend terminating the southern axis of Heneage Lane, while opening up new sightlines through the Heneage Arcade down to Bury Street. It would read as disassociated and set apart from the characterful ensemble of the historic brickwork frontages of the Vestry, Synagogue and Beadle's House.
439. In views from the courtyard entrance, from where both the Synagogue and the proposal can be viewed to their fullest extent, the proposal would appear directly behind the Synagogue's principal north-west elevation. It would mostly obscure the existing form of 40 Leadenhall Street, already visible in this view, and some clear sky space above and to the east of it; in the cumulative scenario, it would be seen alongside the consented (and technically implemented) form of 100 Leadenhall Street. The proposal would be seen behind Valiant House, which frames the Synagogue to the south-west, leaving the sense of seclusion established by Valiant House and the encircling courtyard buildings unbroken.

440. For clarity, the topmost storey of the proposed roof extension to Holland House would be visible as a sliver of development behind Copenhagen House, but this would be extremely minimal, would quickly recede from view and be barely impactful.
441. The proposal would be at its most visible from this viewpoint and would appear as a subtly articulated form of sophisticated pale blue faience. As one looks up the proposal would be seen to taper in width as it rises. It is this view which is the focus of the objections, some of which as mentioned refer to it as a 'sky view' of the Synagogue. Currently, from this viewpoint, there is clear sky over the Synagogue between the existing forms of One Creechurch Place and 40 Leadenhall Street. As described above, the proposal would infill a section of this clear sky, but would not result in the total loss of clear sky over the Synagogue. Clear sky would remain appreciable above the Synagogue from various other points within the courtyard. Even so, as discussed above, whilst recognising the role of sky views in religious observance, officers do not consider the sky to be an element of setting fundamental to the Synagogue's significance as a listed building, instead forming part of that wider setting which makes a neutral contribution.
442. When one is in the courtyard, one is already conscious of the Cluster of tall buildings in which the Synagogue and its secluded setting are located. Existing tall buildings are already visible in these courtyard views, and more would be in the cumulative scenario, especially the scheme at 100 Leadenhall Street. In this respect, officers consider that the proposal would form another part of this layer of the modern City, coexisting with the Synagogue and held at a crucial remove from it by the intervening, low-rise form of Valiant House and the encircling courtyard buildings. Its presence would be a visual manifestation of the modern City beyond, rather than a visual intrusion.
443. In views further into the eastern and western arms of the courtyard – approaching the Beadle's House and the ramped entrance to the Museum – the proposal would be far more recessive. The uppermost storeys of the proposal would appear as a small section of slender blue faience above the brick parapet of the Synagogue. Aside from the view from the courtyard entrance, these other courtyard views of the proposal would be glimpses, caught when deliberately craning the neck beyond a comfortable field of view.
444. The S&P Sephardi Community (S&PSC), Historic England, the Georgian Group and many others have objected the proposal's visual impact on the setting of the Synagogue as a listed building. This impact formed part of the Reason for Refusal of the previous scheme on the 31 Bury Street site.

445. There are subtle but material differences in the designs of the previously refused scheme and the current proposal which are appreciable in the key views of the Synagogue. There would be a different degree of articulation to the proposed north elevation which can be seen from the Synagogue courtyard, though this difference is a rather subtle one and the overall impression created by this area of both schemes may be said to be similar. A more obvious difference between the two is that the top of the proposal would be lower and more articulated, in a way which may be said to be quite noticeable.
446. The S&PSC's heritage consultant asserts that: 'by reason of its height and proximity the proposed tower will overwhelm the Synagogue.' Historic England state 'that the synagogue's 'precedence would be all but lost with a roofline that would become framed against distracting modern development of a very large scale', and that the 'new tall building would become a dominant feature of the courtyard at the expense of the Synagogue, diminishing the latter's role as the focal point of the space'. The S&PSC find that the proposal would cause substantial harm to the setting and significance of the Synagogue; Historic England identify a medium level of less than substantial harm arising to the Synagogue as a result of the proposal (and a departure from the 'small degree of incremental harm' they found the previously refused scheme to cause).
447. Whilst attaching great importance to the views of the S&PSC as the building's occupiers, the statutory consultees and other concerned parties, and with great respect to the strength of feeling expressed in many of the objections on this matter, officers find that the visual impact of the proposal would not cause the damage which consultees refer to.
448. Officers consider that the many objections have overplayed the visibility of the proposal in the general experience of the Synagogue from within the courtyard, and underplayed how the tight confines of the courtyard means the Synagogue easily commands the space and is the pre-eminent and prominent presence. Officers further consider that the objections have downplayed the very clear distinction between the historic scale and materiality of the Synagogue and its courtyard setting, the obvious modernity of the proposal, and the fact that the Synagogue is already seen with a backdrop of tall buildings in the courtyard experience.
449. Officers consider the Synagogue to have a simple, resilient and commanding presence in the courtyard experience which is clearly disassociated from the modern city beyond, the existing towers of which have relatively brief prominence in the courtyard arrival experience before being largely occluded behind the Synagogue and its courtyard buildings when one is closer to the Synagogue. The proposal would, in most of the areas of the courtyard, be seen only as a glimpsed

and partial presence when one is looking up at the Synagogue's roofline and the clear sky which would remain over the courtyard.

450. At its most prominent, the proposal would be seen directly behind the Synagogue, as another architecturally sophisticated element of the modern city beyond. But, as with the visibility of the proposal from with the Inner Ward of the Tower of London, officers strongly consider the average viewer to be capable of distinguishing between ancient and modern elements in the same field of view and, in this case, discerning between the self-contained seclusion of the Synagogue and (its prominence within) its courtyard ensemble and the dynamic urban environment in which it resides.

451. Accordingly, officers find that, in baseline and cumulative scenarios, the proposal would preserve the setting and significance of the Synagogue.

452. The S&PSC, Historic England and other objectors have raised concerns about how the proposal's prominence in the courtyard arrival experience would impact on the ability to see clear sky above the Synagogue; in the words of Historic England, that the 'ability to see clear sky from the courtyard would be lost'; for the reasons set out in preceding paragraphs, it is the view of officers that the HE statement is not correct. The S&PSC, Historic England the other objectors assert in turn that the proposal would prevent the Synagogue's community from observing the emergence of the stars and the transit of the new moon from the courtyard, an important part of the Synagogue's liturgy, and so seriously inhibit their ability to continue worshipping at Bevis Marks. In the words of the Synagogue's Rabbi, from his objection dated 15 May, "each month, Jews gather outside after dark to recite *kiddush levana*, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer".

453. This did not form part of the previous Reasons for Refusal. As set out above, the differences between the two schemes, as they would appear in views of the Synagogue, are relatively subtle; there is no obvious design change between the two schemes that clearly relates to this theme of objection.

454. The S&PSC objection dated 15 May 2024 includes three photographs taken from a point in the courtyard which show the appearance of the moon over the Synagogue at different times. The applicants have taken this viewpoint as a basis for a Lunar Transit Study which has been submitted as part of the application and which the City has had independently reviewed by the BRE. Subsequently, the Rabbi of the Synagogue has indicated that it is in fact a different viewpoint from which the moon is viewed, further back towards the entrance portal where less of the Synagogue (and the sky above) can be seen. As a result the relevant position has been clarified. This alternative has been considered in an addendum to the

Lunar Transit Study. The Rabbi has submitted a further response to this, assessing the applicant's Study and providing more details about how the prayer is performed and how the moon relates to the culture and liturgy of the Synagogue.

455. The Lunar Transit Study and addendum put forward by the applicants and independently reviewed by BRE assesses the various passages of the moon in these views throughout the 18.6-year lunar cycle. It charts the positions of the moon at various stages over these cycles and maps them onto two aforementioned two viewpoints in diagrammatic form. These charts illustrate how, for the majority of the time, the moon is not visible at all from within the courtyard, being obstructed by the buildings in the observer's line of sight.
456. At the times in the cycle when the moon could be visible, it would appear just above the Synagogue and the courtyard buildings. The Lunar Transit Study maps the silhouette of the proposal onto these charts and demonstrates how it would result only in a comparatively small degree of obstruction to this experience, though proportionally greater from the point indicated by the Rabbi, with much of the moon's transit remaining visible from the courtyard even in the cumulative scenario with 100 Leadenhall Street. The charts further show how the moon would still be visible above the Synagogue as well as the courtyard buildings which frame it.
457. Officers have extensively considered the data and conclusions submitted by the applicants and the objectors on this matter. Officers conclude that the proposal would result in varying reductions of the number of hours available to see the moon on each relevant occasion, though in theory there would always be enough visibility to recite the prayer, and there would not be a reduction in the number of occasions (i.e. months) per year against the future baseline.; officers conclude that the presence of the proposal would still allow the prayer to be said, but there nevertheless would be an impact on the ability to carry out this ritual.
458. Officers are very cognisant of the strength of feeling expressed and attach great importance to the views of the S&PSC as the building's occupiers, the statutory consultees and other concerned parties when considering this matter. However, on the basis of the available evidence, which is comprehensive and independently verified, officers conclude that, at the times in the lunar cycle when the lunar transit could be visible from the courtyard, the proposal would preserve open sky above the courtyard and therefore the ability to see emergence of the stars and the new moon from there; and whilst the proposal would lead to a small reduction in open sky for the stars to inhabit and the moon to transit, it would not completely remove the ability to see the stars or the moon from the courtyard.
459. As such, officers conclude that the proposal would allow the stars and the new moon still to be seen from the courtyard. Although it is matter of religious

observance, being a matter on which the officers do not profess expertise, based upon the information provided by those making representations, and on the analysis contained in the studies referred to, officers have concluded that there would be a continued ability to see emergence of the stars and the new moon from the courtyard at the necessary times (although the proposal would have an impact on the duration of the moon's visibility at these times) allowing that element of the ceremony of *kiddush levana* to take place, and that this aspect of the functioning of the Synagogue would not be prevented by the physical attributes and impact of the proposal. As such, and momentarily laying aside consideration equalities/amenity point of view of the impact identified, addressed later in this report, officers find no harm arising to the Synagogue's setting and heritage significance arising from this matter.

460. Further objections from the S&PSC and others relate to the perceived overshadowing of and impact on daylight and sunlight to the courtyard. This impact formed part of the Reasons for Refusal for the previous 31 Bury Street scheme and is treated from an amenity point of view and in greater technical detail in the relevant sections of the report. The findings as they relate to the heritage significance of the Synagogue are summarised below.
461. The S&PSC's consultant has alleged that the proposal's 'visual and psychological impact on the courtyard would be catastrophic'; the S&PSC assert that the proposal would seriously inhibit their ability to use the courtyard, but do not provide evidence as to why. The applicant has submitted studies – which the CoL has had independently reviewed by third parties – that confirm that the proposal would not cause any discernible reduction in daylight and sunlight to the courtyard and that, overall, its amenity would not materially change. Again, officers have no objective evidence to contradict this conclusion, and accordingly find no harm to the Synagogue's setting and significance arising from this perceived impact.
462. Many objections have been received in relation to the potential impact of the proposal on daylight and sunlight levels to the interior of the Synagogue and its ability to function. This potential impact did not form part of the Reason for Refusal of the previous scheme.
463. During daylight hours, the Synagogue's capacious windows provide a level of ambient light which enables an appreciation of the exceptional interior and allows services and readings to take place. There are large windows on all four elevations, resulting in a multi-aspect interior receiving daylight throughout the day. The building's densely urban location means that the levels of ambient natural light are relatively low, though enough to appreciate the historic interior and for the building to be used for its current purpose. Artificial light within the building is minimised and largely restricted to historic fittings.

464. The potential impact on the amenity and usability, rather than the heritage significance, of the Synagogue is fully set out in the Daylight and Sunlight section of the report below. Assessments of the impact of the proposal on daylight and sunlight into the Synagogue have to be grounded in quantifiable, BRE-compliant evidence, rather than subjective assertions. The extensive technical assessments undertaken show that the diminishment of the internal light levels within the Synagogue would be negligibly noticeable in the main, ground floor area of the building and slightly more noticeable, but in a limited area, at the mezzanine level on the south side. This evidence leads officers to conclude that the proposal would not affect (i) the visual appreciation of the historic interior, (ii) the visual appreciation of those particularly significant features such as the *bimah* or the *ark* and that, therefore, most importantly, the proposal's impact on light levels would not diminish the ability of the Synagogue to function or prevent any of the activities within, including circumcision, to be undertaken.
465. A further theme of objections is that the proposal would negatively affect the Synagogue's new Heritage Centre, although this is not substantiated with evidence, and from the findings of the technical and professional assessments above officers do not consider that any adverse impact could occur.
466. As set out above, the variations between the previously refused scheme and the proposal are, in respect to experiences of the Synagogue, comparatively minor. In relation to the previous scheme, officers considered all the areas of impact set out above, with the exception of the lunar transit. In all these areas officers concluded that the previously refused scheme would not result in a harmful impact upon the Synagogue or its setting.
467. A different view was taken by the City's Planning and Transportation Committee, which refused permission for the development because it would, in part, 'adversely affect the setting of the Grade I listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue.'
468. Officers are extremely cognisant of the strength of feeling in the objections relating to the Synagogue and have required extensive and at times unprecedented levels of detail and assessment from the applicants in order to consider the impacts discussed above, whilst noting the relative similarity between the two schemes in these experiences. Officers have had regard to the previous decision of the Committee and to the principle of consistency in decision-making. However, officers consider that the technical evidence upon which this application is assessed does not support the previous reason for refusal.

469. As such, in respect of the proposal now under consideration, for all the reasons set out above, officers reach the same conclusions as for the previous scheme. Overall, in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposal would preserve the setting and significance of the Synagogue and the ability to appreciate it.

470. In their objections the S&P Sephardi Community argue that the proposal would cause harm to the significance of the Synagogue and that public benefits will only outweigh that harm if it is demonstrated that what is proposed is the minimum necessary to achieve the claimed benefits. As set out later in this report when considering the heritage balance, within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a listed building and weighing that harm against the benefits. The decision maker does not have go about balancing harm against benefits in a particular way. The legal advice relied upon by the S&P Sephardi Community states that “it would be amply open to the Council to take the view that clear and convincing justification for the harm to the significance of Bevis Marks Synagogue and the Tower of London does not exist with (clear and convincing) evidence that the benefits relied upon cannot be achieved without the extent of the harm that would be caused-including viability evidence.”. In the view of officers no harm would be caused to the significance of the Synagogue (or the Tower or London) and therefore there is no requirement to balance harm to the significance of those designated heritage assets against benefits.

Renown House (Non-Designated Heritage Asset)

471. Renown House, Nos. 33-34 Bury Street, is on the corner of Bury Street. It is a non-designated heritage asset, its significance is derived from its historic, architectural and artistic interest, it also derives significance from its group value and setting with its neighbours on Bury Street, which form the eastern edge of the Creechurch Conservation Area, marking the transition between a historic townscape to the east and the modern City Cluster to the west. The Victorian Society, Save Britain's Heritage and Historic Buildings and Places have objected to the proposals relating to Renown House, stating that Renown House is a non-designated Heritage Asset and the proposed impacts to the building would harm its significance.

Architectural, artistic and historic interest

472. Renown House is a four-storey building with a basement and attic, built for a successful Dutch import-export trading business Bunge & Co. in 1912. Bunge & Co. Bunge & Co. expanded internationally through the 20th century and the firm established its London headquarters on Bury Street as a result of this rapid

international expansion, these offices were purpose built. It was occupied by shipping firms until the late 20th century.

473. It was designed by one of the City's leading commercial architects from the early 20th Century, Delissa Joseph, who completed numerous high quality buildings across London throughout his career. It is not statutorily listed, and is considered to be one of Delissa Joseph's lesser known works. It is stylistically conservative for its time, particularly when compared to its neighbour Holland House, the historic associations with the architect and the former use of the building give historic interest, which makes a moderate contribution to its significance.
474. Renown House is a Portland Stone clad building, with a grey granite ground floor, designed in a neo-classical manner. It is a characterful survival of a small-scale early 20th-century office building, once a common type in the City. The ground floor has attractive detailing above the entrance portal, it has typical classical proportions and restrained classical detailing, the cornices are relatively simple but contribute to the overall character of the building. The windows at ground floor level are modern replacements but fit the prevailing aesthetic, railings in front of the lower ground floor levels are also coherent with the architectural style.
475. The upper levels, predominantly finished in Portland Stone have good quality carved detailing, the carved stone has a variety of relatively simple forms which decorate the pilasters, spandrels and cornices, overall the facade has an attractive and well considered external appearance. The windows are dark green metal modern replacements. At the upper levels, a chimney stack adds character, but several excrescences at roof level, such as balustrades, dormer windows and a lift overrun detract from the design quality.
476. Holland House wraps around Renown House and appears either side of its street facing elevations. Overall, it makes an effective contrast with the adjacent Holland House which is Grade II* listed, and makes a positive contribution to the character and appearance of the Creechurch Conservation Area. The quality of the external appearance gives architectural and artistic interest, which makes a moderate contribution to its significance, this significance overall is however limited as the building is not statutorily listed.

Setting

477. Renown House has southern and eastern elevations facing Bury Street. These facades are seen as part of a varied townscape, its immediate neighbours are historic buildings, with more modern commercial office developments framing

wider views of these facades, the site is in close proximity to the City cluster and Gherkin Plaza.

478. The backdrop to the Renown House elevations are clear sky and roof level modern excrescences on Holland House, no. 5-10 Bury Street and Bury House. The building remains part of a street block of a comparable scale and density to when it was originally constructed, this element of setting gives a low contribution to the significance of Renown House. The rooflines and building heights vary slightly, the roof level of neighbouring Holland House is slightly higher, the cornice lines are slightly offset resulting in limited coherence between the roofscape, this element of setting could be improved.
479. Originally positioned on a narrow street opposite the former Baltic Exchange. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening up longer views of Renown House across Gherkin Plaza. These views provide a low contribution to the ability to appreciate the significance Renown House.

Impact

480. The proposed development includes window replacements, façade alterations at ground level, the insertion of 2 new floors, a new mansard roof and a new internal interconnection with Holland House as part of the alterations to Renown House. The most significant external change is the increase in height, at street level this will be seen as 1 additional floor in the same architectural style as the main body of the existing façade, with a new, modern mansard on top.
481. On the new 'full' floor, the proportions, architectural detailing, appearance and materials would match the facades below, the extension to the 'main body' is considered to be sensitive and an appropriate high quality design, the materials would be conditioned to match the existing, special care and attention will be paid to the material selection, colour palette, and jointing, so the extension fits seamlessly with the historic façade below.
482. The windows would be replaced with PPC metal framed windows, which respect the existing proportions of the facade, they would be an upgrade on the existing, non-original windows. At ground floor level, the windows, doors, cills and slabs would be dropped to be level with the street, giving the base of the building a more permeable and open street level presence, improving the buildings relationship with the street.
483. The existing attic story, which is overtopped with a lift overrun, chimney stacks and untidy balustrades/rooftop access, would be removed and replaced with the modern mansard design and dormer windows, it would differentiate the new

addition from the more traditional style building below, tidying up the roofscape with a sympathetic yet contemporary design. The proposal preserves the existing buildings external expression with a thoughtful and appropriate, albeit contemporary, architecture. These external alterations, whilst being high quality, would alter the original design intent of the building and remove a large proportion of original fabric, causing a low level of less than substantial harm.

484. Renown House would remain subservient to Holland House when viewed from the west, this massing change would improve the massing relationship of the street block, creating better parity in building heights, but Holland House's pre-eminence would remain. The positioning of Renown House within and its relationship to the rest of the historic block forms part of its setting. The rooftop extensions to Holland House and the proposed tower on Bury House would be visible above the roofscape of Renown House. Discussed elsewhere in the report, the design and appearance of these would high quality, these new additions to the buildings would be visible in conjunction with Renown House when viewed from the south side of Gherkin Plaza. Close up, particularly from the south, the additional upper levels of Holland House would be visible, the existing upper floors of Holland House appear as set back elevations which fold and cascade away from Renown House, the proposals for Holland House would largely have the same effect, the experience for the viewer would be very similar in these views, Renown House would still read as part of a historic block due to its relationship with Holland House. The increased height of Holland House would have a neutral impact on the setting Renown House which contributes to its significance.

485. At present, clear sky appears above Renown House, which gives visual clarity and coherence to the scale of the historic street block, this would be eroded by the construction of a tower on Bury House, the proposed tower would be disturb the viewers ability to appreciate the architectural interest of Renown House. Historic England, Historic Buildings and Places, Save Britain's Heritage and the Victorian Society objected to the proposals, stating the additions and would be overbearing and distracting, which officers concur with to a degree. Renown House has always sat as part of a tight knit, historic urban block, however, its context is also characterized by other tall buildings and taller modern commercial office developments. The proposals for the tower on Bury House would erode clear sky and the viewers ability to appreciate the significance of Renown House, this negative impact on setting would result in a low level of less than substantial harm to Holland House.

Conclusion

486. Overall, officers consider that the proposed designs for Renown House would successfully integrate with the existing building and its neighbours, however, the proposals would detract from its architectural, artistic and historic interest and

setting due to the scale of the interventions proposed to the fabric of Renown House, in addition, the scale of the tower would have a negative impact on the setting, both these consequences amount to a low level of less than substantial harm.

487. The essence of its architecture and appearance will not negatively change under the proposals. The proposals will enable the building to continue to positively contribute to the City and the wider development within the application redline. The modest change to the building's massing is entirely appropriate and proportionate to its low level of heritage significance. Its ability to make a positive contribution to the townscape will not be removed, despite the low level of less than substantial harm.

Indirect Impacts on significance and setting of Designated Heritage Assets

Church of St Katharine Cree: grade I

Significance:

488. At the corner of Leadenhall Street and Creechurch Lane is the Guild Church of St Katharine Cree, established by 1631 with a tower of c. 1504, is of outstanding historic, architectural and archaeological interest. It predates the Great Fire and is a rare example of the early use of classical architectural motifs (internally) alongside the then more traditional perpendicular gothic (externally).

Setting

489. The church benefits from an enclosed churchyard to the north-east that contributes to its significance. Part of a street block, the setting of the church is complemented by buildings of broadly sympathetic scale. These neighbouring buildings include historic warehouses but also modern office buildings which form quieter, neutral components of the church's setting.
490. The City Cluster, including the Leadenhall Building, the Scalpel, 40 Leadenhall Street, 30 St Mary Axe, and 22 Bishopsgate, forms a significant part of the wider setting of the listed building and can be seen in views along Leadenhall Street. The upper part of the existing Aviva Tower is also visible in some of these views. These buildings do not contribute to the Church's significance. They define however, its wider setting characterised by modern, tall commercial buildings at the heart of the City Cluster. The site, which is presently views obliquely from the church, makes a neutral contribution to an appreciation of its significance. The

twentieth century character of the main facades as existing set it apart from the neighbouring Victorian and Edwardian architecture, and it is altogether much plainer in appearance and does not follow the prevailing parapet height along the street.

Impact:

491. The proposed building would appear in views of the church. When looking from the south and south-east, (View 46) the proposed building would appear in the backdrop as part of the City cluster of towers. While the scale of the site will change in these views, this maintains the present character of the site which is currently experienced as a modern intervention to the northern end of the street, noting that the existing relationships in the foreground between the Victorian and Edwardian buildings will be preserved. The location of the site in relation to the church also ensure that views towards its tower are preserved.
492. The GLA consider that the proposed building would, by altering the scale of the built form and reducing the level of open sky on the street, cause harm to the setting of the church.
493. One of the distinctive characteristics of the townscape of the City Cluster is the striking and dynamic contrast in scale between the historic buildings like this church and the new towers. In other townscapes in London, such a contrast might be uneasy in terms of the setting of historic buildings, whereas in this small part of the City the striking juxtaposition of old and new has become a defining characteristic. From most vantage points, the church is already seen against a backdrop of towers. Moreover, the materiality and architectural design of the proposed building has been conceived to relate it closely to the local context of which St Katherine Cree is such an important part. Your officers do not concur with the GLA's conclusion. Within this specific context, the proposed building is not considered to harm the setting or significance of the listed building. Moreover, the proposed building would not diminish daylight to the church to the point that appreciation of the historic interior or its use would be compromised.

Gateway in churchyard of Church of St Katherine Cree (Grade II)

494. The contribution of setting to an appreciation of the significance of this listed building, is limited primarily to the church yard of St Katherine Cree. Due to the very enclosed character of the setting of this asset, the proposals are considered to preserve those aspects of setting which have been found to contribute to significance. Therefore, the proposed development would have a neutral impact upon the listed building's significance or the way this significance is appreciated.

St Andrew Undershaft (Grade I)

Significance

495. The Church of St Andrew Undershaft is located at the intersection of Leadenhall Street and St Mary Axe, to the south-east of the site. A rare survival, dating to the 12th century, rebuilt in the 16th century, of squared rubble and stone incorporating an 15th century tower with a polygonal stair turret, which is partially rendered. Inside, there are several notable monuments and fittings.
496. Similarly to Church of St Helen, the church is of high historic interest as a rare medieval church that survived the Great Fire of London and the Second World War. Damage from an IRA bombing in 1992 resulted in the loss of its remaining 16th-century windows.
497. Architectural interest survives from the appreciation of its medieval architectural style and materials including the distinctive silhouette of the tower. It is a fine example of its kind and a particularly good, and now rare, example of a City church that predates the Great Fire.

Setting

498. St Andrew Undershaft is located at the southern end of St Mary Axe, just before it meets Leadenhall Street. Both streets are historic, and originally developed on all sides - Leadenhall and ancient route connecting Cornhill to Aldgate and St Mary Axe reflecting part of the City's medieval layout.
499. The setting of the Church was originally densely developed and has changed dramatically over the years, with the most drastic changes in the 20th century, and is now characterised in the main by modern, tall commercial developments which make a neutral contribution to its significance.
500. The small surviving churchyard to the north, including its walls and railings, contributes to the building's setting and significance. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset's significance.
501. Modern office buildings and tall towers of the City Cluster, such as the Leadenhall Building 30 St Mary Axe, 52 Lime Street, and 40 Leadenhall Street are some of the tall buildings in the immediate vicinity of the Church. The relationship of the asset and 30 St Mary Axe which is visible directly behind of the Church tower in views from Leadenhall Street has become an iconic and frequently photographed one, joined recently (in the cumulative scenario) by the form of 100

Leadenhall Street directly to the east of the church. Apart from the juxtaposition in terms of height, the contrast of the design and materiality of these buildings add further interest to this view, amplifying the historic character of the masonry church, albeit in a way unrelated to heritage significance, setting and an appreciation of it.

Impact

502. The GLA have identified a less than substantial, low to middle degree of harm to the significance of the listed building through impact upon setting.
503. Under the baseline scenario, the proposed building would appear as a prominent feature on the skyline in views of the church. Views 53 and 54 show the upper levels of the proposed building would rise above the neighbouring buildings to the east of the church and present a prominent new element in the view. However, under the cumulative scenario, the proposed building would be completely occluded by the consented form of 100 Leadenhall Street.
504. As with St Katherine Cree, the church is already seen in dynamic contrast to the taller buildings of the City Cluster. Officers therefore do not agree with the conclusions of the GLA. While visible, the proposals preserve views towards the church tower across the junction and from the immediate locality. Similarly, the proposals are considered in keeping with the existing backdrop character within these views. As such, it is considered that the proposed building would not harm the setting or significance or setting of St Andrew Undershaft.
505. Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church's setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it. The proposal would be the latest addition to the now arguably iconic setting of modern high-rise buildings which frame the church, and its medieval charisma would remain undimmed.

Church of St Helen Bishopsgate: Grade I

Significance:

506. The Church of St. Helen's at Bishopsgate (Grade I) is a rare survival of a medieval building in the City of London. Uniquely, it combines a nunnery church and a parish church side by side. The Church dates back to a Benedictine priory for nuns which was founded in 1210. While most of the outer structure dates from the 13th century, there are elements from the 12th, 14th, 15th, and 16th centuries. The church is of outstanding architectural, historic and archaeological significance. It is one of the City's few surviving pre-Fire buildings.

507. It is built of partly rendered rubble, brick and ashlar. In 1992 and 1993 IRA bombs caused damage to the church. Despite some reordering of the interior many internal fixtures and decorative elements installed in the 15th to 19th centuries have survived and contribute to the building's historic interest and significance.

Setting:

508. The churchyard to the west contributes to the significance of the listed building. From the west, the church's immediate setting comprises a group of 19th and 20th century buildings, with the tall buildings of the City Cluster providing a long-established, dramatic contrast in scale and materiality immediately to the south and west. The Gherkin is prominent behind the church in views looking east. There is a narrow slice of clear sky above the church between the Gherkin and No. 1 Undershaft obscured by a prominent tree in the churchyard.

509. Due to its location within the City Cluster, the setting of the church has changed considerably in more recent years. There is a pronounced contrast between St Helen's Church and the modern tall buildings of the City's Eastern Cluster, which lie in close proximity to the church. This includes Aviva Tower, the Leadenhall Building, Tower 42 and 100 Bishopsgate and 22 Bishopsgate, to the north and south. The setting of the church today is characterised by these long-established contrasting modern buildings that characterise this part of the City of London townscape. The juxtaposition between the historic church and the surrounding tall commercial buildings emphasises the venerable historic character of the church, albeit in a way unrelated to heritage significance and setting.

Impact:

510. The GLA have concluded that there would be a very low level of less than substantial harm caused to the significance of the Church through contribution to its setting as a result of the proposals.

511. In the baseline scenario, the proposed building would partially infill the existing clear sky gap between the Gherkin and No. 1 Undershaft (View 44). It would be partially occluded by the churchyard tree when in leaf but would be more visible in the winter months. However, the setting of the church in this view is predominantly of taller modern forms and the proposed building would be an augmentation of this. Additionally, in the cumulative scenario, the proposed building would be occluded by the consented 1 Undershaft and 100 Leadenhall Street. The proposed building is not considered to harm the setting or significance of St Helen Bishopsgate.

Church of St Botolph Aldgate: grade I (and associated grade II listed street furniture)

Significance:

512. The Church of St Botolph Aldgate has historic interest as it dates to 1741-4, to the designs of George Dance the Elder. Architectural interest derives from the appreciation of its architectural styles, materials including stock brick and classical stone detailing and a distinctive obelisk tower. The church tower and spire rise prominently from the body into open clear sky and have a landmark quality.
513. The Church has group value with the Grade II listed wrought iron gates (probably dating from the early 19th century) with open work piers on Portland stone base, to the entrance of the churchyard.

Setting:

514. The setting of the church includes the churchyard, with its associated planting, trees, drinking fountain and police call box, enclosed by the listed railings and gates. These elements make a very positive contribution to the significance of the church. A positive element within the Church's setting, only recently added in the early 21st century, is Aldgate Square. The whole ensemble of the Grade II* Aldgate School, the Square and the Church form a striking and sympathetic townscape group of great character and interest. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with tall buildings of the Cluster set some distance away to the west. Aviva Tower is visible to the west of the church, between 30 St Mary Axe and 122 Leadenhall Street. These modern elements of the setting make a neutral contribution to the significance of the church.

Impact:

515. The proposed building would be seen in the backdrop of the church as part of the City Cluster (View 38 and 39). The GLA and The Georgian Group consider that the proposed building would cause a low to middle level of less than substantial harm to the setting of the church. Your officers do not concur with this conclusion. In the baseline scenario, the upper levels of the proposed building would appear above existing tall buildings within the cluster, to the left of the church when viewed from the east (View 38). In the cumulative scenario, the proposed building would sit in front of 1 Undershaft and 100 Leadenhall, partially occluding them, but the consented schemes would rise much higher behind the proposed building. In view 39 where the cluster appears directly behind the church tower, in the baseline scenario the building would introduce new, taller built form immediately adjacent to the church spire; however, in the cumulative scenario,

again the consented towers at 100 Leadenhall and 1 Undershaft would rise higher than the proposed building behind the spire. Overall, the proposed building would read as a distant element of the established City Cluster of towers in the backdrop to the church when seen from the east. The proposal would preserve its setting or significance and the ability to appreciate it.

Church of All Hallows by the Tower (grade I)

516. Church of Saxon origins, medieval fabric, a brick tower of 1659 and extensive post-war rebuilding by Seely and Paget. The building is of very high historic and architectural significance as an ancient survivor whose myriad architectural phases testify to the waves of change that have characterised the City of London for the past thousand years.

Setting

517. The building's setting is greatly changed, and it now draws only a modicum of significance from its setting. Due to distance and intervening development, the site is not visible from the church, making a neutral contribution to an appreciation of its significance.

Impact

518. The GLA have identified a less than substantial, very low degree of harm to the listed building, through impacts to its setting. Under both cumulative and baseline scenarios, (Views 56 and 57) the proposed building would be seen at a distance to the north or occluded by the fabric of the church itself. In both bases the proposals do not interact the silhouette of the church, but are seen in the backdrop behind further intervening development demonstrably as part of the existing City Cluster. Officers therefore do not agree with the conclusions of the GLA. The proposals are considered to preserve the existing contribution of setting to an appreciation of this listed building's significance, with no harm arising to its significance.

Lloyds Building (Grade I and Grade II)

Significance:

519. The Lloyd's Building, designed by Richard Rogers Partnership (RRP) with engineers Ove Arup and Partners, opened in 1986. The stone façade, originally designed by Sir Edwin Cooper between 1925-1928 and listed at Grade II in 1977, is included in this assessment as it was integrated into the RRP building's design in the 1980s.

520. The Lloyd's building has historic interest as a highly inspirational late 20th century building by one of Britain's most significant modern architects for an internationally important organisation that successfully integrates the traditions and fabric of earlier Lloyd's buildings (including the Adam Room, originally from Bowood House and the 1925 Cooper façade).
521. The building has architectural interest as a prominent and high-quality example of high-tech architecture, with its design exemplifying architectural innovation, high quality materials and flexibility of plan throughout its impressive interior and exterior. The building's futuristic appearance and the clear architectural expression of different functional spaces contribute to a bold aesthetic.
522. Situated in the heart of the City, the Lloyd's Building forms a strikingly incongruous backdrop to many listed neighbouring buildings. It has notable group value with the nearby Grade II* Leadenhall Market, an important Victorian commercial building to which Lloyd's nods with its glazed atrium. To its neighbouring buildings it presents a strikingly original aesthetic which has never been replicated in quite the same way within the Cluster. Its high-tech facades, shining metalwork panels and complex elevational design consistently draw the eye and make it one of the most standout buildings in the heart of the Cluster.

Setting

523. Such is its architectural singularity that the significance of Lloyd's relies very little on its setting. Tall commercial buildings define its immediate context, the Leadenhall Building, 8 Bishopsgate, and 22 Bishopsgate to the north, the Willis Building and 52 Lime Street to the east, and 1 Leadenhall to the west. Most of these buildings make a neutral contribution to the significance of the Lloyd's Building. However, the Leadenhall Building, also designed by the Richard Rogers Partnership, with similar architectural elements such as exposed circulation and services is considered to make a low contribution to the Lloyd's Building's significance.
524. The existing building on the application site makes a neutral contribution to the significance of the Lloyd's Building with no intervisibility between the two.

Impact

525. The proposed building would be seen as a new skyline feature to the east of the Gherkin. It would appear as an elegant new addition to the existing Cluster of modern towers which already frame the setting of the listed building. In this respect, the proposed building would complement the setting of Lloyd's and would not harm the setting or significance of the listed building.

526. Dramatic contrasts between old and new are a characteristic trait of the Lloyd's Building's setting. The proposed development would be consistent with this character by adding a high-quality architecture to the existing group of tall, modern buildings, reinforcing the City Cluster's character, and in its different footprint creating townscape drama and interest that would not be harmful to the setting of the Lloyd's Building but, indeed, would create new ways to engage with it. The relationship and juxtaposition of the Lloyd's Building with both historic and modern buildings that contribute to its significance would remain unaffected. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

Trinity House: grade I

Significance and Setting:

527. Offices and headquarters building of 1796 by Samuel Wyatt, gutted by bombs in 1940 and rebuilt internally by Albert Richardson. Predominantly Portland stone-faced in the classical style of the Georgian era, an important and rare example of this architectural expression in the City. It is the headquarters of Trinity House, the lighthouse authority for England, Wales and the Channel Islands; they have been based in the City since the Tudor period. The building possesses high architectural and historic significance and draws significance from its dignified setting of Trinity Square and the ensemble of seagoing structures and buildings surrounding.

Impact:

528. The proposed building can be seen behind Trinity House in View 25, where it would be seen to the right of the established Cluster. In the cumulative scenario, it would remain in clear sky behind Trinity House. However, it would be read as part of the emerging, dynamic backdrop of modern tall buildings in the City Cluster, also as shown in View 28, and in View 47 where it would be occluded by trees in Trinity Square Gardens. There would be no harm to the setting or the significance of the listed building which would remain pre-eminent in the immediate foreground setting. The GLA have concluded a very low level of less than substantial harm to the setting of Trinity House. Officers do not agree with this conclusion and find that the setting and significance and ability to appreciate the listed building would be preserved.

Tower Bridge: grade I

529. Tower Bridge was designed by the by the architect Sir Horace Jones, for the City of London Corporation in 1894 with engineering by Sir John Wolfe Barry. It represents a triumph of Victorian engineering as a low, hybrid suspension and bascule bridge with a steel frame, clothed in revivalist French gothic towers, turrets

and pinnacles. The dramatic symmetrical composition acts as a 'portal' to central London from the River and has become an iconic and internationally recognised landmark of London.

530. The building possesses very high architectural/artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

Setting

531. Elements of setting which make a substantial/significant contribution to the significance and appreciation of the heritage asset are set out in relative order of contribution below:
532. The broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen's Walk, the North Bank and Butler's Wharf. From here its commanding, strategic siting, architecture and silhouette stands sentinel, guarding the entrance to central London from the sea and as a City (and London) Landmark.
533. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360 degree panoramic context with those other defining landmarks and features of the historic Pool, including City Hall, the Tower of London, the Monument, St Paul's Cathedral, Old Billingsgate and the London Custom House. In addition to those the remains of the quays, wharfs and warehouses of the historic Pool contribute to a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of it.
534. The local and wider townscape views/approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the Tower of London, from main vista at 'More London' on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul's), where the strategic role of the Pool of London is announced by its towering and dramatic architectural form and silhouette. These make a significant contribution to significance and an appreciation of it.

Impact

535. The GLA has identified a less than substantial, very low level of harm to the significance of the listed building.
536. The proposals will be visible, seen from and in the backdrop of the bridge from the south-east, from Butlers' Wharf and other locations along the South Bank (Views 8, 10, 16, 17, 18, 21, 29, 30). In these views the proposed building would be seen as a high-quality architectural addition, experienced as part of an established City Cluster of modern towers to the north of the bridge. In all views the tower would remain the commanding foreground landmark guarding the Upper Pool of London. While visible in the backdrop, the overall contribution of setting to an appreciation of the listed building's significance is considered to be preserved. Officer's therefore do not agree with the conclusions of the GLA. There would be no harm to the setting or the significance of the listed building.
537. In both the baseline and cumulative scenarios, the proposal would not change the existing composition of the view, nor the visual focus in the view; it would read, like the rest of the Cluster to the north of the bridge, as disassociated from the iconic listed building. It would preserve those elements of setting identified above and thus the significance of the listed building and an appreciation of it.

Lloyd's Register of Shipping: grade II*

Significance:

538. The Lloyd's Register building, 71 Fenchurch Street, was completed in 1900 by architects T.E. Collcutt and B. Emmanuel, was developed alongside a masterplan for the street by property developer James Dixon. This three-story building with an attic has long elevations on Lloyd's Avenue and a shorter one on Fenchurch Street.
539. It has historic interest as a grand classical building to act as the headquarters of a leading independent shipping classification organisation. Architectural interest derives from the appreciation of its free classical style described by Pevsner as "arts and crafts baroque," featuring extensive sculptured and carved decoration, being a superb example of the integration of architecture with sculpture. It reflects the late 19th and early 20th-century trend for grand classical stone-clad buildings in the City of London and features a 14-storey extension by Richard Rogers Partnership (2000) which is not included in the listing. Despite the tall extension, it retains a clearly legible setting with the Edwardian enclave of masonry offices along Lloyd's Avenue, which enhance its architectural and historic significance.

Setting:

540. The coordinated development flanking both sides of Lloyds Avenue, overseen but not individually designed by Colcutt (now known as the Lloyd's Avenue Conservation Area), forms a positive element of the setting of the listed building and enhances its significance.
541. The City Cluster, positioned to the north and west of the listed building, forms part of its wider context and setting. Tall buildings including 20 Fenchurch Street, visible from along Fenchurch Street to the west, while 40 Leadenhall Street defines the views north along Lloyd's Avenue. The surrounding modern mid-rise and tall buildings do not directly contribute to the significance of the listed building but contribute to a visually interesting, contrasting modern context.

Impact:

542. The listed building is visible in Views 40 and 52 of the THVIA. In View 40, northerly from Lloyd's Avenue, the listed building is only glimpsed. The proposed development would appear to the right of 30 St Mary Axe in this view, forming a prominent new element in the background of the listed building in northerly views from Lloyd's Avenue. However, it is significantly offset from the listed building, which remains legible, albeit obliquely, in the foreground. In the cumulative scenario, 100 Leadenhall would infill much of the sky gap presently seen in the northerly views, appearing as more prominent in this view than the proposed development. In View 52, taken on Fenchurch Street to the east of the listed building, the proposed development would appear as new built form behind the mid-rise buildings in the middle ground, showing some intervisibility with the listed building.
543. The proposed development would not affect the relationship of the Lloyd's Registry with the historic buildings along Lloyd's Avenue or other positive elements of the setting of the listed building. Due to its distance from the site, intervening buildings and its location in the context of established tall buildings in the wider context of the asset, the proposals be read as part of the modern Cluster distant and disassociated from the listed building. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it. The GLA have identified a low level of less than substantial harm to the setting of the Lloyd's Registry, but your officers do not agree with that conclusion for the reasons outlined.

Former Port of London Authority Building: grade II*

544. Offices of 1922 by Sir Edwin Cooper for the former Port of London Authority. Crowned by a distinctive tower incorporating allegorical sculpture, the building is

a rich and robust essay in the Edwardian Baroque and possesses high architectural and historic significance. It draws much significance from its setting, too, with Trinity Square and its monuments in the foreground and the neighbouring Trinity House all coalescing to form a dignified group of buildings illustrating London's seagoing past.

545. In views from Trinity Square, the upper storeys of the proposed building would be visible to the right of the listed building. It would appear suitably divorced from the foreground ensemble of historic buildings and would read as part of the emerging City Cluster in the distance, as a subsidiary player to the consented silhouettes of 100 Leadenhall Street, 1 Undershaft and 40 Leadenhall Street. This character of a modern skyline context being so, the proposed building would not be harmful to the setting of significance of the listed building.

The Aldgate School (listed as Sir John Cass School): grade II*

Significance and setting:

546. A school of 1908, of red brick with classical stone detailing in the 'neo-Wren' manner. The associated playground and railings all contribute to the building's setting and significance. To the east, the church's setting is further enhanced by the open space of Aldgate Square and the group relationship with St Botolph's church; to the west, the school is framed by the finer grain and historic townscape of Mitre Street. The setting is otherwise characterised by modern commercial buildings of medium scale in the City, with the tall buildings of the Cluster located to the west.

Impact:

547. The proposed building would be seen in the backdrop of the school as part of the City Cluster in views looking northwest from the junction of Aldgate and Leadenhall Street (looking down Mitre Street), with the Aldgate School glimpsed in the foreground. The proposed building would sit in front of 30 St Mary Axe in this view (View 41), where one would appreciate the stepped form of the proposed building, appearing to mediate in height between the mid-to-high rise buildings in the middle ground, with the much taller buildings in the background, in the cumulative scenario. Despite this intervisibility, as it would form part of the established modern City Cluster, it would not be harmful to its setting or significance. In particular, the proposed building would form a dynamic new terminus to Mitre Street in the background of north-westerly views of the school's western frontage. The GLA have identified a very low level of less than substantial harm to the setting of the Aldgate School; your officers do not agree with this conclusion for the reasons above.

Bishopsgate Institute and Library: grade II*

548. The building is a decorative red brick structure, located prominently on Bishopsgate. Completed in 1895 by Charles Harrison Townsend, the building retains rarity value as a more unusual typology within the city, through its civic and educational function. The use of free gothic elements and terracotta detailing are typically eclectic, making a good example of turn of the century design. The main frontage to Bishopsgate is most elaborate while the longer Brushfield Street elevation is more subdued. The building has high architectural and historic significance.

Setting

549. The building derives a degree of significance from its setting on the south side of Brushfield Street, where it forms a group with two eighteenth century grade II listed buildings. As the viewer moves northwards views along Bishopsgate towards the institute are oblique, and the two turrets of the main frontage are almost entirely backdropped by 70 St Mary Axe, which is seen as part of the wider City Cluster seen distantly to the south. The site is presently not visible from or with the listed building, making a neutral contribution to an appreciation of its significance.

Impact

550. The GLA has identified a very low, less than substantial level of harm to the significance of this listing building.

551. The proposed building would be visible some distance away as part of the established backdrop of the City Cluster (View 37). This view shows the proposals will be seen in the backdrop of the institute including the top of the northern turret. While this will slightly reduce the extent to which the turret is seen against open sky at this specific viewpoint, the overall contribution of this view to an appreciation of the buildings significance is limited given the distance and oblique angle. Furthermore, the majority of the façade in this view is already backdropped by existing development. Therefore while a small loss of open sky to the rear of the turret is identified, this change is considered to preserve the overall character of the view, and the extent to which it contributes to the building's significance. It is noted more immediate views of the Institute, which best reveal the buildings prominence on the street front, and group value with neighbouring buildings will be preserved. Officers do not agree with the conclusions of the GLA. Accordingly there would be no harm to the setting or significance of the listed building, preserving the extent to which setting contributes to an appreciation of its significance.

38 St Mary Axe: grade II

Significance:

552. The Baltic Exchange has historic interest as an inter-war office building (1922) in the City, designed by Sir Edwin Cooper. This stone-faced building of four storeys with two additional attic storeys illustrates an important phase of office development in the City, characterised by grand, classically enriched stone facades and Classical proportions to St Mary Axe, with a plainer stone elevation to Bury Court.
553. Architectural and artistic interest derives from an appreciation of the Classical style and ornamentation of the building, including a Doric entablature at the ground floor and an enriched frieze and dentil cornice at the fourth floor.

Setting:

554. The setting of the listed building is defined by its prominent corner location, addressing both St Mary Axe and Bury Court. It includes office buildings of similar scale, adjacent to the east and north, and on the west side of St Mary Axe, of a later date that make a neutral contribution to the setting of the listed building.
555. Due to its location in the City Cluster, the setting of the listed building is mainly characterised by large-scale, tall modern commercial buildings that make a neutral contribution to the asset's significance. These include 30 St Mary Axe, directly to the south of the asset, but also the Aviva Tower and 22 Bishopsgate, to the south-east. Additional tall buildings including 70 St. Mary House and 100 Bishopsgate are located to the north and west, respectively.

Impact:

556. In views looking east (View 55), the upper levels of the proposed building would be glimpsed behind and above the listed building, to the left of the Gherkin, slightly infilling the sky gap presently seen above the Baltic Exchange from Clerks Place. Although of a larger scale than other buildings in this tight view, the proposed development would be consistent with the much-altered setting of the listed building which is characterised by tall, modern development. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.
557. The GLA have concluded a low-to-middle level of less than substantial harm to the setting of the Baltic Exchange. Officers do not agree with this conclusion for the reasons set out above.

Nos. 2-16 Creechurch Lane: grade II

Significance

558. Nos. 2-16 Creechurch Lane is tea warehouse building of 1887. The building is five storeys high, of brick, iron and stone and gives a typical flavour of the locality. It incorporates many surviving warehouse features such as external cranes and loading bays which contribute to its special historic and architectural interest and also its townscape value. The complex forms a group with the warehouse buildings immediately to the east and on Mitre Street.

Setting

559. The buildings form a group with the other warehouse buildings in the vicinity, of similar age and materiality though unlisted and classed as non-designated heritage assets. The overall architectural and historic significance of the buildings is considered to be high, as a good example of an important and rarer typology in the city context.
560. The proximity of the listed group to St Katherine Cree church to the south and neighbouring Victorian and Edwardian buildings, creates a positive group value along the immediate length of the lane, contributing positively to the listed building's wider setting and enhancing its architectural and historic significance. The setting of this listed building and its unlisted neighbours is also presently characterised by the general proximity of the City Cluster and framed by specific modern buildings such as One Creechurch Place, the Gherkin and 100 Leadenhall Street seen to the north. While the site is visible to the north, its twentieth century architectural character sets it apart from those historic buildings in nearer proximity, lacking an aesthetic or functional relationship. The site therefore presently makes a neutral contribution to the setting of the listed buildings.
561. The GLA has identified a degree of low to middle less than substantial harm to the significance of the listed buildings.
562. The proposed building would be visible in views north along Creechurch Lane (View 46). The design of the facades has sought to create a high-quality architectural addition within these views which its materiality and modelling sympathise to a high degree with the brickwork and terracotta materiality of these historic buildings. While the overall character and scale within the site will change, in view of the site's current neutral contribution, this change is considered to preserve the extent to which these views positively contribute to an appreciation of the buildings' significance. Officers therefore do not agree with the conclusions of the GLA. In this context officers consider the proposal would not harm the listed building's setting or significance.

563. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

72-75 Fenchurch Street (Dixon House): grade II

Significance and setting:

564. Offices of 1900, of Portland stone in the Edwardian baroque style of its fellow buildings in the Lloyd's Avenue Conservation Area. The building has high architectural significance. It draws significance from its setting as part of the enclave of Edwardian buildings in the Lloyds Avenue Conservation Area.

Impact:

565. The listed building is visible in Views 40 and 52 of the THVIA. In View 40, northerly from Lloyd's Avenue, the listed building is only glimpsed in the middle ground. The proposed development would appear to the right of 30 St Mary Axe in this view, directly above the listed building, forming a prominent new element in the background of the listed building in northerly views from Lloyd's Avenue. However, it is read in the background of the listed building as part of the established modern cluster, and the listed building remains legible in short range views along Lloyd's Avenue, from which it derives its significance from its setting. In the cumulative scenario, 100 Leadenhall would appear as much more prominent in the background of this listed building, although offset to the west, infilling much of the sky gap presently seen in the northerly views. In View 52, taken adjacent to the listed building from the west, the proposed development would appear as new built form behind the mid-rise buildings in the middle ground, showing some intervisibility with the listed building.
566. The proposed development would not affect the relationship of the listed building with the historic buildings along Lloyd's Avenue or other positive elements of the setting of the listed building. Due to its distance from the site, intervening buildings and its location in the context of established tall buildings in the wider context of the asset, the proposals be read as part of the modern Cluster distant and disassociated from the listed building. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it. The GLA have identified a low level of less than substantial harm to the setting of the building, but your officers do not agree with that conclusion for the reasons outlined.

Conservation Areas

Lloyd's Avenue Conservation Area

567. This small conservation area has a tightly drawn boundary, comprising the small lane of Lloyd's Avenue, a secondary route located between Fenchurch Street and Crutched Friars. The architectural character is decorative and varied, but largely consistent in date, comprising a number of significant Edwardian and later buildings, which together create a strong group value within the conservation area interior and consistent material palette. The overall architectural and historic significance of the conservation area is considered to be high.

Setting

568. The existing view north up this street terminated by 105 Fenchurch Street and flanked by Lloyd's Register (grade II*) and Dixon House (grade II). Additionally the Gherkin is a distinctive focal point in views along Lloyd's Avenue, which along with the consented 100 Leadenhall Street tower create a modern termination to the view. The conservation area, draws little from its setting, with a strong degree of contrast between the interior and immediate surroundings beyond the lane and junction to the north. The site is presently not visible from the conservation area, making a neutral contribution to an appreciation of the conservation area's significance, character or appearance.

Impact

569. The GLA has identified a low to middle level of less than substantial harm to the significance of the conservation area.

570. The proposals will be visible from the conservation area, seen to the north (Views 40 and 52). The proposed building would introduce elegant faience architecture into this seen as part of an existing backdrop of tall buildings to the north, upholding a high architectural quality and offer a material counterpoint to the existing largely glazed modern towers. Officers disagree with the conclusions of the GLA. Given the characteristic backdrop of tall buildings in this view and the enclosed character of the conservation area, the proposed building would not harm its significance, with no diminishment of the extent to which setting contributes to appreciating this significance.

Trinity Square Conservation Area

Significance:

571. This relatively small conservation area lies to the south of the site, on the border with LB Tower Hamlets, to the north of the Tower of London WHS. It encompasses

buildings around Pepys Street, Seething Lane and Seething Lane Garden, Savage Gardens and Muscovy Street, extending between Hart Street/Crutched Friars to the north, and Byward Street to the south. It comprises a significant group of Georgian and later buildings with strong maritime associations, including Trinity House (Grade I), the Port of London Authority (Grade II*), Hart Street Church of St Olave (Grade I) and the wall and railings to St Olave (Grade II*), which together create a strong group value within the conservation area interior and consistent material palette. The overall architectural and historic significance of the conservation area is considered to be high.

Setting:

572. The conservation area and its buildings share a historic relationship with Trinity Gardens (within the Tower of London Conservation Area in LB Tower Hamlets). They also form part of the local setting of the Tower of London, and form the immediate backdrop to the WHS from the south. The setting of the conservation area to the south contributes positively to its significance. The setting of the conservation area to the north is more varied, including some historic buildings in the Fenchurch Street Station and Lloyd's Avenue Conservation Areas, with the presence of the modern City Cluster of tall buildings visible behind, which create a contrasting scale and character to the Trinity Gardens CA. The setting of the conservation area to the north makes a neutral contribution to its heritage significance. The site is presently not visible from the conservation area, making a neutral contribution to an appreciation of the conservation area's significance, character or appearance.

Impact:

573. In views looking north from Trinity Square Gardens (View 47), located immediately to the south of the conservation area, the upper storeys of the proposed building would appear visible to the east of the Gherkin and above the roofline of the buildings within the conservation area. It would be seen as a new element of the City Cluster between the former PLA building and the grade I listed Trinity House. However, it would be occluded by trees in the foreground, in Trinity Square Gardens, which would provide screening. In the worst-case scenario with the trees not in leaf, and especially in the cumulative scenario, it would appear as an addition to the established City Cluster of modern tall buildings which already forms a prominent backdrop to this view. Given this characteristic backdrop, the proposed building would not harm its significance, with no diminishment of the extent to which setting contributes to appreciating this significance.
574. The GLA have identified a low level of less than substantial harm to the significance of the conservation area through contribution by its setting. Officers disagree with the conclusions of the GLA.

Non-designated heritage assets

575. The Creechurch area harbours a number of unlisted historic buildings of merit, considered to be non-designated heritage assets, of which a number are located within the environs of the proposed building.
576. The Rabbi's House adjoins Bevis Marks synagogue to the east and presents a simple frontage to the synagogue courtyard of stock brickwork and stone dressings. Its more architecturally significant elevation is that to Heneage Lane, of red brick and Mansfield stone dressings incorporating Tudor detailing. It possesses a high level of historical significance for its associations with the synagogue and a moderate level of architectural significance for its well-composed, high-quality elevations. The building's setting as part of the synagogue complex contributes highly to its significance.
577. 113-116 Leadenhall Street is a stone-built bank of 1891 with refined detailing. As one of few remaining historic buildings on Leadenhall Street, the building is an important element of local townscape and reinforces and contributes to the setting of the church of St Andrew Undershaft. It possesses a moderate level of architectural significance for its high-quality, refined architecture. It forms a group with the Church of St Andrew Undershaft but its setting otherwise contributes neutrally to its significance.
578. 33-34 Bury Street is an office building of 1912, built for Messrs Burge, grain dealers. The building typifies the kind of diminutive, early 20th century office building once very common in the City and now hardly to be seen. It has high-quality stone carved stone detailing and makes a strong local townscape contribution, particularly as a group with Holland House. It possesses a moderate level of architectural and historic significance for its high-quality design and as a now-rare example of this building typology. Its forms a group with Holland House but otherwise its setting contributes neutrally to its significance.
579. To the east of Creechurch Lane are a characterful group of 19th century former warehouse buildings. Each is considered a non-designated heritage asset for the positive contribution it makes to the townscape and the setting of the church of St Katherine Cree. The buildings form a strong, cohesive group intrinsically and with the listed warehouses in this location, united by the shared use of brickwork and sophisticated terracotta detailing. Collectively they are a valuable survival of historic townscape at the eastern edge of the City Cluster and make a very strong local townscape contribution. The buildings are: 18-20 Creechurch Lane (Cree House), 24 Creechurch Lane (Fibi House), 12-14 Mitre Street (Mitre House) and 27-31 Mitre Street. They possess high architectural significance for their high-quality materials and stone/terracotta detailing and high historic significance as a

good surviving group of a now-rare building type in the City. Their immediate setting as a cohesive group strongly contributes to their significance. Their wider setting is a mix of buildings of various heights and ages which makes a neutral contribution to their significance.

580. The proposed building would have a visual impact on the settings of the above non-designated heritage assets due to its scale and proximity, though this would not cause harm to their significance as the sophisticated faience materiality and architectural modelling which is inspired by careful study of these buildings would ensure that the proposed building is appropriate for the setting. As such, it is not considered that the proposed building would be harmful to the setting or significance of these non-designated heritage assets.

581. 30 St Mary Axe (the Gherkin) has been identified as a non-designated heritage asset. Its setting is not considered to be adversely affected by the proposal, a high-quality tall building which would be commensurate with the Gherkin's existing character and positioned and designed in such a way as to form a complimentary neighbour to it.

Other Heritage Assets

582. Setting of a heritage asset is defined in the NPPF as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral." Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected. Section 8 of the Heritage, Townscape and Visual Impact Assessment (ES Volume 2) explains which heritage assets were scoped in and out of the assessment. The designated heritage assets considered by officers were:

- 38 St Mary Axe
- 20 & 21 Billiter Street
- Front block of Fenchurch Street Station
- Sir John Cass College
- Gatepiers at entrance to Port of London Authority's warehouses
- House east of entrance to Port of London Authority's warehouses
- Pair of houses to north of entrance to Port of London's Authority's warehouses
- 139-144 Leadenhall Street
- 52-68 Bishopsgate
- 48 Bishopsgate
- 46 Bishopsgate

- Guild Church of St Ethelburga the Virgin
- Lloyd's Building, listed Grade I and the associated Nos 12 and 14-19 Leadenhall Street, listed Grade II
- Port of London Authority Buildings including warehouses, house and pair of houses, listed Grade II
- Nos 139 to 144 Leadenhall Street, listed Grade II
- Nos 46, 48 and 52-68 Bishopsgate, listed Grade II
- Nos 20 and 21 Billiter Street, listed Grade II
- Front block of Fenchurch Street Station, listed Grade II
- Sir John Cass College (now David Game College), Jewry Street, listed Grade II
- Fenchurch Street Conservation Area

583. Officers have considered the potential impact on these designated heritage assets. Officers have also scrutinised all of the designated heritage assets using the THVIA and a digital model. The report has only assessed in detail in those listed buildings where, in the expert view of officers, there is expected to be any meaningful physical or visual proximity and/or intervisibility between the asset and the proposed development and thus a potential impact.

584. The settings and the contribution they make to the significance of the heritage assets which were scoped out of detailed assessment, would not be affected by the proposals due to the level of influence the proposals in question would have over the setting of the assets in question. It is the view of Officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets. The assets assessed in detail in this report are those affected by the proposed development. Officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the THVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. Officers are confident that the analysis that has been undertaken is sufficient to identify the heritage assets which may be affected, to understand their significance, and to assess impact on that significance.

Conclusion on Strategic Views and Heritage

585. The proposal would preserve the OUV/significance of the Tower of London World Heritage Site in accordance with London Plan policy D9m HC2, HC3, HC4, Local Plan policies CS12, CS13

586. The proposal would preserve the characteristics and composition of all relevant strategic views.
587. The proposal would cause a low level of less than substantial harm to the significance of Holland House through the infilling of the upper levels of the atrium. The proposal would also result in a low level of enhancement to Holland House through various works of repair, reinstatement and re-presentation. There would be a minor enhancement to the ability to appreciate significance through the broadening of access to the building.
588. There would be a low level of enhancement to the Creechurch Conservation Area through the creation of Heneage Arcade.
589. As such, the proposals would fail to preserve the special architectural and historic interest of Holland House as a listed building and lead to conflict with Local Plan policies CS12, DM12.1, DM12.3, emerging City Plan policies S11, and London Plan policy HC1.
590. The proposal would otherwise preserve the settings and significance of all other heritage assets assessed
591. The low levels of harm and enhancement highlighted above are carried forward into the paragraph 208 balancing exercise set out below.

Archaeology

592. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and the conservation of archaeological interest is a material planning consideration. Paragraph 200 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.
593. The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago, and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan states that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.
594. 760 The application is accompanied by an archaeological desk-based assessment (AOC Archaeology, July 2023) which is contained within the Environmental Statement as an Appendix.

595. The site lies in an area which was formerly within the walls of the Roman city of Londinium. A large Roman ditch was identified to the west of the site at St Mary Axe and a Roman road was identified to the south of the site, both of which are likely to have continued through the site. Roman buildings have also been identified close to the site. The Augustinian Holy Trinity Priory (founded 1108) was formerly located partially within the east of the site. The site was occupied by a series of buildings during the post-medieval period, including a school.
596. The desk-based assessment has indicated a low potential for surviving Roman and medieval features within the site. It is acknowledged that there is evidence of activity during these periods on the site, however it is stated that the impact of successive brickearth extraction and redevelopment within the site has likely had an adverse impact upon earlier archaeological remains. Notwithstanding, the presence of remains cannot be wholly discounted, and truncated remains may survive and that dependant on the extent of truncation, they'd likely be considered of "Medium" importance.
597. The highest potential for direct impacts results from the proposed basement extension beneath Bury House, which would extend for four levels (two additional levels below existing) and would therefore result in complete truncation of any surviving remains.
598. The proposals at Holland House and Renown House are less likely to have an impact due to them not extending beyond the existing basement levels, however, works associated with the new crane base and foundations, as well as propping up and underpinning have the potential to impact upon archaeological remains.
599. It is therefore possible that remains of Roman and medieval date survive on the site, although remains of high significance are not expected due to truncation from the current buildings.
600. Historic England GLAAS have advised that the proposed development would have a high impact on these potential remains. It is recommended that an archaeological evaluation take place, if consent is granted, in order to establish the nature and extent of archaeological survival. In the first instance, geotechnical investigations should be monitored by an archaeologist as they are carried out. If archaeological remains are encountered, a full programme of archaeological mitigation, which covers all below ground impacts should be implemented.
601. As a cultural and education space is to be provided within the proposed development. The archaeological work should therefore include public engagement to feed into the cultural and education programme for the site. It is

noted that the story of Holy Trinity Priory is of particular interest as little information about this site is currently available to view within the City.

602. Although the NPPF envisages evaluation being undertaken prior to determination, in this case considering the nature of the development, the archaeological interest and/or practical constraints are such that Historic England consider a archaeological conditions could provide an acceptable safeguard. This would comprise firstly, of evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.
603. In addition, a condition requiring a detailed design and method statement for foundations and piling configuration, as well as for public engagement is also recommended.
604. Subject to compliance with the recommended conditions, the proposals comply with the required initial steps of archaeology investigation Local Plan Policy DM 12.4, emerging City Plan 2040 HE2, HE1 and London Plan HC1.

Public Access and Inclusivity

Accessible and inclusive design

605. Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.
606. London Plan policy D5 3.5.3 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. An inclusive design statement has been provided. The proposals were subject to review by the City of London Access Group (CoLAG) on 12th January 2024.

Arrival and departure

607. The site is well-served by public transport, noting that public transport is not accessible to all people. The nearest station providing step-free access is Tower Hill at 600 metres away from the site and the nearest bus stop is 150m away from the site, on St Katherine Cree, albeit it is noted that buses are not suitable for all people.

Parking

608. Whilst there is a high PTAL, step-free public transport routes to the site are significantly further away than the recommended 50m from principal entrance points as set out in Inclusive Mobility and British Standard BS 8300 (1). Accordingly, disabled people may require access to parking, or drop-off at the site. Details of rest points at 50 metres intervals and dropping-off are reserved through the Travel Plan and S278.
609. The Red Badge parking scheme is for disabled residents and workers in the City. Red Badge holders may park in pay and display and disabled persons parking bays in the City without time limits. Blue Badge holders may park for up to four hours in these bays and six hours in the bays nearest to St Bartholomew's hospital. Therefore, disabled people who hold a Blue Badge, but not a Red Badge, are limited to four hours of on-street parking. London Plan T6.5 states that for non-residential uses that 'at least one on or off street' disabled persons parking space is provided. Following negotiations with the Applicant a blue badge parking bay has been incorporated within the designated servicing bay. This should be reserved for use for free by the disabled persons parking bay only between the hours of 7.00am and 11.00pm for the life of the development. Details of controlled entry and use of the space, its layout and surface are reserved by condition. Arrangements for booking the space and its management are reserved as part of the Inclusive Access Management Plan.
610. There are three existing on-street disabled persons parking bays in the vicinity of the development which should be re-provided if any are affected during the construction period and details reserved through the Construction Management Plan.

Dropping-off

611. Good practice guidance is that setting-down points should be positioned close to the accessible entrance of a building on firm and level ground. No drop-off points are identified in the proposals. It is recommended that details of secure drop-off on firm and level ground are reserved by condition and secured through Section S278 works.

Cycle parking

612. Cycle parking should accommodate a range of people, so as not to exclude or disadvantage riders of certain types of cycle. London Plan policy and London Cycle Design Standards recommend that 5% of cycle spaces should be suitable for larger cycles with associated, and appropriately-sized lifts and end-of-trip facilities. The 5% should be spread across both short and longer stay spaces. Routes to cycle parking should include no more than two sets of doors and those should be automated.
613. The application states that 5% of spaces for larger cycles will be provided. Larger cycle storage spaces are provided at level B1 and Lower Ground Floor, accessed by a stepped entrance with cycle ramp or a cycle lift from the northern end of Heneage Arcade. The cycle lift is dual purpose, shared with refuse transfer. There is larger cycle parking at the southern end of the Lower Ground Floor which is not accessible by lift by larger and adapted cycles. It is recommended that details of accessible cycle parking, including controlled points of entry, swept paths, and end of trip facilities are reserved by condition in the Travel Plan to ensure that all spaces are easy to access and are consistent with LCDS.
614. Larger cycle storage is at B1 or Lower Ground Floor. Cyclists will move between levels from the cycle storage via lifts A and F to access end of trip facilities on level B2. Cyclists requiring step-free routes will transfer from the cycle lift, put the cycle into storage and then move across to the passenger lifts in the central lift lobby. The cycle lift allows access to B2 but connects directly into the refuse store. Details of how this lift will be managed and cleaned are reserved by condition through the Inclusive Access Management Plan to maintain independent and dignified access and avoid inadvertent access to the refuse store. No mobility scooter storage charging or storage points have been shown in the submitted plans; however, provision of both would be secured by condition.
615. It is recommended that passive EV charging should be provided for all larger cycle spaces and details reserved through the Travel Plan.

Entrances

616. Guidance in the London Plan is that entrances should be easy to identify and accessed without undue effort, special treatment or separation. Automated sliding doors are proposed to principal entrance points, and for which step free access is provided. Step free access routes and sliding doors are welcomed. Sliding doors are more inclusive of a range of people than revolving doors, which reinforce separation and are not considered inclusive.
617. A new arcade will be created which will improve the permeability of the site. Some of the retail units are shallow and may not have sufficient passing or turning

space for wheelchair users. Details of all shopfronts are reserved by condition to ensure that doors are of sufficient width and have suitable door furniture and surface contrast.

618. Reception facilities should be consistent with AD M(2) 3.6 and include facilities for both standing and seated visitors, have non-slip surfaces, lowered sections of any desks, options for seating and an audio induction loop. As these are not currently shown on the drawings details of reception facilities are reserved by condition.

Vertical access

619. London Plan 2021 Policy D5 requires that at least one lift per core is a fire evacuation lift suitably sized for step-free access out from the building in addition to fire-fighting lifts. Two evacuation lifts are identified in the central lift core, with separate firefighting lifts.
620. Details of the management protocol for assisting people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition through the IAMP to ensure that there is sufficient training and awareness as part of the building's management.
621. Reference is not made to the use of Easy Access to Historic Buildings. However, the proposals would bring greater access to the listed buildings, which is welcome in principle. The Statement of Community Involvement indicates that some relevant disabled persons user groups were engaged during project development.

Culture/education space

622. An end-user has not been identified for the culture use and conditions are imposed to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

Sanitary facilities

623. Policy in the London Plan and Local Plan requires free, publicly accessible toilets for a range of people where there is major development, particularly when they are near significant attractions, public open spaces or existing transport

interchange. Sanitary facilities will need to meet standards in both Approved Documents M and, the updated, T.

624. Changing Places toilets are a requirement of Building Regulations for certain types and/or scales of development. The criteria are set out in Approved Document M of the Building Regulations. Changing Places toilets are intended for people with multiple and/or complex impairments. They are not intended for independent use. A 'Changing Place' toilet is indicated on the proposed drawings, accessed from Heneage Arcade. This is not currently shown fitted out as a Changing Places toilet.

625. Under the requirements of current Building Regulations and relevant policy, separate wheelchair accessible toilet and baby changing facilities should also be provided as well as ambulant accessible toilets. Whilst indicative layouts show some scope for inclusive toilet provision this needs further development, and an Inclusive Toilet Strategy is recommended to be reserved by condition encompassing the whole development. Signage and wayfinding would be secured by condition to direct the public to those facilities.

Landscape

626. Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.

627. Spend areas for assistance animals are not currently identified but could be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

Public Access and Inclusivity Conclusion

628. Overall, and subject to the imposition of conditions, S106 and S278 obligations, the proposal would accord with the access policies outlined above.

Highways and Transportation

Surrounding Highway Network and Site Accessibility

629. There is an established network of footways in the area immediately surrounding the site, with footways provided along each of the adjacent roads.
630. To the south, the site is bounded by Bury Street, which operates a one-way system from a south to north direction and connects to Leadenhall Street and Bevis Marks respectively. Pedestrian footways are provided on both sides of the carriageway.
631. The east of the site is bound by Creechurch Lane, a one-way street for northbound traffic only, which connects to Leadenhall Street in the south and Bevis Marks in the north. There are footways present on both sides of the carriageway along this street. A section of Creechurch Lane is pedestrian only, providing walking links to Bevis Marks and Houndsditch when heading northeast. Heneage Lane is another pedestrian only walkway which runs parallel to Creechurch Lane, providing access to Bevis Marks.
632. Bury Street runs along the south-west and north-west perimeter of the site. Part of the east of the site is bound by Bevis Marks. Both Bury Street and Bevis Marks are one-way streets, with footways on both sides of the carriageway.
633. There is only one signalised pedestrian crossing located in close proximity to the site, which provides a safe crossing location. It is located on Bevis Marks, which allows pedestrian movement along the pedestrianised sections of Creechurch Lane, moving in a southwest to northeast direction.
634. The surrounding road network enables pedestrians to travel directly to and from the site and permeate through the City to public transport nodes and other destinations. The site is within close proximity of Bank, Aldgate, Liverpool Street, Monument, Aldgate East and Fenchurch Street stations.
635. These stations provide access to various services on the Underground, DLR and National Rail networks.
636. The site is therefore considered well located (PTAL of 6B) to enable and encourage sustainable trip making in accordance with policy T1 of the London Plan which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

637. Regarding step free access, step free is available at Liverpool Street/Moorgate stations (Elizabeth Line, Circle, Hammersmith & City and Metropolitan Line) and Bank station (Northern Line and DLR)

Trip Generation

638. A trip generation assessment was undertaken to determine peak hour and daily person trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.

639. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 to 18:00 for the PM peak.

640. The predicted impact of the trip generation and the impact of the new development on the transport network is summarised from extracts of the Transport Assessment (TA) in Table 6.10 and 6.11. These represent the total proposed development trip generation and net trip generation for the total development.

Table 6.10: Total Proposed Development Trip Generation

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	0	0	0	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0	0	0	0
Bus	63	4	68	8	59	67	279	272	552
National Rail	434	30	464	56	402	459	1916	1868	3784
London Underground	298	21	319	39	277	315	1317	1284	2602
Taxi	9	1	10	1	8	10	40	39	79
Motorcycle	9	1	10	1	8	10	40	39	79
Bicycle	45	3	48	6	42	48	200	195	394
Walk	45	3	48	6	42	48	200	195	394
Other	0	0	0	0	0	0	0	0	0
Total	903	63	966	117	838	955	3992	3892	7884

Table 6.11: Total Development Net Trip Generation

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Car Driver	-13	-1	-14	-1	-12	-13	-54	-52	-106
Car Passenger	0	0	0	0	0	0	0	0	0
Bus	48	3	51	7	44	51	215	210	425
National Rail	314	22	336	44	290	334	1412	1376	2787
London Underground	216	15	232	30	200	231	974	949	1923
Taxi	6	0	7	1	6	7	29	28	58
Motorcycle	6	0	7	1	6	7	29	28	58
Bicycle	35	2	37	5	32	37	157	153	309
Walk	32	2	35	5	30	35	146	142	288
Other	0	0	0	0	0	0	0	0	0
Total	646	45	691	91	597	688	2908	2834	5742

641. The net development trip generation of 691 total trips in the 08:00 – 09:00 AM peak, 688 total trips in the 17:00 – 18:00 PM peak and 5,742 daily total trips are considered acceptable, given the scale of the proposals and the fact that the majority of these trips will be done via walking, cycling and public transport, with no adverse impacts on the network and immediate surrounds. The permeable nature of the site featuring Creechurch Lane and Heneage Lane as key pedestrian routes through the site is advantageous.

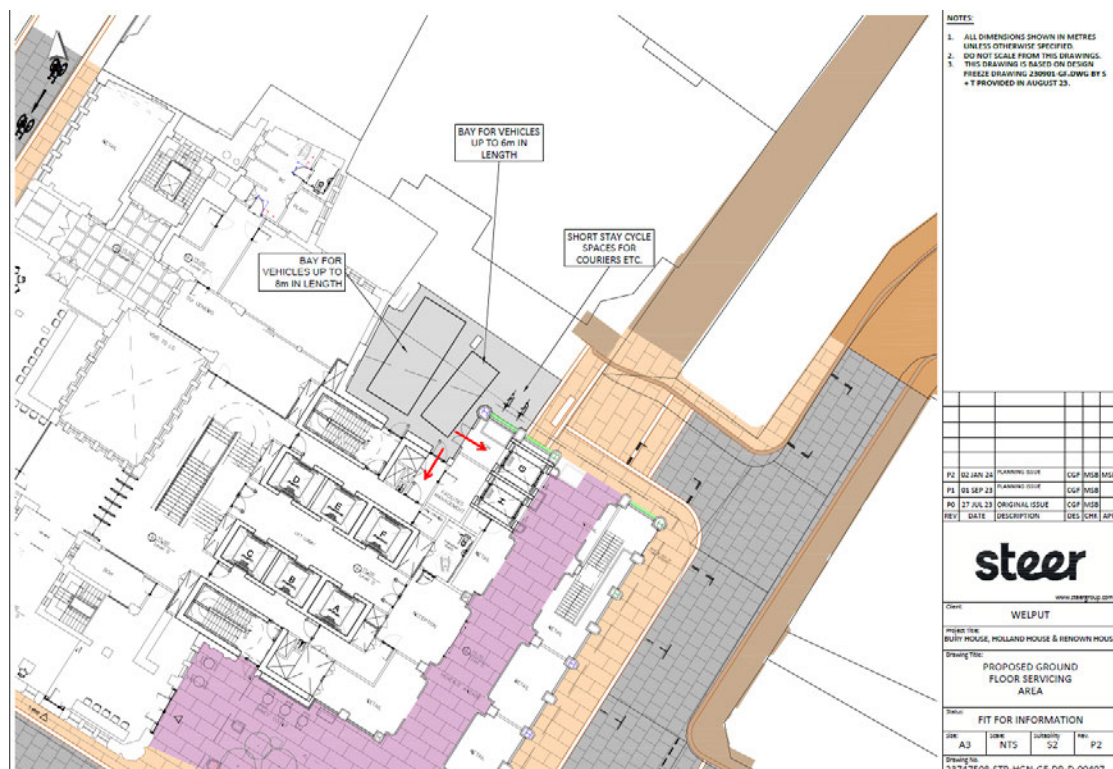
Trip Generation - Servicing and Delivery

642. The servicing area for the proposed development will be located off-street via Heneage Lane. This will serve Bury House, Holland House and Renown House.

643. Servicing area access points would be set back from the highway to ensure an arriving vehicle has place to wait off the highway to prevent any congestion/ delays to pedestrians, cyclists and other vehicles. The motorcycle parking bays on Heneage Lane once reinstated will be adjusted to allow access to the proposed off-street servicing area, and will not interfere with a new through-route via the proposed Heneage Arcade, publicly accessible from 7am to 11pm. If identified during detailed design of the S278 works, that the current location of the

motorcycle parking bays pose a threat to road safety, a relocation might be considered.

644. One fully dedicated loading bay is proposed to accommodate the maximum servicing demand per hour of the proposed scheme. This loading bay will operate alongside one adjacent hybrid loading bay/ blue badge bay, as part of the developments requirement to provide on-site disabled parking. This is demonstrated in the drawings below.



645. A 'Dockmaster' will be employed to manage the servicing area. Using the vehicle management system, they will ensure that delivery slots are honoured and that they will be managed and monitored to eliminate or minimise loading and unloading times, and service vehicles waiting times. Following arrival to the servicing area, the 'Dockmaster' will review the booking/delivery note, with the vehicle then allocated to a loading bay where goods will be unloaded.

646. The blue badge bay adjacent to the loading bay will act as a secondary loading bay, in the event that it is not used and if there are no requests to park there during the day. This flexible arrangement will be fully managed by the on-site facilities management (FM) team.

647. In the event that the blue badge bay is occupied, delivery slots could still be allocated over the course of the day, but more deliveries could be received later in the early evening once the blue badge bay user has departed the office. An indicative example of deliveries made over the course of the day, if the blue badge bay is presented in the table below.

Typical Day	
8 x 15 minute delivery slots per hour provided by two bays	
Time	Predicted number of deliveries
06:00:00	4
07:00:00	0
08:00:00	0
09:00:00	0
10:00:00	8
11:00:00	7
12:00:00	0
13:00:00	0
14:00:00	7
15:00:00	7
16:00:00	0
17:00:00	0
18:00:00	0
19:00:00	0
20:00:00	0
21:00:00	0
22:00:00	0
Total	33

Alternative Day	
4 x 15 minute delivery slots per hour provided by one bay	
Time	Predicted number of deliveries
06:00:00	4
07:00:00	0
08:00:00	0
09:00:00	0
10:00:00	4
11:00:00	4
12:00:00	0
13:00:00	0
14:00:00	4
15:00:00	4
16:00:00	0
17:00:00	0
18:00:00	0
19:00:00	4
20:00:00	4
21:00:00	3
22:00:00	2
	33

648. The proposed servicing trip generation was based on the following assumptions:

- Class E Office – Daily trip rate of 0.21 vehicles per 100sqm Net Internal Area (NIA)
- Class E Retail – Daily trip rate of 2.00 vehicles per 100sqm NIA
- Sui Generis – Daily trip rate of 0.5 vehicles per 100sqm NIA

649. The proposed servicing trip generation analysis anticipates a total of 33 vehicle trips servicing the site per day, including refuse vehicles and facilities

management. To ensure clarity, trips are defined as both the arrival and departure of the vehicle.

650. Part of the assumptions in producing the vehicle trip generation was establishing the percentages of vehicle type that would be used to service each use class. This is summarised in the table below.

Land Use	Floor Area (NIA)	Daily Vehicles			Maximum Vehicles per hour
		MGV	Car/ Vans <4.6T	Total	
Class Office	E 24,258	9.7	38.8	48.55	4.86
Class Retail	E 478	0.96	8.6	9.56	1.9
Sui Generis	1,298	1.62	4.9	6.4	0.66
Total	26,034	12	52	64.6	7.4

651. A consolidation strategy for the scheme calculated a reduction in the number of deliveries by 50%. Therefore, a maximum of 33 daily delivery and servicing trips were forecast for the scheme. This number remains the same for the current proposals.

652. The scheme provides that no deliveries would be undertaken during the CoL peak network times, as follows:

- AM peak period (07:00-10:00);
- Lunchtime peak period (12:00-14:00); and
- PM peak period (16:00-19:00).

653. Policy VT2: Freight and Servicing states Developers should minimise congestion and emissions caused by servicing and deliveries. The City supports deliveries made by cycle and low emission modes such as cargo bikes, and it is encouraging to see allocated provision for two Sheffield stands, so that cargo bikes could park up, and unload any deliveries.

654. To conclude, it is recommended that a S106 obligation be secured, to ensure the delivery management system is used effectively, that delivery slots are honoured and that deliveries are made where possible, via sustainable delivery modes as discussed.

655. An additional condition is recommended to restrict the size of the vehicles for delivery and servicing, to no larger than 9m in length.
656. A full Delivery and Servicing Management Plan will be secured via condition, which will provide full details on the receiving of deliveries, and the method & management of refuse collection.

Pedestrian Comfort Level's (Pedestrian Footway Assessment)

657. Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort based on the level of crowding a pedestrian experience on the street.
658. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that these results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc.)
659. Pedestrian Comfort Levels are graded A+ (Comfortable) to E (Uncomfortable) and a target of B+ is commonplace across the City. TfL's own guidance suggests that scores of C+ are acceptable for office and retail developments.
660. A PCL assessment has been undertaken on key footways and crossings within the local area based on thresholds set by TfL's 'Pedestrian Comfort Guidance for London' document.
661. A Pedestrian Comfort Level (PCL) assessment and a pedestrian movement forecast were carried out. A pedestrian flow survey was conducted on Wednesday 7th to Saturday 10th June 2023. The results of the survey were then used to establish a baseline pedestrian flow.
662. The PCL assessment was carried out for two weekday peaks: 08:00 to 10:00 and 16:00 to 19:00. 13 points of observation points were surveyed. For this analysis, PCL for links with a total width below 1.9, (clear width below 1.5m) were automatically classified with a PCL of F based on the assessment criteria.
663. In the PCL assessment, analysis showed that 8 of the 13 tested locations within the site boundary and adjacent highways are within PCL B+ which is the target set by the City. Locations 1 and 4 on Bury Street, 6 and 7 on South Creechurch Lane and 9 on Upper North Creechurch Lane, are below the target of PCL B+ during all

peak periods, and therefore having no adverse impacts on pedestrian comfort levels.

664. The pedestrian movement forecast provides an estimated pedestrian flow for each direction, as a percentage expressed as a flow ratio. This estimates the total percentage for pedestrians using links between the North of the site at 53.5%, 28.8% to the West, 13.0% to the South and 4.7% to the East.

665. The additional peak hourly flow for each direction resulted in 349 extra walking journeys to the North, 188 to the West, 85 to the South and 31 to the East.

666. The results of the pedestrian comfort study demonstrate that the net uplift in walking trips expected can be, from a pedestrian comfort perspective, satisfactorily accommodated via the proposed pedestrian network and highways interventions.

Cycle Parking

667. London Policy T5 Cycling requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

668. The tables below shows that this proposal is compliant with the policy in terms of overall number of the proposed cycle parking spaces, as well as the parking split of the long stay cycle parking spaces.

London Plan Requirement		Proposed	
Long Stay	Short Stay	Long Stay	Short Stay
582	85	582	85

Use class	GEA Area (sqm)	London Plan Standard	Long Stay	London Plan Standard	Short Stay
Class E Office	43,206	1 space per 75 sqm	577	first 5,000 sqm: 1 space per 500 sqm	18

				thereafter: 1 space per 5,000 sqm (GEA)	
Class E Retail	851	1 space per 175 sqm	5	first 750 sqm: 1 space per 20 sqm; thereafter: 1 space per 150 sqm (GEA)	43
Sui Generis	2,312		N/A		24
Total	46,369		582		85

Long Stay Cycle Spaces – parking split				
Sheffield Stands (2 spaces per unit)	Accessible Sheffield Stands (2 per unit)	Folding bike lockers (1 per unit)	Other high-density solutions (1 per unit)	Total long-stay spaces provided
87	29	58	407	582

669. Long-stay cycle parking will be provided in the basement B1 and B1 Mezzanine, with cyclists being able to access the basement from ground level via stairs and a wheeling channel.

670. Long-stay cycle parking access will be via Creechurch Lane at the north east corner of the site. The dedicated cycle entrance is separated from the pedestrian entrance and is equipped with a sliding door and stairs.

671. An alternative access for cycle parking is provided via the eastern Holland House entrance, from James Court via lift or stairs.

672. Short-stay cycle parking for all users has been provided within the building. It is proposed that the visitor parking will be compliant with London Plan standards. The 85 required short stay cycle parking spaces will be located within basement level B1 and B1 mezzanine level, accessed via the Creechurch Lane cycle

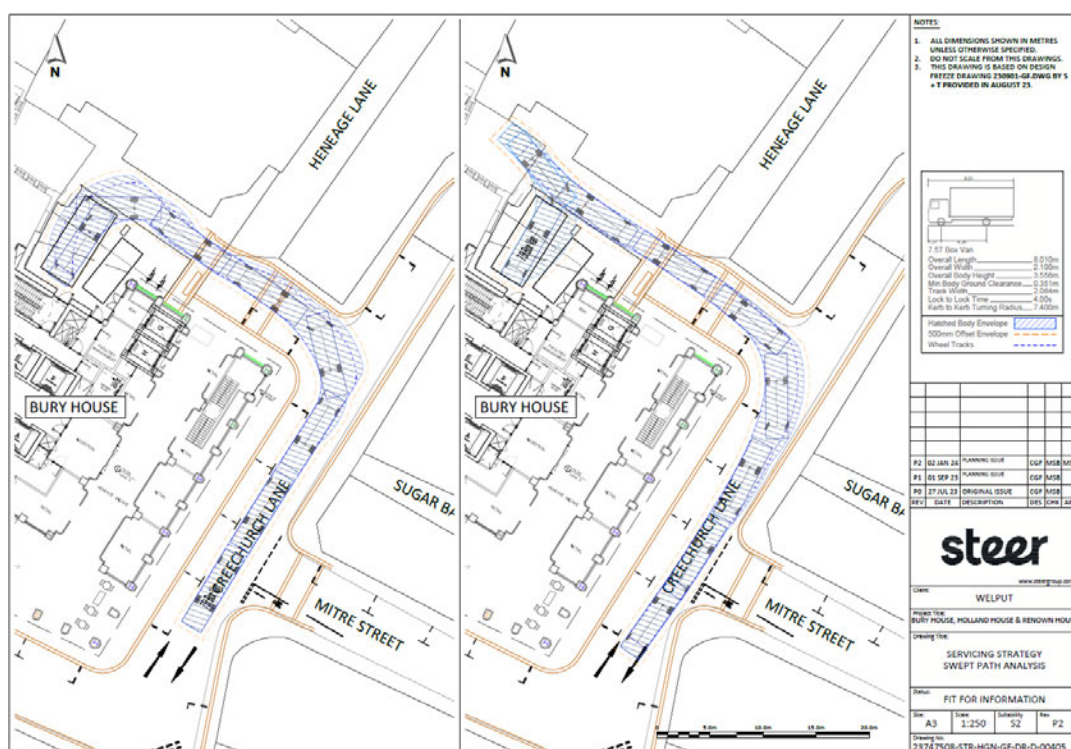
entrances. No short stay/ visitor cycle parking spaces are provided within the public realm surrounding the development.

673. The new development will offer changing and showering facilities (located at basement B2) for use by all staff and building occupants, this will be of particular use to those travelling by cycle and other active travel modes.
674. The proposed development will provide a minimum of 1 shower per 10 long-stay cycle parking spaces, equating to 59 showers. The London plan recommends shower facilities (at least one per ten long-stay spaces). However, due to the size of the proposed development it is unlikely that all of showers will be in use at all times therefore a degree of flexibility is applied, and the proposed provision is considered acceptable in principle.
675. The proposed development will provide 582 locker spaces in the shower rooms. The changing facilities will ensure that cyclists have access to a private space where they can change before and after working and separate from their workspace facilities. The London Plan recommendation for lockers is at least two per three long-stay spaces. The provision is considered acceptable.
676. There are currently plans for cycle repair stations to be provided within parking areas to allow cyclists to service their bikes. Such stations will provide essential tools to allow for repairs to be undertaken much more efficiently and with ease for a wider range of users.
677. In conclusion, the policy requirement on cycle parking have been met. A recommendation for condition to secure 582 long stay cycle spaces and 85 short stay cycle spaces, along with the provision of accessible changing facilities is required, to ensure accessibility requirements are met.

Refuse Management/Waste Strategy

678. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing.
679. For the proposed development each of the commercial tenants will be required to comply with the Site's Waste Management Strategy and may bring their own waste to the allocated refuse stores within the basement, the dedicated refuse collection store at basement or could arrange for waste to be collected regularly by the facilities management (FM) team.

680. In addition to the containers for refuse and recyclables, producers of large quantities of glass, organic waste, waste food oil and other dry mixed recyclables will be required to provide additional separate containers for these waste streams.
681. At regular intervals the tenants' staff or their FM contractor will transport their segregated waste and refuse from the shared waste store at Basement Level 2 to the main off-street loading bay off Heneage Lane. The details of vehicle collection and specification are to be submitted for further consideration via condition.
682. It is acceptable for refuse collection to be carried out by private waste collection companies and will ensure this takes place in the off-street servicing area. It is anticipated that the vehicles utilised will be approximately 8m in length or the equivalent of a 7.5T box van.
683. The swept path analysis for a 7.5T box van is considered acceptable, ensuring that facilities management staff are on hand to guide with an internal reverse manoeuvre. This is to ensure the vehicle can depart in forward gear, departing in reverse from the loading bay onto the highway is not accepted
684. To conclude, the proposals for refuse collection comply with City Plan policy S9: Transport and Servicing, due to the provision of on-site servicing facilities and encouragement of deliveries by bicycle and cargo bike.



685. The Corporation's Community Facilities Manager has been consulted and advised that the proposed waste and storage collection facilities indicated on

drawings no. 4458-ST-PR-02-100 & 4458-ST-PR-02-097 and in the Delivery and Servicing Plan, Jan 2024, comply with their requirements.

686. A full Delivery and Servicing Management Plan will be secured via condition, which will provide full details on the receiving of deliveries and will include a Waste Management strategy detailing the method & management of refuse collection.

Travel Plans

687. With an expected uplift of over 5,500 trips generated from this proposed development, steps should be taken to mitigate the impact on this development by requesting a Workplace Travel Plan be put in place; this will not be required to cover the retail areas of the site as it does not meet thresholds to be needed. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.
688. If planning permission is granted a Workplace Travel Plan would need to be secured as a section 106 planning obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

Car Parking

On-site

689. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons parking for Blue Badge holders are to be provided in accordance with Policy T6.5 for Non-residential elements of the development.
690. The proposals would be 'car free' with the exception of one on-site disabled parking bay, located within the servicing area. The parking bay due to site constraints, only has the full 1.2m clearance on the driver side and rear of the parking space.
691. A car-free development has no general parking but still must provide disabled persons parking, in line with the aforementioned policy. In order bring this proposal fully in line with the policy a Travel Plan (TP) has been recommended, to be secured via the Section 106 Agreement.

692. The foundation of the TP is supporting disabled people of this development through different measures. Each disabled staff member to have a tailored travel plan, on how to get to/from this site, and supported through different initiatives. The foundation of the TP is to support the inclusion of disabled people.
693. Similarly, disabled visitors of this development, could request support to get to/from the site, if the public transport is lacking to meet their needs.
694. Not all London Underground (LU), nearby stations are step-free access, thus some users of this development may require additional support, such as: arranging a pickup from a nearby LU station which has step-free access or at a pre-arranged location
695. The TP must also monitor the demand for on-street car parking spaces coming from this development. If records show that demand is higher than the available spaces nearby, the developer will be required to provide additional travel plan measures to support the needs of the disabled users of this development.
696. The Travel Plan (TP) is required to monitor the demand for the disabled car parking spaces and to encourage the use of public transport through travel planning measures.

Off-site

697. There are three disabled parking bays on Creechurch Lane and Mitre Street that are located in close proximity to the building entrances as per the requirements of the London Plan T6.5 and the Draft City Local Plan 2040.
698. Car-free development can in some cases lead to parking displacement on the surrounding highway network. However, the whole of the City of London is covered by a controlled parking zone, (CPZ) active Monday to Friday from 0700-1900 and Saturdays from 0700-1100. During these times motorists must pay to park in pay and display bays and must not park on single or double yellow lines. When different times apply, signage displays the controlled parking hours for specific locations.
699. Office workers and visitors are expected to travel via sustainable modes of transport. There are existing parking restrictions within the area and it is acknowledged by the City, that a robust enforcement will be required in the area to prevent illegal parking and obstruction of the highway.

Oversailing & Undersailing

700. No oversailing and undersailing have been identified at this stage, as part of the planning submission.

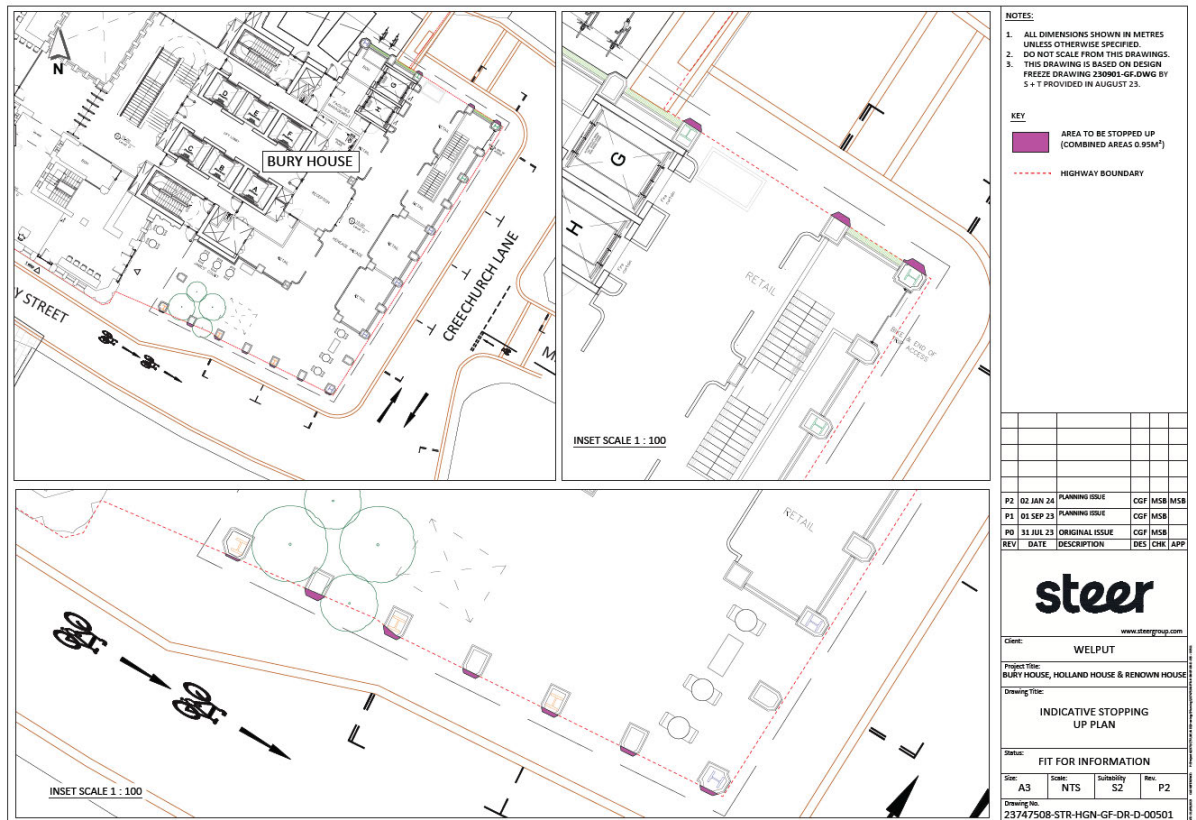
Highway Boundary/Stopping Up and Adoption

701. As the highway authority the City of London has the power to stop up areas designated as highway land by making orders known as a 'stopping up' order. The term 'stopping up' means that once such an order is made, the highway land ceases to be a highway, road, or footpath i.e. the highway rights are extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorizing the stopping up or diversion of a highway if it is satisfied that it is necessary to do so in order to enable development to be carried out. That process would be carried out under separate procedures to considerations of the applications currently before you.

702. Areas of privately owned land can alternatively be 'offered up' for adoption as public highway, for instance for the creation of a new 'estate road' to be adopted and maintained by the local authority.

703. As a result of the proposals, sections of the highways within the vicinity of the site will need to be stopped up, reconstructed and eventually adopted with areas to be dedicated as public highway. The area to be stopped up is approximately 0.95m² and the area to be adopted is 2.7m².

704. The draft stopping up / public highway offering plan, was produced by the applicant and is shown below, which illustrates the proposed changes. The plan is preliminary and will be subject to further refinement in consultation with the City's Highways Authority, following any planning approval. The process to formalize stopping up orders can only be made at the appropriate point. In principle, the plan with reference 23747508-STR-HGN-GF-DR-D-00501 is considered acceptable, as well as the plan reference 23747508-STR-HGN-GF-DR-D-00502 for highways adoption is considered acceptable.



Section S278/38 - Highways Works

705. The proposed development will attract a substantial number of pedestrians within the area.
706. It is acknowledged that meaningful changes are ongoing in the area due to the construction of tall buildings. Therefore, an increase in pedestrian flows will be able to be accommodated within the existing footways, with no adverse impacts to the surrounding area.
707. The highways works necessary to mitigate the impact of the development (including post-construction), will be carried out as part of a Section 278/38 Agreement under the Highways Act 1980.
708. The proposed works within the adjacent highways of the planning application site are (and not limited to):

Creechurch Lane

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Removal of redundant vehicle crossing
- Improvements to highways drainage
- Provision of road markings and associated traffic orders
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Bury Street

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Improvements to highways drainage
- Provision of road markings and associated traffic orders
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Heneage Lane

- Reconstruction and raising of the footway, as per the City's approved materials
- Removal of redundant street furniture
- Improvements to footway drainage
- Provision of greenery

Mitre Street Junction with Creechurch Lane

- Reconstruction of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageway

Construction Logistics Plan (CLP)

709. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that the development must address the impacts during the construction phase, and when the site becomes operational.

710. The detailed plans to be developed in accordance with TfL guidance and latest standards and approved by CoL prior to the start of the construction of this development.

711. A preliminary Construction Logistics Plan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which will need to be in line with TfL's Construction Logistics Plan Guidance and outlines the initial method

712. This should consider the following points:

- Expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highway licenses would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1600 to 1830 hours on Monday to Friday.
- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.

713. Full details of the CLP to be submitted and agreed prior to start of construction phase. Temporary works will be required to be implemented on the public highway and subject to approvals.
714. Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work-Related Road Risks are to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include:
715. Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.
716. Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.
717. Construction vehicle routes to and from the site to be approved with CoL Highways.
718. Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
719. Construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. The use of cargo bike should be encouraged throughout the construction process.
720. Details on how pedestrian (including most vulnerable) and cyclist safety will be maintained, including any proposed alternative routes (if necessary) and any Banksman arrangements.
721. A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.

722. The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <http://www.clocs.org.uk/standard-for-clocs/>

Conclusions

723. The proposals are acceptable in transport terms: provided the required alteration, condition and obligation are set out as discussed above
724. Should planning permission be granted the following S106 planning obligations and conditions, along with a s278 agreement which would need to be secured:
725. A condition to secure a Workplace Travel Plan (TP) for the development. The Section 106 agreement shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The Section 106 agreement shall require the applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process.
726. A condition securing a full Delivery and Servicing Management Plan, which will provide full details on the receiving of deliveries, and the method & management of refuse collection. This condition must be approved prior to first occupation of the site, and the approved plan shall be followed, unless otherwise agreed with the Highway Authority.
727. A condition to restrict the size of the vehicles for delivery and servicing, to longer than 9m in length.
728. A condition requiring the provision of 582 long stay cycle parking spaces and 85 short stay cycle parking spaces within the entire development, designed to London Cycle Design Standards, and the ongoing retention of these facilities.
729. A condition requiring the provision of accessible changing facilities, to ensure full accessibility needs are met.
730. A condition to secure a Construction Logistic Plan (CLP). The Section 106 agreement shall state that the CLP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. It should also restrict HGV movement to and from the site to within the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.

Environmental Impact of Proposals on Surrounding Area

731. Local Plan policy DM10.1 requires the design of development, and materials used to ensure that unacceptable wind impacts at street level and in the public realm are avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

732. In accordance with the City of London requirements, a Wind tunnel testing has been undertaken to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

733. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, buildings entrances, bus stops, ground and terrace level amenity spaces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

734. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

735. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as result of development. If wind conditions become windier but remain in a category suitable for the intended use, or if there is a negligible or beneficial effect, winds mitigation is not required.

736. Assessments have been carried out for both the windiest and the summer season.

737. The wind tunnel testing and CFD results broadly give the same assessment results. However, variance can occur as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

738. The wind microclimate across the site was tested for the following configurations:

- Configuration 1: Baseline - The existing Site with the existing surrounding buildings within the 450m radius of the site. The following development, which are currently under construction have been included in the assessment as existing buildings in the baseline:
 - One Leadenhall Court (Planning Reference: 18/00740/FULEIA);
 - 6-8 Bishopsgate (Planning Reference: 17/00447/FULEIA); and
 - 40 Leadenhall (Planning Reference: 13/01004 FULEIA)
 - Following testing, it was identified that 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA) has commenced. Therefore, qualitative analysis of 100 Leadenhall Street in the Baseline scenario is provided.
- Configuration 2: The Proposed Development with the existing surrounding buildings.
- Configuration 3: Future Baseline -The existing Site with the consented cumulative schemes which have commenced construction.
- Configuration 4: Tier 1 - The Proposed Development with the consented cumulative schemes. These include:
 - 1 Undershaft (Planning Reference: 16/00075/FULEIA)
 - 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA);
 - 123 Houndsditch (Planning Reference: 21/00622/FULEIA);
 - Bevis Marks House (Planning Reference: 17/00330/FULMAJ);
 - Fountain House (Planning Reference: 19/00713/FULMAJ);
 - Mark Lane (Planning Reference: 19/01307/FULEIA);
 - 70 Gracechurch (Planning Reference: 20/00816/FULEIA);
 - 153 Fenchurch Street (Planning Reference: 16/00345/FULMAJ);
 - 55 Bishopsgate (Planning Reference: 22/00981/FULEIA); and
 - Friary Court (Planning Reference: 22/00882/FULMAJ)
- Configuration 5: Tier 2 - The Proposed Development with the consented and non-consented cumulative schemes. The non-consented schemes that have been considered include:

- 85 Gracechurch (Planning Reference: 22/01155/FULEIA). Following testing, 85 Gracechurch (Planning Reference: 22/01155/FULEIA) achieved planning consent and is now considered a Tier 1 cumulative scheme. Therefore, its effect of being a Tier 1 cumulative scheme in Configurations 3 and 4 has been assessed qualitatively based on results of Configuration 5.
- Boundary House (Planning Reference: 21/00826/FULMAJ); and
- 15 Minories (Planning Reference: 16/00406/FULMAJ).

739. All configurations were assessed without existing or proposed landscaping to assess the worst-case scenario.

740. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation, and architectural features.

741. The City of London Lawson criteria, set out in the Wind Microclimate Guidelines 2019, defines the safety limit as once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.

742. The significance of on-site measurement locations are defined by comparing the wind comfort/safety levels with the intended pedestrian activity at each location, using the following table:

On-site Receptors		
Significance	Trigger	Mitigation required?
Major Adverse	Conditions are 'unsafe'.	Yes
Moderate Adverse	Conditions are 'unsuitable' (in terms of comfort) for the intended pedestrian use.	Yes
Negligible	Conditions are 'suitable' for the intended pedestrian use.	No
Moderate Beneficial	Conditions are calmer than required for the intended pedestrian use (by at least one comfort category).	No

Figure 13: On-Site Measurement Locations Nature and Scale of Effect

743. The significance of off-site measurement locations are defined not only by comparing the wind comfort levels with the intended pedestrian activity, but also by comparing the conditions to those experienced prior to the introduction of the proposed development (baseline), using the table below:

Off-site Receptors		
Significance	Trigger	Mitigation required?
Major Adverse	Conditions that were 'safe' in the baseline scenario become 'unsafe' as a result of the Proposed Development. OR Conditions that were 'suitable' in terms of comfort in the baseline scenario become 'unsuitable' as a result of the Proposed Development. OR Conditions that were 'unsafe' in the baseline scenario are made worse as a result of the Proposed Development.	Yes
Moderate Adverse	Conditions that were 'suitable' in terms of comfort in the baseline scenario are made windier (by at least one comfort category) as a result of the Proposed Development, but remain 'suitable' for the intended pedestrian activity.	No
Negligible	Conditions remain the same as in the baseline scenario.	No
Major Beneficial	Conditions that were 'unsafe' in the baseline scenario become 'safe' as a result of the Proposed Development.	No
Moderate Beneficial	Conditions that were 'unsuitable' in terms of comfort in the baseline scenario become 'suitable' as a result of the Proposed Development. OR Conditions that were 'unsafe' in the baseline scenario are made better as a result of the Proposed Development (but not so as to make them 'safe').	No

Figure 14: Off-Site Measurement Locations Nature and Scale of Effect

744. The City of London Lawson Comfort Criteria are as follows:

- Frequent sitting - Acceptable for frequent outdoor sitting use, e.g. restaurants, cafe.
- Occasional sitting - Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies and terraces intended for occasional use etc.
- Standing - Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
- Walking - Acceptable for external pavements, walkways.
- Uncomfortable - Not comfortable for regular pedestrian access.

745. The Wind Tunnel Testing was submitted with the application and was undertaken in July 2023. As noted above, after testing, it was identified that 100 Leadenhall Street (Planning Reference: 22/00790/FULEIA) has commenced.

Therefore, qualitative analysis of 100 Leadenhall Street in the Baseline scenario is provided.

746. In terms of receptors, these have been splits into two categories, as follows:
- On site locations:
 - Pedestrian thoroughfares, including areas that are immediately adjacent to the Proposed Development (i.e. within 5m of the building line). This also includes thoroughfares within the Proposed Development;
 - Entrances, including entrances at ground level; and
 - Amenity areas, including those at ground level and terraces (includes terraces located on the upper levels of the buildings).
 - Off site locations:
 - All receptors falling outside the definition of the boundary of the Site, such as thoroughfares, along roads, bus stops, surrounding building entrances, pedestrian crossings and amenity areas, including terraces influenced on upper levels.
747. The following existing receptors have been identified at those in close proximity to the site with terraces:
- One Creechurch Place terrace;
 - The Ace Building terrace;
 - 11-12 Bury Street; and
 - The Aldgate School terrace.
748. The methodology considers that the target condition for seating in residential amenity areas is a wind microclimate that is suitable for frequent sitting or occasional sitting during the summer season. This is because these areas are more likely to be frequently used during the summer when pedestrians would expect to be able to sit comfortably. Occasional sitting or calmer conditions are required at public outdoor seating areas. Frequent sitting conditions are required at spill out seating areas such as permanent café.
749. It is noted that if an area is classified as suitable for occasional sitting in the summer, the windier conditions that occur during the winter season usually mean that the area would be classified as suitable for standing in the windiest season, unless additional shelter was provided. This is considered to be tolerable on the basis that such an area would be most frequently used for sitting during the summer months. At other times of the year, the expectation of usability is lower due to other factors such as temperature and precipitation.

750. Upper-level terraces and large amenity spaces are assessed on the basis that these are intended for good weather use only. Occasional sitting conditions during the summer are considered acceptable for these areas.

Configuration 1: Baseline

751. There are no strong winds threshold in this configuration. The development at 100 Leadenhall would increase windiness along Bury Street to the east. Conditions are generally suitable for frequent sitting around the Site, with mainly occasional sitting or standing to the west and frequent sitting or occasional sitting to the east.

Safety criteria

752. Both the Wind Tunnel testing and CFD assessment concluded that there are no instances of strong winds exceeding the safety threshold at the Site and the nearby surrounding area.

Comfort criteria

Pedestrian Comfort

753. Wind conditions around the existing Site are mostly acceptable for a mixture of frequent sitting and occasional sitting use with some areas having wind conditions acceptable for standing use during the windiest season. This range in conditions would be considered relatively calm. The CFD assessment has identified wind conditions appropriate for walking use only during the windiest season at the Paradise Green building amenity space to the north-west of the Site.

Throughfares

754. On-Site thoroughfare locations have frequent sitting and occasional sitting use wind conditions during the windiest season. These wind conditions are suitable for the intended use.
755. Off-Site thoroughfare locations have wind conditions ranging from frequent sitting to standing use during the windiest season. These wind conditions are suitable for the intended use.

Entrances

756. On-Site entrance locations have frequent sitting use wind conditions during the windiest season. The CFD assessment results reported similar wind conditions, ranging from frequent sitting to standing use during the windiest season. These wind conditions are suitable for the intended use.

757. Off-Site entrance locations have wind conditions ranging from frequent sitting to standing use during the windiest season. These wind conditions are suitable for the intended use.

Bus Stops

758. Tunnel testing has shown that bus stop locations have occasional sitting use wind conditions during the windiest season, whilst CFD has identified a mixture of frequent sitting and occasional sitting use. These wind conditions are suitable for the intended use.

Pedestrian crossings

759. Pedestrian crossings have occasional sitting and standing use wind conditions during the windiest season. These wind conditions are suitable for the intended use.

Ground level amenity areas

760. Mixed use amenity areas have frequent sitting and occasional sitting use wind conditions during the summer season. These wind conditions are suitable for the intended use.

761. Wind tunnel testing results reported bench style seating areas have frequent sitting and occasional sitting use wind conditions during the summer season. These wind conditions are suitable for the intended use. The CFD assessment results reported wind conditions, ranging from frequent sitting to standing use during the summer season. Standing use wind conditions have been identified:

- to the south of 1 Undershaft,
- to the north and to the west of the Gherkin, and
- in the Paradise Green building amenity space to the north-west of the Site.

762. The above are one category windier than suitable for bench style seating.

763. Café style seating areas have frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use wind conditions that are one category windier conditions than required have been identified:

- at the café style seating areas along Bevis Marks,
- to the east and west of the Gherkin and
- near the Costa kiosk along St Mary Axe (measurement locations 15, 40, 42, 43, 53 and 84).

764. CFD assessment results have also identified standing use wind conditions to the east of the Gherkin, which are two categories windier than suitable for the intended use.

Roof level amenity

765. Off-Site roof level amenity areas have frequent sitting and occasional sitting use wind conditions during the summer season. These wind conditions are suitable for the intended use.

Potential effects during demolition and construction

766. It is expected that wind conditions during demolition would be suitable for a working construction site and use as existing of pedestrian thoroughfares, crossings, road users, entrances, bus stops, ground and roof level amenity areas around the Site with the hoarding in place. Therefore, the likely effect is expected to be Negligible (not significant), and no specific wind microclimate mitigation or management procedures are considered necessary during the demolition.

767. As construction of the Proposed Development progresses, wind conditions at the Site would gradually adjust from those of the existing Site to those of the completed Proposed Development. The effects would range from direct, local, short-term (temporary), Moderate Beneficial (Not Significant) to Negligible (Not Significant) at on-Site receptor locations. These wind conditions would be acceptable for construction workers representing a Negligible (Not Significant) effect. Health and safety measures would be implemented also through the CEMP.

768. The wind conditions off-Site would gradually adjust to that with the Completed Development in situ, largely representing a Negligible (Not Significant) effect.

Configuration 2: Proposed Development with Existing Surrounding Buildings

769. Overall the high rise buildings from south through to north-west shelter the Proposed Development from the predominant south-westerly winds; resulting in calm wind conditions at and around the Proposed Development.

Safety Criteria

770. Both Wind tunnel testing and CFD assessment result that there would be no instances of strong winds exceeding the safety threshold at the Site and the nearby surrounding area.
771. As the existing buildings are of the comparable height as the cumulative development, 100 Leadenhall is not expected to draw large amount of winds on the ground level, therefore, it is expected that similar wind conditions as in the Configurations 4 and 5 would prevail along the Bury Street with the inclusion of the 100 Leadenhall in the existing context.

Comfort Criteria

Pedestrian Comfort

772. Wind conditions on Site and in the nearby surrounding area of the Proposed Development would mostly be appropriate for a mixture of frequent sitting and occasional sitting use during the windiest season, with some areas having standing use wind conditions. This is because the Proposed Development is sheltered by the existing mid-rise developments to the west and south-west, where the prevailing winds originate.
773. The CFD assessment results reported similar wind conditions with walking use wind conditions in the Paradise Green amenity space to the north-west of the Proposed Development during the windiest season, consistent with the baseline scenario.

Thoroughfares

774. All on Site thoroughfares would have frequent sitting and occasional sitting use wind conditions during the windiest season. These wind conditions would represent Moderate Beneficial (Not Significant) effect.
775. All off Site thoroughfares surrounding the Proposed Development would have wind conditions ranging from frequent sitting to standing use during the windiest

season, suitable conditions for the intended use. Wind conditions at the majority of these areas would be consistent with or calmer than in Configuration 1 and would represent a Negligible (Not Significant) effect.

776. Reported occasional sitting use conditions are identified along Bury Street and Creechurch Lane (measurement locations 28, 119 and 159) and standing use wind conditions along St Mary Axe (measurement location 1). These would be one category windier than the baseline scenario (Configuration 1). This would represent a Moderate Adverse (Not Significant) effect. These conditions would remain suitable for the intended use.

Entrances

777. On Site entrances to the Proposed Development would have frequent sitting and occasional sitting use wind conditions during the windiest season, suitable conditions for the intended use. These wind conditions would represent Moderate Beneficial (not significant) effects.
778. Off Site entrances surrounding the Proposed Development would have wind conditions ranging from frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at the majority of the areas would be consistent with or calmer than in Configuration 1 and would represent a Negligible (Not Significant) effect.
779. The entrances to the retail outlets to the south along Creechurch Lane (measurement locations 108 and 123), along Bury Street to the north (measurement location 25), along Heneage Lane to north-east (measurement location 134) and the entrance to 18 Bevis Marks (measurement location 142) would be one category windier than the baseline scenario (Configuration 1). This would represent a Moderate Adverse (Not Significant) effect.

Bus stops

780. Bus stops would have occasional sitting use wind conditions during the windiest season, suitable for the intended use. Wind conditions at all of these areas would be consistent with the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

Pedestrian crossing

781. Pedestrian crossings would have occasional sitting use and standing use wind conditions during the windiest season, suitable for the intended use. Wind conditions at these areas would be consistent with Configuration 1 and would represent a Negligible (Not Significant) effect.

Ground level amenity spaces

782. Off Site ground level mixed use amenity areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

783. The on site bench style seating on the ground level would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect.

784. Off-Site bench style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

785. The CFD assessment reports standing use wind conditions to the south of 1 Undershaft, to the north and to the west of the Gherkin and at bench style seating provisions in the Paradise Green building amenity space to the north-west of the Proposed Development. These are one category windier than suitable for bench style seating, albeit they are consistent with the baseline scenario. These wind conditions would represent a Negligible (Not Significant) effect.

786. Off-Site ground level café style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use wind conditions are reported:

- at the café style seating areas along Bevis Marks, and
- to the east and to the west of the Gherkin (measurement locations 15, 40, 42, 43 and 53)
- south of the proposed development (measurement location 107)

787. The above would be one category windier than suitable. These wind conditions at Bevis Marks and west of the Gherkin would be consistent with the baseline scenario (Configuration 1) and would represent Negligible (Not Significant) effect.

788. The café style seating provisions near the Costa kiosk along St Mary Axe (measurement location 84) would have frequent sitting use wind conditions during the summer season. These wind conditions would be one category calmer than in the baseline scenario (Configuration 1) and would represent Moderate Beneficial (Not Significant) effect. However, the CFD assessment reports occasional seating at this location. Furthermore, the CFD assessment results represent standing use wind conditions at the café style seating area to the east of the Gherkin, which would be two categories windier than suitable for the intended use. However, this would be slight improvement as compared to the baseline scenario, which were suitable for standing across the entire space. This would represent a Negligible (Not Significant) effect.

Roof level amenity

789. Roof level amenity areas on the Proposed Development would have a mixture of frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent Moderate Beneficial (Not Significant) and Negligible (Not Significant) effects. However, CFD assessment has reported wind conditions ranging from frequent sitting to standing use during the summer season. Standing use wind conditions are identified at roof level amenity area on Level 8 and Level 9. These would be one category windier than suitable for the intended use. This would represent a Moderate Adverse (Significant) effect. Furthermore, the wind tunnel testing reports occasional sitting along the western façade of the level seven terrace of the Proposed Development (measurement locations 214 and 215), which is one category windier than suitable. These conditions would represent a Moderate adverse effect and would require mitigation measures in the form of localised landscaping.

790. The following mitigation measures would be expected to improve conditions:

- A 1.5m tall balustrade, at least 50% solid on all sides of the level seven roof terrace; or
- 1.5m tall planters with planting around the seating provisions; or
- 1.5m tall hedging around the seating provisions.

791. All the off-Site roof level amenity areas would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season, suitable for the intended use. The majority of the wind conditions would be consistent or calmer than in the baseline scenario (Configuration 1) and would represent a Negligible (Not Significant) effect.

792. There is one roof level amenity space, on the Ace Building to the south of the proposed development which would have occasional sitting use wind conditions during the summer season, one category windier than in the baseline scenario. This would represent a Moderate Adverse (Not Significant) effect.
793. Bench style seating areas on the roof level of the Proposed Development would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect.

Configuration 3: Future Baseline

794. Configuration 3 assesses the existing Site with the consented cumulative schemes that have commenced construction and are likely to be built out prior to commencement of construction of the Proposed Development.
795. It is noted that the Future Baseline conditions were not modelled explicitly as part of the CFD assessment. From the CFD results it can be inferred that the impact of the Tier 1 cumulative schemes would result in calmer conditions directly west of the Site on Bury Street, and windier conditions to the southwest of the Site on Leadenhall Street and west of the Site around 1 Undershaft. These changes would not be so extensive as to alter the overall suitability of conditions relative to the Baseline conditions.
796. In terms of the demolition and construction phases, the wind conditions would be suitable for a working construction site and pedestrian thoroughfares, entrances and ground level amenity around the Site. Therefore, the likely effect is expected to be Negligible.

Configuration 4: Proposed Development with Consented Cumulative Surrounding Buildings

797. The development at 85 Gracechurch was assessed as non-consented (Tier 2) cumulative development in Configuration 5, however as it has since achieved planning consent it should now be assessed as a Tier 1 cumulative development. Given that there are other taller buildings in between 85 Gracechurch and application site and that this building is located approximately 390m away from the site, it is considered that any affects would not be significant in the future baseline (Configuration 3) and consented cumulative context (Configuration 4). As such, the discussions for the Configuration 3 and Configuration 4 remain valid.

Safety exceedances

798. In configuration 4, there would be no instances of strong winds exceeding the safety threshold at any measurement location at the Site and the nearby surrounding area.

Comfort Criteria

Pedestrian Comfort

799. In terms of the suitability of the intended uses on site, the wind tunnel testing reports conditions around the Proposed Development that would generally be suitable for frequent sitting and occasional sitting use during the windiest season, with some areas having standing use wind conditions.
800. The CFD assessment results that there would be walking use wind conditions in the Paradise Green amenity space to the north-west of the Proposed Development during the windiest season, consistent with the baseline scenario.

Thoroughfares

801. With regard to the suitability of thoroughfares, all those at the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.
802. Off-site all thoroughfares would be suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at the majority of the areas would be consistent with or calmer than in Configuration 3 and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.
803. Although suitable for their intended use, the following locations would be one category windier than the future baseline (Configuration 3):
- along Bury Street to the north (measurement location 26)
 - along Creechurch Lane (measurement locations 126, 128, 129, 130 137 and 159) and
 - along Heneage Lane (measurement location 137)
804. These wind conditions would represent a Moderate Adverse (Not Significant) effect.

Entrances

805. Frequent sitting and occasional sitting use wind conditions during the windiest season are reported for all entrances to the Proposed Development. These would be suitable conditions for the intended use and represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.
806. All the entrances surrounding the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at all the entrances would be consistent with or calmer than the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, representing calmer wind conditions than in Configuration 2.

Bus Stops

807. All bus stops would have frequent sitting and occasional sitting use wind conditions during the windiest season, suitable for the intended use. Wind conditions at all the areas would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

Pedestrian crossing

808. Occasional sitting use and standing use wind conditions during the windiest season are reported, which are suitable for the intended use. Wind conditions at all the areas would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that in Configuration 2. The CFD assessment reports standing use or calmer, which represent Negligible to Moderate Adverse effects, both not significant effects.

Ground Level Amenity Spaces

809. Mixed use amenity areas off site would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These would represent a Negligible (Not Significant) effect, consistent with the future baseline scenario (Configuration 3). The CFD assessment reported wind conditions with a mixture of frequent sitting and occasional sitting use. This still represents a Negligible (Not Significant) effect.

810. Both the wind tunnel testing and CFD assessment report frequent sitting use wind conditions during the summer season, on on-site bench style seating provisions on the ground level, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.
811. Off-Site bench style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with or calmer than in the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.
812. CFD assessment reported standing use wind conditions during the summer season to the north and to the west of the Gherkin and Paradise Green building amenity space. These are one category windier than suitable for bench style seating. These wind conditions would be consistent with the baseline scenario. These wind conditions would represent a Negligible (Not Significant) effect.
813. On site café style seating provisions would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2. Furthermore, the off-Site café area represented by probe location 107 would have suitable wind conditions, with windier conditions alleviated due to the shelter from cumulative buildings.
814. Off-site café style seating will range from frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use is reported:
- to the east of the Gherkin (measurement locations 40, 42, 43) and
 - near the Costa Kiosk to the west of the Gherkin (measurement location 84)
815. The above reported conditions are one category windier than the suitable conditions. These wind conditions would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.
816. The café style seating provisions along Bevis Marks to the north (measurement location 15) would have frequent sitting use wind conditions during the summer season. These wind conditions would be one category calmer than in the future baseline scenario (Configuration 3) and would represent a Moderate Beneficial (Not Significant) effect. In the CFD assessment though, the seating area along Bevis Marks reports occasional sitting conditions, similar to the baseline scenario.
817. Standing use wind conditions at the café style seating area to the east of the Gherkin would be up to two categories windier than suitable for the intended use,

however, would be slight improvement as compared to the baseline scenario, which were suitable for standing across the entire space. This would represent a Negligible (Not Significant) effect.

Roof Level Amenity

818. The roof level amenity space at the proposed development would range from frequent sitting and occasional sitting use wind conditions, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) and Negligible (Not Significant) effect, similar to that observed in Configuration 2).
819. The CFD assessment reports standing use wind conditions on areas of level 8 and 9. These would be one category windier than suitable for the intended use; however, a substantial proportion of the terraces would remain suitable for the intended use. These would represent a Moderate Adverse (Not Significant) effect.
820. Off-site roof level amenity areas would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season, suitable for the intended use. Majority of the wind conditions would be consistent or calmer than in the baseline scenario (Configuration 1) and would represent Negligible (Not Significant) effect, similar to Configuration 2.
821. One off site roof level amenity area on top of 11-12 Bury Street development (measurement location 205) would have occasional sitting use wind conditions during the summer season. This would be suitable for their intended use, albeit one category windier compared to the future baseline scenario (Configuration 3). These would represent a Moderate Adverse (Not Significant) effect.
822. Bench style seating areas on the roof level of the Proposed Development would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that in Configuration 2. Although the CFD assessment result report some occasional sitting use, this is still suitable for the intended use and represents a Moderate Beneficial (Not Significant) effect.
823. Although the occasional sitting use wind condition at the café style seating area at level seven (measurement location 215) is more localised than Configuration 2, mitigation would still be required in the form of a 1.5m balustrade, at least 50% solid on all sides.

Configuration 5: The Proposed Development with Consented and Non-consented Cumulative Surrounding Buildings

824. In configuration 5, the wind conditions reported for each type of use are similar to those reported in configuration 4.

Safety exceedances

825. In configuration 5, there would be no instances of strong winds exceeding the safety threshold at any measurement location at the Site and the nearby surrounding area.

Comfort Criteria

Pedestrian Comfort

826. In terms of the suitability of the intended uses on site, the wind tunnel testing reports conditions around the Proposed Development that would generally be suitable for frequent sitting and occasional sitting use during the windiest season, with some areas having standing use wind conditions.
827. The CFD assessment results that there would be walking use wind conditions in the Paradise Green amenity space to the north-west of the Proposed Development during the windiest season, consistent with the baseline scenario.

Thoroughfares

828. With regard to the suitability of thoroughfares, all those at the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.
829. Off-site all thoroughfares would be suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at the majority of the areas would be consistent with or calmer than in Configuration 3 and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.
830. Although suitable for their intended use, the following locations would be one category windier than the future baseline (Configuration 3):
- along Bury Street to the north (measurement locations 26 and 71)

- along Creechurch Lane (measurement locations 126, 128 and 159) and
- along Heneage Lane (measurement location 137)

831. These wind conditions would represent a Moderate Adverse (Not Significant) effect.

Entrances

832. Frequent sitting and occasional sitting use wind conditions during the windiest season are reported for all entrances to the Proposed Development. These would be suitable conditions for the intended use and represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.

833. All the entrances surrounding the Proposed Development would range from being suitable for frequent sitting to standing use during the windiest season, suitable conditions for the intended use. Wind conditions at all the entrances would be consistent with or calmer than the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar to that in Configuration 2. The CFD assessment reports similar results, representing a Negligible (Not Significant) to Moderate Adverse (Not Significant) effect.

Bus Stops

834. All bus stops would have frequent sitting and occasional sitting use wind conditions during the windiest season, suitable for the intended use. Wind conditions at all the areas would be consistent with the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

Pedestrian crossing

835. Occasional sitting use and standing use wind conditions during the windiest season are reported to all pedestrian crossings, which are suitable for the intended use. Wind conditions at all the areas would be consistent with or calmer than in the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that in Configuration 2. The CFD assessment reports standing use or calmer, which represent Negligible to Moderate Adverse effects, both not significant effects.

Ground Level Amenity Spaces

836. Mixed use amenity areas off site would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These would represent a Negligible (Not Significant) effect, consistent with the future baseline scenario (Configuration 3). The CFD assessment reported wind conditions with a mixture of frequent sitting and occasional sitting use. This still be suitable for their intended use and represents a Negligible (Not Significant) effect.
837. Both the wind tunnel testing and CFD assessment report frequent sitting use wind conditions during the summer season, on on-site bench style seating provisions on the ground level, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that observed in Configuration 2.
838. Off-Site bench style seating areas would have frequent sitting and occasional sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would be consistent with or calmer than in the future baseline scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.
839. Whilst suitable for their intended use, bench style seating in the pocket park along the One Creechurch Place (measurement location 186) would have occasional sitting use wind conditions during the summer season, which is one category windier than in the future baseline scenario (Configuration 3), this would represent a Moderate Adverse (Not Significant) effect.
840. CFD assessment reported standing use wind conditions during the summer season to the north and to the west of the Gherkin and Paradise Green building amenity space. These are one category windier than suitable for bench style seating. These wind conditions would be consistent with the baseline scenario. These wind conditions would represent a Negligible (Not Significant) effect.
841. On site café style seating provisions would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Negligible (Not Significant) effect, similar to that observed in Configuration 2.
842. Off-site café style seating will range from frequent sitting and occasional sitting use wind conditions during the summer season. Occasional sitting use is reported:
- to the east of the Gherkin (measurement locations 40, 42, 43) and
 - near the Costa Kiosk to the west of the Gherkin (measurement location 84)
843. the above reported conditions are one category windier than the suitable conditions. These wind conditions would be consistent with the future baseline

scenario (Configuration 3) and would represent a Negligible (Not Significant) effect, similar effect to that observed in Configuration 2.

844. The café style seating provisions along Bevis Marks to the north (measurement location 15) would have frequent sitting use wind conditions during the summer season. These wind conditions would be one category calmer than in the future baseline scenario (Configuration 3) and would represent a Moderate Beneficial (Not Significant) effect. In the CFD assessment though, the seating area along Bevis Marks reports occasional sitting conditions, consistent with the baseline scenario.

845. Standing use wind conditions at the café style seating area to the east of the Gherkin would be up to two categories windier than suitable for the intended use, however, would be slight improvement as compared to the baseline scenario, which were suitable for standing across the entire space. This would represent a Negligible (Not Significant) effect.

Roof Level Amenity

846. The roof level amenity space at the proposed development would range from frequent sitting and occasional sitting use wind conditions, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) and Negligible (Not Significant) effect, similar to that observed in Configuration 2.

847. The CFD assessment reports standing use wind conditions on areas of level 8 and 9. These would be one category windier than suitable for the intended use; however, a substantial proportion of the terraces would remain suitable for the intended use. These would represent a Moderate Adverse (Not Significant) effect.

848. Off site roof level amenity areas would have wind conditions suitable for frequent sitting and occasional sitting use during the summer season, suitable for the intended use. Majority of the wind conditions would be consistent or calmer than in the baseline scenario (Configuration 1) and would represent Negligible (Not Significant) effect, similar to Configuration 2.

849. One off site roof level amenity area on top of 11-12 Bury Street development (measurement location 205) would have occasional sitting use wind conditions during the summer season. This would be suitable for their intended use, albeit one category windier compared to the future baseline scenario (Configuration 3). These would represent a Moderate Adverse (Not Significant) effect.

850. Bench style seating areas on the roof level of the Proposed Development would have frequent sitting use wind conditions during the summer season, suitable for the intended use. These wind conditions would represent a Moderate Beneficial (Not Significant) effect, similar to that in Configuration 2. Although the CFD assessment result report some occasional sitting use, this is still suitable for the intended use and represents a Moderate Beneficial (Not Significant) effect.

Wind Microclimate Conclusion

851. In terms of the safety, there will be no strong winds with a potential to give rise to safety concerns at any of the configurations, including the proposed development within its existing surrounds, consented and non-consented schemes.

852. With the proposed development built, on-site conditions are suitable for the intended uses without landscaping or mitigation measures. This applies to all proposed entrances, seating, benches, seating terraces and mixed amenity terraces. However, café style seating area off-site to the south of the proposed development and café style seating areas on-site on the level seven of the proposed development would have windier than suitable conditions. Landscaping mitigation measures are suggested for level seven of the development. The café seating area to the south of the site is expected to get some protection from existing trees.

853. The wind tunnel testing shows that when the consented cumulative schemes come forward, wind conditions would become one category windier along Creechurch Lane. However, these areas would remain suitable for the intended use. Wind conditions would be suitable for the intended use at the windier than suitable café style seating area to the south of the proposed development. As such, there would be no additional areas that would have windier than required wind conditions, compared to those in the existing context.

854. The CFD assessment results that all off-site conditions are suitable for their intended use, including thoroughfares, crossings, mixed amenity spaces and roof terraces. Seating areas although one or two categories windier, they are consistent with or slightly improved from the baseline conditions. Regarding off-site benches, for those one category windier, conditions are consistent with the baseline conditions. Therefore, impacts are considered negligible.

855. The inclusion of Tier 1 cumulative schemes has a marginal impact on conditions, but does not alter the suitability of conditions for any receptor.

856. The inclusion of Tier 2 cumulative schemes did not have a material impact on conditions.

Daylight, Sunlight, Overshadowing

857. Policy D6(D) of the London Plan states that the design of development should provide sufficient daylight and sunlight to (new) and surrounding housing that is appropriate for its context. whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

858. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

859. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings and other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.

860. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the draft City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

861. The BRE guidelines 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

Interpreting results

862. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionally* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-40% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

863. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Assessment

864. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the BRE Guidelines and considered applying the policies set out in policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

865. The application is supported by an Environmental Statement including an assessment (Chapter 10 with associated annexes) of the Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage. A Radiance Assessment has also been submitted including visual imagery visually representing the daylight and sunlight results. This analysis has been carried out for Bevis Marks Synagogue, 2 Heneage Lane, 18-20 Creechurch Lane and 2 & 10-16 Creechurch Lane.

866. The Local Planning Authority has commissioned a third party review by BRE, who have reviewed both abovementioned documents.

867. The Radiance Assessment contains Average Daylight factor (ADF) and median daylight factor results for some of the existing buildings. However, the BRE Report states *“Use of the daylight factor or daylight illuminance for loss of light to existing buildings is not generally recommended. This tends to penalise well-daylit existing buildings, because they can take a much bigger and closer obstruction and remain above the minimum recommendations in BS EN 17037. Because BS EN 17037 quotes a number of recommended values for different qualities of daylight provision, such a reduction in light would still constitute a loss of amenity to the room. Conversely if daylight factor and / or daylight illuminance values in an existing building were only just over the recommended minimum, even a tiny reduction in light from a new development would cause them to go below the minimum, restricting what could be built nearby.”* The BRE Report goes on to list situations in which use of these methods may be appropriate, such as to a consented, but not yet built, property. According to the BRE review, since the selection of existing buildings assessed in the Radiance Assessment does not include these examples then the use of these methods is not in line with the BRE guidelines. Care should therefore be taken in their interpretation and when giving weight to the outcome of those elements of the assessment.
868. Whilst there is currently no established guidance regarding what constitutes a ‘noticeable’ or ‘significant’ change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE’s recommended ADF target values. Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in the Environmental Statement in line with BRE Guidelines. The local plan (paragraph 3.10.41) states that the CoL will apply the methods set out in the BRE guidelines. That approach is carried forward in the draft City Plan 2040 (paragraph 9.8.1).
869. BRE note that visual imagery are a form of qualitative assessment and it is advised that care should be taken if using and interpreting these images as their appearance will depend on a number of factors including the contrast and brightness of the viewing medium and individual perceptions. In contrast, the BRE guidelines give clear cut measures by which the acceptability of loss of light may be judged. It is noted that officers have considered and interpreted the visual images submitted as part of the radiance assessment qualitatively only. The actual daylight and sunlight impacts have been assessed against the BRE guidelines.

870. Officers consider that the applicants have completed a comprehensive daylight assessment, as set out within Environmental Statement (ES) Chapter 10 and ES Volume 3, Technical Appendix: Daylight, Sunlight and Overshadowing, Solar Glare and Light Spillage. BRE has confirmed that the daylight effects were generally correctly assessed in accordance with BRE Report, 'Site layout planning for daylight and sunlight – A guide to good practice', 2022 (the BRE Guidelines). This is the principal reference document used by local authorities in consideration of daylight and sunlight matters, throughout the UK and including CoL, and is referenced in key planning policy including in Local Plan policy DM 10.7 and in Emerging City Plan policy DE7.

871. The assessment submitted by the applicant considers the existing baseline conditions as the prevailing conditions across the site and of the surrounding area at the time of writing (August 2023), including relevant schemes under construction at the time (with massing due to be predominantly constructed / completed by the commencement of the construction works for the Proposed Development). It is advised that the baseline characterisation was based on site visits and on information and data sources online from the Valuation Office Agency.

872. The evolution of the baseline is an alternative baseline condition at an indeterminate point in the future for a scenario that assumes all relevant neighbouring developments outlined in the 'Cumulative Schemes' for the EIA (refer to ES Volume 1: Chapter 2 EIA Methodology) are built in the surrounding environment, prior to the implementation of the Proposed Development.

873. The Tier 1 cumulative schemes are as follows:

- 2-3 Finsbury Avenue
- Tenter House, 45 Moorfields
- 1 Undershaft
- 100, 106 & 107 Leadenhall Street
- 115-123 Houndsditch
- Bevis Marks House, 24 Bevis Marks
- Fountain House, 130 Fenchurch Street
- Site bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane
- 70 Gracechurch Street
- 55 Gracechurch Street
- Seal House, 1 Swan Lane
- 41 Tower Hill
- 1-5 London Wall Buildings
- Finsbury Circus Gardens
- 150-152 & 153 Fenchurch Street

- City Tower and City Place House, 40-55 Basinghall Street
- 55 Bishopsgate
- 85 Gracechurch Street
- 1 Exchange Square
- 65 Crutched Friars
- 1-27 The Arcade Liverpool Street
- 34-40 Whitechurch Lane and 29-31 Commercial Road
- Former Beagle House (Maersk House), Braham Street

874. In terms of the Assessment Methodology in the Environmental Statement, the following scenarios have been assessed in relation to daylight, sunlight and overshadowing:

- Existing Baseline Scenario - This scenario considers the existing daylight, sunlight and overshadowing condition of the Site and surrounding context.
- Future Baseline Scenario - This scenario assumes all Cumulative Schemes have been built out in the absence of the Proposed Development.
- Proposed Development Scenario - This scenario consists of the completed Proposed Development in the context of the surrounding environment; and
- Cumulative Scenario - This scenario considers the effects of the Proposed Development in conjunction with consented Cumulative Schemes in close enough proximity to the site.

875. Of the abovementioned Tier 1 cumulative schemes, the following have been considered with the potential to generate effects to daylight, sunlight, and overshadowing, in conjunction with the Proposed Development, and have been included within the Cumulative Assessment:

- 1 Undershaft (planning reference: 16/00075/FULEIA)
- 100 Leadenhall Street (planning reference: 22/00790/FULEIA)
- 24 Bevis Marks (planning reference: 17/00330/FULMAJ)
- 115-123 Houndsditch (planning reference: 21/00622/FULEIA)

876. For the assessment of the daylight and sunlight the following residential buildings have been considered in the ES:

- 2 Heneage Lane
- 4-8 Creechurch Lane
- 2&10-16 Creechurch Lane
- 18-20 Creechurch Lane
- 27-31 Mitre Street

877. The following places of worship have been considered, as sensitive receptors:

- St Helen's Church Bishopsgate

- Bevis Marks Synagogue
- St Katherine Cree Church
- St Andrew Undershaft Church

878. The following educational building has been considered, as sensitive receptor:

- Sir John Cass Primary School

879. In terms of overshadowing, the following open spaces, as sensitive receptors, have been assessed:

- 30 St Mary Axe
- Bevis Marks Synagogue Courtyard
- 19 Bevis Marks Rooftop
- 1 Creechurch Place
- Mitre Square Garden
- Three education building amenity areas at Aldgate School
- 11 – 12 Bury Street Rooftop

880. When referring to the degree of effect (negligible, minor, moderate and major) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. Officers agree with these judgements reached in the ES and daylight/sunlight review when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the ES in forming a judgement on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (Part D of London Plan Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (Emerging City Plan Policy DE7).

881. The ES considers moderate and major effects to be significant effects, whilst minor and negligible effects to be not significant effects. In the context of the BRE review all adverse impacts, including minor impacts, have been considered significant. As this is an EIA development and the BRE guidelines do not provide guidance on effect significance in EIA terms, it is considered that professional judgement is reasonable to be applied. The BRE guidance advises that the guidelines should be interpreted flexibly considering the built environment of each area and allows for local authorities to adopt different target values in certain circumstances. Considering that the site is located in a highly dense urban environment, with high-rise buildings in the vicinity, a pragmatic approach, in terms of significance of the effects, is considered reasonable to be applied. Whilst minor

adverse effects may be of local concern, they are not necessarily considered significant in the context of an EIA development in CoL.

882. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same daylight/sunlight test requirements as residential properties. The dense urban environment of the city in and around the Cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in this respect.

Daylight and Sunlight

883. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL) tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met.

884. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

885. Both the London Plan 2021 and draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need

to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

886. A total of 10 buildings, including residential, educational and places of worship, have been considered as sensitive receptors and assessed in the baseline condition in relation to daylight and sunlight, as stated above. Within these 10 buildings, a total of 586 windows serving 139 rooms were assessed. 219 windows were assessed for sunlight.

887. The third party reviewer (BRE) concurs that the scope of the study in terms of properties assessed appears reasonable covering the nearest applicable buildings. This includes residential properties, places of worship and a school. It is also noted that other nearby buildings contain offices, to which loss of daylight and sunlight would be less of an issue in the context of the BRE Report. It is therefore appropriate to exclude them from the detailed assessment. Some of the surrounding offices were noticed to be vacant or “to let”. Any loss of daylight and sunlight would only be relevant if they were converted to residential properties in the future.

888. Three scenarios are presented in the ES results in Chapter 10 including:

- Existing baseline vs Proposed
- Existing baseline vs Cumulative (future baseline and proposed) and
- Future baseline vs Cumulative.

889. The BRE reviewer considers that the existing baseline vs cumulative scenario should be seen as the primary assessment of cumulative impact. The future baseline vs proposed scenario is useful in ascertaining the proposed development’s contribution to any cumulative impact. For example, if the results of the future baseline vs proposed analysis show little difference in the results, it is other schemes, and not the proposed development, which are responsible for the cumulative impact results.

Existing Baseline

890. In relation to daylight, 20 (3.5%) of the 586 windows assessed for VSC have a baseline equal to or greater than the 27% VSC outlined in the BRE Guidelines. 53 (38.1%) of the 139 rooms assessed for NSL have a baseline daylight distribution of at least 80% or more of the total room area.

891. With regard to sunlight, 49 (22.4%) of the 219 windows meet the BRE criteria for both APSH and WPSH in the baseline condition.

892. The abovementioned assessment indicates that the surrounding receptors currently receive low light levels compared to the initial numerical values of 27% VSC, 80% NSL, 25% APSH and 5% WPSH, outlined in the BRE Guidelines (2022). This is representative of the very dense urban context of the area, which is characterised by a mixture of buildings, including tall buildings. To those windows receiving low levels of daylight and sunlight in the baseline scenario, even very small light losses can translate into large relative or percentage alterations, albeit the perceptible changes may be negligible.

St Andrew Undershaft Church

893. St Andrew Undershaft Church, which is place of worship is located to the southwest of the site

Existing baseline vs Proposed

894. The results suggest that all windows and rooms assessed would meet the BRE loss of daylight guidelines. The proposed development is to the north so would not impact sunlight provision. Therefore, the loss of daylight and sunlight would be assessed as negligible.

Existing baseline vs Cumulative

895. The cumulative scenario suggests that 37 windows would be below the BRE VSC guidelines. The relative losses would be 25-100, compared to the guideline 20% (7 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 16 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 14 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect). However, many of the windows have low values of existing VSC so a small absolute loss results (equating to 0.1% to 5.4% VSC) in a larger relative loss. 35 of the affected windows would serve the main nave and two would serve further auxiliary rooms. The BRE reviewer advises that the ES Chapter assessment of a minor to moderate adverse cumulative impact is reasonable.

Future baseline vs Cumulative

896. In the future baseline vs cumulative scenario the results show no difference in values of VSC or daylight distribution. This suggests that the cumulative impact is driven by other schemes and not the proposed development.

2 Heneage Lane

897. This is a residential receptor to the north of the site.
898. Concerns have been raised regarding the use of this residential property and in particular the light levels on the upper floors. It has been raised that upper floor rooms are utilised throughout the day as rooms for reading (with reading chairs), a key need for a rabbi as study is a religious requirement, and as a playroom for the rabbi's family.

Existing baseline vs Proposed

899. The windows and rooms analysed at 2 Heneage Lane would meet BRE guidelines in terms of daylight. Loss of sunlight would not be an issue since the windows face northerly. Therefore, the loss of daylight and sunlight would be assessed as negligible.
900. In light of the above, the proposed development alone would meet the BRE guidelines in terms of daylight and sunlight and therefore, it would not adversely impact upon the light levels experienced in this residential property, including the upper floor rooms.

Existing baseline vs Cumulative

901. A total of six rooms were assessed. The cumulative scenario suggests that one window would be below the BRE VSC guidelines with a relative loss of 23.3% compared to the guideline 20% which is a Minor Adverse effect. The alteration equates to an absolute change of 2.4% VSC. This is located on the third floor and serves a bedroom with another window that would just meet the guidelines. The ES Chapter states that a weighted average of results gives a 20.8% relative reduction, just below the 20% guideline. The Radiance Assessment gives results of VSC averages for rooms, but the result suggests a slightly different 22.4% reduction. For NSL, all rooms assessed would meet BRE criteria. The ES Chapter suggests a negligible cumulative impact to daylight. However, the BRE review suggests that since one room would be below the VSC guidelines (albeit marginally) a minor adverse cumulative impact would be more appropriate. A Minor Adverse impact is not significant. It is noted that the room would meet the

daylight distribution criteria and therefore, the light levels would be such that even if the room is not only or primarily used for sleeping, other activities including reading and playing would still be able to be carried out.

Future baseline vs Cumulative

902. The future baseline vs cumulative results, show a small difference to one window. This suggests that the primary cause of the cumulative loss comes from other consented schemes than the proposed development.

St Helen's Church Bishopsgate

903. St Helen's Church is located to the northwest of the site, beyond 30 St Mary Axe (the Gherkin).

Existing baseline vs Proposed

904. Although the window map for St Helen's Church was missing from the Annex submitted with the ES, it has thereafter been submitted by the applicant. It should be noted though that a full assessment of St Helen's Church was reported in the assessment of effects in the ES Chapter, and this does not alter outcomes.

905. The windows and rooms analysed at St Helen's Church Bishopsgate would meet BRE loss of daylight guidelines. Loss of sunlight would also meet the BRE guidelines. Loss of daylight and sunlight would therefore be assessed as negligible.

Existing baseline vs Cumulative

906. In the cumulative assessment a total of 49 windows serving 13 rooms were assessed for daylight within this building. Of the 49 windows 23 windows would be below the BRE VSC daylight guidelines. The relative losses would be 33-100% (compared to the guideline 20%), with resultant values in the range 0-7.4% VSC. There are some low existing values which can at least partly explain the larger relative losses. However, there would also be daylight distribution results below the BRE guidelines to eight rooms. The relative losses of the areas able to receive direct skylight would be 24-82% (compared to the guideline 20%).

907. In terms of daylight distribution eight out of 13 rooms would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect

and two would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining four rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect. It is noted that the nave would see a minor adverse NSL loss, retaining 52% NSL.

908. The ES Chapter states that the absolute changes in VSC to the nave may not result in a noticeable change, as shown by the minimal absolute average change to VSC and assesses an overall minor to moderate cumulative adverse impact. The BRE review suggests this would tend to at least moderate for the worst-case rooms based on the daylight distribution results, if they had a particular requirement for daylight. Given the reductions in both VSC and NSL, officers concur with the view taken by the BRE reviewer that the effects would be moderate adverse

909. There would also be windows to St Helen's Church Bishopsgate below the BRE loss of sunlight guidance in the cumulative scenario. Five windows would be below the guidelines with removal of all, or nearly all, of their currently available annual probable sunlight. The ES Chapter assesses a moderate to major impact, which BRE review considers reasonable. However, as noted below the assessment of the future baseline against the cumulative, demonstrates that this is due to other consented schemes.

Future baseline vs Cumulative

910. The results of the future baseline vs cumulative scenario, where one window would be below the VSC guidelines but it has a very low existing value and small absolute loss of 0.1% VSC, suggest that other consented schemes are predominately responsible for the cumulative loss and not the proposed development.

911. In terms of sunlight, ES Chapter presented results suggest the proposed development makes no difference to sunlight at these windows and therefore the cumulative loss is due to other consented schemes, one of which is directly to the south of the church.

Sir John Cass Primary School (Aldgate School)

912. This is an educational receptor located approximately 130m to the east of the application site.

913. It is noted that a few rooms and windows were not included in the initial assessment for daylight and sunlight. However, additional information has been provided during the process of the application.

914. A total of 111 windows serving 21 rooms were assessed for daylight within this building.

Existing baseline vs Proposed

915. The windows and rooms analysed would meet the BRE guidelines in terms of daylight and sunlight. These effects are therefore assessed as negligible.

Existing baseline vs Cumulative

916. The cumulative assessment shows that one room would be below the BRE daylight distribution guideline. The area able to receive direct skylight is reduced by 26.6% compared to the guideline 20%. This room is labelled as a “Play Centre Room” on the second floor. The ES Chapter assessed a negligible cumulative impact to daylight. However, the BRE reviewer considers that since there is an area below the BRE guidelines a minor cumulative loss of daylight would be more appropriate. However, as discussed below, the results suggests that the proposed development does not impact the area able to receive direct skylight in that room and thus, the impact is due to other consented schemes.

Future baseline vs Cumulative

917. The results presented do suggest that the proposed development does not impact the area able to receive direct skylight in the room affected and therefore other consented schemes are the primary reason for the cumulative loss of daylight.

Bevis Marks Synagogue

918. Bevis Marks Synagogue is a place of worship, and it is located to the north of the application site. This building is labelled as 4 Heneage Lane Spanish and Portuguese Synagogue in the results in Annexes 4 and 5 and the window maps in Annex 6.

919. The building comprises the ground floor central space, which has north, west and south facing windows, with a row of windows along the gallery level above.

Due to the open design, the central room is served by both the ground and gallery level windows, albeit the ES Chapter has counted the gallery as a separate room for the NSL assessment. It is understood that prayers are read from the central raised platform (the Bimah). The third room assessed is the Synagogue's visitor centre, situated between Valiant House and the Bevis Marks Synagogue. This room has a glazed 'canopy' roof, a roof light window and four north facing windows by the entrance.

920. The future use of those spaces when in full operations has been clarified by the Rabbi. It has been confirmed that their use will include daily worship, both in the morning and midday, and on the Sabbath and Jewish festivals. Evening events, and weekend weddings would also be conducted. Finally, the visitor centre will be opened Sunday-Friday. It has been forecasted that the visitor centre would be welcoming at least 25,000 visitors a year including local school-children.

921. It is noted that several objections have been received in relation to the impact of the development on the daylight and sunlight within the Synagogue. The effects of the proposed development onto this place of worship are assessed in detail below. As noted above, the applicant aside of the daylight and sunlight assessment has submitted a radiance assessment including visual imagery, providing a contextual narrative, only used as a qualitative assessment to visualise whether there are any noticeable daylight and sunlight differences.

Existing baseline vs Proposed

922. A total of 29 windows serving three rooms were assessed for daylight within this building, of which five are south facing at gallery level. The ES Chapter results suggest that five windows would be below the BRE VSC guidelines. These are the south facing windows which directly face the proposed development. The relative losses would be 27-36% (compared to the guideline 20%), with resultant values in the range 2.3-4.8% VSC. The absolute changes in VSC to these five windows equates to 1.3% to 1.9% VSC. These windows light spaces which are also lit by other windows on other aspects of the building. These are considered minor for four windows and moderate adverse effects for one window, which results in VSC alterations higher than 30%.

923. The ES Chapter and separate radiance assessment discuss the weighted average for the results, indicating a reduction of 0.4% VSC. Since the two main spaces these five windows light (gallery and central room) are large spaces, a loss of light from one area may not be compensated by daylight from a window on the other side of the building and the BRE reviewer considered that a weighted average is not suitable.

924. For NSL, all three rooms assessed (central room, gallery and exhibition/visitor centre) would meet the BRE criteria and so are considered to experience a Negligible effect.
925. The ES Chapters assessed minor adverse impact to daylight is reasonable. In the context of the BRE review report, all impacts, including minor adverse, are considered significant. This is to maintain adequate natural light in existing properties. Although this perspective is aimed to minimise potential negative effects on wellbeing and promoting healthier living environments, it is a precautionary principle. The BRE guidelines do not advise on effect significance in EIA terms and therefore, to assess an EIA development, such as the one currently being assessed, professional judgement should be applied. Effectively, whilst minor adverse effects may be of local concern, they might not be considered significant in the context of the EIA development in CoL. In their review of this position, the BRE reviewer has considered it reasonable. The effect is therefore considered minor adverse.
926. The BRE review also states that the radiance assessment includes Average Daylight Factor and median daylight factor results for the existing baseline, consented baseline and proposed development (with the consented baseline). The results do show a small decrease in the values with the proposed development. However, the BRE guidelines do not recommend the use of these metrics to assess loss of daylight in existing buildings.
927. It is the officers view that given that the VSC and NSL assessments have been carried out in accordance with the BRE suggested methodology for the loss of daylight, the use of an alternative assessment (radiance assessment) to provide a contextual narrative for the daylight in the space is useful for the assessor and the decision makers. Whilst it is understood that the spaces (central room and gallery) are large spaces, they are also served by large windows on all aspects of the building, mainly to the north and south. It is therefore considered that, taking into account the very low absolute VSC values, the daylight distribution results which meet the BRE guidelines, the existing open layout of the Synagogue and existing large windows on all aspects of the building which would largely not be affected (24 out of 29 windows would not be impacted), it is considered that the light levels within the building would not be reduced to an extent that would make impossible to function as a place of worship or as an exhibition centre. It is also not considered that the development, if erected, would diminish the visual appreciation of the internal features of the Synagogue, including the Bimah and Ark.
928. Loss of sunlight to windows would meet the BRE guidelines. Although there would be a loss of sunlight to south facing windows and the rooflight to the exhibition/visitor centre, this would meet the BRE guidelines since the absolute

loss of annual sunlight would be 4% or less. In two cases this is 4%. Given that the loss of sunlight does not relate to losses to living rooms, the effect is not considered to result in adverse impacts on living conditions. The BRE reviewer advises that if there is a particular requirement for sunlight, the loss could be assessed as minor adverse, since the guidelines are only just met. Whilst it is understood from representations received by the Rabbi and the Sephardi community that daylight is necessary to be able to carry out daytime rituals within the Synagogue, direct sunlight is not understood being a requirement for the place of worship to be used for its intended use. Nevertheless, the results indicate that the BRE guidelines for sunlight will be met and therefore, the impact is considered Negligible.

929. Concerns have been raised by a number of objectors regarding the levels of light in the Synagogue. It has been highlighted that these are important to maintain Jewish worship and carry out rituals. Although the matters raised are taken in careful consideration, it is considered that for the reasons explained above, the impacts would be limited and localised. The VSC effects are minor adverse, the BRE guidelines for NLS and sunlight are met and therefore, overall, the daylight and sunlight effects are not considered significant, in EIA terms. It is noted that the BRE consultant has considered this position reasonable.

Existing baseline vs Cumulative

930. In the cumulative assessment, there would be 17 affected windows. These include the five south facing windows below the guidelines with the proposed development, four north facing windows to the exhibition centre, five west facing windows and three north east facing windows.
931. Out of the 17 affected windows, three are located on the north facing elevation at gallery level and would experience an alteration in VSC of 20.5%, 20.9% and 25.4% compared to the guideline 20%. This is considered a Minor Adverse effect. These windows would see absolute reductions of 0.8% to 1.8% VSC.
932. Of the five windows located on the west facing elevation at ground and gallery level, four would see alterations of 32.4%, 32.6%, 37.5% and 38.2% which are considered Moderate Adverse, and the fifth seeing a 42.6% alteration, which is considered Major Adverse. These alterations equate to absolute changes ranging from 1.1% to 2% VSC.
933. On the south facing elevation, the five facing the application site would experience an alteration in VSC between 40.2% and 52.9% which are considered a Major Adverse effect. However, the absolute reductions at these five windows

would be between 1.8% VSC and 3.1% VSC. These windows light spaces which are also lit by other windows on other aspects of the building.

934. It is noted that the 13 windows servicing the Synagogue's central room and gallery have baseline values of 3.4% to 7.1% VSC, due to the constrained location of the site and relationship with adjacent taller buildings.
935. The final four north facing windows at the entrance of the exhibition centre would see alterations greater than 40% (46% to 72%) which is considered Major Adverse. The absolute reductions equate to 1.4% to 1.8% VSC. The exhibition/visitor centre would continue to receive light through the canopy and rooflight, and so this room would continue to meet the BRE criteria on a room basis.
936. The daylight distribution results for the three areas of the Synagogue (gallery, central room and exhibition/visitor centre) analysed meet the BRE guidelines. It is noted that for the gallery, the area able to receive direct skylight is reduced by 20%, which is the guideline target. The ES Chapter assesses a minor to moderate adverse impact to daylight. The BRE review suggests this would tend to moderate due to the increased number of results below the guidelines. Other schemes are responsible for the loss of daylight to northerly facing areas whilst the proposed development is a factor in the loss of light to the southerly facing windows.
937. Cumulative loss of sunlight results are the same as those reported in the existing vs proposed scenario, meeting the BRE guidelines. The BRE reviewer advises that the same conclusions of an impact to sunlight that could tend to minor adverse, as the southerly facing windows just meet the guidelines, can be drawn.
938. Additional alterations to windows on the north and west elevations of the central room would be due to other consented schemes. The five windows to the south elevation would incur additional alterations as a result of the proposed development and together with consented schemes. However, there are small absolute VSC changes and the BRE criteria are met on a room basis in terms of daylight distribution. The exhibition centre would see some changes in daylight to the north facing windows as a result of consented schemes; however, would have access to daylight through the canopy and rooflight. The NSL to all three rooms would be BRE compliant. Therefore, due to the additional impact occur from cumulative schemes, the cumulative effect to daylight within this building is considered Minor to Moderate Adverse.

Future baseline vs Cumulative

939. The results of the future baseline vs cumulative scenario show that for VSC, 24 of the 29 (82.8%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The five remaining windows are located on the south facing elevation at gallery level, thereby serving the main central room. Four of these would experience an alteration in VSC of 34.5%, 32.1%, 31.6% and 32.7%, 37.0% which is considered a Moderate Adverse effect. Although the percentage values are greater than the 'Existing vs Proposed' development, it is noted that the absolute changes remain almost unaltered (between 1 and 1.9% VSC). This is because these five windows and other windows serving the central room at the Future Baseline values, are lower as a result of consented schemes.
940. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.
941. In terms of sunlight, Bevis Marks Synagogue would meet the BRE criteria and therefore, the effects would be negligible.
942. On the basis of the above, it is considered that, given that the absolute VSC reductions would be limited and all rooms would meet the BRE criteria for NSL, it is considered that the effects would be Minor Adverse. This is therefore indicative of the minor to moderate effects of the cumulative scenario assessment occur as a result of all cumulative schemes than the proposed development alone.
943. The application is supported by a radiance assessment and Radiance generated images. Although a qualitative assessment, these images show that the impact on the level of daylight will be more localised to a limited area of the mezzanine floor on the south side (an area which is understood to be used by female members of the congregation) than the gallery.
944. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
945. The relevant protected characteristics include sex, race, and religion or belief.

946. Giving due regard to the matters identified in the public sector equality duty with respect to this place of worship and the community associated with it, it is the view of officers, taking into consideration all material factors into consideration, in particular the quantifiable daylight results, the effects would not be such that to cause an adverse effect on the ability to manifest religion in worship in the Bevis Marks Synagogue or prevent the ability to carry out religious activities, including circumcision. Indeed, it is considered that the development would not adversely affect the Synagogue as a place of worship for all who share relevant protected characteristics and those who do not do so and that the duty is complied with in this respect.

4 – 8 Creechurch Street

947. This is a four storey residential building and it is located to the southeast of the application site, approximately 35 metres away. The ES chapter assesses rooms and windows on the north, west and south facing elevations. A total of 59 windows serving 21 rooms are assessed.

Existing baseline vs Proposed

948. Of the 59, 19 windows would be below the BRE VSC guidelines with relative losses between 20.3% and 29.9% compared to the guideline 20%, which are considered minor adverse effects. Resultant values would be in the range 2.6-11.2% VSC.

949. Of these 19 windows, five serve bedrooms. Two of these bedrooms on the fourth storey have a second window and would meet the VSC criteria for the room as a whole. The three other bedrooms, located at first to third storey, would see absolute reductions of 2.4% VSC or less. Therefore, it is unlikely that these alteration would materially affect the function of these rooms. Two of the affected windows serve small galley kitchens on second and third floors. The absolute reductions to those windows equate to 1.3% VSC and 2.3% VSC. Six of the affected windows serve three dual aspect living rooms which each have four windows with absolute VSC reductions ranging from 1% to 3.2%. Due to all three living rooms having two further windows facing away from the Site which are unaffected in terms of daylight, the change is unlikely to be materially harmful and adversely impact the function of these rooms. Two windows which serve a dual aspect living kitchen dining (LKD) room would also be affected, however, the room as a whole would meet BRE's criteria. Finally, four affected windows serve a dual aspect studio apartment on the fourth storey. These two windows would see

minimal absolute alterations of 3% and 3.4% VSC and as a whole it would meet the BRE criteria.

950. Daylight distribution would meet the BRE guidelines.

951. In light of the above, the daylight effects are considered Minor Adverse.

952. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Existing baseline vs Cumulative

953. In the cumulative assessment a total of 23 windows would be below the BRE VSC guidelines with relative losses of 20,3% – 53% compared to the 20% guideline. Therefore, four additional windows would be impacted compared to the Proposed Development scenario, with 19 seeing a similar or greater magnitude of VSC impact. nine would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and five would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining nine windows would experience an alteration in excess of 40% which is considered a Major Adverse effect. Resultant values would be 2.5-11.1% VSC.

954. Of the 23 windows, nine serve bedrooms. Four of the bedroom windows previously affected would see no change to the magnitude of impact in the cumulative scenario, except for one fourth storey bedroom which would see a Major Adverse cumulative effect. The remaining four bedrooms, which were not affected in the 'Proposed Development' scenario, would result in Minor to Major Adverse effects because of other consented schemes. The effect on the two small galley kitchens would experience the same absolute reduction as the 'Proposed Development' scenario. The same six windows serving three dual aspect living rooms discussed in the Proposed Development scenario would see a greater magnitude of impact in the cumulative scenario. Two of these living rooms would continue to meet BRE's criteria for VSC on a room bases, with the third living room seeing an overall 23% (Minor Adverse) effect. The two windows serving the dual aspect living kitchen dining (LKD) room would also see virtually no change in the magnitude of VSC impact in the cumulative scenario. The four affected windows serve a dual aspect studio apartment on the fourth storey would see additional reductions. These four windows would see alterations of 6.4% to 7% VSC. The room would not meet BRE's criteria for VSC overall, with the additional alterations occurring due to consented schemes.

955. In terms of daylight distribution, all rooms would meet the BRE NSL criteria.

956. The ES Chapter assesses a minor to moderate adverse impact to daylight. This is reasonable, but the BRE review report suggests that the effects would tend to moderate. Given that all rooms would meet the daylight distribution and taking into account the existing dense urban environment at the City, it is the view of officers that the appropriate classification is minor to moderate. Given that the impact on the 'Existing vs Proposed' scenario resulted in Minor Adverse effect, it is considered that the additional effect would be due to other consented schemes.
957. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Future baseline vs Cumulative

958. Of the 59 windows, 20 would be affected, which are located on the north and west facing elevations. 13 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst seven would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.
959. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect in that regard.
960. Overall, the VSC and NSL impacts are virtually unchanged from the Existing Vs Proposed assessment and so are considered to remain Minor Adverse.
961. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.
962. The results of the future baseline vs cumulative suggest the cumulative loss of light is due to the impact of the proposal with other schemes rather than the development in isolation.

2 and 10-16 Creechurch Street

963. This is a four storey residential building and it is located to the southeast of the application site, 12 metres away at each closest point. Consent for residential use was granted in 2000 for the "*Retention of use as residential Class C3 and temporary sleeping accommodation (as defined in the Greater London Council (General Powers) Act 1973 s.25 (as amended)) and office Class B1(a) in lieu of Class B1(a) office and/or C3 residential at 1st-4th floors of 2 and 10-16 (even) Creechurch Lane and 1st-5th floors of 18-20 (even) Creechurch Lane/24-26 (even) Mitre Street.*" (Ref no: 4118CE). Enforcement complaints were thereafter

lodged for the use of the premises for short term lets. Following assessment and on the limitation imposed by s.44 of the Deregulation Act 2015 and the new s.25A of the Greater London Council (General Powers) Act 1973 (as amended), the enforcement cases closed. Although online searches show that some properties are used as short term lets, the ES Chapter assumes the worst case scenario that they are permanent residential properties.

964. A total of 72 windows on the west facing elevation, serving 16 rooms, have been assessed.

Existing baseline vs Proposed

965. Of the 72 windows, only four meet the BRE VSC guidelines. 68 windows would therefore be below the guidelines with relative losses between 23.9% and 58.5%, compared to the guideline 20%. The ES Chapter states in paragraph 10.143 that *“Due to the close proximity of this neighbour to the Site, the tightly constrained location and being lower compared to the surrounding context, the existing daylight values are generally very low, such that high percentage changes may arise in relation to small absolute reductions.”* The BRE review report considers that there is some validity to this point and there are some existing low values of VSC. The values of existing VSC for the 68 windows below the guidelines would be 2.6-9.5% VSC, which would be reduced to 1.5-5.8% VSC.
966. Three of the affected windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect and 69 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.
967. There are two living/dining rooms at first and second storey, and two living rooms at third and fourth storey. These four rooms are each served by five affected windows (20 affected windows in total). These rooms do not meet the BRE light distribution criteria, resulting in minor to moderate effects (between 21% and 37% reductions).
968. A total of 16 windows affected serve a bank of four bedrooms in the central portion of the elevation. Each of these bedrooms has four windows, which would see absolute reductions of 1.4% to 3.3% VSC. Three of these bedrooms would see NSL alterations greater than 40% which is considered a Major Adverse effect, and the fourth would see an alteration of 36% (Moderate Adverse). However, it is noted that BRE Guidance suggests that daylight distribution may be considered less important in bedrooms than living areas, as they are mainly used for sleeping.

969. The remaining 32 affected windows serve eight living rooms, at the northern end of the elevation which is closest to the Proposed Development. Each of these living rooms have four windows. The absolute reductions equate to VSC levels between 2.9% and 7.3% VSC. One living room would see a Moderate Adverse NSL alteration, whilst seven would see Major Adverse light distribution alterations.
970. Given the low baseline values, the percentage alterations are very high and disproportionate to absolute reductions. For that reason, the effects are considered moderate to major adverse.
971. The separate 'Radiance Assessment' gives weighted VSC values (an approach recommended in the BRE Report in situations such as the layout here where it is suggested that all rooms analysed are lit by multiple windows). However, no value for the proposed development with the existing baseline appears to have been given, so the results cannot be commented on. Similarly, the submitted visual radiance generated images submitted do not consider the 'Existing vs Proposed' scenario. Further assessment is provided in the sections below.
972. The ES Chapter assesses an overall impact of minor to moderate adverse. The BRE review report suggests this should be at least moderate adverse. Although part of the reason for larger relative losses is due to existing lower values, the vast majority of windows would be below the VSC guidelines and half the rooms, including four living rooms, would be below the daylight distribution guideline. Officers agree with the view taken from the BRE reviewer in terms of the magnitude of overall effects.
973. Loss of sunlight would not be an issue since the development is located to the north. The effects would therefore be negligible.

Existing baseline vs Cumulative

974. All 72 windows would be below the VSC guidelines in the cumulative scenario with relative losses in the range 23.9-58.5%, compared to the guideline 20%. Resultant values would be between 1.2% and 2.8% VSC. Three windows would experience a reduction between 30-39.9% which is considered a Moderate Adverse effect and 69 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.
975. There are two living dining rooms at first and second storey, and two living rooms at third and fourth storey. These four rooms are each served by five affected windows (20 affected windows in total). The absolute reductions equate to VSC levels between 1.4% and 2.9%. The living dining rooms would see NSL alterations of 21% and 37%, which are considered Minor and Moderate Adverse respectively.

Due to the low existing NSL values, which are below 18% NSL in the baseline, the daylight distribution reduction would be very high and potentially not as experienced in these rooms.

976. A total of 16 windows affected serve four bedrooms in the central portion of the elevation. Each of these bedrooms has four windows, which would see absolute VSC reductions of 1.4% to 3.3%. Three of these bedrooms would see NSL alterations greater than 40% which is considered a Major Adverse effect, and the fourth would see an alteration of 36% (Moderate Adverse). BRE Guidance suggests that daylight distribution may be considered less important in bedrooms, due to their main use for sleeping.
977. The remaining 32 affected windows serve eight living rooms, at the northern end of the elevation which is closest to the Proposed Development. Each of these living rooms have four windows. The absolute reductions equate to VSC levels between 2.9% and 7.3% VSC. One living room would see a Moderate Adverse NSL alteration, whilst seven would see Major Adverse NSL alterations over 40% against the guideline 20%.
978. The separate report contains weighted averages of VSC results for each room. In the cumulative scenario (existing vs cumulative) all 16 rooms would also be below the VSC guidelines with relative losses of 47-78%, compared to the guideline 20%. All 16 rooms would be below the daylight distribution guideline with the areas able to receive direct skylight being reduced by 27.7-57.3%, compared to the guideline 20%.
979. The ES Chapter considers that overall, the VSC and NSL impacts are virtually unchanged from the Existing Vs Proposed assessment and so are considered to remain moderate to major adverse. The BRE review report advises that these should be considered as major impacts. Although there are lower existing values, all windows and rooms assessed at the building would be below the guidelines in general by a large margin. Officers concur with the view taken by the BRE consultant.
980. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Future baseline vs Cumulative

981. Of the 72 windows 71 will be below the BRE guidelines. Three windows would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and eight would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 60 windows would

experience an alteration in excess of 40% which is considered a Major Adverse effect.

982. 23 of the affected windows serve two living dining rooms at first and second storey, and two living rooms at third and fourth storey. These four rooms are each served by five or six affected windows. The absolute reductions equate to VSC levels between 1.2% and 2.2%. The living dining rooms would see NSL alterations of 30% and 38%, which are considered Moderate Adverse. The living rooms would see NSL alterations of 27% and 34% which are also Minor and Moderate Adverse effects. Due to the low future baseline NSL values, which are below 18% NSL in the baseline, the alterations are higher than would potentially be experienced in those rooms.
983. 16 of the affected windows serve four bedrooms. Each of these bedrooms has four windows, which would see absolute reductions of 1.4% to 2.5% VSC. Three of these bedrooms would have NSL alterations greater than 40% which is considered a Major Adverse effect, and the fourth would result in an alteration of 36%. BRE Guidelines suggest that daylight distribution may be considered less important in bedrooms, due to their use primarily for sleeping.
984. The remaining 32 affected windows serve eight living rooms, at the northern end of the elevation which is closest to the Proposed Development. Each of these living rooms have four windows. The absolute reductions equate to VSC levels between 2.2% and 3.7% VSC. Five rooms would meet BRE's criteria for NSL and thus will have a Negligible effect, whilst three would see alterations of 22.2%, 26.4% and 32.4% which are Minor and Moderate Adverse effects, respectively.
985. The VSC and NSL impacts are almost unchanged from the Existing Vs Proposed assessment and so are considered to remain minor to moderate adverse.
986. The VSC assessment shows that the level of daylight at these flats is generally very low, which is typical within a highly built up urban environment. The alterations from the Proposed Development (with consented schemes) are in line with reductions already caused from the consented schemes.
987. The separate assessment including Average Daylight Factor and Median Daylight Factor results for the existing baseline, consented baseline and proposed development (with the consented baseline) has been submitted, although this is not recommended in the BRE guidelines. The visual radiance images prepared show that some rooms would not experience noticeable differences, whilst others will experience limitedly noticeable changes. Although it is considered that the proposed development would be a factor in the cumulative loss, it is considered that due to existing dense urban environment, low existing VSC and NSL values

and limited absolute changes, the effects would not be such a to adversely impact the use of these rooms for their intended use.

18 - 20 Creechurch Street

988. This is a four storey residential building, located approximately 12 metres to the southeast of the application site. Consent for residential use was granted in 2000 for the *“Retention of use as residential Class C3 and temporary sleeping accommodation (as defined in the Greater London Council (General Powers) Act 1973 s.25 (as amended)) and office Class B1(a) in lieu of Class B1(a) office and/or C3 residential at 1st-4th floors of 2 and 10-16 (even) Creechurch Lane and 1st-5th floors of 18-20 (even) Creechurch Lane/24-26 (even) Mitre Street.”* (Ref no: 4118CE). Enforcement complaints were thereafter lodged for the use of the premises for short term lets. Following assessment and on the limitation imposed by s.44 of the Deregulation Act 2015 and the new s.25A of the Greater London Council (General Powers) Act 1973 (as amended), the enforcement cases closed. Although online searches show that some properties are used as short term lets, the ES Chapter assumes the worst case scenario that they are permanent residential properties.

989. The building wraps around the corner of Creechurch Lane, meaning that corner windows look directly towards the Proposed Development. Windows on the west and north elevation would have an oblique view of the Proposed Development. Layouts obtained show that a total of 82 windows serving 43 rooms, which are relevant for daylight assessment.

Existing baseline vs Proposed

990. Of the 82 windows assessed, 42 would be below the BRE VSC guidelines. Relative losses of VSC would be 21.4-65.5% compared to the guideline 20%. The values of existing VSC for the 42 windows below the guidelines would be 6.9-20.4% VSC and would be reduced to 4.1-15.4% VSC.

991. Of the 42 affected windows, 13 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and five would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 24 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

992. 16 of the affected windows serve nine bedrooms, and five serve single aspect kitchens. These rooms, which see VSC impacts ranging from Minor to Major Adverse, are not considered primary living spaces due their use and so are

considered less sensitive to daylight reductions. The remaining 21 windows serve seven living dining rooms. Four of the living dining rooms are located on the corner of 18-20 Creechurch Lane, which each have four windows facing directly towards the application site. At each living dining room, three of the windows see Moderate to Major Adverse effects, with the stack of windows located on the north facing elevation seeing Minor to Moderate Adverse losses. The absolute alterations to these four living dining rooms on a VSC by room basis range from 6.1-7.7% VSC. It is therefore expected that these reductions would be perceptible. The remaining three living dining areas, each have two windows that are located on north facing elevation. These rooms would experience absolute reductions to VSC on a room basis ranging from 3-3.4% VSC, which is considered unlikely to result in perceptible change.

993. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

994. Considering the type of rooms and their effect, the ES Chapter assessed the overall impact as moderate adverse. This is reasonable overall by the BRE reviewer, but it is suggested that the effects would tend to major for the living area on each of the first to fourth floors where all windows would be below the guidelines, some by a large margin. It is the officers view that taking into consideration of the dense urban nature of the City and the fact that daylight distribution criteria will be met, the overall effects can be considered moderate adverse.

995. Loss of sunlight would not be an issue since the development is located to the north. The effects would therefore be negligible.

Existing baseline vs Cumulative

996. In the cumulative scenario, of the 82 windows 62 would be below the BRE VSC guidelines. Relative losses of VSC would be 21.0-86.6%, compared to the guideline 20%. 27 windows would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and nine would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 26 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

997. Of the 43 rooms 34 will experience reductions in daylight distribution. 28 of the affected windows serve 16 bedrooms, where a similar or greater magnitude of impact occurs as a result of cumulative schemes. An additional 12 bedrooms windows would be affected due to cumulative schemes, compared to the

Proposed Development scenario. However, these additional losses equate to less than 2% VSC. Six affected windows serve small kitchens, which is one more than in the Proposed Development scenario. The sixth kitchen would see a 24.2% reduction which is a Minor Adverse effect. However, these bedrooms and kitchens are not considered primary living spaces and so the BRE guidance considers them less sensitive to daylight alterations.

998. The remaining 24 affected windows serve the corner and north living dining rooms. These windows would see a similar or greater magnitude of impact in the cumulative scenario. The fourth floor living dining room on the north elevation is not affected in the Proposed Development scenario and so the impacts occur as a result of cumulative schemes. Finally, three living rooms located further east along the north facing elevation, which were BRE compliant in the Proposed Development scenario, would see reductions from other consented schemes.

999. Of the nine rooms affected for NSL, all would experience an alteration in NSL greater than 40% which is considered a Major Adverse effect. These are all bedrooms and small kitchens where daylight distribution is considered less important due to their use.

1000. The separate report also includes visual Radiance generated images from points in the spaces. Although a qualitative assessment, it provides an indication of whether changes in the daylight will be noticeable. The submitted radiance images suggest that there will be some changes that will be limitedly noticeable.

1001. The ES Chapter suggests a moderate to major cumulative impact. The BRE reviewer considered that these would be major for three rooms on each of first to fourth floor rooms on the west façade to Creechurch Lane and the corner of Creechurch Lane and Mitre Street and two rooms in this area on the fifth floor. Officers considered that overall moderate to major impacts would be reasonable, considering the magnitude of effects and the dense urban environment.

1002. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

Future baseline vs Cumulative

1003. Of the 82 windows 46 will be below the BRE guidelines in this scenario. Of the 46 affected windows, 16 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and four would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining 26 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1004. A total of 16 windows affected for VSC serve nine bedrooms, and five serve kitchens. These rooms are not considered primary living spaces and therefore are not afforded the same protection in terms of daylight. The remaining 27 windows serve eight living dining spaces, and the final window affected serves one living room. Due to the living dining rooms being located on the corner, with windows fronting the proposed development, are expected to result in large percentage reductions. The living room which is located further east along the north facing elevation would meet the BRE criteria for VSC on a room basis.
1005. In terms of daylight distribution, 34 of the 43 (79.1%) rooms assessed would meet the BRE criteria and are therefore considered to experience a Negligible effect. Of the nine affected rooms, four would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and three would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining two rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.
1006. Overall, the effects of this scenario are very similar to those of the 'Existing vs Proposed' scenario and are considered moderate adverse. It is considered that the building is a factor for the resultant reductions in daylight.
1007. Although it is considered that the proposed development would be a factor in the cumulative loss, it is considered that due to existing dense urban environment, low existing VSC and NSL values, the effects would not be such as to warrant refusal of the application on those grounds.
1008. Loss of sunlight would not be an issue since the development is to the north. The effects would therefore be negligible.

27 – 31 Mitre Street

1009. This is a four-storey residential building located approximately 35 metres to the east of the application site. A total of 28 windows serving 16 rooms were assessed for daylight within this building.
1010. It is noted that some windows were missing from the windows maps submitted in Annex 6; however, since the submission of the application, further information has been submitted including the additional window maps.

Existing baseline vs Proposed

1011. Of the 28 windows assessed two would be below the BRE VSC guidelines with relative losses of 21.1% and 26.3%, which are considered a Minor Adverse effect. The results suggest that the windows light rooms also lit by other windows which meet the guidelines.

1012. Daylight distribution results show that the BRE guidelines will be met.

1013. Therefore, due to the VSC and NSL compliance, the effect is considered Negligible.

1014. Loss of sunlight would not be an issue since the development is to the northwest. The effect is therefore negligible.

Existing baseline vs Cumulative

1015. In the cumulative scenario, four windows would be below the BRE VSC guidelines with relative losses of 22.1-60.9%, compared to the guideline 20%. One affected window serving a living/kitchen/dining room would experience an alteration in VSC of 22.1%, which is considered Minor Adverse. The three remaining windows serve a bedroom and two LDs, seeing alterations greater than 40%, but the rooms as a whole continue to meet BRE's criteria for VSC.

1016. In terms of daylight distribution, results show that the BRE guidelines will be met. Therefore, the effect would be negligible.

1017. The BRE reviewer considered that the negligible assessed cumulative loss of daylight in the ES Chapter is reasonable. Officers concur within this view.

1018. Loss of sunlight would not be an issue since the development is to the northwest. The effect is therefore negligible.

Future baseline vs Cumulative

1019. Of the 28 windows three will be below the BRE guidelines in this scenario. Of the three affected windows, all would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect. All three rooms would continue to meet BRE's criteria for VSC on a room basis.

1020. For NSL, all rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect.

1021. The ES Chapter considered that overall, the effects would be almost the same as the 'Existing vs Proposed' scenario and would remain negligible. Officer concurs that due to compliance with VCS and NSL criteria on a room basis, the effects would be negligible.

1022. Again, loss of sunlight is not an issue due to the position of the proposed development in relation to this building.

St Katharine Cree Church

1023. This is religious building, which is located approximately 40m south of the Proposed Development.

1024. A total of 79 windows serving two rooms, which are the nave and an auxiliary room, were assessed for daylight within this building.

Existing baseline vs Proposed

1025. Of the 79 windows analysed to the church, 15 would be below the BRE VSC guidelines with relative reductions of 21.7-42.4% compared to the guideline 20%. The values of existing VSC for the 15 windows below the guidelines would be 3.3-18.6% VSC and, with the proposed development in place, would be reduced to 1.9-13.5% VSC.

1026. All 15 windows serve the main chapel nave, of which 12 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and two would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The remaining window would experience an alteration in excess of 40% which is considered a Major Adverse effect. All windows are located on the north facing elevation and situated in a constrained location due to their position in relation to adjoining buildings. The absolute reductions would be less than 5.1% VSC and the room would continue to meet BRE's criteria for VSC.

1027. In terms of daylight distribution, it is noted that the BRE guidelines are met.

1028. Although the space within the church is large and loss of light to one window, might not be easily mitigated from windows on another elevation, the ES Chapter assessed minor adverse effect to daylight appears reasonable to both the BRE reviewer and officers. Although there are losses of daylight below the BRE guidelines, the space does have other windows which meet the guidelines.

1029. Loss of sunlight would not be an issue since the development is to the north. The effect is therefore negligible.

Existing baseline vs Cumulative

1030. In the cumulative scenario 21 windows would be below the BRE VSC guidelines with relative reductions of 20.2-51.5%, compared to the guideline 20%.

1031. Except for two windows which serve an auxiliary room and see Minor Adverse alterations, the 19 affected windows serve the main nave, of which seven would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 12 would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The remaining two would experience alterations in excess of 40% which is considered a Major Adverse effect.

1032. For NSL, all rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect.

1033. The ES Chapter suggests a minor adverse cumulative impact to daylight. This is reasonable if other windows to the spaces would mitigate the loss to those below the BRE guidelines. There is a greater loss of daylight with the other consented schemes, although the proposed development is still a factor in the loss. Officers are in agreement with the ES Chapter assessment of the overall effects and the view taken by the BRE reviewer.

1034. Loss of sunlight would not be an issue since the development is to the north. The effect is therefore negligible

Future baseline vs Cumulative

1035. Of the 79 windows 18 will be below the BRE guidelines in this scenario. Of the 18 affected windows, six would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 11 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining window would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1036. The 16 windows are located on the north facing elevation and situated in a constrained location, as explained above, resulting in high reduction percentages. A further two are located on the west facing elevation. The absolute reductions

would be less than 5.1% VSC, and the room would continue to meet BRE's criteria for VSC.

1037. For NSL, all rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect.

1038. Overall, the VSC and NSL impacts are virtually unchanged from the 'Existing Vs Proposed' assessment and so the effect is considered to remain Minor Adverse. Considering that the rooms would meet the VSC criteria for the rooms overall as well as the daylight distribution effects, it is considered that the function on the church would not be adversely affected.

1039. Again, loss of sunlight is not an issue due to the position of the proposed development in relation to this building.

Conclusion on Daylight and Sunlight Impact

1040. In conclusion, it is considered that the ES Chapter 10 has correctly used the methodology assessing daylight and sunlight in accordance with the latest BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.

1041. In summary, the results of the of daylight effects are as follows:

- In the 'Existing vs Proposed' scenario there are only two out of ten properties that would experience a Moderate adverse effect. Three would experience Minor adverse effects and the rest result in Negligible effects. These effects show that the development on each own would have limited effects to the nearby receptors.
- In the 'Existing vs Cumulative' scenario, there is one receptor that would experience Major adverse effects. Moderate to major effects are also expected to another receptor. Moderate effects would experience one more receptor, whilst Minor to Moderate effects are expected to three more receptors. There will be Minor effects experienced by two properties and three will experience Negligible effects.
- In the 'Future baseline vs Proposed (with cumulative)' scenario, there is one receptor that would experience Moderate effects and one Minor to Moderate. The majority of the receptors would receive Negligible effects, with three experiencing Minor adverse effects.

1042. In terms of sunlight, there would only be Negligible effects to both 'Existing vs Proposed' and 'Future baseline vs Proposed (with cumulative)' scenarios. There is only one receptor, St Helen's Church that would experience Moderate to Major Adverse effects, but this appears to be the result of another consented scheme.

1043. In the 'Existing vs Proposed' scenario, two of the residential receptors (2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane) would experience a Moderate effect (significant). The rest of the receptors would experience a Minor or Negligible effect (not significant) on daylight. In respect of sunlight, all receptors would experience Negligible effects (not significant) in this scenario. Whilst officers do acknowledge that there are properties that would experience impacts greater than the BRE guidance levels, it is considered that due to the existing low baseline values and the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations in most instances are either very limitedly or not likely to be noticeable and as such, the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels. As a result the scheme complies with policy DM10.7 of the Local Plan 2015. The daylight and sunlight for these properties is considered to be appropriate for their context in accordance with policy D6(d) of the London Plan 2021 and policy DE7 of the draft City Plan 2040, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

1044. In the 'Existing vs Cumulative' scenario, three of the residential properties considered would experience an effect greater than negligible. Of these three, one (2 and 10-16 Creechurch Lane) would experience a Major Adverse (significant) effect, one (18-20 Creechurch Lane) would experience a Moderate to Major Adverse (significant) effect; and one (4-8 Creechurch Lane) would experience a Minor to Moderate (significant) effect. None of the properties would experience sunlight impacts greater than Negligible. Whilst officers do acknowledge that the properties listed above would experience effects greater than the levels indicated in the BRE Guidance, it is considered that due to the existing low baseline values and the dense urban context, the percentage alterations are higher and therefore, disproportionate compared to the absolute alterations. The absolute alterations in most instances, although perceptible, that would be limited and as such the daylight and sunlight to these properties is not considered to be reduced to an extent that would warrant refusal of the application on those grounds. The proposal together with other consented schemes would not reduce sunlight and daylight to unacceptable levels and the proposal accords with policy DM10.7 of the Local Plan 2015. Sufficient daylight and sunlight would be provided to surrounding housing and other uses, and policy D6(d) of the London Plan 2021 is complied with. The sunlight and daylight would be appropriate for its context and provides acceptable standards, and therefore and policy DE7 of the emerging City Plan 2040 is complied with. The properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

1045. In addition, in the cumulative scenario, three religious buildings (Bevis Marks Synagogue, St Helen's Bishopsgate Church and St Andrew's Undershaft Church) would experience an effect greater than negligible. Of these sensitive receptors, one (St Helen's Bishopsgate Church) would experience a Moderate (significant) effect and two (Bevis Marks Synagogue and St Andrew's Undershaft Church) a Minor to Moderate Adverse (significant) effect. Whilst officers do acknowledge that these sensitive receptors would experience impacts greater than the levels indicated in the BRE Guidance and due regard has been given to the matters set out in section 149 of the Equality Act 2010 and the protected characteristics of users of these places of worship, it is considered that due to the existing baseline values, due to the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations are not likely to be noticeable and as such the daylight and sunlight to these sensitive receptors is considered to be appropriate for the context and provide these buildings with acceptable levels of daylight and sunlight in accordance with policy DE7 of the draft City Plan 2040. Further justification for each property is provided in the relevant section of the daylight and sunlight report above.

1046. In the 'Future baseline vs Proposed (with cumulative)' scenario, two of the residential receptors (2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane) would experience a Minor to Moderate and Moderate effect (significant). The rest of the receptors would experience a Minor or Negligible effect (not significant) on daylight. In respect of sunlight, all receptors would experience Negligible effects (not significant) in this scenario. These results are virtually the same as those of the 'Existing vs Proposed' scenario and therefore, the daylight and sunlight levels would not be reduced to unacceptable levels and the scheme accords with policy DM10.7 of the Local Plan 2015. Sufficient daylight and sunlight would be provided to surrounding housing and other uses, and policy D6(d) of the London Plan 2021 is complied with. The sunlight and daylight would be appropriate for its context and provides acceptable standards, and therefore and policy DE7 of the emerging City Plan 2040 is complied with. The properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

Overshadowing

1047. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces

1048. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the

different times of the day and year when shadow would be cast over a surrounding area.

1049. To assess overshadowing the ES has used the following methodologies:

- Transient Overshadowing (TOS); and
- Sun Hours on Ground (SHOG)

1050. BRE Guidelines (2022) suggest that 'sun hours on ground' assessment should be undertaken on the Equinox (21st March and 21st September). It is recommended that at least half of an amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

1051. For the sun on ground and transient overshadowing, the ES Chapter considers all of the private and public amenity spaces to be of high sensitivity.

1052. A total of 9 outdoors spaces have been considered as sensitive receptors, and these are:

- 30 St Mary Axe (public amenity area)
- Bevis Marks Synagogue Courtyard (religious amenity area)
- 19 Bevis Marks Rooftop (office building rooftop amenity area)
- 1 Creechurch Place (office building rooftop amenity area)
- Mitre Square Garden (public amenity area)
- Three education building amenity areas at Aldgate School – playgrounds 1, 2 and 3 (educational building amenity areas)
- 11 – 12 Bury Street Rooftop (office building rooftop amenity area)

1053. Other nearby open spaces identified by the BRE reviewer include the following:

- The area next to the Leadenhall building. This area is predominantly to the south of the proposed development and the overshadowing diagrams suggest that the shadow of the proposed building would only have the potential to reach this area in the early mornings in summer. The proposed development would therefore not impact the results on 21 March
- Abbott's Park, immediately to the west of St Helen's. The shadow of the proposed development does not appear to reach this area as it would be overshadowed by other existing buildings.
- A roof terrace to a building on the northwest (on the northwest corner of the junction of St Mary Axe with Bevis Marks). The overshadowing diagrams suggest that the shadow of the proposed development would pass over this space around mid to late morning on 21 March. However, it does not seem likely to significantly impact the areas able to receive at least two hours of sunlight on 21 March.

- Aldgate Square, to the east of the development. The overshadowing plots suggest that the proposed development would not cause an additional shading to this area on 21 March.

Existing baseline

1054. At the existing baseline, six of the nine surrounding receptors currently meet the BRE 50% area guideline for receiving at least 2 hours of direct sunlight on ground. The remaining three areas, which do not meet the BRE criteria in the baseline condition are:

- 30. St. Mary Axe Public Amenity (4%)
- Bevis Marks Synagogue Courtyard (0%)
- Aldgate School Playground 1 (35%)

Existing Baseline vs Proposed

Transient overshadowing

Equinox (21st March/September)

1055. On these days, shadows are cast from the proposed development from 08:00, which move in a clockwise direction. At this time, the area at 30 St. Mary Axe Plaza would become partially overshadowed by the proposed development. This would clear by approximately 12:00, at which time shadow from the proposed development begins to move over 11-12 Bury Street Rooftop for a short period, clearing by 13:00. Between 11:00 and 14:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard; however, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. From 13:00 to 14:00, the proposed development shadow passes over the 19 Bevis Mark Rooftop.

1056. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on these days.

Summer Solstice (21st June)

1057. On this day, shadows are cast from the proposed development from 06:00 in a south-westerly direction. No areas are affected until 09:00, when the area at 30 St. Mary Axe Plaza would become partially overshadowed by the proposed

development. This would clear by approximately 13:00, at which time shadow from the proposed development begins to move over 11-12 Bury Street Rooftop for a short period, clearing by 14:00. Between 13:00 and just before 15:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard. However, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. At 14:00, the proposed development shadow passes over 19 Bevis Mark Rooftop for a very short period. For a very short time at 18:00, then 1 Creechurch Place would see a very small amount of shading from the proposed development alongside shading from existing structures.

1058. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Winter Equinox (21st December)

1059. On this day, shadows are cast from the proposed development from 09:00, which moves in a clockwise direction. At 10:00, the at 30 St. Mary Axe Plaza would see a very small amount of shading from the proposed development in the north eastern corner, which would clear before 11:00. At this time shadow from the proposed development would move over 11-12 Bury Street Rooftop, clearing by 13:00. Between 11:00 and just after 12:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard; however, as noted above, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor.

1060. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Sun Hours on Ground

1061. The nine amenity areas have been quantitatively assessed against the BRE sun hours on ground criteria. Eight of the nine areas would meet BRE's criteria, either retaining at least two hours of direct sunlight on at least 50% of their total area on March 21st or seeing no alteration greater than 20%.

30 St Mary Axe Plaza

1062. This area receives 2 or more hours of sun on March 21st on just 4% of its total area, due to the built up nature of the surrounding context. This would be reduced to none with the proposed development in place. The northeastern corner of this area where the alteration occurs is likely to only just meet the BRE criteria, due to

the built up nature of the surrounding context and the absolute reduction would likely equate a short period of time where sunlight is reduced. The ES Chapter assessed a minor adverse impact to sunlight. This is reasonable as although there is a large relative loss and any area able to receive at least two hours of sunlight is removed, the existing area is small. The cumulative and future baseline scenarios suggest that although other consented schemes make a small reduction in the results, the impact is predominately due to the proposed development.

19 Bevis Marks Rooftop

1063. This area would see a 7% reduction to the area which receive at least 2 hours of sun on March 21st, retaining 2 or more hours of sunlight on 92% of the total area, and would therefore meet the BRE criteria. The effect would therefore be Negligible.

11-12 Bury Street Rooftop

1064. This area would see a 19% reduction to the area which receive at least 2 hours of sun on March 21st, retaining 2 or more hours of sunlight on 60% of the total area, and would therefore meet BRE's criteria. As such, the effect is considered Negligible.

11-12 Bury Street Rooftop

1065. This area would see a 19% reduction to the area which receive at least 2 hours of sun on March 21st, retaining 2 or more hours of sunlight on 60% of the total area, and would therefore meet BRE's criteria. As such, the effect is considered Negligible.

Bevis Marks Synagogue Courtyard

1066. As it is noted in the 'Relevant history and background' section of this report, as application was at Bury House, 31 Bury Street, was refused by reason of the overbearing and overshadowing impact of the previously proposed development on the setting and amenities of the Grade 1 listed Bevis Marks Synagogue.

1067. It is noted that since the determination of the previous application the courtyard of the Synagogue has undergone changes to include a new ramp to the visitor centre, permanent security booth at the entrance of the site and ticketing booth on the northern part of the courtyard. It is also noted that part of the courtyard will be used in the future for outdoor seating in association with the new café.

1068. Concerns have been raised in the objection letters received regarding the importance of the courtyard to the community's religious and communal activities

and the Synagogue's new exhibition centre and café. The courtyard is used for celebrations and gatherings, such as celebrating a Bar or Bat Mitzvah or celebrations of Succot and weddings.

1069. The courtyard to the Bevis Marks Synagogue would meet the BRE guidelines, although none of its area would be able to receive two hours of sunlight on 21 March currently. There would be 0% reduction, given that at baseline scenario no area receives two hours of sunlight on 21 March. The submitted Radiance Assessment document includes Sun Exposure analysis and sunlight availability in different months of the year. The BRE reviewer considered that this could be used in conjunction with the shadow diagrams (Annex 7) for an understanding of sunlight provision in the courtyard throughout the year if sunlight at specific times is required, albeit the numerical guidelines in the BRE Report apply to 21 March only.

1070. Although the submitted analysis does not include a scenario of Existing baseline vs Proposed, the results of the proposed development (plus consented schemes) are very similar to those of the consented schemes alone. The changes between the two are almost imperceptible between April and August. For the other half of the year (September till March) the sunlight levels in the courtyard are as low as the baseline scenario. In respect of average sunlight availability, in the baseline scenario, the average sunlight varies from one hour in April to two hours in June. The consented scenario follows a similar pattern, albeit with a 30 min loss on average, reaching a maximum of 1.5 hours in June. In the Proposed Development scenario, which is based on a 'clear sky' assumption, the results show a reduction in the average sunlight availability within the courtyard of 16 minutes to 19 minutes when compared to the consented scenario. It is therefore considered that the proposed development alone would not materially change the sunlight on the Bevis Marks Synagogue courtyard. Therefore, it is not considered that the development would result in overshadowing in the Synagogue's courtyard that would preclude continuing use for religious events and/or as part of the visitor experience visiting the Synagogue's exhibition centre.

Existing Baseline vs Cumulative

Transient overshadowing

Equinox (21st March/September)

1071. On these days, shadows are cast from the proposed development from 08:00, which move in a clockwise direction. At this time, 30 St. Mary Axe Plaza would become partially overshadowed by the Proposed Development. Cumulative

Schemes would begin to overshadow this area at 09:00. The proposed development shadow would clear by approximately 12:00, with Cumulative Schemes overshadowing the area for the remainder of the day. At 12:00, shadow from the proposed development would move over to 11-12 Bury Street Rooftop for a short period, clearing by 13:00. Cumulative Schemes overshadow this area from 15:00 until the end of the day. Between 11:00 and 14:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard. However, similar to the Existing vs Proposed scenario, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. From 14:00 until the end of the day consented schemes shadow would pass over the area, although also would not reach the floor. From 13:00 to 15:00, the proposed development and cumulative schemes shadow would pass over 19 Bevis Mark Rooftop.

1072. The cumulative schemes would not result in any additional shadow to the remaining sensitive amenity areas on these days.

Summer Solstice (21st June)

1073. On this day, shadows are cast from the proposed development from 06:00 in a south-westerly direction. No areas are affected until 09:00, when the 30 St. Marys Axe Plaza would become partially overshadowed by the proposed development. Cumulative schemes begin to overshadow this area from 11:00. The proposed development shadow would clear by approximately 13:00, and consented schemes would shadow would clear by 16:00. At 13:00, shadow from the proposed development begins to move over 11-12 Bury Street Rooftop for a short period, clearing by 14:00. At this time, the area becomes overshadowed by other cumulative developments until 16:00. Between 13:00 and 14:00, the proposed development shadow passes over the Bevis Marks Synagogue Courtyard; however, due to the depth of this area within the surrounding buildings, which cause the majority of shading, only a very minimal portion of the proposed development shadow hits the floor. At 14:00, cumulative schemes shadow would pass over the area, although would also be unlikely to reach the floor. At 14:00, the proposed development shadow would pass over 19 Bevis Mark Rooftop for a very short period, before cumulative schemes overshadow the area. For a very short time period at 18:00 the proposed development would shadow 1 Creechurch Place. Aldgate School area 3 would see a very small amount of shading from the other consented schemes alongside shading from existing structures.

1074. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Winter Equinox (21st December)

1075. On this day, shadows are cast from the proposed development from 09:00, which moves in a clockwise direction. At 10:00 30 St. Marys Axe Paza would see a very small amount of shading from the proposed development in the north eastern corner, which would clear by before 11:00. At this time shadow from the proposed development would move over to 11-12 Bury Street Rooftop, clearing by 13:00, with a small amount of additional shading from cumulative schemes at 14:00. Between 11:00 and just after 12:00, the proposed development shadow would pass over the Bevis Marks Synagogue Courtyard. As noted before, the majority of shading is due to other existing buildings, only a very minimal portion of the proposed development shadow hits the floor. At 14:00, cumulative scheme shadows would pass over the area at 13:00, although would also be unlikely to reach the floor.

1076. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

Sun Hours on Ground

1077. The nine amenity areas have been quantitatively assessed against the BRE sun hours on ground criteria. Eight of the nine areas would meet the BRE criteria, either retaining at least two hours of direct sunlight on at least 50% of their total area on March 21st, or seeing no alteration greater than 20%.

1078. There would be no magnitude of impact beyond the BRE criteria in the cumulative scenario for 30 ST Mary Axe Plaza and the Bevis Marks Synagogue courtyard and therefore, the effects would remain the same (Minor Adverse and Negligible, respectively). The 19 Bevis Marks rooftop would see a 10% reduction to the portion seeing at least 2 hours of sun, however, would remain BRE compliant. Therefore, there would overall be no change in the Cumulative Scenario and the effect would remain Negligible. 11-12 Bury Street Rooftop would see a 41% reduction to the portion seeing at least 2 hours of sun, receiving 74% in the existing baseline condition, which is reduced to 44% due to the Proposed Development and Cumulative Schemes. The areas seeing a reduction are slightly stepped down, resulting in self-shading. The main portion of this area would still see 2 or more hours of sunlight on March 21st, increasing to 6 or more hours in June, when the space is most likely to be enjoyed. Therefore, the ES Chapter considers this effect Minor Adverse. The BRE review considers this is reasonable when considering that 44% of the area would still be able to receive at least two hours of sunlight (compared to the guideline 50%), albeit the large relative loss.

1079. All other sensitive amenity areas would have a Negligible effect.

1080. The impacts based on the Sun Exposure analysis and average sunlight availability submitted with the Radiance Assessment document are addressed in the Existing vs Proposed section above.

Future Baseline vs Cumulative

Transient overshadowing

1081. The results of the transient overshadowing at this scenario are virtually identical to those of the Existing vs Proposed scenario. Therefore, no further assessment is required.

Sun Hours on Ground

1082. The nine amenity areas have been quantitatively assessed against the BRE sun hours on ground criteria. Eight of the nine areas would meet the BRE criteria, either retaining at least two hours of direct sunlight on at least 50% of their total area on March 21st, or seeing no alteration greater than 20%.

1083. In the Future Baseline condition, 3% of the St Mary Axe Plaza would receive 2 hours of sun on March 21st, which is 1% lower than the Existing Baseline condition, due to consented schemes being built out. In terms of the Bevis Marks Synagogue courtyard, there would be a 0% alteration from the Proposed Development compared to the Future Baseline condition and therefore the effect would remain Negligible. The Future Baseline conditions reduce the portion of the area of the 19 Bevis marks rooftop receiving 2 hours of sun on March 21st to 92%. This area would see a 3% reduction to the portion seeing at least 2 hours of sun, however, would remain BRE compliant. The Future Baseline conditions reduce the portion of the 11-12 Bury Street Rooftop receiving to 67%. This area would see a 34 % reduction to the portion seeing at least 2 hours of sun. The effect would therefore, considered Minor Adverse. All other sensitive amenity areas would have a Negligible effect.

1084. The impacts based on the Sun Exposure analysis and average sunlight availability submitted with the Radiance Assessment document are addressed in the Existing vs Proposed section above.

Overshadowing conclusion

1085. In conclusions, the results show that there would be no materially harmful overshadowing effects caused by the development to any public amenity areas and therefore, the proposal complies with policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

Comparison to the Previously Refused Scheme

1086. As part of the previously refused application (ref number: 20/00848/FULEIA) Daylight, Sunlight and Overshadowing assessment was prepared by Avison Young and thereafter independently reviewed by BRE, who have also reviewed the application that is currently under determination.

1087. For the purposes of comparing the two schemes, it is considered reasonable for the existing and proposed scenarios at the properties in the closer proximity to be assessed to be considered, using the data from the two EIAs. The cumulative scenarios in both assessments are not considered as part of this assessment due to differences in the cumulative scenarios used. Given that the two assessments were undertaken by different consultants a direct comparison of some areas is not possible, due to how they have been performed. However, a third party review from BRE who was both the previous and current reviewer of the daylight and sunlight has been commissioned for the comparison and the following findings are mainly focused on this review.

The Bevis Marks Synagogue

1088. In the assessment for the current proposal, five windows at the Bevis Marks Synagogue would be below the BRE vertical sky component (VSC) guidelines, as discussed in the relevant section above. These are the first floor south west facing windows which light the main space (the central ground floor space and first floor gallery). The space has other windows on other sides of the building, which would not be impacted. The existing values of VSC to the five windows are in the range of 3.6-6.7% VSC. The relative losses to the five windows would be 27-36% with absolute losses of VSC between 1.3-1.9% VSC and resultant values in the range 2.3-4.8% VSC. The impact to daylight would be assessed as minor adverse.

1089. In the previous application the same five windows were also below the BRE guidelines. There are minor differences in the calculated values, which may be expected due to being undertaken by different consultants at different times. The existing values of VSC in this assessment are in the range of 4.1-7.0% VSC. The relative loss of daylight to the five windows was in the range of 25-32% with absolute losses of VSC between 1.3-1.8% VSC and resultant values between 2.8-5.2% VSC. The impact to daylight was assessed as minor adverse.

1090. The differences between the results for the two schemes is therefore very small. The impact to daylight would still be assessed as minor adverse for both schemes.
1091. The results for loss of sunlight to windows with the current scheme suggest that although there would be some loss of sunlight to the south facing windows, the BRE guidelines would be met, albeit with two windows just meeting the guidelines with a loss of annual probable sunlight hours of 4%.
1092. In the previous application, the same windows are affected in terms of loss of sunlight; however, the results of the previous scheme suggest a greater loss of sunlight with three of the five south west windows discussed reduced to below the BRE annual probable sunlight hours guidelines. These three windows below the guidelines would have absolute losses of annual probable sunlight hours in the range of 7-12%. Three further windows to the southeast facing façade would also be below the guidelines. The previous BRE review assessed a moderate adverse impact to sunlight. The worst-case window for loss of sunlight (the most westerly of the five windows on the first floor of the current proposal) is suggested to have a value of 10% with the previously proposed development in place.
1093. In light of the above, it is considered that the loss of sunlight to windows results with the current proposed scheme would represent an improvement compared to the previous scheme.
1094. With regard to overshadowing of the Synagogue's courtyard, the assessment of the previously refused scheme found that 1.5% of the Synagogue courtyard area would receive 2 hours of sun on the equinox in the baseline condition. The updated assessment for the Proposed scheme finds the none of the Synagogue courtyard area would receive 2 hours of sun on the equinox. This is likely a result of the evolving baseline, modelling and software factors noted above.
1095. Overall, it is considered that the result of the daylight and overshadowing effects remain relatively comparable between the previously refused and currently proposed scheme. The sunlight effects of the proposed scheme represent an improvement when compared to the refused scheme.

2 Heneage Lane

1096. The results, when comparing the existing and proposed scenarios, of both the previously refused and currently proposed schemes are assessed to be negligible as the BRE guidelines are met. Loss of sunlight is not an issue for this property due to its orientation.

2 and 10-16 Creechurch Lane

1097. For these properties to the southeast, a comparison of the effects of daylight distribution between the previously refused and currently proposed schemes is not possible because the previously submitted assessment based on assumed layouts, whilst the current one is based on known layouts and the layouts are different.

1098. Of the 72 windows analysed across both assessments, 68 would be below the VSC guidelines with the current proposal. With the previous proposal 67 windows would be below the guidelines. For the current scheme the relative reduction of VSC would be in the range of 24-58%, with absolute losses of VSC in the range of 1.0-3.8%. This compares to a relative reduction of VSC in the range of 21-54% with absolute losses of VSC in the range of 1.0-4.1%. This suggests the two sets of results are similar and there is not a significant difference in impact between the two schemes.

1099. Sunlight is not an issue due to the northerly facing windows.

18 - 20 Creechurch Lane

1100. Similar to the other properties analysed on Creechurch Lane a direct comparison of daylight distribution results is not possible due to different layouts being used between the two assessments.

1101. For the section of the building to Mitre Street, Five windows would be below the BRE guidelines with the previous proposal and six would be below the guidelines with the current proposal. Relative reductions in VSC for windows below the guidelines with the previous proposal would be in the range of 21-28% with absolute losses of 1.9-2.5% VSC. This compares to relative reductions in VSC of 21-28% with the current scheme with absolute losses of 1.5-2.2%. The loss of daylight impact to this section of the building is therefore very similar between the two proposals. Taken those results individually the effects would be considered minor adverse in both schemes.

1102. For the corner section of the building, the relative reduction in VSCs with the previous proposal would be in the range of 20-67%, with absolute losses of 2.9-11.7% VSC. This compared to relative reductions in VSC of 22-66% with the current proposal with absolute losses of 2.8-11.2% VSC. The loss of daylight results between the schemes are therefore very similar. These effects are assessed as major adverse in both schemes.

Conclusion

202 Overall, it is considered that the daylight, sunlight and overshadowing effects of the previously refused scheme and the one currently proposed to the nearby sensitive receptors are very similar, with the exception of the sunlight impacts on the Synagogue, which represent an improvement.

Addressing the daylight/sunlight report submitted on behalf of The S&P Sephardi Community

1103. As part of their response to the latest consultation, the S&P Sephardi Community has submitted a daylight and sunlight empirical report for the Synagogue, using two illuminance meters. The daylight report provides an assessment of the existing daylight levels in Bevis Marks Synagogue and considers how these would be likely to be affected by proposed development. The assessment was carried out between 26th February 2022 to 2nd April 2024 and the illuminance meters were positioned in the central area of the ground floor (Sanctuary), both at a height normal for holding a prayer book at locations BM1 (on the edge of the Bimah) and BM2 (on the pew closest to the Ark). The daylight report advises that light levels were recorded at five minute intervals continuously throughout the monitoring period and that some monitoring data was lost due to practicalities around long-term monitoring in an occupied space, primarily due to human interference related aspects.

1104. This report was review by a third party consultant on behalf of the City and the findings and conclusions are set out below.

1105. The report refers to 767 daily plots; and all of these are stated to have been used for data plotting. These plots could not be found in the material provided and therefore, it was not entirely clear to the reviewer what data was actually included in the analysis.

1106. The independent reviewer states that BS ISO/CIE 19476:2014 'Characterization of the performance of illuminance meters and luminance meters' defines quality indices to characterise the performance of such devices in a general lighting measurement situation, considering two main factors, namely spectral correction and cosine correction. However, it was not possible to source detailed technical data for the type of logging illuminance meter used for monitoring light levels inside the Synagogue. Therefore, the accuracy of the recorded light levels could not be ascertained.

1107. The reviewer of the Bevis Marks daylight also states that "*It is debatable whether the illuminance levels recorded at the two measurement locations are representative for daylight achievable across the entire core area on the ground floor.*" The chosen locations can only provide evidence of the daylight levels in those specific locations as opposed to an overall representation of the daylight

across the entire Synagogue. This is evident given the notable differences in the average daily hours that specific illuminances were achieved on a monthly basis, suggesting that location BM1 was visibly better daylighted than location BM2. The reviewer considers that this raises the question as to how representative the data recorded for the two measurement locations chosen are for the rest of the space.

1108. With regard to contribution of electric lighting, the daylight report states that this was subtracted from the recorded values only for some dates during the monitoring period (namely 26 February to 7 June 2022) and also that the contribution is small, around 10lux. However, it is not clear whether this is applicable to one or both measurement locations, or indeed to the rest of the space.

1109. In relation to the key illuminance levels chosen to characterise daylight provision for the Bevis Marks Synagogue daylight report (25 lux, 50 lux, 100 lux and 200 lux), the reviewer advises that these are leaning towards the lower values than the key illuminance levels used in British standards, which recommend higher illuminance levels (300 lux horizontally on the book stand and vertically at speaker height in the Bimah, 300 lux vertically over the vertical reader area in the Amud, and 150 lux horizontally at floor level across the Sanctuary). As a result, the data presented in Table 1 of the Bevis Marks Synagogue daylight report indicates that the two locations used for illuminance monitoring generally receive low levels of daylight in the current context.

1110. The Bevis Marks Synagogue daylight report compares the internal illuminance monitoring results against simultaneous external data for the same location. However, the submitted details contain a description of the illuminance data and refers to a complete report for daily plots, which was not provided and therefore, the daily plots of internal versus external illuminance could not be checked.

1111. The results presented in the Bevis Marks Synagogue daylight report suggest that sunlight reflected from neighbouring building façades that penetrates the Synagogue windows contributes significantly to the daylight levels achieved within the core of the ground floor area of the Synagogue throughout the year. A similar argument was also raised in one of the objection letters received during the consultation period, which argued that the proposed development would cast a shadow over the building facades of the nearby buildings, which would impact the daylight levels in the Synagogue.

1112. The analysis of reflected sunlight in section 2.4 of the Bevis Marks Synagogue daylight report is based on shadow plotting and therefore purely geometric. That section concludes that, given the contribution of reflected light to internal daylight levels, computer modelling which adequately accounts for reflected sunlight and skylight can assess more accurately the impacts from the proposed development.

The reviewer considers that this is an appropriate statement based on a sound analysis of reflected sunlight.

1113. Section 3 of the Bevis Marks Synagogue daylight report discusses the results of climate-based daylight modelling, using an approximate as opposed to accurate scenario in terms of the Synagogue and its current surroundings. The daylight report states that the 3D model used for the simulations based on detailed drawings for the Synagogue, but on estimates massing models for the surrounding buildings. The daylight report accepts that the results presented “*should be considered as illustrative until more accurate building geometry is available.*”
1114. The Bevis Marks daylight report introduces the total annual illumination (TAI) as the measure to quantify all daylight illumination received at a point indoors for an entire year. The reviewer considers this sensible as it accounts for both direct and reflected light from the sun and the sky which can reach the point indoors. Full details of the results have not been provided and it is also not clear whether the results relate to the locations of the logging illuminance meters used or particular zones of the core area, or the entire core area. Nevertheless, the presented results suggest almost no contribution from direct sunlight and around 99% contribution from sunlight or skylight reflected off the neighbouring buildings. However, the reviewer states that light reflection is fundamentally influenced by reflective surface characteristics including material, texture, and reflectance. No information on surface characteristics could be found in the Bevis Marks Synagogue daylight report and therefore it is not clear what types of material and surface reflectances were used in the calculation model. This is applicable to both external and internal surfaces. Therefore, the proportions of direct and reflected light stated in the report could not be verified.
1115. It is acknowledged that reflected light contributes to internal daylight illumination. However, the results in the daylight report cannot be verified and also reflectivity is highly dependent on the finishing materials of the buildings abutting the Synagogue’s courtyard that the development does not relate to. Furthermore, in the context of the BRE guidelines, which is used by local planning authorities to determine planning applications, daylight and sunlight are assessed separately and reflected light is not considered in the metrics used. This is in order to limit the uncertainty related to surface reflectances in an existing context, both outdoors and indoors, and improve the efficiency of the loss of light assessment process.
1116. The Bevis Marks Synagogue daylight report does not give TAI results for the proposed development, albeit the estimated effects show that the light levels would be reduced between 11am and 2pm by the proposed development. Therefore, it does not predict the impacts of the proposed development on daylight levels achievable inside the Synagogue building. The analysis contained therein is only used to support the argument that prediction methods commonly used at

the planning stage to assess impacts on daylight in existing buildings in typical situations are not suitable for the context of the Synagogue because they do not account for contribution from the sun and/or reflected light.

1117. The report concludes that the Synagogue is currently experienced as a *“functionally daylit space for considerable periods of the year”*. This appears to be contradicted by the illuminance monitoring results provided for the two locations chosen inside the Synagogue. In particular, the submitted table suggests that BM1 receives only a few hours daily on the spring and summer months of over 100lux, while BM2 records substantially lower levels. These indicate levels of daylight below the minimum recommended in BS EN17037. Furthermore, the report itself states that current daylight levels are *“at or very close to a ‘tipping point’”*, which actually deviates from the notion of a *“functionally daylit space”*.
1118. The Applicant’s daylight consultants in their response to the submitted Bevis Marks Synagogue daylight report conclude that *“While GIA agree that it may be possible to read at 50-100 lux, even if this were the median lux levels exceeded over 50% of the whole ground floor, it would firmly position the Synagogue within the category of dimly daylit space, where additional artificial lighting is likely to be needed during daylight hours, according to the British Standards and BRE Guidance”*. The Corporation’s appointed reviewer agrees with that point.
1119. Whilst the reviewer considers the methodology used in the Bevis Marks Synagogue daylight report is generally reasonable, in their conclusions they note that *“alternative metrics that account for contribution from the sun and reflected light, such as daylight illuminance as defined in BS EN17037 or TAI as proposed in the Bevis Marks daylight report, could be applied when assessing the loss of daylight to the Bevis Marks Synagogue building provided they are part of a climate-based daylight modelling methodology based on a detailed massing model and appropriate calculation parameters. The latter include actual surface reflectances and glazing transmittance as measured in situ for existing indoor and outdoor surfaces and Synagogue windows, alongside suitable calculation points and/or grids, weather data and modelling parameters. Most of these details are missing from the Bevis Marks daylight report.”*
1120. Overall, based on the results of the submitted data it is accepted that the Synagogue currently experiences low levels of light, which accords with the results of the Daylight, Sunlight and Overshading Assessment submitted by the Applicant. Officers, based on the findings and conclusions of the reviewer, consider that the although the Bevis Marks Synagogue daylight report is not based on a published or generally used method, if carried out appropriately with adequate equipment and controlled methodology it can give an understanding of the current and proposed light levels. However, it is considered that the submitted daylight report, is not complete or entirely accurate, due to the lack of necessary information and

other limitations, as discussed above, and therefore, it can be attributed limited weight. It is considered more appropriate that officers give substantial weight to the findings of the Daylight, Sunlight and Overshadowing Assessment submitted by the Applicant and reviewed by the Corporation's appointed daylight consultant, as this follows the BRE guidelines as referred to in Local Plan policy DM10.7, and paragraph 3.10.41 of the reasoned justification to that policy. The BRE guidelines are also referred to in draft City Plan 20240 policy DE7.

Solar Glare

1121. Glare is the discomfort or impairment of vision caused by excessive or large contrast in luminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare; distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).
1122. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.
1123. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.
1124. The solar glare assessments undertaken assume a worst-case scenario whereby the sun will shine every day during daylight hours which is not the case within the UK.
1125. Solar glare has been assessed via the times of day and year able to receive instances of reflection at example road points and one rail point surrounding the site. All of the road and rail viewpoints assessed are considered to be of high sensitivity.
1126. 41 road locations and one railway location have been identified in the Environmental Statement as sensitive to solar glare. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions, pedestrian crossings, and railway lines at these locations.

1127. From the 41 nearby roads, the proposed development would not be visible from 32 viewpoints. Roads and junctions in the vicinity where points are not considered appear to be based on not having a view of the building, either because it would be blocked by other buildings or one way roads with vehicle traffic facing away from the building. For example, Mitre Street, immediately to the east of the proposed development is a one way street with vehicles moving easterly away from the proposal. However, the third party reviewer has highlighted that for some one way streets in the area, including Mitre Street, cyclists can travel in the opposite direction to the one way street towards the development. It is advised that although solar glare may be an issue to cyclists it could be considered less of an issue than to motorists, as a cyclist may be able to more easily stop, shield their eyes or look away without potential of causing a serious accident. Solar glare could also be an issue if traffic direction is changed in the future.
1128. Since the proposed development is tall there may be the potential of solar glare outside of the area tested. However, the building would be smaller in size from a distance and the effects would be more limited. The scope of the study focusing on worst-case areas closest to the proposal which is considered appropriate. The viewpoints that face multiple traffic lights have been assessed to include view to each relevant light, which is considered a sensible approach.
1129. There are nine viewpoints that would potentially see solar reflections from the proposed development. Following review of the ES Chapter, some typographical errors in relation to the locations and viewpoints have been corrected.
1130. For three of the nine viewpoints, the instances of reflection would occur on very small areas of glazing, which are broken up by solid elements and occur beyond 20° of a road user's line of vision. Therefore, they will occur for a very short time and the effect would be Negligible (not significant). At five viewpoint locations solar reflections are visible within 10° to 20° or between 10° to 5° of the driver's line of sight for a short period of time. These effects are considered Minor Adverse (not significant). At the remaining location, two viewpoints have been identified, looking left and right at the two traffic lights visible. The potential reflections would be visible within 3° to 5° of a road users' line of sight at various times throughout the year. However, any potential reflections at the lower portion of the proposed development would be shielded by existing buildings. For those reflections which are visible, the majority of reflections would occur above the visor line. Due to the orientation of the two façades where reflections are potentially visible, the period of time and duration of reflections would be limited. Overall, the ES Chapter concludes that the effect to this location would be Minor Adverse (not significant).
1131. The BRE reviewer has suggested further investigation of some viewpoints. However, as highlighted by the applicant, further technical assessments are

typically undertaken when the exact glazing specifications are agreed. These details are not available at this stage of the planning process.

1132. Overall, the potential impact of solar glare from the proposed development is considered at it worse to be minor adverse but the effects are not significant.

1133. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of a mitigation measures (if considered necessary). The proposed development would comply with Policy D9C(g) of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

1134. Local Plan policy DM15.7 and draft City Plan policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

1135. The potential light spillage impacts arising from the proposed development has been assessed on the following residential and religious buildings:

- Bevis Marks Synagogue
- 2 Heneage Lane
- 10-16 Creechurch Lane
- 6-8 Creechurch Lane

1136. The assessment in the ES states that it is based on a typical internal lighting design and therefore not a final design. The assessment therefore includes the impact of a notional proposed interior lighting on surrounding areas only and does not include any exterior lighting.

1137. The ES Chapter suggests negligible (not significant) effects to Bevis Marks Synagogue, 2 Heneage Lane, 10-16 Creechurch Lane and 6-8 Creechurch Lane and a minor adverse (not significant) effects post-curfew (after 11pm) at 18-20 Creechurch Lane. This is based on coloured plots representing the illuminance on windows at the buildings (no numerical results are given). The results for 18-20 Creechurch would meet the guideline but have values closer to the 5 lux post-curfew target. The BRE reviewer considered the assessment of a minor adverse impact being reasonable based on the information provided.

1138. The suggested mitigation measures would include the submission of detailed lighting scheme to minimise the illuminance levels to the southeast end of the floor plan. This could include the dimming of lights at the perimeter of the floor plan post-curfew and automatic blinds post-curfew. These are sensible for a future detailed internal lighting design. It is considered that similar details for proposed external lighting should also be submitted.
1139. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.
1140. Subject to the imposition of the condition for the submission of necessary details, the development would comply with Local Plan policy DM 15.7 and draft City Plan 2040 Policy DE8 and has been designed to avoid light spill.
1141. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the Emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood, must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
1142. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared using high resolution Computational Fluid Dynamics (CFD). The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the site, by comparing the predicted felt temperature values and frequency of occurrence.

1143. The assessment was graded against the City of London Thermal Comfort Criteria, as set out in “Thermal Comfort Guidelines for Developments in the City of London”. Categories are based upon the seasonal percentage for which thermal conditions are acceptable (UTCI values of between 0° and 32°).

London Thermal Comfort Criteria

KEY	USAGE CATEGORY	% OF HOURS WITH ACCEPTABLE UTCI	DESCRIPTION
	All Season	>90% in each season	Appropriate for use year-round (e.g. parks).
	Seasonal	>90% spring-autumn AND >70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
	Short-term	>50% all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.
	Short-term seasonal	>50% spring-autumn AND >25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
	Transient	<25% winter <50% any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

1144. The thermal comfort conditions have been assessed for entrances, bus stops and amenity spaces.

1145. The purpose of the tests is to compare conditions with and without the proposed development. To assess those conditions the following conditions have been tested:

- Configuration 1: The existing site with existing surrounding buildings (The Baseline);
- Configuration 2: The Proposed Development with existing surrounding buildings;
- Configuration 3: The Proposed Development with the tier 1 cumulative schemes (schemes for which planning permission has been granted, including 6-8 Bishopsgate, Leadenhall Court, 40 Leadenhall Street, Emperor House, Boundary House and 29 - 15 Minories, 57-60 & 62 Aldgate High Street and 1 Little Somerset Street);
- Configuration 4: The Proposed Development with the tier 1 and tier 2 cumulative schemes (schemes which have been submitted and are awaiting determination, including 1 Undershaft, 100, 106 & 107 Leadenhall Street, 115-123 Houndsditch, Bevis Marks House, 24 Bevis Marks, Fountain House, 130 Fenchurch Street, Site bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane, 70 Gracechurch Street, 150-152 & 153 Fenchurch Street, 55 Bishopsgate, 65 Crutched Friars and 85 Gracechurch Street).

Configuration 1: Existing site with the existing surrounding buildings

1146. In the existing baseline configuration, entrances and bus stops are suitable for seasonal or short term use, which satisfies the target condition.
1147. The spill out sitting areas adjacent to 1 Undershaft, west of 30 St Mary Axe and on the corner of Bevis marks and Bury Street are suitable for seasonal use. To the east of 30 St Mary Axe the area is suitable for a mix of seasonal and short term use, which is a category above the target condition. The benches in St Helen's churchyard and west of 30 St Mary Axe are suitable for seasonal use, which satisfies the target condition. The benches to the south of 1 Undershaft are suitable for a mix of seasonal and short term use. The benches to the north of 30 St Mary Axe are suitable for short term use. These are one category above the target condition. The benches to the east of 30 St Mary's Axe and in Mitre Square Garden are suitable for a mix of seasonal and all-season use. These satisfy the target conditions.
1148. The conditions at the Aldgate School playground and the Aldgate Station Memorial are suitable for a mix of seasonal and all-season use. The Aldgate School roof terraces would be suitable for seasonal use. These satisfy the target conditions. There are also terraces at the ACE building, 11-12 Bury Street and One Creechurch Place. These terraces are suitable for seasonal use, which satisfies the target condition.

Configuration 2: Proposed development with the existing surrounding buildings

1149. In the proposed development configuration, all entrances to the proposed development would be suitable for a mixture of all-seasonal or seasonal use, which satisfies the target condition. Off-site entrances and bus stops are suitable for all-season to short term use, which satisfies the target condition.
1150. The proposed seating at the south east of the site would be suitable for all-season use. This satisfies the target condition. The spill out sitting areas adjacent to 1 Undershaft, west of 30 St Mary Axe and on the corner of Bevis Marks and Bury Street are suitable for seasonal use, which accords with the target condition. To the east of 30 St Mary Axe the area is suitable for a mix of seasonal and short term use, which is a category above the target condition, same as the baseline conditions.
1151. The proposed benches at the southern end of the site would be suitable for all-season use. This satisfies the target condition. The benches in St Helen's churchyard and west and north of 30 St Mary Axe are suitable for seasonal use,

which satisfies the target condition. The benches to the north of 30 St Mary Axe have improved by one category from the baseline scenario. The benches to the south of 1 Undershaft are suitable for a mix of seasonal and short term use. These are one category above the target condition. The benches to the east of 30 St Mary's Axe and in Mitre Square Garden are suitable for a mix of seasonal and all-season use. These satisfy the target conditions.

1152. The conditions at the Aldgate School playground and the Aldgate Station Memorial are suitable for a mix of seasonal and all-season use. The Aldgate School roof terraces would be suitable for seasonal use. These satisfy the target conditions. The terraces at the ACE building, 11-12 Bury Street and One Creechurch Place would be suitable for seasonal use, which satisfies the target condition.

1153. On site, the proposed Level 6 and 7 amenity terraces would be suitable for a mix of all-season and seasonal use. This satisfies the target condition. The proposed Level 8 amenity terrace would be suitable for seasonal use. This satisfies the target condition. The proposed Level 9 amenity terrace is suitable for seasonal use across the majority of the terrace, but has localised regions which are suitable for short-term use at the outer edges of the terrace. Conditions in these locations are driven by the winter conditions, but are still over 90% acceptable throughout spring, summer and autumn. Taking into consideration the extent of the terrace, which is still suitable for seasonal use, it is considered that this terrace will still be suitable for the intended use. At the tower, the proposed Level 22 and roof level amenity terraces would be suitable for a mix of all-season and seasonal use. The proposed Level 36 amenity terrace would be suitable for all-season use. These satisfy the target condition.

Configuration 3: Proposed development with Tier 1 cumulative surrounding buildings

1154. In the proposed development with Tier 1 cumulative buildings configuration, all entrances to the proposed development would be suitable for a mixture of all-seasonal or seasonal use, which satisfies the target condition. Off site entrances and bus stops are suitable for all-season to short term use, which satisfies the target condition.

1155. The proposed seating at the south east of the site would be suitable for all-season use. This satisfies the target condition. The spill out sitting areas adjacent to 1 Undershaft, west of 30 St Mary Axe and on the corner of Bevis Marks and Bury Street are suitable for seasonal use, which accords with the target condition. To the east of 30 St Mary Axe the area is suitable for a mix of seasonal and short term use, which is a category above the target condition, same as the baseline conditions.

1156. The proposed benches at the southern end of the site would be suitable for all-season use. This satisfies the target condition. The existing benches in St Helen's churchyard and west and north of 30 St Mary Axe are suitable for seasonal use, which satisfies the target condition. The benches to the north of 30 St Mary Axe have improved by one category from the baseline scenario. The benches to the south of 1 Undershaft would be suitable for seasonal use, an improvement from Configurations 1 and 2. The benches to the east of 30 St Mary's Axe and in Mitre Square Garden are suitable for a mix of seasonal and all-season use. These satisfy the target conditions.
1157. The conditions at the Aldgate School playground and the Aldgate Station Memorial are suitable for a mix of seasonal and all-season use. The Aldgate School roof terraces would be suitable for seasonal use. These satisfy the target conditions. The terraces at the ACE building, 11-12 Bury Street and One Creechurch Place would be suitable for seasonal use, which satisfies the target condition.
1158. On site, the proposed Level 6 and 7 amenity terraces would be suitable for a mix of all-season and seasonal use. This satisfies the target condition. The proposed Level 8 amenity terrace would be suitable for seasonal use. This satisfies the target condition. The proposed Level 9 amenity terrace is suitable for seasonal use across the majority of the terrace but has localised regions which are suitable for short-term use at the outer edges of the terrace. Conditions in these locations are driven by the winter conditions, but are still over 90% acceptable throughout spring, summer and autumn. Taking into consideration the extent of the terrace, which is still suitable for seasonal use, it is considered that this terrace will still be suitable for the intended use. At the tower, the proposed Level 22 and roof level amenity terraces would be suitable for a mix of all-season and seasonal use. The proposed Level 36 amenity terrace would be suitable for all-season use. These satisfy the target condition.

Configuration 4: Proposed development with Tier 1 and Tier 2 cumulative surrounding buildings

1159. In the proposed development with Tier 2 cumulative buildings configuration, the comfort levels recorded would be very similar to Configuration 3. The suitability of conditions is therefore consistent with what was reported for Configuration 3. This applies to on-site entrances, off-site entrances, bus stops, on-site seating, off-site seating, on-site benches, off-site benches, off-site mixed ground level amenity, proposed amenity terraces and off-site amenity terraces.

Thermal Comfort Conclusion

1160. All ground level thermal comfort conditions were either suitable for the intended use, or no worse than the baseline conditions. This applies to all entrances, bus stops, spill-out seating areas, benches and mixed amenity spaces within the study area. The results show that the proposed development would result in a beneficial impact on the existing benches to the north of 30 St Mary Axe, which are made suitable having not been so for the baseline. With regard to off-site terraces, all would be suitable for their intended use. For terraces proposed on site, there will be some localised exceedances at Level 9 terrace, which will be colder than desirable in winter. However, this is not considered to result in an unacceptable level in terms of thermal comfort to an extent to that would make the use of the terrace unsuitable. All other terraces on the proposed development would be suitable for their intended use.

1161. In light of the above, it is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Air Quality

1162. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

1163. The Environmental Statement at Chapter 8 and appendices 8.1 to 8.5 and includes assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development.

1164. An air quality positive statement has been submitted, which details the approach to be undertaken in association with the construction and operation of the proposed development. The air quality positive approach has identified the following:

- The main constraints to air quality at the Application Site are the existing high pollutant concentrations resulting from road traffic emissions, existing high pollutant background concentrations, as well as the proximity of nearby sensitive land uses;

- Design opportunities considered throughout the design stage include proposed energy and ventilation strategies, transport, public and green spaces, and land use;
- Measures will be adopted under the four key areas (better design and reducing exposure, building emissions, transport emissions, innovation and future proofing); and
- An implementation and monitoring plan will ensure that the measures agreed are upheld and adhered to.

1165. The air quality officer has confirmed the air quality positive approach set out in the statement to be acceptable.

1166. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

1167. The proposed development would be car free and heating is through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment and would be Air Quality Positive, and there are mitigations set out within the Air Quality Positive Statement.

1168. Secondary power is proposed to be supplied by a second mains connection, and it has been confirmed there is to be no backup generator installed.

1169. Particulate filtration has been proposed as part of the full mechanical ventilation strategy. Due to the majority of predicted NO₂ annual mean concentrations being within 10% of the annual mean objective, and the uncertainty value of the modelling being >10%, NO_x filtration will also be required.

1170. The City's Air Quality Officer has no objections following clarifications on the ES Chapter. Conditions are recommended including a restriction on the use of diesel generators, submission of evidence of installation of an appropriate NO_x and Particulate filtration system and Non-Road Mobile Machinery Registration.

1171. Subject to conditions, the proposed development would have a minimal impact on local air quality. The scheme meets the air quality neutral and positive benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan Policy 2015 policy policies HL2 and DE1 of the draft City Plan 2040, and Policy SI1 of the London Plan which all seeks to improve air quality.

Noise and Vibration

1172. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
1173. The Environmental Statement at Chapter 9 and Appendices 9.1 to 9.4 assess the impact from noise and vibration associated with the proposed development, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the proposed development.
1174. The Environmental Statement identifies the following as receptors that would be sensitive to noise and vibration from the proposal (the sensitive receptors):
- Religious: Bevis Marks Synagogue; St Katherine Cree C of E Church (Both identified as “Medium Risk”).
 - Residential: 2 Heneage Lane; 18-20 Creechurch Lane; 10-16 Creechurch Lane; 4-8 Creechurch Lane (all identified as “High Risk”)
 - Commercial: 4-10 Heneage Lane; 33 Creechurch Lane; 24 Creechurch Lane; 12-14 Mitre Street; 88 Leadenhall Street; 100 Leadenhall Street; 30 St Mary Axe (The Gherkin); 5-10 Bury Street (all identified as “Low Risk”)
1175. In most City redevelopment schemes the main noise and vibration issues occur during demolition and construction phases. In respect of noise, the assessment identifies that for the two medium sensitivity religious institutions, there would be a negligible impact.
1176. During the majority of the construction period the impact to some high sensitivity residential receptors at 2 Heneage Lane and 4-8 Creechurch are expected to be negligible to minor adverse.
1177. The impact to 10-16 Creechurch Lane however would potentially be significant, being classed as minor adverse to moderate adverse for the majority of the construction phase. The impact to 18-22 Creechurch Lane would also be significant as major adverse effects are expected during demolition and excavation works. Noise mitigation measures and management plans would therefore be required, with specific measures for those expected to be impacted significantly during the works. A Scheme of Protective Works is recommended to be secured by condition.

1178. The statement does not identify any significant effects resulting from construction traffic.
1179. In respect of vibration, the construction works would not result in significant effects to nearby receptors.
1180. Noise and vibration mitigation during the deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Demolition, and a Construction and Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.
1181. Regarding the operational phase of the development, there would not be a significant impact due to road traffic as the number of vehicle attributed to the proposed development would be negligible.
1182. Noise levels from mechanical plant in the completed development would need to comply the City of London's standard requirements that noise output should be 10dB below the background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area. The environmental statement confirms this to be the intention, and it would be a condition of development.
1183. The Proposed Development provides for active uses at lower levels, including retail, food and beverage, and community uses. At this stage specific users have not been identified so the precise commercial activity and associated noise level cannot be accurately defined however, the levels of noise generated from the likely type of commercial activity are expected to be relatively low.
1184. The retail, food and beverage, and community premises could include low levels of background music, in addition to noise from people conversing within the space and using outdoor seating areas.
1185. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces, as well as a restriction on the use of amplified music on these terraces. Operational management plans for each of the commercial elements would be secured by legal agreements, and these will be expected to set out the appropriate noise control measures to minimise disturbance to nearby sensitive receptors. The appropriate noise control measures are likely to be largely based around opening hours and effective security.

1186. Overall, at worst the cumulative effects would be considered minor adverse, which is not significant throughout the construction and demolition phase, as well as during operation.
1187. Environmental health officers have confirmed, that subject to the recommended conditions, they would have no objections with regard to the noise impacts.
1188. The submitted Environmental Statement considers the impact of the development on the noise environment. Subject to a series of conditions to mitigate noise and vibration during the deconstruction/construction and operational phases of the development, the proposed development would comply with policies D13 and D14 of the London Plan and policy DM15.7 of the Local Plan (2015).

Overlooking and overbearing impact to residential properties and other sensitive receptors

1189. Local Plan policy DM21.3 and draft City Plan 2040 policy seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and Draft City Plan 2040 assess residential amenity and not the amenity of office occupiers.
1190. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not, inter alia, immediately overlook residential premises.
1191. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.
1192. The proposed amenity terraces for the office accommodation on levels 22, 36 and roof level (level 43), due to their height, separation distance and high balustrade (2.6 metres high) would not result in overlooking and loss of privacy to nearby residential properties to the southeast or the residential unit to the north (2 Heneage Lane).
1193. There are no residential properties to the south or west of the site and therefore, the proposed terraces at Holland House and Renown House would not give rise to overlooking.
1194. The proposed development would result in an increased massing and height. Although the proposed development and in particular the tower element would be

located in close proximity to residential units, it is considered that by nature of the development within the Eastern Cluster, incorporating tall buildings, the proposal would not result in a greater impact to these units greater than that already caused by other consented schemes. It is therefore considered that the development would not be reasonable to be refused on the grounds of resulting in an unacceptable overbearing impact to the nearby residential properties.

1195. A similar development was previously refused due to its adverse effect on the setting of the Grade 1 listed Bevis Marks Synagogue and the setting and amenities of its courtyard by reason of the overbearing and overshadowing impact. Whilst the proposed development would be visible from the Synagogue's courtyard when facing south, it is noted that the massing and height of the development has been reduced since the refusal of the previous application. Furthermore, there is an existing building (Valiant House) intervening between the proposed tower and Bevis Marks Synagogue, which results in securing a separation distance between the courtyard and proposed development. It is therefore considered that the proposed development would not detrimentally impact upon the amenities or usability of the courtyard for religious events, by way of being overbearing.

1196. The proposals would not result in any undue overlooking, loss of privacy or overbearing impact. As such, it would comply with Local Plan policy DM21.3 and CS5 and policies HS3 and S23 of the draft City Plan 2040.

Contaminated Land

1197. Local Plan policy DM15.8 and draft City Plan 2040 policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential of pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

1198. Policy S1 of the draft City Plan 2040 expects developers to address land contamination.

1199. The Environmental Statement at Chapter 10 and appendix 10.1 assess the impact of ground conditions associated with the proposed development, including potential effect on construction workers, potential effect on adjacent sensitive users, potential effect on controlled waters and potential effect on groundwater and recharge during operation.

1200. The Environmental Statement concludes that subject to mitigation, no likely significant effects have been identified.

1201. The submission has been reviewed by Environmental Health Officers who have suggested a series of conditions in respect of site investigation and a risk assessment to establish if the site is contaminated and a condition in respect of the process/remediation if contamination is found when carrying out the works. Thames Water have also requested a condition in respect of a piling method statement. Subject to the imposition of conditions, the proposal is in accordance with Local Plan policy DM15.8 and policies S1 and HL4 of the draft City Plan 2040.

Sustainability

Circular Economy

1202. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2, and the emerging City Plan 2040 policy S8 and DE1 set out the City's support for circular economy principles. The application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

1203. The site consists of the following existing buildings: Bury House (31 Bury Street), Holland House (1-4 Bury Street) and Renown House (33-34 Bury Street). The existing Bury House was constructed in the 1967 and is formed of a concrete frame with flat roof and curtain walling with stone-clad sections and large areas of tinted glazing. The main office floors have varying floor to ceiling heights (top of floor slab to underside of floor slab) of 3.29 -3.83m. The structure and core would not be able to facilitate a meaningful adaptation and extension, in particular regarding fire safety, equality and access, energy efficiency, facilities, building services and structural capacity. The current form of the building would also not be easily adaptable for significant public realm improvements and the activation of the ground floor. The basement retaining walls can be retained.

1204. Holland House is a Grade II* listed building constructed in 1916. In addition to the identified required repair and refurbishment works, some local demolition proposed at the rear could connect the building with the other buildings on site via a proposed lift and stair core within Bury House that would serve all three buildings, with minimal interventions into the historic fabric.

1205. Renown House is the smallest of the 3 buildings and was constructed in 1912. The building's constraints are similar to those of Bury House and therefore only the facades are proposed to be retained. All internal floors including the basement

slab would be replaced to allow interconnection between the 3 buildings and improve fire safety, access, energy efficiency and facilities.

Optioneering

1206. An options assessment has been carried out that includes information about how the options would address circular economy principles, set out in this section. Whole life-cycle carbon impacts of the options are set out in the Whole life-cycle carbon emissions section of this report. The optioneering exercise is designed to establish the potential of retention, reuse of materials and the carbon impacts of the options. The options are also evaluated with regard to their opportunities for wider environmental benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2023, chapter 2, paragraph 8.

1207. The optioneering exercise undertaken for this site includes 4 options:

- Option 1: Refurbishment, new cores and new Renown House structure, 92% retained substructure, 88% retained superstructure; 11,207sqm GIA
- Option 2: Refurbishment, new cores, new Renown House structure and extensions, 92% retained substructure, 75% retained superstructure; 13,467sqm GIA
- Option 3: Refurbishment, consolidation with new central core, new Renown House structure and extensions, 92% retained substructure, 77% retained superstructure; 13,467sqm GIA
- Option 4: Redevelopment of Bury House, refurbishment of Holland House, new Renown House structure and extensions, 64% retained substructure, 39% retained superstructure; 40,558sqm GIA

1208. The results of the optioneering with regard to circular economy demonstrate that options 1 – 3 retain very high percentages of the existing buildings' fabric, The three buildings currently serve as office buildings and require a number of essential interventions to ensure their continued use, to include upgrades to energy efficiency, circulation (and equality measures), fabric, end of trip facilities and building services. However, the upgrades in the retained buildings would not result in sufficient improvement of the quality of internal spaces which would limit the commercial viability of the schemes. Options 3 and 4 would offer the opportunity for the new core to share services and provide current access requirements to the heritage advantage of the listed Holland House which can be upgraded with limited physical interventions. Option 4, despite of the redevelopment of Bury House, has been designed to retain the majority of substructure and a substantial amount of existing superstructure.

1209. The explored options are considered to comply with the GLA's Circular Economy Statement guidance requiring a robust exploration of circular economy options for the site. Although the Bury House redevelopment option 4 would result in the highest quantity of demolition waste of the assessed options due to its largest size, it would deliver holistic environmental benefits combining heritage, amenity and wellbeing, urban greening, climate resilience and activation of the local area that are required to future proof the City as a highly sustainable location. This option therefore has been further developed for the application scheme.

1210. The evaluation of the carbon intensity of the options is discussed in the Whole life-cycle carbon emissions section of this report.

The application proposal:

1211. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

1212. A pre-redevelopment audit has been carried out, demonstrating that pre-demolition audit has been carried out to identify opportunities of retention, recovery, reuse and recycling. The proposed scheme includes retention of 64% (by mass) of the site's substructure and 39% of the existing superstructure (Holland House: 64%, Renown and Bury House: 0%). The best reuse opportunities exist for items such as raised access flooring, timber, carpet tiles, metal elements and stone cladding. The demolition material with the highest quantity is concrete which can be recycled through crushing and use as aggregate, for example in the proposed concrete frame of the proposed lower floors.

1213. The strategy includes measures to support reuse and recycling of existing materials within the new built scheme as well as durable materials and construction and sustainable procurement, to include the following principles that will be further developed in the detailed design:

- Evaluation of existing steelwork within the building to be demolished for reuse
- Assessment of opportunities to reuse existing materials, such as the existing retaining walls of the single storey basement to minimise new piling, and the crushed concrete from the existing building utilised in the piling mat and as hardcore
- Use of low carbon materials and products with high recycled contents
- Incorporation of modular products to aid the construction process and the opportunities for disassembly and early re-use

- Design for adaptability and flexibility: opportunity of adaptive reuse of the tower to use as a future hotel, due to the smaller ratio between core and façade lengths
- Design for disassembly of building elements:
 - Glass panels designed to allow ease of replacement and disassembly at end of life
 - Design of building maintenance units to have access to all faces to allow unitised façade disassembly and replacement
 - All plant is accessible and with plant replacement hatches to disassemble all building services at end of life
- Design for longevity:
 - Structure designed for at least a 100-year life span (standard 50- or 60-year lifespan)
 - Incorporation of extreme weather impact assessment including flooding
 - Adherence to relevant industry standard sustainability schemes (e.g. BCSA Sustainability Charter), to ensure robust components
 - Façade design to ensure longest possible life span, to include terracotta cladding.

1214. An update to the Circular Economy Statement resulting from the detailed design stage and a post-completion update in line with the GLA guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

1215. The Energy Statement accompanying the planning application aligns with a variable assessment approach for new build and major refurbishments in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 28.6% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.

1216. The risk of overheating would be reduced through optimising the glazed to solid ratio, in the new build areas achieving 49% glazing, while the refurbished areas would have 32% of glazing. The small footprint of the tower results in relatively shallow floorplates, with the majority of the work desk areas within 10m of the external façade. This provides the opportunity for a mixed mode ventilation strategy. Passive natural ventilation is achieved through vertical ventilation panels to each side of the office windows, reducing the need for mechanical systems by an estimated 50% of the year.

1217. Further energy efficiency measures, such as heat recovery from mechanical ventilation and low energy lighting would be incorporated, achieving a 12.3% carbon reduction over the Part L 2021 baseline overall, an 8.4% carbon reduction for the new build and 27.6% carbon reduction for the refurbishment.
1218. There is currently no available district heating network close enough to the site, and the opportunity to connect into a future district heating network would be incorporated into the basement of the proposed development.
1219. In relation renewable energy technologies, a PV array of 51.3 sqm would be installed on various roof levels and including in conjunction with bio solar roofs. It is recommended that a condition be imposed requiring submission and approval of details. The PVs and air source heat pumps would provide low carbon and renewable energy, reducing the operational carbon emissions overall by over 16% compared to a Building Regulations 2021 compliant building. For the new build, this would be over 15% and for the refurbishment over 20% carbon emission savings.
1220. The air source heat pumps would be located in a central energy centre at roof level of the tower. The mechanical systems for the building have been decentralized with all the air handling plant being located at soffit level of each floor. The facade design includes permeable terracotta spandrel panels to enable drawing or extracting air through the façade. This approach significantly reduces the need for large, centralised plant and makes the floor plates extremely adaptable for fit out and use, reducing over supply, waste and unnecessary carbon emissions.
1221. The submitted energy statement demonstrates that the proposed tower would achieve a 23.7% reduction and the refurbished Holland House and altered Renown House a 48.2% reduction of operational carbon emissions. The site wide and new build carbon reduction does not meet the GLA's 35 % target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for non-domestic buildings. However, the proposed level of operational carbon savings constitutes an improvement on average performances of commercial City developments at planning stage recently assessed. As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

Energy Use Intensity (EUI)

1222. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating

demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m²(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year. The estimated EUI from the offices of the proposed development is 97.1 kWh/m²/year and for the space heating demand 3.3 kWh/m²/year, the latter being particularly low as the building would be cooling-led due to the internal gains from occupancy, small power, lighting and solar gain.

1223. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - of the building is dependent on the level of occupancy and operation of the building.

1224. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

1225. The proposed development has been pre-assessed under BREEAM New Construction v6 - shell & core (office); shell & core (retail). All uses target an “excellent” rating, 84.15% for the offices, and 77.75% for retail, both with aspiration to achieve “outstanding” ratings through detailed design. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

1226. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

NABERS UK

1227. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposals target a 5 star (out of 6 possible) rating.

Whole life-cycle carbon emissions

1228. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The

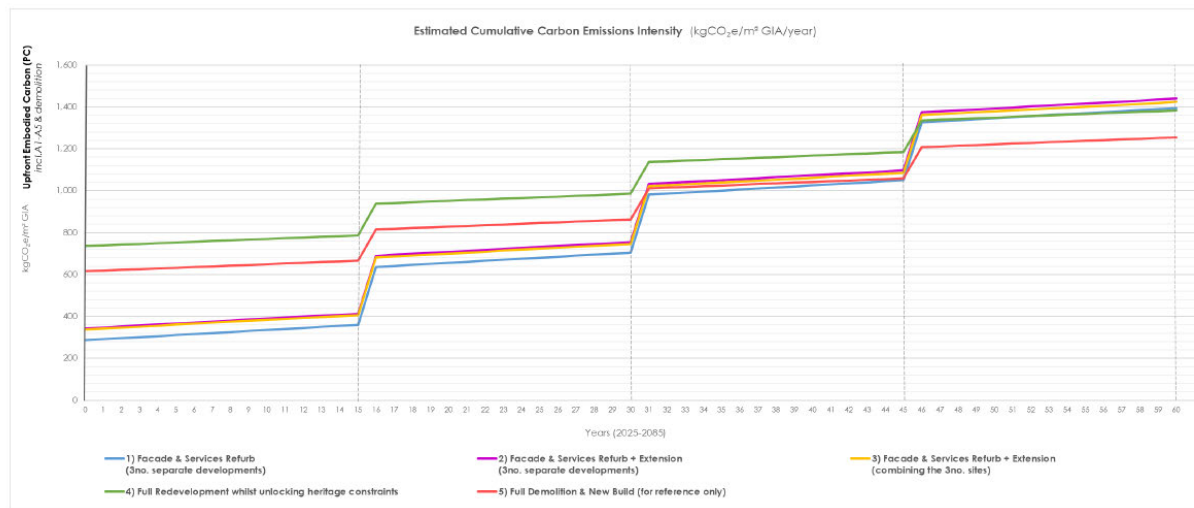
emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

Carbon options

1229. 4 options have been assessed with regard to their carbon impacts, environmental and wider planning benefits and constraints:

- Option 1: Refurbishment, new cores and new Renown House structure, 92% retained substructure, 88% retained superstructure; 11.207sqm GIA
- Option 2: Refurbishment, new cores, new Renown House structure and extensions, 92% retained substructure, 75% retained superstructure; 13,467sqm GIA
- Option 3: Refurbishment, consolidation with new central core, new Renown House structure and extensions, 92% retained substructure, 77% retained superstructure; 13,467sqm GIA
- Option 4: Redevelopment of Bury House, refurbishment of Holland House, new Renown House structure and extensions, 64% retained substructure, 39% retained superstructure; 40,558sqm GIA

1230. The following graph and table present the whole life-cycle carbon results from the 4 options.



Graph: Whole life-cycle carbon emissions per square over 60 years

	Option 1	Option 2	Option 3	Option 4
	Facade & Services Refurb (3x separate developments)	Facade & Services Refurb + Extension (3x separate developments)	Facade & Services Refurb + Extension (combining the 3x sites)	Full Redevelopment whilst unlocking heritage constraints
Option Reference	1	2	3	4
Project reference period	60	60	60	60
Gross Internal area (GIA) m ²	11,207	13,467	13,467	40,558
Net Internal area (NIA) m ²	7,845	9,427	9,427	25,278
Change in NIA (compared to existing) m ²	0	1,594	1,594	17,445
Substructure % retained by mass	92%	92%	92%	64%
Superstructure % retained by mass	88%	75%	77%	39%
Total WLCA (incl. B6 & pre-demo) (kgCO ₂ e/m ² GIA, B7 not included)	1,395	1,440	1,424	1,383
Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA)	278	332	329	726
In-Use Embodied Carbon (B-C) excl. B6 & B7 (kgCO ₂ e/m ² GIA)	815	815	815	444
Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	293	282	271	203
Total WLCA (incl. B6 and pre-demo) (tCO ₂ e, B7 not included)	15,629	19,387	19,177	56,095
Total existing building demolition (tCO ₂ e)	88	140	130	402
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	3,120	4,474	4,426	29,450
In-use embodied carbon (B-C) (tCO ₂ e)	9,134	10,976	10,976	18,008
Operational Carbon for building life time (B6) (tCO ₂ e)	3,287	3,798	3,646	8,235

Table: Whole life-cycle carbon results for the options

1231. The options can be analysed in terms of their carbon emissions, opportunities and constraints throughout the GLA's reference period of a 60 year life-cycle as follows:

1232. Option 1 would have the lowest absolute carbon emissions due to the limited new building elements, however this option would have slightly higher whole life-cycle carbon impacts per square meter compared to the Bury House redevelopment option 4, due to operational inefficiencies of the retained buildings. Options 2 and 3 would have slightly higher upfront carbon emissions, total and per square meter compared to option 1, due to proposed extensions and alterations, however the operational carbon emissions of options 2 and 3 would be lower compared to option 1 due to the extensions being able to deliver improved plant spaces. However, option 4 would achieve the greatest efficiencies in the fabric and the MEP strategy with a saving of up to 1/3 of operational carbon compared to the other options.

1233. Due to the almost fourfold floorspace uplift of option 4 compared to the existing buildings and approx. three times of the floorspace compared to options 2 and 3, the absolute carbon emissions of option 4 are more than double compared to the other options. However, the whole life-cycle carbon emissions per square meter of option 4 would be the lowest out of the 4 options. A lower new build option might be able to deliver the same sustainability benefits as option 4 with less embodied carbon impacts, however, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London, as set out elsewhere in the report. With regard to sustainability, these benefits include:

- reducing the level of harmful interventions and negative heritage impacts through Bury House hosting up-to-date circulation spaces, end of trip facilities and building services both for Holland House and Renown House
- retaining substantial percentages of the existing structures
- improving social sustainability through the activation and diversification the local area and integration of the site into the context through incorporation of community facilities, retail and public realm improvements
- integrating urban greening and climate resilience measures to intrinsically address local flooding (and the need for SuDS), overheating and urban heat island effects and saving water resources.

1234. Option 4 therefore has been selected as to be developed for the application scheme.

1235. The optioneering approach set out in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

1236. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2023 stating in paragraph 157 that the planning system should support the transition to a low carbon future and that it should help to, amongst others, encourage the reuse of existing resources, including the conversion of existing buildings. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

The application proposal:

1237. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The tall building structure and design present particular challenges to the need to reduce whole life-cycle carbon emissions, and the consideration of design options has determined the design to include:

- exploring foundation options to minimise the concrete and steel material quantity
- rationalising the structural grid to be as efficient as possible, minimising the quantity of material within the build structure and ensuring that the material composition of the superstructure is as low carbon as possible – a steel structure with precast concrete floor slabs was selected
- façade embodied carbon assessment resulting in a lower carbon profile ceramic option within a curtain walling system
- replacement of only the thermal components of the retained facades using 50% of reused raised access floor systems.

1238. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development can achieve a result close to the GLA's Standard Benchmark. The measures listed above contribute to achieving upfront carbon emissions that improve on the GLA standard benchmark, and to all embodied carbon emissions reaching close to the GLA standard benchmark, despite the challenges of a tall building structure.

1239. Further opportunities to reduce embodied carbon emissions will be considered during detailed design stages and include:

- maximising the Design for Manufacture and Assembly (DFMA)

- the selection of low carbon aluminium products, such as optimising recycled contents for concrete and steel
- sourcing steelwork from electric arc furnace rather than blast furnace produced steel
- an aluminium framed curtain wall system - aluminium can be easily disassembled, reused and recycled
- maximising reused raised access floor systems.

1240. The table below shows baseline whole life-cycle carbon emissions per square meter for the whole site in relation to the GLA benchmarks for offices at planning application stage (including other uses – the GLA guidance advises to select the most relevant building use in providing data):

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS components	kgCO2/m2	kgCO2/m2	
A1-A5	837	< 950	GLA Standard
		< 600	GLA Aspirational
A-C (excluding B6-B7)	1,447	< 1400	GLA Standard
		< 970	GLA Aspirational
B6+B7	804		
A-C (including B6-B7)	2,251		

1241. The proposed whole site development would result in overall whole life-cycle carbon emissions of 92,937,977 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 33,182,958 kgCO2 (35.7% of the building's whole life-cycle carbon), and the embodied carbon emissions for 59,755,019 kgCO2, (64.3% of the building's whole life-cycle carbon).

1242. A detailed whole life-cycle carbon assessment and a confirmation of the post-construction results are required by conditions.

1243. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable

Development and Climate Change and the emerging City Plan 2040 policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to a low carbon future in accordance with NPPF (2023) paragraphs 157 and 159.

Urban Greening

1244. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2040) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.
1245. The proposed development would incorporate 274m² of green roofs, 83m² of standard trees in connected pits with a soil volume at least two-thirds projected canopy of the mature tree, 206m² of flower-rich perennial planting, 424m² of standard trees in pits with a soil volume less than two-thirds projected canopy of the mature tree, 158.5m² of green wall, and a 2.5m water feature.
1246. The projected UGF of the whole site is equal to 0.32, which meets the policy requirement.
1247. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that “Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent size and quality.” The emerging City Plan 2040 seeks to increase the number of trees and their overall canopy cover through a number of measures including “Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value.”
1248. There are no existing trees on the site to be lost. New trees are proposed in planters at ground floor level in the public realm area, as well as on the upper level terraces of the development. All new greening at the site represents a net-gain.

1249. It is recommended that further details of urban greening measures, and the landscaping and planting strategies are to be secured by condition. Subject to compliance with these conditions the proposal would be policy compliant with regards to Urban Greening.

Climate Resilience

1250. NPPF Paragraph 159 requires new development to avoid increased vulnerability to the range of impacts arising from climate change. Policy DM15.5 Climate change resilience and adaptation of the Local Plan 2015 and Policy DE1 of the draft Local Plan 20240 require climate change adaptation measures to be incorporated into development and for developers to demonstrate how they will improve environmental performance and mitigate and adapt to climate change.

1251. Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

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

Overheating and the urban heat island effect

1252. An outdoor thermal comfort assessment was conducted by GIA using high resolution Computational Fluid Dynamics (CFD). The assessment found:

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

1253. Section 8.3 within the CCRSS (Climate Change Resilience Sustainability Statement) (Rev.4 - Hoare Lee, August 2024) covers the risk of heat stress and assesses the following hazards:

- Increase in temperature may result in a risk of overheating and reduction in building user health and comfort levels within their internal environment (High Risk)
- Increased in temperature may result in reduction in building user comfort within the external environment (Moderate Risk)
- Increased temperatures will have a direct impact of the urban heat island effect (Moderate Risk)
- High levels of sun exposure may cause UV damage to building fabric and reduction in material durability and robustness (Moderate Risk)
- Increased risk of dust and damage results in increased repairs and maintenance (Moderate Risk)
- Building degrading, subsidence and reduced robustness due to dry and hot conditions (Moderate / Low Risk)

1254. Increased risk of damage to building materials (Moderate Risk)

1255. To manage the above risks, the CCRSS states that the following design features and techniques will be included:

- Mechanical ventilation installed with heat recovery mechanisms and plant located away from pollution sources
- Facade and building services have been designed with a fan coil cooling solution
- Dynamic thermal modelling using TM49 DSYs has been conducted to demonstrate the Proposed Development is not at risk of overheating against the criteria of CIBSE TM52 and justify the inclusion of active cooling –
- An external (outdoor) thermal comfort assessment has been completed (using high resolution Computational Fluid Dynamics - CFD) to evaluate external thermal comfort conditions based on the design proposals. The assessment concluded that:
 - All ground level conditions were suitable for intended use, or no worse than the baseline conditions.
 - The Proposed Development is having a beneficial impact on existing benches to the north of 30 St Mary's Axe.
 - Conditions for all existing off-site terraces are suitable for the intended use.
 - Conditions for all proposed terraces are suitable for the intended use

- Air source heat pumps will be located at roof level, minimising the amount of heat being rejected to the external environment at low level, where heat absorbing surfaces are present
- Building maintenance strategy will be implemented to check and treat materials for UV damage
- Materials on exposed areas will be designed and installed to weather effectively
- Structural foundations and frame have been designed to accommodate a range of soil stiffness values
- All heat stress hazards residual risks have been assessed as Low.

1256. The Climate Change resilience officer has confirmed the proposal to be policy compliant with regards to overheating and the urban heat island effect, and the proposal is therefore considered to be acceptable in this regard.

Flooding

1257. The application site is located within Flood Zone 1 and is therefore identified as being an area at low risk of fluvial and tidal flooding.

1258. Section 8.1 of the CCRSS includes the risk assessment for flooding and includes the following hazards:

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

1259. The CCRSS states that the proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed drainage system will be sized to attenuate storms up to the 1 in 100 year event plus a 40% allowance for climate change, comprising a blue roof and two attenuation tanks. Flows will be restricted to 5 l/s, which provides an 83% reduction on the equivalent brownfield rate during the 2 year storm event. Based on the above, the CCRSS assesses the residual risk for flooding to the proposed development to be Moderate/low

1260. The Climate Change resilience officer has confirmed the proposed development is policy compliant with regard to flooding and the proposal is therefore considered to be acceptable in this regard.

Water stress

1261. Section 8.2 of the CCRSS includes the risk assessment for water stress and includes the following hazards:

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

1262. In terms of risk management, the CCRSS states that the following design features and techniques will be incorporated to adapt and mitigate for the above risks:

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

1263. All water stress hazards' residual risks have been assessed as Low. The FRA & DS states that "roofwater recycling has been discounted on the basis that the roof area is small compared to the number of potential users and disproportionate investment required to distribute a small water resource over a large number of occupants."

1264. The climate change resilience officer has confirmed the proposal is policy compliant with regard to water stress and the proposal is therefore considered to be acceptable.

Biodiversity Net Gain, pests and diseases

1265. Section 8.4 of the CCRSS assesses the risk to natural capital and includes risk of loss of biodiversity and high quality green space (Moderate Risk). This risk will be managed through:

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

1266. The CCRSS classes the residual risk as Low.

1267. Section 8.5 of the CCRSS assesses the risk of pests and diseases and assesses the following hazards:

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

1268. The CCRSS states this risk will be managed through:

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

1269. The CCRSS assesses the residual risk to be Moderate /Low.

1270. A Preliminary Ecological Appraisal (PEA) has been produced by Bowes & Wyer. The survey deemed the site to be of low ecological value with limited opportunities to support nesting birds. The proposed development incorporates multiple biodiversity enhancements measures which will result in an Urban Greening Factor (UGF) exceeding 0.3. Ecological enhancements will be delivered through the inclusion of green roof habitats, terraced landscaping, a green wall and planting at the public realm level. Habitat infrastructure such as bird and insect boxes will also be installed.

1271. The proposed development will achieve 300% net gain, in the form of “area based habitat” establishes a total ecological value of the final development site of 0.30 habitat units. This is comprised of 0.1 units Intensive Green Roof, 0.14 Urban trees, 0.02 Green Wall, 0.04 Ground level planters, 0.02 sustainable drainage system.

1272. The proposals would achieve a UGF of 0.32 and this is through greening at ground level and the upper level terraces. The ground level public realm planting would be within standard tree pits and planters, as well as the vertical climbing green wall. Further green roofs trees and planters are proposed on each of the

terraces at 7th, 8th, 9th, 22nd, 23rd, 36th and 37th levels, as well as at the inaccessible RF1 and RF3 levels.

1273. A range of acceptable native species are proposed and with the correct management could provide high level biodiversity value. Further details of the proposed landscaping with regard to species and management is recommended to be secured by condition. The final details of the UGF are also recommended to be secured by condition.

1274. A series of conditions are recommended to secure the implementation and management of the proposed biodiversity net gain measures.

1275. A Health Impact Assessment was prepared by Quod which found the proposed development has a positive impact on health overall. This assessed in more detail in the 'Health Impact assessment' section below, and is considered to be acceptable.

Food, Trade, Infrastructure

1276. The proposed development would make a positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change.

1277. The proposed development would include facilities that are directly beneficial to the local economy in the form of trade, such as the retail, cultural/community spaces. The proposed facilities would enable occupiers to use active transport including cycling and reducing the dependence on transport infrastructure.

1278. The Sustainability Statement writes that the project aims to deliver a 'WELL' certified building thereby incorporating industry best practice on health and wellbeing. Measures encouraging physical exercise such as the provision of cycle spaces will incentivise active commuting. The positive health impacts taken from the Quod Health Impact Assessment can also be applied to positive improvements to trade and infrastructure.

Climate Change Resilience Summary

1279. The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.

Conclusion on Sustainability

1280. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process

relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

1281. The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

1282. Compared to the assessed retrofit options with limited extension potential, a redevelopment option could result in the lowest whole life-cycle carbon emissions per square meter, with benefits relating to avoiding harmful interventions into historic fabric, improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. A lower new build option might be able to deliver the same sustainability benefits with less absolute carbon impacts - the highest due to the proposed size - however, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London.

1283. The energy strategy has been optimised for the site and a BREEAM “excellent” rating is targeted, aspiring to an “outstanding” rating through detailed design. Circular economy measures have been incorporated, such as by retaining 64% of the existing substructures (by mass) and 39% of the existing superstructure, as well as designing for longevity, adaptability and low maintenance. The proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. However, the proposal demonstrates that on-site carbon emission savings have been maximised and offset payments will be made to mitigate the shortfall to reach the net zero carbon target. The proposed development therefore is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies

DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

1284. London Plan Policy D11 (Safety, security and resilience to emergency) states that development should include measures to design out crime that – in proportion to the risk – defer terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and wider area.
1285. Local Plan Policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism.
1286. Local Plan Policy DM3.2 (Security measures in new developments and around existing buildings) seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 (Crowded places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to nighttime uses.
1287. The submission sets out the security proposals to protect the building and its users. The City Police have been consulted on the submission and have provided a number of comments and advice to the applicant. This includes ensuring there is sufficient access controls into different areas of the buildings and at different times, sufficient natural and formal surveillance and sufficient safety and management of accessible terraces.
1288. The applicant has confirmed they will engage with the Police during the next design phase of the project, to ensure their comments and recommendations are taken into account.
1289. A security Risk Assessment and Concept Security Strategy have been produced, and these served as the baseline for design and follows a best practice methodology aligned to the NPSA guidance. This demonstrates a clear commitment to ensuring security as a priority in the development of the proposals detailed design.
1290. It is recommended to secure full details of security measures by condition and within the various management plans which would be secured in the Section 106, which would be assessed in consultation with the City Police Design out Crime

and Counter Terrorism teams. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan Policy D11, Local Plan 2015 policies DM3.2, DM3.3 and DM3.5.

Suicide Prevention

1291. Policy DM3.2 'Security measures in new development and around existing buildings' aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. Policy DE4 'Terraces and Elevated Public Space' of the draft Local Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrence capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1292. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building regulation K2 states the following:

K2 –(A) Any stairs, ramps, floors and balconies and any roof to which people have access, and

(B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1293. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS6180: Barriers in and around buildings.

1294. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advised a barrier height of at least 2.5m high, no toe or foot holes, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with building regulations standards, and where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
1295. In order to further protect from the risk of suicide, the suicide prevention advisor has recommended that for the lower level terraces, the balustrade be at least 1.6m in height, and for the upper levels that the barrier is at least 2.8m. It is also recommended that roll bars are used at the top of these. They have also recommended security measures, including CCTV, motion activated lighting, and security staff training on suicide prevention.
1296. The proposal includes a publicly accessible terrace at level 9, where the urban farm is proposed to be located. This terrace has a large planted buffer to the edge, and furthermore, the level 8 terrace is below this which would likely discourage any suicide attempts.
1297. Privately accessible tenant terraces are proposed at 4th, 5th, 6th, 7th, 8th, 9th, 22nd, 36th and 40th level. The staggered nature of the lower level terraces would discourage suicide attempts. Furthermore the balustrades would be 1.8m in height, and it is suggested by the City Suicide prevention advisor that they be fitted with rolling bars to make them harder to climb. The 22nd, 26th and 40th level balustrades would be 2.8m and also fitted with roll bars to make them harder to climb. Final details of suicide prevention measures, including balustrade heights are recommended to be secured by condition.
1298. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the draft City Plan 2040.

Health Impact Assessment

1299. Policy HL9 of the draft City Plan 2040 requires major development to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.
1300. Policy GG3D of the London Plan states that *“to improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments”*.
1301. The application is accompanied by a Health Impact Assessment (HIA) (Quod, January 2024) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health impacts.
1302. The HIA has been based on the London Healthy Urban Development Unit (HUDU) Planning for Health Guidance (2019) to develop a comprehensive assessment outlining how the proposed development could impact on health.
1303. The HIA concludes that the development overall has a positive impact on health. Positive impacts include:
- New jobs associated with the uplift in office floorspace and affordable co-working space supporting access to local employment
 - Provision of flexible community/education/cultural space meeting an identified need in the area;
 - ‘City Cycles’ – a new social enterprise in the retail space on site supporting unemployment adults into employment through training and work experience of bike mechanics, as well as meeting a need for bike servicing in the area;
 - A car-free building minimising vehicles travelling to the Site alongside extensive provision of bike parking to support active travel (and improved pedestrian permeability, as set out above);
 - Provision of new open space at James’ Court and external building terraces providing much needed amenity provision;
 - Heneage Arcade providing a new north-south through route improving connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
 - Inclusivity and accessibility as placemaking principles;
 - Building and landscape design considering sustainability and climate change, with ASHPs and a ‘fabric first’ approach significantly reducing the carbon footprint, and extensive urban greening measuring enhancing biodiversity;

- The building and landscape design also provides an enhanced environment for workers and site users (along with the wider public) through high quality design aspiring towards
- BREEAM 'Outstanding' and WELL 'Platinum' rating, an attractive public realm, greening measures and supporting active travel measures.

1304. The HIA proposes recommendations with the aim of ensuring the potential benefits of the proposed development are maximised and potential adverse effects are avoided, for example by:

- Implementation of a Travel Plan to maximise uptake of active travel options secured by a suitably worded planning condition / planning obligations;
- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight secured by a suitably worded planning condition / planning obligation;
- Implementation of a Construction Environmental Management Plan (CEMP) to minimise construction impacts including dust, noise and vibration secured by a suitably worded planning condition
- Implementation of a Construction Logistics Plan (CLP) (included within the CEMP) to minimise the environmental and road traffic related impacts of the demolition and construction works secured by a suitably worded planning condition;
- Suitably worded planning obligation(s) to secure terms of use for the Sui Generis community/education/cultural floorspace;
- Suitably worded planning obligation(s) to secure local employment and training initiatives (a local training skills and jobs brokerage contribution, and strategy);
- An Air Quality and Dust Management Plan (AQDMP) to minimise impact of dust at the construction stage secured via a suitably worded planning condition; and
- The requirement for Operational Noise Management Plans to minimise noise at the operational phase / commercial uses secured via a suitably worded planning condition.

1305. Potential impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.

1306. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and draft City Plan 2040 Policy HL9.

Fire Statement

1307. A Fire Statement has been submitted outlining the fire safety strategy for the building.

1308. The City District Surveyor's office has reviewed the submitted statement and has confirmed that this is in accordance with Policies D5 and D12 of the London Plan. The Fire Statement is therefore acceptable for the planning stage and would be secured by condition.

Assessment of Public Benefits and paragraph 208 NPPF balancing exercise

1309. Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess.

1310. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 205 and 206).

1311. The proposal would cause a low level of less than substantial harm to the significance of Holland House through the infilling of the upper levels of the atrium.

1312. The proposal would trigger paragraph 208 of the NPPF, which states '*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*'.

1313. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a listed building and weighing that harm against the benefits. The decision maker does not have to go about balancing harm against benefits in a particular way.

1314. The National Planning Practice Guidance states that "*public benefits...could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not*

always have to be visible or accessible to the public in order to the genuine public benefits”.

1315. The key social, environmental and economic public benefits of the proposal are considered to be as follows:

Economic Benefits:

1316. Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the provision of 34,584 sq.m (GIA) of Grade A office floorspace and circa 2,470 FTE jobs, and increased spending in the locality boosting local businesses and a post-covid resurgence. This is a benefit which should be afforded substantial weight.

1317. The provision of 1,170sqm of affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities would fulfil the City's vision to providing inclusive workspace. This would be an inclusive offer which will attract smaller and more diverse businesses including SMEs to the City Cluster.

1318. Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages. Heneage Arcade, would be aligned with retail units and spaces which are designed to be utilised as vitrines for a rolling programme of displays including artworks, local community information, reference to the important history of the site and products of local artisans. These spaces could also be utilised as small workshop and retail units for emerging local businesses and craft. The intention would be to help foster and support emerging local talent and provide space to create, make, display and sell their creations. Occupiers on site and in the locale would benefit from the increase in footfall and the high-quality amenities provided by the proposed development as well as provide amenity space for the wellbeing of workers, residents and visitors.

1319. The proposed multi-functional bookable spaces would provide flexible educational/ cultural/ community/ sports/ multi-faith space creating a compelling and inclusive public offer in the cluster in line with the Destination City agenda.

1320. The overall quality of the development, improved public realm and proposals offer would attract visitors, increase tourism, support and improve worker productivity.

1321. Collectively, but primarily the Grade A office floorspace and employment provision, given their nature and extent, the aforementioned benefits, are attributed substantial weight.

Environmental benefits:

1322. The proposed building would result in a significant aesthetic enhancement to the Creechurch locality. The proposed building would, at ground floor level, present a sophisticated, dark blue faience elevations of a triple order to the surrounding townscape, complementing the existing warehouse buildings of brick with terracotta detailing which characterise the Creechurch locality. Through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area. This is a benefit that would attract moderate weight.

1323. The proposal would result in a low level of enhancement to Holland House through the works to its primary facades and the re-presentation of its heritage lobbies. The proposal would result in a low level of enhancement to the Creechurch Conservation Area through the reinstatement of the lost southern leg of the historic Heneage Lane through the creation of the Heneage Arcade. Together these would attract moderate weight.

1324. Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys. This includes;

- A north-south route through the building is proposed, which would re-introduce a historic connection between Heneage Lane and Bury Street.
- James' Court, which incorporates improvements to this public open space.
- Within the public realm it is proposed to incorporate temporary and permanent art installation program to showcase work of local artists'. (secured by a S106 obligation).

1325. Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane. These improvements would be secured via a section 278 agreement.

1326. Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles. The proposed building is a fossil-fuel free, all electric building with zero combustion on site. This is a benefit that would attract moderate weight.

1327. The abovementioned benefits should be afforded moderate weight.

Social Benefits:

1328. The provision of a dedicated community/cultural/ educational/ multi-faith/ sports space within the lower ground, ground and first floors of the three buildings. This space is specifically designed for local groups, including schools and other education uses, charities and cultural/art groups. The spaces would be available to pre-book, free of charge for community based groups and non-profit organisations, schools and other local groups, for 81 hours a week, of which over 67 hours free of charge. These multi-functional bookable spaces would attract a wide range activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space as an outreach, training and skills centre. It therefore offers the potential to make a significant contribution towards training and skills opportunities in the City. The community space is intended to provide a gateway for the population of the more economically deprived areas around the City fringe to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and economically inclusive manner.

1329. The public offer would also include an Urban Farm at the ninth floor of Holland House to be used as a rooftop classroom and the provision of a climbing wall, offering a new sport facility and attraction in the City Cluster.

1330. Heneage Arcade would create a new pedestrian route, with flexible retail/café uses, incorporating public art.

1331. The dedicated cycle repair space at lower ground floor level would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community.

1332. The proposal would contribute towards affordable housing by making a contribution in leu of £1,482,723.00.

1333. The above social benefits are collectively afforded substantial weight.

Conclusion

1334. When applying the policy in paragraph 208 of the NPPF, the above-mentioned public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report, namely the harm to the significance of Holland House through the roofing over and partial infilling of its atrium.

1335. It is the view of officers that ascribing weight to the public benefits as set out above, including delivering accommodation for City type businesses thereby contributing to economic growth, and other social and environmental benefits, and giving great weight to the conservation of designated heritage assets and therefore to the less than substantial harm to their significance and considerable importance and weight to the desirability of preserving the listed building and its setting, the public benefits of the proposal outweigh the harm to significance of heritage assets as identified in this report.

1336. On that basis there is clear and convincing justification for the harm, and the presumption against granting planning permission is rebutted, the outcome of the paragraph 208 NPPF heritage balance falls in favour of the proposal, and policy D9C(1)(d) in the London Plan is also complied with.

Planning Obligations and Community Infrastructure Levy

CIL and Planning Obligations

1337. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1338. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1339. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2

under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

1340. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£4,980,808.88	£4,781,576.53	£199,232.36

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,246,550.00	£2,134,222.50	£112,327.50
City Planning Obligations			
Affordable Housing	£1,497,700.00	£1,482,723.00	£14,977.00
Local, Training, Skills and Job Brokerage	£898,620.00	£889,633.80	£8,986.20
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£219,450.00	£219,450.00	£0
Section 278 (Initial Evaluation and Design Fee but any excess costs will also be secured) <i>Not indexed</i>	£100,000	£100,000	£0
Security Measures Contribution (Eastern City Cluster)	£299,540.00	£296,544.60	£2,995.40
S106 Monitoring Charge	£5,750.00	£0	£5,750.00
Total liability in accordance with the City of London's policies	£5,267,610.00	£5,122,573.90	£145,036.10

1341. City's Planning Obligations

- The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Cycle Improvement Contribution (TfL) (£100,000.00)
- Highway Reparation and Highway Obligations
- Local Procurement Strategy

- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)
- Delivery and Servicing Management Plan (including Consolidation and provision of accessible parking space)
- Active Travel Plan
- Carbon Offsetting Document Submissions
- 'Be Seen' Energy Performance Monitoring
- Provision of the Cultural, Education, Sports and Community Spaces and an Implementation Strategy
- Provision of the Mixed Affordable and Free Workspace and the submission of a Management Plan
- Provision of Public Art and the submission of a Management Plan
- Provision of the Climbing Wall and the submission of a Management Plan
- Provision of the Cycle Repair Workshop and Practical Skills Space and submission of a Management Plan
- Provision of the Creechurch Hall and Holland House and submission of a Management Plan
- Utility Connection Details
- Television Interference Survey
- Wind Audit
- Solar Glare Assessment
- Construction Monitoring Costs (£53,820 for the First Year and £46,460 for Subsequent Years)
- A10 Contribution (*TfL*)
- Changing Places Management Plan
- Provision of the Public Route at Heneage's Arcade, Public Access to St James' Court and provision of the Management Plan
- Section 278 agreement

1342. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

1343. The scope of the s278 agreement may include, but is not limited to:

Creechurch Lane

- Reconstruction and widening of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Improvements to highways drainage

- Provision of road markings and associated traffic orders, relocation of parking bays (if required)
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Bury Street

- Reconstruction and widening of the adjacent footways to the application site, as per the City's approved materials
- Resurfacing and raising of the carriageways adjacent to the planning application site
- Removal of redundant street furniture
- Removal of redundant vehicle crossing
- Improvements to highways drainage
- Provision of road markings and associated traffic orders, relocation of parking bays (if required)
- Provision of planters or alternative infrastructure, with the dual-use of acting as rest stops and appropriate access arrangements
- Provision of greenery

Mitre Street Junction with Creechurch Lane

- Reconstruction and widening of the footway, as per the City's approved materials
- Resurfacing and raising of the carriageway

Heanage Lane

- Reconstruction and widening of the adjacent footways to the application site, as per the City's approved materials
- Reconstruction and raising of the carriageway, as per the City's approved materials
- Improvements to highways, footway and drainage
- Provision of greenery

And any other associated works necessary to deliver the above scope of Works

Monitoring and Administrative Costs

1344. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

1345. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Impact on the Foundation of the Synagogue and Ground Movement

1346. Representation have been received raising concerns about the impact the proposed development would have and potential damage it would cause to the Bevis Marks Synagogue's Foundations.

1347. The applicant has submitted a Structural Report and Basement Impact Assessment. The report has assessed the impact from basement excavation to the nearby receptors, including Bevis Marks Synagogue, Holland House, Renown House, Valiant House and 33 Creechurch Lane. With regards to the Bevis Marks Synagogue negligible ground movement is predicted and this is to be classed as Category 0 'negligible', the lowest possible category.

1348. The report also stated that throughout the development of the design, any risks identified will be brought to the attention of the design team and client in various reports and on the drawings. The risk assessment will continue to be developed in future design stages giving details of how risks will be eliminated or reduced. Ground movement would be continually monitored throughout the demolition and construction process. With regards to monitoring, the report states that frequent monitoring of neighbouring properties to be carried out during excavation, to validate ground movement predictions against reality.

1349. The submitted assessment was previously reviewed by District Surveyor, who advised that due to the fact that the Synagogue is located some distance from the proposed development, there would be no material impact to its foundations. Notwithstanding, a condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.

The Public Sector Equality Duty (section 149 of the Equality Act 2010)

1350. The City, as a public authority must, in exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1351. Section 149(3) of the 2010 Act provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

1352. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

1353. The application is supported by an Equality Statement, which considers the potential equality impacts related to the proposal. The CoL, as the planning authority, have the duty to consider potential equality impacts. The purpose of the Equality Statement (EqS) was to provide information for the planning authority to carry out its role. To ensure that the methodology and data used in the Equality Statement, ensure that all relevant matters have been taken into consideration, and the conclusions and recommendations suggested in the EqS are robust, a third party has been instructed to review this document.

1354. In terms of the methodology used to assess any potential equality impacts, the following has been adopted in the EqS.

- A differentiation between disproportionate and differential impacts relevant to equality upon persons who share a relevant protected characteristic compared to persons who do not share it. These impacts are assessed qualitatively. Therefore, to assess any such impacts, a decision maker should balance a range of positive and negative impacts of different types.

- Disproportionate: there may be a disproportionate equality impact where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
- Differential: there may be a differential equality impact where people with a protected characteristic are affected differentially to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.
- The EqS assessment of potential equality impacts is focused on the following, during both the construction and end use where relevant:
 - Noise
 - Air quality
 - Transport impacts
 - Daylight and sunlight
 - Access to community facilities
 - Employment and skills
- These aspects have then been grouped into four key considerations of potential equality related impacts:
 - Amenity disruption during construction
 - Community uses and accessible design
 - Employment creation
 - Impacts upon places of worship
- These aspects have then been considered in relation to their potential impact on protected characteristics. Consideration was then given to any action that needs to be taken to mitigate any adverse impacts or to promote equality of opportunity.

1355. To prepare the EqS the consultant has confirmed that they used the CoL Public Sector Equality Duty toolkit. The toolkit suggests a number of questions/considerations to identify potential impacts on protected characteristic. These question were adopted and amended appropriately in the EqS to be relevant to the current scheme.

1356. Overall, the third party reviewer considers that the policy context and methodology are deemed appropriate for the assessment of equality impacts relating to the proposed development. The suggested mitigation measures to address the impacts are also considered appropriate.

1357. A range of datasets and sources have been used including Census 2021, Annual Population Survey 2022, ONS Live Births 2021 and Index of Multiple Deprivation 2019.

1358. In summary, in terms of demographics, the City has a significantly higher workday population compared to its residential population. There is a limitation in

EqS identifying all protected characteristics for the working population. With regard to residents, the City's resident population is generally comprised of younger working age with proportionately fewer children living here. However, it is noted that the Aldgate School and City Child and Family Centre are in close proximity to the Site. In terms of sex, there are disproportionately more men living and working in the City compared to women. The population living in the City is less racially diverse compared to London's average in terms of ethnicity. However, there are a higher proportion of residents not born in the UK, with a higher proportion of residents born in Europe and the Americas and Caribbean. In terms of religion and belief of residents there are no disproportionately high representations of any particular religion or faith compared to London's average. However, the site is in close proximity to a number of places of worship, including a number of churches and a Synagogue in very close proximity to the site. When it comes to deprivation, no area within the City falls within the top 20% most deprived areas within England. However, an area to the north and east of the site within the City is within the 30% most deprived (the area around Aldgate). Within this area, deprivation relating to income, employment and barriers to housing and services is more severe. No disproportional representation of the population has been identified in the City in terms of disabilities. On the basis of the above, the protected characteristics that have been identified for potential disproportionate impacts included age, sex, sexual orientation (high number of population identified as of another sexual orientation than heterosexual), race, religion and belief.

1359. Consideration has also been given to the key community infrastructure within a 500 metres radius from the site. There is a high number of places of worship, including churches and two Synagogues (the Bevis Marks Synagogue in close proximity to the application site and Sandys Row Synagogue, which is outside the boundaries of the City of London) and also some educational facilities in close proximity to the site.

1360. Overall, demographics of the area have been described in a succinct way. The third party reviewer considers that the baseline context chapter is sufficient for outlining the context of the area in relation to the protected characteristics. Additional detail and more recent data could be included in this section. However, the inclusion of this is unlikely to change the conclusion of which protected characteristics should be considered for potential disproportionate impacts. The findings of the baseline analysis and disproportionate impacts are considered appropriate given the supplementary information provided in response to the Clarification Questions.

1361. To consider the equality impacts of the development of individuals or groups with protected characteristics the EqS sets out a series of questions. The assessment follows the methodology set out in the earlier sections of the report, addressing the relevant questions drawn from the City of London's Toolkit.

1362. In considering disproportionate impacts, as identified based on the baseline findings and the sensitivities of protected characteristics within the local area, the submitted EqS suggests that any such impacts would be mitigated via measures secured through conditions and the S106 agreement. Other measures are also included in the submitted Construction Environmental Management Plan, the Design and Access Statement and the Transport Assessment.

1363. In considering the differential impacts, the impacts of the development itself should be considered opposed to the nature of the surrounding population. Four different impacts have been identified in the EqS and these relate to the following:

- Amenity disruption during construction – There are people with some protected characteristics, such as age, disability, pregnancy and maternity, that may be more affected during demolition and construction due to the potential lengthier time spend at home.
- Community uses and accessible design – there are people with some protected characteristics, such as age, religion or belief, pregnancy and maternity and disability, that may differentially benefit from access to community space and improvements in accessibility, and likewise differentially suffer from lack of access to community space and poor accessibility.
- Employment creation - The EqS considers that there would a positive impact in terms of employment creation, albeit benefit people with different protected characteristics in ways that are difficult to predict as they depend on the actions of future employers. Whilst it is accepted that the increase in employment would be a benefit for the City as one of the world's leading international financial and business centres, the benefit to groups with protected characteristics is not clear to officers.
- Impact on places of worship – there are a number of places of worship in the vicinity of the site. Impacts of the proposed development may have differential impacts on the protected characteristic of religion or belief due to how these spaces are used for religious ceremonies. It should be noted that during the process of the application additional information has been submitted by the applicant to address matters related to impact of the development on places of worship and in particular the Bevis Marks Synagogue.

1364. With respect to the equality impacts during construction, it is expected that all properties in close proximity to the site would have the potential to disproportionately affect people with some particular protected characteristics, for example older or younger people, women during pregnancy, people with disabilities that are more likely to spent longer time at home. Disproportionate impacts will potentially also experience the congregation of the Bevis Marks Synagogue, in relation to the protected characteristic of religion and belief, due to

the proximity to the site. Any footway closure during demolition/construction would also potentially differentially affect people with mobility challenges.

1365. Overall, any equality impacts on amenity during demolition/construction would be temporary and will be able to be mitigated as far as possible through management plans and other mitigation measures, which will be secured by conditions and S106 obligations.
1366. With regard to community engagement, the applicant has complied with the advice as set out in the Statement of Community Involvement for pre-application engagement. The pre-application engagement that the applicant has carried out is extensively described in the 'Statement of Community Involvement' section of the report. Engagement has included targeted outreach to define the uses of the proposed space within Holland House. The Equality Statement outlines the groups and relevant points raised during this process. The Local Planning Authority has carried out its duty for consultation and publicity of the application in accordance with The DMPO 2015, The Town and Country Planning (Consultation) (England) Direction 2024, The TCPA 1990, The EIA regulations 2017, The Mayor of London Order 2008 and the Act and Regulations for Listed Building and Conservation Areas 1990.
1367. Through engagement with education providers, community cultural, arts and faith-based groups, spaces within the Holland House, Renown House and the proposed tower element have been dedicated for community uses, namely a total of 1, 411 sqm of floor space. Consideration has been given to the accessibility of all those uses, as well as the commercial floorspace.
1368. The development would also provide affordable co-working space for the local community/businesses/charities (1,176 sqm GIA). This will be provided in the restored Holland House and will include 60 desks alongside meeting rooms, and will be 50% of market rent for qualifying occupiers and zero rent for charities secured for the lifetime of the development.
1369. Following negotiations with the applicant, a blue badge parking bay will be provided on site, to address the equality impacts of people with limited mobility. The provision and effective management of this parking bay will be secured by condition and S106 obligation respectively.
1370. Recumbent cycle spaces are proposed alongside accessible showers and toilets within the basement, accessed via a recumbent cycles accessible lift.
1371. It is the view of officers that the proposed development would reduce barriers to access for disabled people through the provision of an enhanced and step-free community/ cultural/ faith/ educational/ amenity space and public realm. It is also

the view of officers that the provision of accessible office floorspace including affordable workspace, and publicly accessible community/cultural/ faith/ educational space would advance equality of opportunity.

1372. The EqS addresses the equality impacts on places of worship focusing on the impacts that may affect religious activities. It is stated that the Bevis Marks Synagogue may be affected by the proposed development in a number of ways, including townscape and visual impact, noise, daylight and sunlight and overshadowing. It is noted that considerations that relate to the significance of the Synagogue from a heritage perspective and its importance as a Grade I listed building do not form part of the scope of the EqS. Officers concur that although material planning considerations, any such impacts are not relevant to equality impacts and are addressed separately in the relevant heritage section of the report. Further concerns regarding the impact of the development on the visibility of the night sky and in particular the moon have been submitted by the Synagogue's representatives. A Lunar Transit Study has been prepared by the applicant and reviewed by a third party on the CoL's instructions to respond to those concerns. The aforementioned equality impacts are addressed in turn below.

1373. The proposed development will alter the visual backdrop to the Synagogue from its courtyard, which is considered essential part to the visitor experience. However, it is considered that the townscape, heritage and visual impacts would not be significant (minor effect neutral in nature). These impacts are further assessed in the relevant heritage section the report. These impacts, although material planning considerations, are not considered impacting in the religious activities of the Synagogue and therefore, are not considered resulting in a disproportionate or differential equality impact. The impact on the visibility of the night sky is assessed below.

1374. The differential impacts on religion and belief due to noise impacts, by reason of the proximity of the site to the Synagogue are discussed above. The Noise and Vibration Assessment concludes that the impact during demolition and construction will be negligible (not significant). Nonetheless, the Construction Environmental Management Plan will require the contractor to have close regard to the religious calendar to limit disruption during religious events. At operation stage, an Operational Noise Management Plan would be developed to manage the end uses. The details of both plans will be secured by condition.

1375. An extensive assessment of the daylight, sunlight and overshadowing impacts to the Synagogue and its courtyard are addressed in the relevant section of the report. Consideration of daylight levels within the Synagogue is sensitive due to the context of the reliance primarily on candlelight during religious ceremonies where the congregation need to be able to read from the Torah. There are 29

windows serving three rooms in the Synagogue, the central area, the gallery and the exhibition/visitor centre. The gallery is used by Jewish women for prayer and worship (the 'Ladies Gallery'). Concerns have also been raised around the equality impact that the development would have to older people using the Synagogue as a place of worship, due to their need of additional light to read text of the same size as younger people. Therefore, any significant impact could have a disproportionate impact on the protected characteristics of sex, age and religion or belief. The finding of the assessment of the daylight shows a minor adverse (not significant) effect in the existing vs proposed scenario, which is increased to minor to moderate (significant) effect in the case of the existing vs cumulative (including the proposed development) scenario. It should be also noted that due to the low height of the Synagogue in comparison to its existing surrounding buildings, it already receives relatively low levels of light. Although the southern section of the gallery would experience some reductions due to the proposed development, these would be localised on the southwest section of the gallery, and the Synagogue also receives light from several other windows to all elevations. Furthermore, as discussed in the relevant daylight and sunlight section of the report, the applicant has submitted a qualitative assessment, namely the Radiance Assessment, that shows that the daylight impacts would be almost imperceptible between the consented schemes and the consented schemes with the proposed development. Effects on sunlight were found to be negligible.

1376. Although due regard is given to the equality duty of the Corporation with respect to this place of worship, it is the view of officers, taking into consideration all material factors into consideration, that daylight impact would not be such that to cause an adverse effect on the ability to manifest religion in worship in the Bevis Marks Synagogue. In the Advice on the Equalities Statement dated 18th November 2024 (submitted as part of the representations made by the S&P Sephardi Community) it is said that the Equalities Statement fails to address the potential daylight and sunlight impact on the ability to continue to carry out circumcisions at the synagogue. The impact on the ability to carry out circumcisions is considered earlier in this report. The conclusion reached is that the proposal's impact on light levels would not diminish the ability of the Synagogue to function or prevent any of the activities within, including circumcision, to be undertaken. The CoL have taken positive steps to advance equality of opportunity by undertaking a detailed assessment of the impacts of the proposal on the use of the synagogue and on other places of worship. It is considered that the impacts of the development would be limited and would not adversely affect the Synagogue as a place of worship and it would not result in a disproportionate impact on the protected characteristics of sex, age and religion or belief.

1377. It has been highlighted that the since the courtyard was formed in 1699 it has hosted generations of religious events and it is therefore, considered important for the congregation. It is noted that the courtyard has recently undergone a number

of alterations, including the introduction of a ramp, a security booth and ticketing booth in association with the exhibition centre. These structures have reduced the usable area of the courtyard.

1378. The baseline analysis in the overshadowing assessment indicates that the courtyard currently experiences low levels of sunlight given the dense urban environment and nearby high rise buildings. At the equinox (21 March and 21 September) the courtyard receives virtual no direct sunlight. On the basis of the BRE guidance the development would result in negligible effects at all scenarios. The applicant has assessed the impacts of the development on the courtyard beyond the BRE requirements. In April to August, there is greater access to sunlight currently with the northern corner of the courtyard receiving up to three hours of direct sunlight. This position is reduced when considering consented development in the surrounding area. With the proposed development the sunlight availability in the courtyard is very similar to that in the consented position. For the other half of the year (September until March) are as low as in the baseline scenario. In respect of average sunlight availability in the proposed development scenario (including cumulative schemes), which is based on a 'clear sky' assumption, the results show a reduction in the average sunlight availability within the courtyard of 16 minutes to 19 minutes when compared to the consented scenario. Overall, it is considered that the impact of the proposed development to the sunlight received in the courtyard is limited and it would not restrict the use of the space for religious purposes.

1379. One of the concerns raised by the Synagogue's representatives was the loss of views of the moon in the night sky above Bevis marks Synagogue. In particular Rabbi Shalom Morris states that, *"Each month, Jews gather outside after dark to recite kiddush levana, as the moon's waxing crescent appears in the night sky. This proposed tower will obstruct our visibility of this phenomenon, making it impossible to recite this prayer. This is a direct obstruction to our freedom of worship as we have enjoyed it in this place since 1701"*. In the Advice on the Equalities Statement dated 18th November 2024 (submitted as part of the representations made by the S&P Sephardi Community) it is said that the Equalities Statement is silent on the importance of the night sky view to the weekly observance of Shabbat, the daily obligation to recite the Shema Yisrael and the monthly blessing on the appearance of the new moon. It is understood that this is an important element for Jews to manifest their religion from the Bevis Marks Synagogue and in particular its courtyard.

1380. In the letter received by the Sephardi Community and the Rabbi of the Bevis Marks Synagogue, dated 14 November 2024, further details about the Kiddush prayer, the uniqueness about reciting the prayer at the Bevis Marks Synagogue and the how the ritual has been recorded and altered in Europe have been submitted. It is stated that *"The prayer is recited whilst standing outside, under an*

open sky, and requires sight of the moon. If the moon is blocked by either buildings or clouds, the prayer cannot be recited. However, if the moon is visible through a cloud, one can still recite the prayer... Kiddush Levana takes about fifteen minutes to recite. It is typically recited following the evening service at a synagogue". It is also stated that at Bevis Marks Synagogue in particular "Kiddush Levana is ideally said from day seven of the lunar cycle until the middle of the month...When climactic conditions are difficult, it is permitted to recite even from day 3". With regard to the payer, it is noted that "For European Jews, cloud cover, a common concern, was seen as a bad omen, whilst a clear night was considered a positive sign, as the prayer for renewal could then be recited. Finally, proximity in the northern hemisphere has made the recital of 'Kiddush Levana' notoriously difficult in locations like England during July and August with its short summer nights and associated lower arc of the moon".

1381. Since the receipt of the abovementioned objections, the applicant has commissioned a Lunar Transit Study to assess the impact that the development would have on the visibility of the moon in the night sky. Subsequent information including an additional analysis from a new viewpoint has been submitted following a site visit to the Synagogue and discussions with the Rabbi of the Synagogue and the Corporation's officers and appointed independent reviewer. The Lunar Transit Study and subsequent additional information have been reviewed by a third party consultant on behalf of the City.
1382. The methodology used in the study submitted by GIA takes into consideration the lunar path, describing minor and major lunistice as seen from a specific location across a full 18.6-year lunar cycle. This approach has been considered relevant and appropriate by the independent reviewer. The moon phases and positions (daytime and nighttime) reported in the GIA material have been checked against published data and appear to be accurate.
1383. It is understood from the submitted study, the review, discussion with the Synagogue's Rabbi and the details included in recently submitted letter by the Sephardi community, that in order for Kiddush Levana to be recited the moon would have to be visible, including through any cloud cover and not covered by clouds. For that reason, the submitted study has taken into consideration the probability of cloudiness in London to estimate the likelihood of the moon to be visible. As this information has been applied using data on a monthly than daily basis, the independent reviewer has advised this would not be able to capture daily variations. It has therefore been advised that this information is treated with caution. The Rabbi has also raised concerns in the use of cloud cover for the assessment of the lunar visibility. For the assessment below the impacts are assessed discounting cloud cover.
1384. Three scenarios have been tested for the study including

- the baseline, which contains the current context without consented or proposed developments;
- future baseline, which contains the current context and currently consented developments; and
- cumulative, which contains the future baseline scenario with the proposed development.

1385. The future baseline scenario includes, most relevantly, the consented and implemented scheme at 100 Leadenhall Street. The implementation of this scheme means that the permission is extant and this is why the proposal has been measured against it in the 'future baseline' scenario. It is relevant to note that the transit of the moon was not assessed or considered (nor raised as a theme of objection) in relation to that scheme, which was originally granted permission in 2019 and implemented in early 2024.

1386. Two observer points, at the entrance of the Synagogue courtyard, have been tested. One of them was originally included in the submitted study and one was thereafter assessed, following consultation with the Synagogue's Rabbi. Observer point P is 0.53m higher than location N. The applicant has confirmed that this height variation has been taken into consideration and that the 3D modelling reflects the accurate terrain of the courtyard.

1387. The assessment, following request from the Corporation's appointed independent reviewer, provides charts for 15-day periods between the new moon and full moon for each month in 2024 and 2034, with clear sky conditions, while also considering only the 12-day periods of the waxing moon when it is understood that Kiddush Levana prayer is recited. These have been tested for both observer points. It has been confirmed that the data used by the applicant for the moon phases and positions are accurate. The site measurement results taken for the Corporation's appointed independent reviewer confirm that the cylindrical projections reported in the GIA material correctly reflect the actual geometry of the existing buildings as seen from the two observer locations.

1388. Based on the results produced taking into account the lunar bracelet visibility throughout the 18.6-year lunar cycle, only for the 12-day periods of the waxing moon when the Kiddush Levana prayer can be recited (discounting cloud cover), the visibility of the moon when comparing the existing and cumulative scenario will be reduced by 2.5% and 2.1% in the major and minor lunistics respectively from point P (indicated by the Rabbi) and between 2.2% and 2.1% respectively from point N (initially included in the submitted study). The absolute reductions between the future baseline and cumulative scenario, effectively those resulting from the proposed development, are between 1.8% and 1.3% in the major and minor lunistics from both points.

1389. In relative terms, in the existing vs cumulative scenario, the opportunity to view the moon within a full moon cycle (not accounting for cloud cover probability) from observer location P, would be reduced by between 49% (at a major lunistice) and 52% (at a minor lunistice), or by 51% on average throughout a full lunar cycle. The same opportunity to view the moon from observer location N would be reduced by between 41% (at a major lunistice) and 51% (at a minor lunistice), or by 46% on average throughout a full lunar cycle. The relative reductions in the future baseline vs cumulative scenario would be 42% for observer location P and 33% for observer location N, on average throughout a full lunar cycle. It is important to recognise that large relative percentage alterations, regardless of the very low absolute losses, are as a result of the existing low levels of visibility of the moon.

1390. When accounting for cloud cover probability the relative loss of moon visibility would not change significantly. Overall, there would be less than a 1% difference in results on average across all assessment scenarios considered for both observer locations, compared to the previous stage of assessment which did not account for cloud cover probability.

1391. At existing baseline scenario, the results show that the moon is visible for 9 months and 63 days each year from viewpoint P, indicated by the Rabbi, at a major lunistice year and 61 at a minor lunistice year. Under both the future baseline and cumulative scenarios, the moon would be visible for 8 months and 50 days each year on both major and minor lunistice years. When considering the impact of the proposed development against the future baseline scenario, the moon would be visible for 8 months in each year and the number of days would be reduced by two (from 52 to 50 days) in the case of the major lunistise year and by one (from 51 to 50 days) in a minor lunistice year. In terms of hours there will be a reduction of approximately 41 hours (from 82hrs 30min to 41hrs 45min) in a major lunistice year and approximately 46 hours (from 86hrs 30min to 39hrs 45min) in a minor lunistice year. This is clear in the following tables prepared by the CoL's appointed consultant.

Table 5 – Number of days and hours when the moon would be visible from observer location P on nights with clear sky conditions during 12-day periods of waxing moon throughout 2024 (a major lunistice year).
Based on the charts reported in Appendix 2 of the final GIA addendum.

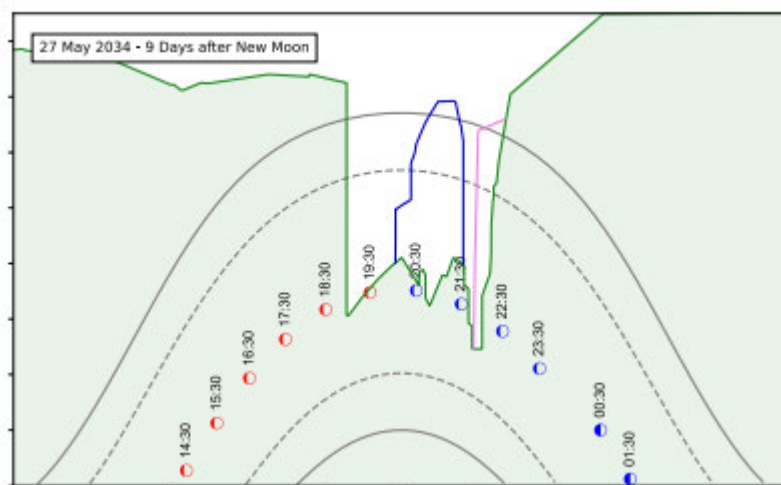
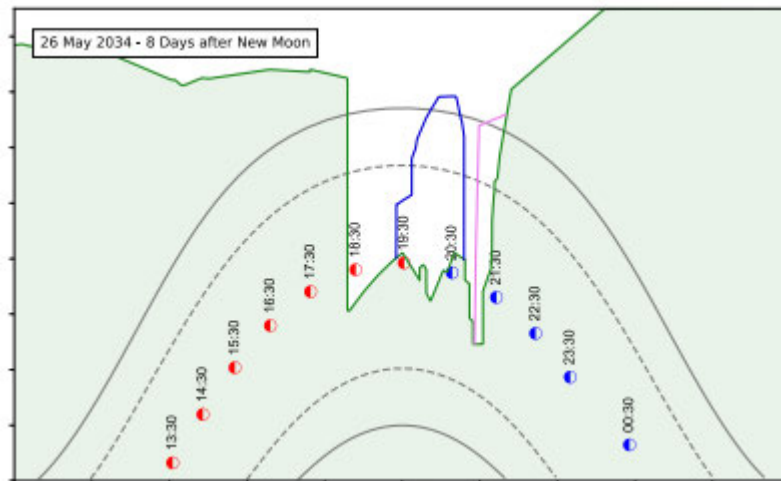
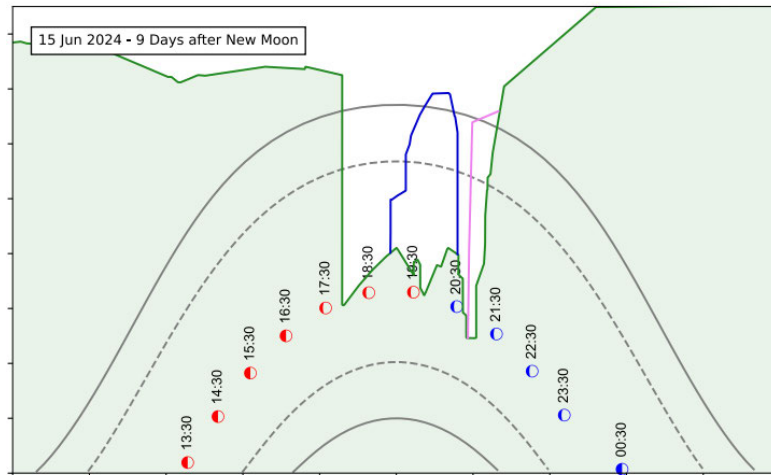
Period	Existing baseline scenario		Future baseline scenario		Cumulative scenario	
	Days	Hours	Days	Hours	Days	Hours
14 Jan – 25 Jan	11	20hrs 15min	10	16hrs 45min	10	9hrs 45min
12 Feb – 24 Feb	11	18hrs 45min	11	15hrs 15min	10	8hrs 30min
13 Mar – 25 Mar	11	19hrs 30min	10	16hrs 45min	9	8hrs 15min
11 Apr – 23 Apr	8	12hrs 45min	6	10hrs 15min	6	4hrs 30min
11 May – 23 May	4	3hrs	2	2hrs	2	30min
9 Jun – 22 Jun	2	30min	-	-	-	-
8 Jul – 21 Jul	-	-	-	-	-	-
7 Aug – 19 Aug	-	-	-	-	-	-
6 Sep – 18 Sep	-	-	-	-	-	-
5 Oct – 17 Oct	4	4hrs 30min	3	3hrs 30min	3	1hrs 15min
4 Nov – 15 Nov	4	7hrs 30min	3	6hrs 30min	3	3hrs
4 Dec – 15 Dec	8	14hrs 15min	7	11hrs 30min	7	6hrs
Total 2024	63	101hrs	52	82hrs 30min	50	41hrs 45min
The periods considered in the results do not include the first 72 hours following each new moon. The number of hours is rounded to the nearest quarter of an hour.						

Table 6 – Number of days and hours when the moon would be visible from observer location P on nights with clear sky conditions during 12-day periods of waxing moon throughout 2034 (a minor lunistice year).
Based on the charts reported in Appendix 2 of the final GIA addendum.

Period	Existing baseline scenario		Future baseline scenario		Cumulative scenario	
	Days	Hours	Days	Hours	Days	Hours
23 Jan – 3 Feb	11	21hrs 45min	10	18hrs 30min	10	8hrs 45min
21 Feb – 5 Mar	11	20hrs 15min	10	17hrs 30min	9	7hrs 45min
23 Mar – 3 Apr	10	17hrs 30min	9	14hrs 15min	9	6hrs 45min
21 Apr – 3 May	7	9hrs 45min	5	8hrs	5	3hrs
21 May – 2 Jun	2	45min	-	-	-	-
19 Jun – 1 Jul	-	-	-	-	-	-
18 Jul – 31 Jul	-	-	-	-	-	-
17 Aug – 29 Aug	-	-	-	-	-	-
15 Sep – 28 Sep	1	1hr	1	1hr	1	1hr
15 Oct – 27 Oct	5	6hrs 45min	4	5hrs 30min	4	2hrs 30min
14 Nov – 25 Nov	5	8hrs 15min	4	7hrs 15min	4	3hrs 30min
13 Dec – 25 Dec	9	17hrs	8	14hrs 30min	8	6hrs 30min
Total 2034	61	103hrs	51	86hrs 30min	50	39hrs 45min
The periods considered in the results do not include the first 72 hours following each new moon. The number of hours is rounded to the nearest quarter of an hour.						

1392. In the two assessed scenarios, namely a major lunistice in 2024 and a minor lunistice in 2034, under existing conditions the moon would be visible for 9 months, as stated above. This would be reduced to 8 months in the future baseline and cumulative scenarios, due to another consented and implemented development (100 Leadenhall) than the proposed development. The moon is currently visible in June during a major lunistice year and in May during a minor lunistice year. In the

future and cumulative scenarios, the visibility of the moon during those two months would be lost. As shown on the graphs below, submitted as part of the Lunar Transit Study and also independently reviewed, it is clear that this loss would be primarily due to the building marked in pink (100 Leadenhall) rather than the building marked in blue (proposed development).



1393. In light of the above assessment, it is concluded that currently, in the existing condition, there is a reduced overall opportunity to view the moon from the Synagogue courtyard due to obstructing effects from the existing surrounding buildings.

1330. Although the development would result in high relative losses of the visibility of the moon, the absolute reductions would be limited. Based on the analysis, the third-party reviewer considers that the loss of the visibility would be significant. However, it is noted that the moon would still be able to be viewed from the Synagogue's courtyard in the same number of months (8 months in each year) and almost the same number of days (50 instead of 52 in each year) when considering the impacts of the development against the future baseline. It is therefore, considered that the prayer would still be able to be recited in those same months, which are one month less than the existing baseline scenario. As explained above this reduction in the months that the moon is visible arises not from the proposed development, but from the consented and implemented scheme at 100 Leadenhall Street); and that the moon's transit was not raised as an issue for that implemented scheme.

1331. This impact of the proposed development, in percentage and hour reduction terms, is acknowledged. It would reduce the amount of time on each occasion when the moon is visible for the purposes of the Kiddush Levana prayer, but not the number of months of such occasions when considered against the future baseline; officers conclude that the presence of the proposal would still allow the prayer to be recited. Furthermore, it must be acknowledged that there are already three months of the year in the existing condition when the moon is not visible at all. Nevertheless, this impact on the amount of time available to recite the prayer weighs against the grant of planning permission and this is a matter to which officers give significant weight. In the planning balance and conclusions below, it is assessed whether the benefits of the proposed development are able to outweigh this impact.

1332. The Sephardi community has also advised in their letter regarding the Centrality of Sky View at Bevis Marks to Religious Services and Heritage that the sky view in the courtyard at Bevis Marks serves important ritual purpose as the sky view is central to Jewish practice. One which occurs weekly is the Sabbath, which is determined ended when the average person can see three medium sized stars in the sky. Although it is advised that the congregation tend to rely on the clock when it is cloudy, the view of the three medium sized stars in the sky is still conscious inspection regarding the sabbath times. These timings are central to other aspects of rituals and worship, such as Shema Yisrael which is an obligation every evening must be done only after three medium sized stars are seen in the sky.

1333. The submitted objection states that the Jewish Sabbath concludes at the appearance of three stars which first appear in the darkening eastern sky. Similarly, it is understood that Shema Yisrael is recited when the first three medium sized stars appear in the darkening eastern sky. The proposed development would be sited to the southwest of the Bevis Marks Synagogue and therefore, the proposed tower element would not reduce the visibility of the eastern sky that is necessary to recite those prayers and therefore, officers consider that it would not prevent these important rituals being undertaken and the Bevis Marks Synagogue and its courtyard to be used as a place of worship.

1334. There are also a number of other places of worship in close proximity of the site, including a number of churches. The one closest to the site is St Katharine's Cree Church 50m to the south of the application site. The environmental impacts on this Katharine's Cree Church have been considered and are not significant. It is therefore considered that the proposed development would not have an adverse effect on the ability to manifest religion in worship in the church and as such, there would be no adverse impact on those who share the protected characteristic.

1335. The EqS sets out a number of actions to mitigate potential impacts arising from the proposed development. Officers consider that any potential impacts from the development relating to demolition, construction and operation of the development would be able to be addressed via the imposition of appropriately worded conditions and S106 obligations.

1336. The applicant has indicated the intention to continue engaging with the Bevis Marks Synagogue and various community stakeholders. It is noted that the Equality Act also carries ongoing responsibilities for the owner which will continue once the development is complete. As part of considering the design of the building and the physical environment, property management teams for each buildings and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the buildings are in operation. This would include the proposed community/cultural/educational/multi-faith/sports/amenity spaces and affordable workspace which currently do not have any end user finalised. In formulating this offer, the landowner should continue to engage with a full range of key stakeholders so that it is relevant and accessible to all. As referred to in other sections of this report, where necessary, details will be secured by condition and/or planning obligations.

Human Rights Act 1998

1337. It is unlawful for the City, as a public authority, to act in a way which is compatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).

1338. Insofar as the grant of planning permission will result in interference with right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby sensitive receptors. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the Draft City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, together with all other benefits that would arise from the provision of affordable workspace and community and cultural spaces for the public to enhance the role of the City as destination, outweighs the Minor to Major Adverse impacts on nearby residential properties and Places of Worship and that such impact is necessary in the interest of the economic well-being of the country and is proportionate.

1339. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

1340. Insofar as the grant of planning permission will result in interference with freedom of thought, conscience and religion (Article 9 of the ECHR), including the ability of people to attend or wishing to attend the Bevis Marks Synagogue to manifest their religion or belief in worship, teaching, practice and observance, it is the view of officers that the Minor Adverse effect on daylight identified within the Synagogue by the proposed development will not impact upon the ability people to attend or wishing to attend Bevis Marks Synagogue to manifest their religion or belief in worship, teaching, practice and observance.

Conclusion and Overall Planning Balance

1341. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations. The determination must be made in accordance with the development plan unless material considerations indicate otherwise.
1342. The application relates to site located on the northeast corner of Bury Street, northwest of Creechurch Lane and it comprises three buildings, namely Holland House, Renown House and Bury House. The site is located within the recently designated Creechurch Conservation Area and Holland House is a Grade II* listed building.
1343. The current proposal follows the refusal of an application at 31 Bury Street, proposing the demolition of the building at 31 Bury Street and the construction of a 48 storey tower building under the terms of application 20/00848/FULEIA. The application currently under consideration incorporates a tower at 31 Bury Street, which has been reduced in height by 19 metres and has been set back at the top eight floors to reduce the massing towards the termination point of the tower.
1344. The proposal is for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House and three storey extension resulting in ground plus 5 storeys at Renown House and interconnection of the three buildings. The buildings would be used for the following purposes office (Class E(g)(i)), including affordable workspace, flexible retail/café (Class E(a)/E(b)), and flexible community/education/cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses. The development also includes the provision of a new covered pedestrian route, cycle parking and facilities, public toilet, landscaping and highway improvements and the provision of a single servicing access point onto Heneage Lane.
1345. Objections have been received from statutory consultees including Historic England, the Greater London Authority, the 20th Century Society, the Victorian Society, the Georgian Group, Historic Royal Palaces, the CAAC, SAVE Britain's Heritage, the London Borough of Tower Hamlets, as well as several objections from third parties, including those from the Jewish community, relating to the scale, massing and design of the development and its perceived impact on designated heritage assets, including the Tower of London World Heritage Site, the Bevis Marks Synagogue and the Creechurch Conservation Area and concerns around the perceived ability of

the Synagogue's congregation to use the Synagogue and its courtyard as a place of worship due to the daylight, and overshadowing impacts and by reason of the reduced visibility of the night sky and the moon. This report has considered these impacts in detail.

1346. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The application site is situated within the City Cluster. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The site is within the City's growth modelling and would deliver over 1.5% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
1347. The scheme would provide 34,584 sq.m (GIA) of office floorspace (Use Class E(g)(i)), which would be sustainable Grade A office floorspace suitable for circa 2,470 FTE City workers. The proposed office floorplates would range between 350 and 580sqm for businesses of 50-60 people supporting smaller, start-up businesses, providing office tenants with their own private entrance and dedicated floor space. An area of 1,170sqm would be provided as affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities, fulfilling the City's vision to providing inclusive workspace.
1348. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of accessible spaces. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.
1349. Officers consider the site to be acceptable for a tall building, supporting the consolidation of the City Cluster. While there is conflict with Local Plan policy CS7 (3) and CS14 (2) and London Plan D9 B (3), because the site is

located in a conservation area and therefore considered inappropriate for a tall building, officers nevertheless find that the qualitative impacts of the proposal would be acceptable and that it would accord with London Plan Policy D9 A, C and D, Local Plan Policy CS7 (1,2, 4-7), draft City Plan S12 (1,2, 4-10) S21 (1,3-8). Most relevantly, the proposal would not cause harm to the significance, character or appearance of the Creechurch Conservation Area in which it is situated. As such, officers consider the site appropriate for a tall building, notwithstanding some limited further conflict with emerging City Plan 2040 S21 (5) due to an impact on the significance of the grade II* listed Holland House which forms part of the application site.

1350. The proposal would be a sophisticated new addition to the City Cluster, massed in tapering stages to form an endpiece at the eastern edge, and clad in pale blue faience elevations to do so elegantly and differentiate it from the more glazed towers at the centre. It would enliven the locality of the City at its feet by reinstate the lost leg of Heneage Lane with a new route and retail arcade and reimagining the existing open space between Bury House and Holland House; both these existing buildings on the application site and the new spaces between them (and the wider locality) would be made more accessible, inclusive, inviting, and animated by the scheme. The creation of the proposed new public spaces and improvements to the existing public spaces are considered by officers to be a benefit of the scheme. The proposal would comply with the relevant design policies set out above.

1351. The proposal would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

1352. The proposals would preserve the characteristics and composition of all relevant strategic views and would comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging elevated public spaces which are also important to the character of the City of London.

1353. The proposal would result in a low level of harm to the grade II* listed Holland House. As such, it would fail to preserve the significance/special interest or setting of this designated heritage asset and conflict with Local

Plan policies, CS12 (1 and 2), DM12.1 (1), Draft City Plan S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals would otherwise comply with Local Plan CS14, CS 12 (2-5), CS13 and DM12.1 (2-5) DM12.5 Draft City Plan 2040 S11 (1,3-5) S 13, HE1 and London Plan HC 1 (D), HC2, HC3 and HC4. Most germanely, they would preserve the setting and significance of Bevis Marks Synagogue and the special interest, character and appearance of the Creechurch Conservation Area.

1354. Giving considerable importance and weight to the desirability of preserving the significance of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits, set out in more detail in the Heritage section below, include a low level of enhancement to the grade II* Holland House and a low level of enhancement to the Creechurch Conservation Area. The public benefits include the delivery of growth in a highly sustainable location, the opening up of Holland House, and in particular its heritage lobbies, to a much broader demographic, and the provision of a highly compelling mix of educational/ cultural/ community/ sports/ multi-faith spaces across the lower levels of the proposal. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.
1355. The proposals comply with the required initial steps of archaeology investigation Local Plan DM 12.4 Draft City Plan 2040 HE2 13, Policies HE1 and London Plan HC1 subject to archaeology conditions.
1356. Through engagement with educational, sporting and arts providers and organisations, charities, multi-faith groups, livery companies and other local key stakeholders, the development would deliver a significant community/cultural offer through the provision of flexible educational/ cultural/ community/ sports/ multi-faith/ amenity space within the lower ground, ground and first floors of the three buildings.
1357. These multi-functional bookable spaces would attract a wide range of activities, including student visits for learning, educational, creative and skills workshops, rehearsals, performances, conferences, charity events, sports tournaments and faith events. The spaces would be available to pre-book, free of charge for community based groups and non-profit organisations, schools and other local groups, for 81 hours a week, of which over 67 hours free of charge. The public offer would also include an Urban Farm at the ninth floor of Holland House to be used as a rooftop classroom and the provision of a climbing wall, offering a new sport facility and attraction in the City

Cluster. Heneage Arcade would create a new pedestrian route, with flexible retail/café uses, incorporating public art. The dedicated cycle repair space at lower ground floor level would support the provision of new skills in the area, providing training and jobs for young adults and concurrently providing a service in the area to support the local community. The provision of a changing place, public toilet and water fountain, will be secured by condition.

1358. In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking (582 long stay and 85 short stay) and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The three buildings are proposed to be serviced by a single point onto Heneage Lane. 66 daily trips are forecasted following consolidation of deliveries by 50%. This would need to be set out in a delivery and servicing management plan. It is considered at this stage that the proposed servicing arrangement would be acceptable. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy T5.

1359. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. The whole life-cycle carbon emissions per square meter of selected option would be the lowest out of the 4 options tested. The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

1360. Compared to retrofit options with limited extension potential, the proposed development would result in the lowest whole life-cycle carbon emissions per square meter, with benefits relating to avoiding further interventions into historic fabric, improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. The energy strategy has been optimised for the site and a BREEAM "excellent" rating is targeted, aspiring to an "outstanding" rating through detailed design. Circular economy measures have been incorporated, such as by retaining approximately 35% of the

existing structures, as well as designing for longevity, adaptability and low maintenance. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan policies SI 2, SI 7, Local Plan policies CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

1361. In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant. In terms of thermal comfort beneficial impacts are expected on the existing benches to the north of 30 St Mary Axe.
1362. A number of objections have been received from Bevis Marks Synagogue and members and the wider Sephardi community, inter alia, relating to the impact of the development to the historical and religious significance and the setting of Bevis Marks Synagogue, the loss of daylight and sunlight to the Synagogue, overshadowing of its courtyard and the ability to view the sky and the moon in order to observe religious practices.
1363. As discussed above and in length in the main body of the report, it is considered that the proposed development would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.
1364. In terms of the daylight and sunlight impacts into the Synagogue, officers are extremely cognisant of the matters raised by the Jewish community and have analysed these in considerable detail. However, it is considered that the impacts would be limited, localised and minimally noticeable at ground floor level and slightly more noticeable at the southwest area to the mezzanine level. The VSC effects caused by the proposed development are minor adverse, the BRE guidelines for NLS and sunlight are met and therefore, overall, the daylight and sunlight effects are not considered significant, in EIA

terms. The effects of cumulative scenarios have been assessed including consented and unconsented schemes. Although minor to moderate adverse effects are identified in the cumulative vs existing baseline scenario, the additional effects would be due to other consented schemes. It is also noted that BRE guidelines for daylight distribution and sunlight are again met in the cumulative scenario.

1365. As such, it therefore follows that there is a very limited impact on the visual appreciation of the historic interior and on the visual appreciation of interior features of key religious significance such as the Bimah and the Ark. Consequently, on the basis of the detailed evidence provided, officers come to the view that the visual appreciation of the religious ceremonies and associated activities including the reading of religious text would not be diminished to a significant or perceptible degree. From this it can be concluded that, based on the quantifiable daylight impact results, the effects of the proposal on daylight to the interior of the Synagogue would not be great enough to compromise the religious use or activities therein.

1366. Since the submission of the application, a daylight and sunlight empirical report has been submitted on behalf of the S&P Sephardi community and the Bevis Marks Synagogue Rabbi. Overall, based on the results of the submitted data it is accepted that the Synagogue currently experiences low levels of light, which accords with the results of the Daylight, Sunlight and Overshading Assessment submitted by the Applicant. Officers, based on the findings and conclusions of the reviewer, consider that although the Bevis Marks Synagogue daylight report is not based on a published or generally used method, if carried out appropriately with adequate equipment and controlled methodology it can give an understanding of the current and proposed light levels. However, it is considered that the submitted daylight report, is not complete or entirely accurate, due to the lack of necessary information and other limitations, as discussed above, and therefore, it can be attributed limited weight. It is considered more appropriate that officers give substantial weight to the findings of the Daylight, Sunlight and Overshadowing Assessment submitted by the Applicant and reviewed by the Corporation's appointed daylight consultant, as this follows the BRE guidelines as referred to in Local Plan policy DM10.7, and paragraph 3.10.41 of the reasoned justification to that policy. The BRE guidelines are also referred to in draft City Plan 20240 policy DE7.

1367. At present no area of the courtyard receives two hours of sunlight on 21 March and therefore, although no area would be able to receive sunlight on the 21 March following the erection of the proposed development, the BRE guidelines are met. The Sun Exposure analysis and shadow diagrams, submitted with the application, show a reduction in the average sunlight

availability within the courtyard of 16 minutes to 19 minutes when comparing the proposed development (including the consented schemes) with the consented scenario. It is therefore considered that the proposed development alone would not materially change the sunlight on the Bevis Marks Synagogue courtyard. As a result, it is not considered that the development would result in overshadowing in the Synagogue's courtyard that would affect the setting of the listed building or its associated amenities and it would not preclude from continuing to be used for religious events and as part of the visitor experience visiting the Synagogue's exhibition centre.

1368. To respond to the concerns raised regarding the ability to recite the Kiddush Levana prayer, the applicant has submitted a Lunar Transit Study, assessing the impact the development would have on the visibility of the moon in the night sky. This study was independently reviewed. Following discussions with the Synagogue's Rabbi, the visibility of the sky from two observer points at the entrance of the Synagogue courtyard were assessed. Based on the results produced taking into account a full moon cycle, only for the 12-day periods of the waxing moon when the Kiddush Levana prayer can be recited (discounting cloud cover), the visibility of the moon when comparing the existing and cumulative scenario will be reduced by 2.5% and 2.1% in the major and minor lunistice respectively from point P (indicated by the Rabbi) and between 2.2% and 2.1% respectively from point N (initially included in the submitted study). The absolute reductions between the future baseline and cumulative scenario, effectively those resulting from the proposed development, are between 1.8% and 1.3% in the major and minor lunistics from both points. When considering the months and days that the moon would be able to be visible, taking into account the development alone (cumulative vs future baseline) it is noted that there would be no further reduction in the months that the moon would be able to be visible (the moon would still be able to be viewed 8 months of the year) and minor reductions in the number of days (50 days instead of 52 or 51 days every year, in case of a major and minor lunistice year respectively). In terms of hours there will be a reductions exceeding 40 hours in each year.

1369. It is therefore concluded that currently there is a reduced overall opportunity to view the moon from the Synagogue courtyard due to obstructing effects from the existing surrounding buildings. The proposal would result in varying reductions of the number of hours available to see the moon on each relevant occasion, though in theory there would always be enough visibility to recite the prayer, and there would not be a reduction in the number of occasions (i.e. months) per year against the future baseline. Although the impact of the development in terms of relative losses is acknowledged, the prayer would still be able to be recited in those same months each year as the future baseline scenario. Whilst the development

would have some impact on the ability to recite the Kiddush Levana Prayer due to the reduced hours that the moon would be able to be visible, it would not have a material impact on the ability to carry out of other religious practices including circumcision, the observance of Shabbat, and daily obligations. It is the view of officers that such an adverse impact is small, and should, taking account of the duties imposed by section 149 of the Equality Act 2010, therefore be attributed limited weight. In any event such adverse impact would be outweighed by the many public benefits of the scheme as set out in this report.

1370. In terms of daylight impacts on other receptors, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 2 and 10-16 Creechurch Lane and 18-20 Creechurch Lane which would experience moderate adverse effects. However, the absolute alterations in most instances are either very limitedly or not likely to be noticeable and as such, the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels.

1371. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.

1372. Any potential impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

1373. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

1374. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Cluster and public realm would be complied with that notwithstanding the conflict with CS12 (Historic Environment) , DM12.1 (Managing Change affecting all heritage assets and spaces), draft

City Plan Policies 2040 S11 (Historic Environment), S12 (3) (Tall Buildings), and London Plan HC1 (Heritage Conservation and Growth), the proposals comply with the development plan when considered as a whole.

1375. Other than the significant effect that the proposal will have to advance Local Plan Strategic Objective 1 to maintain the City's position as the world's leading international financial and business centre by providing 34,584 sq.m (GIA) of sustainable Grade A office floorspace, there are other benefits that would weight in favour of the proposed development when assessed against the local and national planning policies, as set out below:

- Securing a strategic high-quality mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster which contributes to the Destination City objectives;
- The provision of generous and unique multi-functional community, cultural, educational, sports, multi-faith, amenity space that is intended to reach out to the wider community and provide a gateway into the City to access opportunities to inspire, connect, create and educate themselves and deliver genuine public benefits to the wider community;
- Provision of affordable workspace available at 50% of market rent for qualifying occupiers or zero rent for charities that meets the City's vision to providing inclusive workspace;
- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function and growing number of working population and number of visitors, whilst enhancing a place which would be more interesting and vibrant with active street frontages;
- Provision of a rooftop urban farm and climbing wall offering a nurturing environment for learners to explore and encouraging health and wellbeing by new sport and recreational facilities;
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys;
- Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste;
- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality, through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. It would result in modest

enhancement to the exteriors of Holland House. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area.

- Provision of meaningful public art along Heneage Arcade and to educate public about heritage.

1376. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement.

1377. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

1378. As discussed above, the paragraph 208 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less that substantial harm.

1379. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

- Air Quality Positive Statement (Hoare Lea, 2 November 2023)
- Carbon Options Tool
- CIL Form (Welput, 4 January 2024)
- Circular Economy Statement Rev.4 (Hoare Lea, 22 December 2023)
- Climate Change Resilience Sustainability Statement Rev.4 (Hoare Lea, 21 August 2024)
- Construction Environmental Management Plan Rev.5 (Hoare Lea, January 2024)
- Contamination Report (Landmark, 31 March 2023)
- Cover letter (DP9, 4 January 2024)
- Cultural Strategy (J2, January 2024)
- Daylight, Sunlight & Overshadowing – Radiance Based Supplementary Report (GIA, January 2024)
- Development DSO analysis compared against the Refused Development analysis (GIA, October 2024)
- Delivery and Servicing Plan (Steer, January 2024)
- Design and Access Statement (Stiff and Trevillion, January 2024)
- Energy Statement Rev.4 (Hoare Lee, 10 October 2023)
- Environmental Statement Non-Technical Summary (Trium, January 2024)

Environmental Statement (Trium, January 2024):

1. Volume 1: ES Main Report
 - i. Chapter 1 Introduction
 - ii. Chapter 2 EIA Methodology
 - iii. Chapter 3 Alternatives and design evolution
 - iv. Chapter 4 The Proposed Development
 - v. Chapter 5 Demolition and Construction
 - vi. Chapter 6 Socio-Economics
 - vii. Chapter 7 Traffic and Transport
 - viii. Chapter 8 Air Quality
 - ix. Chapter 9 Noise and Vibration
 - x. Chapter 10 Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage
 - xi. Chapter 11 Wind Microclimate
 - xii. Chapter 12 Archaeology
 - xiii. Chapter 13 Climate Change
 - xiv. Chapter 14 Effect Interactions
 - xv. Chapter 15 Likely Significant Effects and Conclusions
 - xvi. Chapter 16 Mitigation and Monitoring Schedule
2. Volume 2: Heritage, Townscape and Visual Impact Assessment
3. Volume 3: Technical Appendices
 - Appendix: Introduction

- i. Annex 1: Location of Information within the ES ('wayfinding' document)
- ii. Annex 2: EIA Statement of Competent Experts
- iii. Annex 3: Glossary
- Appendix: EIA Methodology
 - iv. Annex 1: Informal EIA Scoping Report
 - v. Annex 2: EIA Waste Note
 - vi. Annex 3: Correspondence from CoL on EIA Scoping
 - vii. Annex 4: Cumulative Schemes List and Map
 - viii. Annex 5: Climate Change Technical Note
- Appendix: Air Quality
 - ix. Annex 1: Legislation, Policy and Guidance Documents
 - x. Annex 2: Construction Dust Mitigation Measures
 - xi. Annex 3: Construction Road Traffic Modelling Methodology
 - xii. Annex 4: Construction Road Traffic Modelling Results
 - xiii. Annex 5: Professional Experience
- Appendix: Noise and Vibration
 - xiv. Annex 1: Glossary
 - xv. Annex 2: Legislative, Policy and Guidance Documents
 - xvi. Annex 3: Noise Survey Data
 - xvii. Annex 4: Road Traffic Data Sets
- Appendix: Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage
 - xviii. Annex 1: Relevant Planning Policy and Guidance
 - xix. Annex 2: Methodology and Baseline
 - xx. Annex 3: Drawings
 - xxi. Annex 4: Daylight and Sunlight Results
 - xxii. Annex 5: No Sky-Line Contour Drawings
 - xxiii. Annex 6: Window Maps
 - xxiv. Annex 7: Overshadowing Assessment
 - xxv. Annex 8: Solar Glare Results
 - xxvi. Annex 9: Light Spillage Results
- Appendix: Wind Microclimate
 - xxvii. Annex 1: Policy and Guidance
 - xxviii. Annex 2: Technical Appendix – Wind Tunnel
 - xxix. Annex 3: Technical Appendix -- CFD
- Appendix: Archaeology
 - xxx. Annex 1: Planning Policy and Legislation
 - xxxi. Annex 2: Archaeological Desk-Based Assessment
- Appendix: Climate Change and Greenhouse Gases
 - xxxii. Annex 1: Policy and Guidance Background
 - xxxiii. Annex 2: Extract from Whole Life Carbon Assessment
 - xxxiv. Annex 3: Extract from Energy Strategy
- Appendix: Ecology
 - xxxv. Annex 1: Preliminary Ecological Appraisal and Biodiversity Net Gain Report
- Appendix: Geo-Environmental

xxxvi. Annex 1: Geo-Environmental and Geotechnical Phase 1 Desk Study

- Environmental Impact Assessment Cumulative Schemes Review (Trium, 25 September 2024)
- Equalities Statement (Quod, January 2024)
- Equality Statement Independent Review (Buro Happold, 15 November 2024)
- Fire Strategy Rev.03 (Semper, 19 September 2023)
- Flood Risk and Drainage Strategy Rev.P2 (Thornton Tomasetti, 20 September 2023)
- Framework Travel Plan (Steer, January 2024)
- GLA Carbon Emissions Spreadsheet
- GLA Circular Economy Spreadsheet
- GLA Energy Strategy Spreadsheet
- Health Impact Assessment (Quod, January 2024)
- Heritage Statement Holland House (KM Heritage, December 2023)
- Heritage, Townscape and Visual Impact Assessment (The Townscape Consultancy, 25 January 2024)
- Landscape Statement (Bowles & Wyer, January 2024)
- Lighting Strategy (Hoare Lea, January 2024)
- Outdoor Thermal Comfort Assessment (GIA, 12 October 2023)
- Planning Statement (DP9, January 2023)
- Review of lunar transit study (BRE, 4 November 2024)
- Review of daylight, sunlight, overshadowing, solar glare and light spillage assessment (BRE 16 August 2024)
- City of London
- Statement of community involvement (Kanda, January 2024)
- Statement of community involvement Addendum (Kanda, September 2024)
- Structural Report and Basement Impact Assessment (Thornton Tomasetti, 29 September 2023)
- Sustainability Statement (Hoare Lea, 10 October 2023)
- Third Party Review: Carbon Optioneering Study (Arup, 7 February 2024)
- Tower of London Heritage Impact Assessment (The Townscape Consultancy, December 2023)
- Transport Assessment (Steer, January 2024)
- Utilities Statement Rev.2 (Hoare Lea, 27 July 2023)
- Ventilation/Extraction Statement Rev.4 (Hoare Lea, 18 September 2023)
- Whole Life Carbon Assessment Rev.3 (Hoare Lea, 10 October 2023)
- Whole Life Carbon Assessment Spreadsheet

Representations - Members of the Public

15-Mar-24, Harris, Geraldine

15-Mar-24, Kovalskyi, Volodymyr

15-Mar-24, Shollar, Leah-Perl

15-Mar-24, Fox, Nicola

15-Mar-24, Marrache, Jacob
15-Mar-24, Martin Wright, Julia
15-Mar-24, Shelper, Jonathan
15-Mar-24, GURNEY, DAVID
16-Mar-24, Skellon, Katherine
16-Mar-24, Hughes, Tricia
16-Mar-24, Lawson, Robert
16-Mar-24, Odebi, Idris
16-Mar-24, Crew, Steve
16-Mar-24, Arenas Martinez, Ivan
18-Mar-24, W, A
18-Mar-24, Brady, R
19-Mar-24, Varsamis, Dimitri
19-Mar-24, Beloff, Jonathan
19-Mar-24, Garson, Raphael
19-Mar-24, Bonnet, Joel
19-Mar-24, Kimhi, Emmeli
19-Mar-24, Millunchick, Samuel
19-Mar-24, Knott, Wendy
19-Mar-24, Reginald, S
19-Mar-24, Toff, Penelope
19-Mar-24, Green, Michael
19-Mar-24, Orenstein, Joe
19-Mar-24, Ledman, Rebecca
19-Mar-24, Cabrera, Carlos
19-Mar-24, O'Connell, Theresa
19-Mar-24, Van den Bergh, Martin
19-Mar-24, Kendall, Rebecca
19-Mar-24, Altneu, Emily
19-Mar-24, Barnett, Ian
19-Mar-24, Souroujon, Stephanie
19-Mar-24, Stone, Lee
19-Mar-24, Pitts, Jonathan
20-Mar-24, Forbes, Karen
20-Mar-24, Querfurth, Keren
20-Mar-24, Waterman, Dov
20-Mar-24, Lebon, Scott
22-Mar-24, de Vries, Arnold
22-Mar-24, Ehrenzweig, M
22-Mar-24, Silver, Lorraine
25-Mar-24, Stoleran, Professor Ian
25-Mar-24, Nyman, Susan
25-Mar-24, Kramer, Miriam
25-Mar-24, Leon, Jean

25-Mar-24, Ross, Xander
25-Mar-24, WATERMAN, Stanley
26-Mar-24, Seres, David
26-Mar-24, Levene, Peter
26-Mar-24, Montagu, Sarah
26-Mar-24, Bower, Patrick
27-Mar-24, Somekh, Jonathan
27-Mar-24, Graziani, Lia
27-Mar-24, Holland, Sasha
27-Mar-24, Sorani, Ornella
27-Mar-24, Levy, Oliver
27-Mar-24, Lebrecht, Elspeth
27-Mar-24, Setton, Malcolm
27-Mar-24, Ison, Michael
27-Mar-24, lee, corinne
27-Mar-24, Sopher, Rick
27-Mar-24, SUEKE, JOHN
27-Mar-24, Cohen, David
27-Mar-24, Gomes da Costa, Marcus
27-Mar-24, RIESE, GINA
27-Mar-24, Raquel de Almeida, Maria
27-Mar-24, Krygier, Emma
27-Mar-24, Mizrahi, Paulette
27-Mar-24, Levy, Gemma
27-Mar-24, Green, Charlotte
27-Mar-24, Leon, Roger
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27-Mar-24, gubbay, lucien
27-Mar-24, Zelouf, Diana
27-Mar-24, Mocatta, Fiona
27-Mar-24, Dawood, Cindy
27-Mar-24, Marshall, Vivien
27-Mar-24, salem, phili
27-Mar-24, Webber, Michael
27-Mar-24, Fellerman, Naomi
27-Mar-24, Adler, Fiona
27-Mar-24, Salem, Freddy
27-Mar-24, Garcia, Barry
27-Mar-24, Kaplan, Myles
27-Mar-24, Brooke, Jennifer
27-Mar-24, Green, Katherine
27-Mar-24, Morgan, Ronnie
27-Mar-24, Martin, Maurice
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27-Mar-24, Ofer, Lina
27-Mar-24, Mendoza, Alan
27-Mar-24, Zubaida, David
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27-Mar-24, Dwek, Marie-Anne
27-Mar-24, Davidson, David
27-Mar-24, Arwas, Jenny
27-Mar-24, Bekhor, Jack
27-Mar-24, Zinkin, Peter
27-Mar-24, Jacobs, Steven
27-Mar-24, Yentob, Robert
27-Mar-24, Baroness Deech, Ruth
28-Mar-24, Baroukh, Vivien
28-Mar-24, Baroukh, Izzak
28-Mar-24, Hougie, Andrew
28-Mar-24, Donoghue, Denise
28-Mar-24, shamash, david
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28-Mar-24, Gostyn, Antony
28-Mar-24, Caddy, Adam
28-Mar-24, Benzecry, Kitty
28-Mar-24, Alliance, Homa
28-Mar-24, Morgan, Cyril
28-Mar-24, Martin, Nicola
28-Mar-24, Moses, Selina
29-Mar-24, Ish-Horowicz MBE, Judith
29-Mar-24, ORENSTEIN, Sara
29-Mar-24, Salem, Muriel
29-Mar-24, Khalastchi, Tony
29-Mar-24, Martin, Gusti
29-Mar-24, Mocatta, Edward Charles
29-Mar-24, Ansell Brauner, G. E.
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29-Mar-24, Engelbert, Ronald
29-Mar-24, Fenton, Susan
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29-Mar-24, Setton, Raphael
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29-Mar-24, Sopher, Rachel
29-Mar-24, Gold, A
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30-Mar-24, Timan, Ezra

30-Mar-24, Timan, Ruth
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01-Apr-24, KRAMER, STEPHEN
01-Apr-24, Seres, Jennye
01-Apr-24, Cohen, Charles
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02-Apr-24, Sandler, Patricia
02-Apr-24, OBERMAN, ISABEL
02-Apr-24, Morgenthau, Allan
02-Apr-24, Morris, Sarah-Lou
02-Apr-24, Jackson Levy, Caroline
02-Apr-24, Epstein, Thelma
02-Apr-24, Banks, Adrienne
02-Apr-24, Kemp, Malcolm
02-Apr-24, Obadiah, Sophie
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02-Apr-24, Seruya, Donna
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02-Apr-24, Jacobs, Steven
03-Apr-24, Black, Robert
03-Apr-24, Samson, Alan
03-Apr-24, Mount, Amanda
03-Apr-24, Solomons, Lesley
03-Apr-24, Taylor, Nick
03-Apr-24, Alexander, Victoria
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03-Apr-24, Sanders, Anna
03-Apr-24, Sebag-Montefiore, Victoria
03-Apr-24, Elfassi, Angie
03-Apr-24, Cohen, Michael
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03-Apr-24, Taylor, Diane
04-Apr-24, Spencer, Antony
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04-Apr-24, Easey, Reuben
04-Apr-24, Zarach, Stephanie
05-Apr-24, Ainslie, John
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07-Apr-24, Kay, Deborah
07-Apr-24, Sawdaye, Michael

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07-Apr-24, Leifer, Janet
07-Apr-24, Morris, Joshua
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07-Apr-24, Singer, T.
07-Apr-24, Kissin, Ellesheva
07-Apr-24, Rebak, Sandra
07-Apr-24, Cohen, Jaime
07-Apr-24, Ezra, Nicola
07-Apr-24, Assor, Marc
07-Apr-24, Jacob, Deni
07-Apr-24, Gartner, Moira
07-Apr-24, Davidson, Pamela
07-Apr-24, Cowan, Natasha
07-Apr-24, Fish, Adam
07-Apr-24, Wick, Sandra
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08-Apr-24, Yanovich, Leonid
08-Apr-24, Blake, Nena
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08-Apr-24, Marks MBE, Ella
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08-Apr-24, Tresman, Janet
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08-Apr-24, Sasto, Daniel
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08-Apr-24, Lorie, Miriam
08-Apr-24, Marks-Bluth, Jonathon
08-Apr-24, Abrahams, Carole
08-Apr-24, Levy, Mark
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09-Apr-24, Goldenberg, Philip
09-Apr-24, Grubin, Helen
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09-Apr-24, Dinkin, Raymond
09-Apr-24, Jay-Brown, Chelsey
09-Apr-24, Levy, Neville
09-Apr-24, Shaw, Barry
09-Apr-24, Jay, Alison
09-Apr-24, Green, A.
09-Apr-24, Martin, Howard
09-Apr-24, Flaxington, Frances
09-Apr-24, Wheatley, Mark
09-Apr-24, kwasnik, sefton
09-Apr-24, Patchick, Jonathan
09-Apr-24, Avisror, Elaine
09-Apr-24, Del Monte, Richard
09-Apr-24, Warden, Angela
09-Apr-24, Hall, Rachel
09-Apr-24, Weichselbaum, Aaron
09-Apr-24, Collins, Genene
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09-Apr-24, Sackman, Paloma
09-Apr-24, Martin, William
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10-Apr-24, S, Adam
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10-Apr-24, Isaacs, Edward
10-Apr-24, Grunwald OBE KC, Henry
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10-Apr-24, Northcote, Jane
10-Apr-24, Szasz, Michael
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10-Apr-24, Persky, Sarah

11-Apr-24, Motz, Timothy
11-Apr-24, Saady, Stephen
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11-Apr-24, Shenkin, Lawrence
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12-Apr-24, Charles, Michelle
12-Apr-24, Chapman, Ariel
12-Apr-24, Ellis, Edward
12-Apr-24, djanogly, david
12-Apr-24, Latter, Carole
12-Apr-24, Hayim, Alex
12-Apr-24, Abrahams, Bianca
12-Apr-24, Morgan, Leslie
12-Apr-24, Ballen, Russell
12-Apr-24, Brodie, Philip
12-Apr-24, Black, Aaron
12-Apr-24, Hayim, Caroline
12-Apr-24, Brett, Richard
12-Apr-24, Zagoria-Moffet, Mikayla
12-Apr-24, Querfurth, N
12-Apr-24, Posnansky, Rachel
12-Apr-24, Monk, Gregory
13-Apr-24, Leigh, David
13-Apr-24, Lethbridge, Lucy
13-Apr-24, Strauss, Jimmy
13-Apr-24, Pinto, Andrew
13-Apr-24, Musikant, Kris
14-Apr-24, Albert, Simon
14-Apr-24, Pervez, Imran
14-Apr-24, Musikant, Barry
15-Apr-24, Peery, Alan
15-Apr-24, Ramos, Rosa
15-Apr-24, Yudkin, Michael
16-Apr-24, boujo, edward
16-Apr-24, Chernoff, Barry
16-Apr-24, Goulding, Niall
16-Apr-24, Simons, Josephine
16-Apr-24, dhaliwal, Mandeep
16-Apr-24, Pemberton, Nichola
16-Apr-24, Albert, Brian
16-Apr-24, Morton, Catherine

16-Apr-24, Sneader, Charlie
16-Apr-24, Kelvin, Philip
16-Apr-24, Peterman, David
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16-Apr-24, Morris, Malka
16-Apr-24, Somekh, Ronald
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16-Apr-24, Benjamin, Janice
16-Apr-24, de Sola Mendes, Eliza
16-Apr-24, Warren, Martin
16-Apr-24, Skellon, Katherine
16-Apr-24, Geismar, Robert
16-Apr-24, roth, brian
16-Apr-24, Kreindler, Simon
16-Apr-24, Silver, Lorraine
16-Apr-24, Frojmovic, Eva
16-Apr-24, Zeilinger, Tony
16-Apr-24, Kandel, Susan
16-Apr-24, Jackson, Daniel
16-Apr-24, Haynes, Michelle
16-Apr-24, Getto, Melanie
16-Apr-24, Montagu, Isaac
16-Apr-24, Berk, Louis
16-Apr-24, Lovric, Michelle
16-Apr-24, Mizrahi, Paulette
16-Apr-24, Poll, Michael
16-Apr-24, Boyar, Michael
16-Apr-24, Sherwood MBE, Peggy
16-Apr-24, Zubaida, David
16-Apr-24, Porter, Deborah
16-Apr-24, Levene, Wendy
17-Apr-24, Walker, Anne
17-Apr-24, Phillips, gary
17-Apr-24, Goldberg, Mira
17-Apr-24, Oakley, Melanie
17-Apr-24, Halban, Peter
17-Apr-24, Berger, Doreen
17-Apr-24, ALPERT, MICHAEL
17-Apr-24, Shaw, Carole
17-Apr-24, Har-Zion, Shay
17-Apr-24, Urazovskaya, Liana
17-Apr-24, Costa, E
17-Apr-24, Steinberg, Jonathan

17-Apr-24, Jarolimkova, Vita
17-Apr-24, bright, georgina
17-Apr-24, Brower, Danny
17-Apr-24, Levi, Ron
17-Apr-24, Rubens, Angela
17-Apr-24, Perdomo, Pedro
17-Apr-24, Crollick, Avril
17-Apr-24, Ghnassia, Oliver
18-Apr-24, Sanford, Clive
18-Apr-24, singer, laurence
18-Apr-24, Abell, Grace
18-Apr-24, Jackson, Judith
18-Apr-24, Jackson, Michael
19-Apr-24, Finkel, Mazaltob Ruth
19-Apr-24, Sneader, Alex
19-Apr-24, Richards, David
19-Apr-24, Skinazi, Karen E.
19-Apr-24, Green, Abigail
19-Apr-24, Bennett, Michael
19-Apr-24, Copitch, Cyril
19-Apr-24, Richards, Mark
19-Apr-24, Blume, Dame Hilary
19-Apr-24, LEVY, JOHN
19-Apr-24, Eshel, Rosemary
19-Apr-24, King, Albert
19-Apr-24, Joory, Joy
19-Apr-24, TREUHERZ i, Francis
19-Apr-24, Gold, Jeffrey and Bonita
19-Apr-24, Brooks Evans, Michelle
19-Apr-24, Gomes da Costa, Diana
20-Apr-24, Page, Anne
20-Apr-24, Carver, Shirlee
21-Apr-24, Smilg, Jeremy
21-Apr-24, Stein, Janis
21-Apr-24, Stewart, Rosalind
21-Apr-24, Coelho, Jane
21-Apr-24, Franks, Joanna
21-Apr-24, Ronish, Yarema
22-Apr-24, Franks, Joanna
22-Apr-24, Grubin, Donald
22-Apr-24, Pilo, Jacquelynne
22-Apr-24, Black, Pat
22-Apr-24, GARCIA, Nicola
22-Apr-24, Courtney, Yvonne

23-Apr-24, Sale, Anabel Unity
23-Apr-24, Harris, John
23-Apr-24, Burstin, Stephen
23-Apr-24, Othen, Gillian M
23-Apr-24, Rees, Alison
23-Apr-24, Coleman, Brian
23-Apr-24, Carson, Steven
23-Apr-24, Denham, J
24-Apr-24, Jeffrey, Robin
24-Apr-24, jackson, claire
24-Apr-24, Mann, Alan
24-Apr-24, Baharier, Linda
24-Apr-24, Topper, Amelia
24-Apr-24, Schonfield, Amos
24-Apr-24, Burstin, Stephen
24-Apr-24, Solomons, Jonathan
24-Apr-24, Shupak, Harold
24-Apr-24, Dobson, Owen
24-Apr-24, Fox, Vicki
24-Apr-24, Moreland, Lee S
24-Apr-24, Simon, Barbara
24-Apr-24, Ward, Kevin

24-Apr-24, Comaroff, John
24-Apr-24, Rubens, Fiona
24-Apr-24, Rubin, Miri
24-Apr-24, Schmool, Marlana
24-Apr-24, Inglesant, Philip
24-Apr-24, PNatali,
24-Apr-24, Gulland, Yvette
24-Apr-24, Simmons, David
24-Apr-24, Matthews, Stephen
24-Apr-24, Walden, Kiri
24-Apr-24, Sawyer, Jenny
25-Apr-24, Levine, Stuart
25-Apr-24, de Pass, Jonathan
25-Apr-24, Sneader, Graham
25-Apr-24, Lawrence, Nigel
26-Apr-24, Baskin, Usevalad
26-Apr-24, Morganstein, Stuart
26-Apr-24, Gauthier, Charlotte
26-Apr-24, Ward, James
26-Apr-24, Sondack, Julia
26-Apr-24, Naar, John

26-Apr-24, Schonfield, Jeremy
26-Apr-24, Ridler, Katharine
26-Apr-24, Dingle, Barbara
26-Apr-24, Amado, Jozef Ercevik
26-Apr-24, Waller, Suzanne
26-Apr-24, Lewis, Rebecca
26-Apr-24, Bernstein, Antony
27-Apr-24, Kindelan, Adam
28-Apr-24, Richards, Paul
28-Apr-24, Richards, Guy
28-Apr-24, Shamash, Sue
28-Apr-24, Petretti, Richard
29-Apr-24, Stock, Lisanne
29-Apr-24, Langner, Lola
29-Apr-24, Eskenzi, Yvonne
29-Apr-24, Gritzman, Jeffrey
29-Apr-24, Dreyfuss, John
29-Apr-24, Edwards, Matthew
29-Apr-24, Vock, Ido
29-Apr-24, Flaxington, Frances & Lee
29-Apr-24, Lawrence, Beverley
29-Apr-24, Gayer, Stephen
29-Apr-24, Hart, Ruth
29-Apr-24, Owen, Denise
29-Apr-24, Kalinowska, Jo
29-Apr-24, Nowill, Rob
29-Apr-24, Darley, Gillian
29-Apr-24, Symonds, V
29-Apr-24, Verbick, Jade
29-Apr-24, Craig Cohen, Leonora
30-Apr-24, Roumani, Judith
30-Apr-24, Lampert, Dorothy
30-Apr-24, Kateb, Fuad
30-Apr-24, Bloom, Alastair
30-Apr-24, sitch, peter
30-Apr-24, Tamman, Jessica
30-Apr-24, Shaw, David
30-Apr-24, Fyne BA FRSA Solicitor (Non Practising), Daniel
01-May-24, Brett, Edward
01-May-24, Mainz, Andrew
01-May-24, Tarlton, Calvin
01-May-24, Farrell, Tommy
01-May-24, Dean, Gemma
01-May-24, Feldman, Alex

01-May-24, Cory, Graham
01-May-24, Gorman, Suzanne
01-May-24, Baccus, Aslam
01-May-24, Hillman, Michael
01-May-24, Sames, Dan
01-May-24, Sapphire Employability,
01-May-24, Castle, Lauren
01-May-24, Webster, Oliver
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01-May-24, Chadwick, Nicola
01-May-24, Parsons, Kathleen
01-May-24, Scott, Adam
01-May-24, Morley, Phillip
01-May-24, Franco, Mario
01-May-24, Jackson, Alexandra
01-May-24, Robinson, Tommy
01-May-24, Jackson, Paul
01-May-24, Shaw, David
01-May-24, Rabinowitz, Monica
01-May-24, Denham, Alison
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02-May-24, Chissick, Michael
02-May-24, Midda MBE, Lorraine
02-May-24, Hollick, Jeanette
02-May-24, Goldstein, Andrew
02-May-24, Samsworth, Jane
02-May-24, Stock, Caroline
02-May-24, Heitlinger, Philip
02-May-24, Hammond, Joan
02-May-24, Crowne, Tilla
02-May-24, Krol, Alan
02-May-24, Grossman, Deena
02-May-24, Graham, David
02-May-24, Clarkson, Paul
02-May-24, Firth, Tanya
02-May-24, Braithwaite, Nick
02-May-24, Wertheim, David
02-May-24, Dorey, Helen
02-May-24, homewood, alison
02-May-24, Webb, Julia
02-May-24, Banatvala, Fiona
02-May-24, Hephher, Roger
02-May-24, Horowitz, Michael
02-May-24, Wakeman, Lindsay

02-May-24, Dunkley, Sam
02-May-24, Montlake, Martha-Anne
02-May-24, Glaessner, Verina
02-May-24, Julius, Corinne
02-May-24, Glaessner, Verina
02-May-24, Hunt, R. G.
02-May-24, Scott, Paul
02-May-24, Penny, Susan
02-May-24, Cannell, Dave
02-May-24, Morris, Shelagh
02-May-24, Venner, Peter
02-May-24, Ramsay, Steve
02-May-24, Kustow, R Alexandra
02-May-24, Lilley, Rebecca
02-May-24, Plummeridge, Joy
02-May-24, Hibbert, Neil
02-May-24, Miller, Jonathon
02-May-24, Howe, Andrew
02-May-24, Ellis, Peter
03-May-24, Salter, Amy
03-May-24, Beard, David
03-May-24, Corrin, Christopher
03-May-24, Hardisty, Michael
03-May-24, Pike, Graham
03-May-24, Bilbul, Jonathan
03-May-24, Shintag, Rachelle
03-May-24, Gubbay, Judith
03-May-24, Schluter, Angela
03-May-24, Owens, M
03-May-24, Thompson, Alan
03-May-24, Baskerville, Patricia
03-May-24, ISRAEL, ANTHONY
03-May-24, Tyson, Diana
03-May-24, Garnham, Lucy
03-May-24, Stallwood, W
03-May-24, Saunders, Joanne
03-May-24, Mocatta, Michael
03-May-24, Balkin, Brian
04-May-24, Amar, Janine
04-May-24, Liverseidge, Janice
04-May-24, Lawrence, P
04-May-24, Childerstone, Meredith
04-May-24, Moses, Selina
04-May-24, Rothschild, Louise

04-May-24, Kal-Weiss, Holly
04-May-24, Carp, Debbie
04-May-24, Walker, Caroline
04-May-24, Goldman, Jeffrey
04-May-24, Beenstock, Sian
05-May-24, Whaley, karen
05-May-24, Caller, Niki
05-May-24, Tolley, Tamara
05-May-24, Silverstone, Fay
05-May-24, Gilbert, Dina
05-May-24, Kuhn, Michael
05-May-24, Symons, Geraldine
05-May-24, Gafsen, Susan
05-May-24, Goodman, Judi
05-May-24, Stone, Lee
05-May-24, Newman-Crane, Sue
05-May-24, Sinclair-Horne, Annabel
05-May-24, Rahamim, Simon
05-May-24, LEHMANN, Laura
05-May-24, Bekhor, Alan
05-May-24, Pick Crystal, Suzana
05-May-24, Daniel, Edward
05-May-24, Harris, Joy
05-May-24, Rose, Helena
05-May-24, Angus, Bernard and Ruth
05-May-24, Stagni, Silvano
05-May-24, Brice, Katherine
05-May-24, Son, Michael
05-May-24, Hilsenrath, Alex
06-May-24, Baharier, Michelle
06-May-24, Levy, Raymond
06-May-24, Levy, Raymond
06-May-24, Ereira, Angela
06-May-24, Leigh-Wood, Oliver
06-May-24, Shapiro, Adam
06-May-24, Martin, Frank
06-May-24, Richardson, Joanna
06-May-24, Billinghamurst, Keith
06-May-24, Evans, Chris
06-May-24, Gower, Judith
06-May-24, Steinberg, Susan
06-May-24, Kessler, Charles
06-May-24, Hephher, Margaret
06-May-24, Shear, Hugh

06-May-24, Edwards, Jennifer
06-May-24, MacNeil, Chris
06-May-24, Kindelan, Adam
06-May-24, Silver, Rachelle
07-May-24, Scott, Marion
07-May-24, Hudson, Lee D
07-May-24, Riella, Samantha
07-May-24, Riella, Samantha
07-May-24, Furness, Sara
07-May-24, McGurran, Deborah
07-May-24, Walker, Marcus
07-May-24, Simpson, Karla
07-May-24, Eisner, Philippe
07-May-24, Waterman, Dawn
07-May-24, Montgomery, Ruth
07-May-24, Hogan, Margaret
07-May-24, Isaacs, L
07-May-24, Johnson, Donna
07-May-24, Bankover, Michael
07-May-24, Roston, Natasha
07-May-24, Sacks, Rachel
07-May-24, Renton, D
07-May-24, Segall, Edwin
07-May-24, Wright, carin
07-May-24, Hakkak, Meir
08-May-24, Smith, Lynda
08-May-24, Stein, S
08-May-24, Davey, Cathy
08-May-24, SMITH, Maurice
08-May-24, Silverstein, Raymond
08-May-24, Sassoon, Janette
08-May-24, Ronish, Yarema
08-May-24, Morris, Howard
08-May-24, Cusack, Andrew
08-May-24, Acres, Tom
08-May-24, Album, Edward
08-May-24, Ben Garcia, Jonathan
08-May-24, Torry, The Rev'd Dr Malcolm
08-May-24, Jacobs, Everett M
08-May-24, Sodes, The Countess
08-May-24, Coghill, Andrew
08-May-24, Azagury, A E
08-May-24, LL, A
08-May-24, Jones, Roslyn

08-May-24, Bijl - Meijer, Anna
09-May-24, Austen, Michal
09-May-24, Faulds, Susan
09-May-24, palache, ralph
09-May-24, Nicholas, Ronny
09-May-24, Lecutier, Louise
09-May-24, Sorotzkin, Duche
09-May-24, Gau, Justin
09-May-24, Hardy, Patrick
09-May-24, Brooks, Iolo
09-May-24, Harrison, Sarah
09-May-24, Marks, Jackie
09-May-24, Bye, Georgina
09-May-24, Stapleton, Mariella
09-May-24, Stapleton, Laura
09-May-24, Devine, Kathryn
09-May-24, Purcell, Mark
09-May-24, LAX, JACOB
09-May-24, Binke, Adrian
09-May-24, Artoon, Sydney
09-May-24, Jacobs, Tony
09-May-24, Joseph, Natalie
09-May-24, Franz, Benjamin
09-May-24, Morales, Eva
09-May-24, Collins, Lauren
09-May-24, Kaiser-Chen, Aaron
09-May-24, Summers, Dominic
09-May-24, Ani, Alex
09-May-24, Shenton, Caroline
09-May-24, Doherty, Helen
09-May-24, de Solla, Wendy
09-May-24, Ansell, Charlotte
09-May-24, Mocatta, David
09-May-24, Terpilowski, Sue
09-May-24, Ruff, Chris
09-May-24, black, keith
09-May-24, Nathan, Gia
09-May-24, Hassan, Alexandra
09-May-24, Greenberg, Susan
09-May-24, Max, Jonathan
09-May-24, Fawcett, Robin
09-May-24, Marsh, Alan
09-May-24, Lawrence, Harvey
09-May-24, Scott, Lisa

09-May-24, Davila, Patricia
09-May-24, Rose, Adam
09-May-24, Simon, Rashi
09-May-24, Lent, Paula
09-May-24, Vos, Benjamin
09-May-24, Fraser, Lola
09-May-24, Leffman, ADELE
09-May-24, Samuel, Jonathan
09-May-24, SOLOWAY, stuart
09-May-24, Pell Scholes, Daisy
09-May-24, Duke, Marc
09-May-24, Bendahan, Yael
09-May-24, Pell Scholes, Barney
09-May-24, Abboudi, Maurice
09-May-24, Wiesenbergl, Mindy
10-May-24, Lee, Marilyn
10-May-24, Winston, Anthony
10-May-24, Hasenson, Phillippa
10-May-24, Williamson, Donald
10-May-24, Weiss, Annie
10-May-24, Brown, Jeremy
10-May-24, Lerner, David
10-May-24, Dwek, David
10-May-24, Marks, Michael
10-May-24, Wilson, Mark
10-May-24, Loftus, Richard
10-May-24, Ta, David
10-May-24, Holt, Jason
10-May-24, Lester, Jonathan
10-May-24, Stubbs, Ian
10-May-24, Loftus, Nicola
10-May-24, stephenson, judy
10-May-24, Mellman, Susan
10-May-24, Lerner, Ashley
10-May-24, Ognall, Geoffrey
10-May-24, Nono, Paola
10-May-24, Graff, Michelle
10-May-24, Shaanan-Eisen, Naomi
10-May-24, Freedman, James
10-May-24, LEVY, DANIEL
10-May-24, Wober, Jonathan
10-May-24, Lerner, Marc
10-May-24, Davis, Angela
10-May-24, Pereira-Mendoza, Marc

10-May-24, Swart, Ben
10-May-24, Cotte, Severine
10-May-24, Stamler, Darcy
10-May-24, Steinman, Sharon
10-May-24, Morrison, John
10-May-24, Prever, Danny
10-May-24, Owen, Matthew
10-May-24, Bridge, Mark
10-May-24, Steven, Elizabeth
10-May-24, Hassan, Isaac Samuel
10-May-24, Shakhani, Ronit
10-May-24, Elias, Aviva
10-May-24, Rich, Miriam
10-May-24, Curry, Nicholas
10-May-24, Stern, Adrian
10-May-24, Green, Edwin
10-May-24, Kay, Michelle
10-May-24, Cummins, Mark
10-May-24, Canfield, Teresa
10-May-24, Welsh, Stephen
10-May-24, Bridge, Jenepher
10-May-24, Braham, Samuel
10-May-24, Cummins, Mark
10-May-24, Smith, Fiona
10-May-24, Martins Dos Santos, Jonatan Ismael
10-May-24, Bollins, Patricia
10-May-24, Gurevitz, Shirley
10-May-24, Gregor, Neil
10-May-24, Zenios, Jonathan
10-May-24, musgrove, theresa
10-May-24, Pitcher, John
10-May-24, Blackman, Bob
10-May-24, Edwards, Kerry
10-May-24, Todd, Edward
10-May-24, Cohen, JK
10-May-24, Charig, Nigel
10-May-24, Parker, Marsha
10-May-24, Dalton, Karen
10-May-24, Chambers, Mark
10-May-24, Field, Frances
10-May-24, Rackovsky, Ariel
10-May-24, Flory, Oliver
11-May-24, Berno, G
11-May-24, Daniels, Jon

11-May-24, de Jong, Benjamin
11-May-24, Bailey, Jane
11-May-24, Short, Geoff
11-May-24, Graham, Jody
11-May-24, Webster, Martin
11-May-24, Jessop, Manuella
11-May-24, Roberts, Daniel
11-May-24, Kirk, Helen
11-May-24, Olesker, David
11-May-24, Weiner, Julia
12-May-24, Stone, Marion
12-May-24, Firestone, Noreen
12-May-24, Hawk, White
12-May-24, Newman, Jeremy
12-May-24, Cramer BEM, Dalia
12-May-24, Silver, Justin
12-May-24, Lewinsohn, Ronald
12-May-24, Phillips, Adrienne
12-May-24, Musson, Jeremy
12-May-24, Joseph, Michael
12-May-24, Tilley, Joe
12-May-24, Sogbodjor, Harriet
12-May-24, Treatman, Aharona
12-May-24, Ambrose, Jonathan
12-May-24, Maynard, Esther
12-May-24, Ambrose, Jonathan
12-May-24, Roberts, Maralyn
12-May-24, Lovat, Laurence
12-May-24, Boonin, Dov
12-May-24, Wimborne, Zoe
12-May-24, Altman, Colin
12-May-24, Wurtzel, David
12-May-24, Howe, Anthony
12-May-24, Stone, Jeremy
12-May-24, Mcclements, Neil
12-May-24, Gold, Jonathan
12-May-24, Gottschalk, Sylvia
13-May-24, Rodrigues Balbuena, Monique
13-May-24, Jebreel, Elliot
13-May-24, Roberts, Guy
13-May-24, Sayliss, Adrian C
13-May-24, Gibbons, Stuart
13-May-24, Dreyfuss, John
13-May-24, Isaacs, Tina

13-May-24, Eskenzi, Eileen
13-May-24, Haagman, Francine
13-May-24, Blake, Michael
13-May-24, Milne-Day, Mary
13-May-24, Preston, Jane
13-May-24, Newman, Martin
13-May-24, Simon, Michael
13-May-24, Amado, Can
13-May-24, Mann, John
13-May-24, Filer, Paul
13-May-24, BenTzvi, B
13-May-24, Rafaeli, Barbara
13-May-24, Dunbar, William
13-May-24, Teeger, Edward
13-May-24, Agustin, Laura
13-May-24, Lazarus, John
13-May-24, Drain, John
13-May-24, Crowne, Ben
13-May-24, Lipton, Zachary
13-May-24, Castle, Lauren
13-May-24, hajioff, michele
13-May-24, Wiazel, Michal
13-May-24, Benjamin, Jon
13-May-24, Pereira-Mendoza, L
13-May-24, Knight, Marie-Anne
13-May-24, Englender, Daniel
13-May-24, Bogod, Howard
13-May-24, Robinson, Brian
13-May-24, Hale, Alastair
13-May-24, Barker, Neil
13-May-24, Nacamuli, Alec
13-May-24, Goldschmidt, Robert
13-May-24, Black, Michael
13-May-24, Hughes, Stephen
13-May-24, Jacobson, David
13-May-24, Furnell, Alison
13-May-24, Herskovits, Georgie
13-May-24, Davila y Verdin, Juan
13-May-24, Maleh, Maurice
13-May-24, Davis, Rina
13-May-24, silverbeck-setti, sima
13-May-24, Livingstone, Elly
13-May-24, Glickman, Lucy
13-May-24, helfgott, maurice

13-May-24, Glantz, Nikki
13-May-24, Preter, Daniel
13-May-24, El Baz, Freya
13-May-24, Simmons, Dame Melinda
13-May-24, Bloom, Hannah
13-May-24, Glantz, Jacob
13-May-24, Shock, Katherine
13-May-24, Proner, Barry
13-May-24, BERNSTEIN, Shira
13-May-24, Molvidsson, Kay
13-May-24, El baz, Shu
13-May-24, Sixou, Linda
13-May-24, Benhamou, Tristan
13-May-24, Weiner, Howie
13-May-24, Robinson, Jessica
13-May-24, Wrightman, L
13-May-24, Roberts, James
13-May-24, Lopez-Salzedo, Shelley
13-May-24, Yardley, Tracey
13-May-24, Kuttner, Stuart
13-May-24, Mortiaux, Vanessa
13-May-24, Korczyn, Iris
13-May-24, Mana-Stein, Galit
13-May-24, Fishman, Rebecca
13-May-24, Howard, Laura
13-May-24, Fishman, Oliver
13-May-24, Ledermann, Dan
13-May-24, Krigman, Eliza
13-May-24, Szotten, Ruth
13-May-24, Hall, Sasha
13-May-24, Andreacchi, Gracy
13-May-24, Sgnaolin, Yoav
13-May-24, Abramowitz, David
13-May-24, Cohen, Eran
13-May-24, Tanaman, Ruth
13-May-24, Preter, Elizabeth
13-May-24, Zweig, Michal
13-May-24, Lanceman, Stuart
13-May-24, Lanceman, Stuart
13-May-24, Katz, Sara
13-May-24, Smouha, Lucy
13-May-24, Benson, Stella
13-May-24, Howard, Angela
13-May-24, May, Kathryn

13-May-24, Schonfield, Tamar
13-May-24, Cohen, Sarah
13-May-24, May, Spencer
13-May-24, Barnett, Celia
13-May-24, Joffe, Debbie
13-May-24, Rose, Kalina
13-May-24, Speyer, Lawrence
13-May-24, Wacks, Jude
14-May-24, Green, Miriam
14-May-24, Ruback, Greg
14-May-24, Reynolds, Marie
14-May-24, Appel, Cheryl
14-May-24, Strum, Daniel
14-May-24, Bloomfield, Louise
14-May-24, Seplowitz, Harry
14-May-24, Katz, Joanna
14-May-24, Appleson, Karen
14-May-24, Pearson, Taryn
14-May-24, Carr, Kim
14-May-24, Lobel, Vered
14-May-24, Msika, Emmanuelle
14-May-24, Ellis, Linda
14-May-24, Kaye, Lesley
14-May-24, Levene, Sara
14-May-24, Cohen, Ellen
14-May-24, Sacks, Deborah
14-May-24, Tanaman, Baruch
14-May-24, Brown, Joshua
14-May-24, Hougie, Jacob
14-May-24, Kliman, Sonia
14-May-24, Wolfe, Laura
14-May-24, Stone, Judith
14-May-24, Barnett, Robert
14-May-24, Hilton, Michael
14-May-24, Aslet, William
14-May-24, Swaythling, Alistair
14-May-24, Hyman, Neil
14-May-24, Gold, Jessica
14-May-24, Obadia, Anne
14-May-24, Levi, Albert
14-May-24, Scott- Norman, Anthony
14-May-24, Miller, Abigail
14-May-24, Walden, Sam
14-May-24, Bowers, Liz

14-May-24, Evans, Judy
14-May-24, Green, Renee
14-May-24, Zender, Mrs
14-May-24, Sisso Raz, Alicia
14-May-24, Tragen, Dawn
14-May-24, Lopes Dias, Alexander
14-May-24, ADAMS, CHARLES
14-May-24, Bowles, Lauren
14-May-24, Selwyn, Rebecca
14-May-24, Israel, Marcel
14-May-24, Bronzite, Ruth
14-May-24, Korn, Daniela
14-May-24, Rabson, Jonathan
14-May-24, Ferera, Leon
14-May-24, Westman, Julia
14-May-24, Press, Dan
14-May-24, Magnus, Alfred
14-May-24, Baum, Dennis
14-May-24, Soccio, Caroline
14-May-24, Goffe, Jude
14-May-24, Musikant, Adam
14-May-24, Sikking, Mary
14-May-24, Foreman, Bridget
14-May-24, Halon, Sally
14-May-24, Copisarow, Katharine
14-May-24, Lee, Lealiza
14-May-24, Ridgeway, Pauline Golda
14-May-24, Lurie, Kate
14-May-24, Hills, Christine
14-May-24, Shapiro, Melissa
14-May-24, Seymour, Ulla-Britt
14-May-24, Isaacs, Jonathan
14-May-24, Bekhor, Joseph
14-May-24, Goldstein, Michael
14-May-24, Sacerdoti, Daniel
14-May-24, Braude, Sheila
14-May-24, Marx, Jeanette
14-May-24, levinson, sharon
14-May-24, Hood, Sharon
14-May-24, Peters, Kathy
14-May-24, Brenner, Don
14-May-24, Goodenough, Sharon
14-May-24, Peever, Silvana
14-May-24, Borr, Barry

14-May-24, Young, Diana
14-May-24, Israel, Ruth
14-May-24, Orgel, Esti
14-May-24, Raingold, Jo
14-May-24, Marks, Joshua
14-May-24, Collovini, Chiara
14-May-24, Brand, Vadim
14-May-24, Goldstein, Ralph
14-May-24, Rothband, Nicole
14-May-24, Levenson, Yoel
14-May-24, Keats, Michael
14-May-24, Austen, Amanda
14-May-24, Videtzky, Joanne
14-May-24, Krom, Jodie
14-May-24, Landau, Rachel
14-May-24, Gouldman, Judith
14-May-24, Iarchy, Marc
14-May-24, Leventhal, Michael
14-May-24, Gold, Paul
14-May-24, Okrent, Sara
14-May-24, Gold, Isabel
14-May-24, Rubin, Suzanne
14-May-24, Gold, Elijah
14-May-24, Cousin, Yocheved
14-May-24, Segal, Richard
14-May-24, Shenker, Stephen
14-May-24, Pearl, Jennifer
14-May-24, Barkan, Limor
14-May-24, Stevens, Rich
14-May-24, Weiss, Maxime
14-May-24, Lavi, Roslyn
14-May-24, Ross, Reva
14-May-24, Wilks, Anne
14-May-24, GLATMAN, Zara Ruth
14-May-24, Israel, Adrien
14-May-24, Sher, Nicky
15-May-24, Kaufman, Martin
15-May-24, Marcus, Lucy
15-May-24, Mendleson, Elizabeth
15-May-24, Bedarida, Gabriella
15-May-24, Chalibamba, Michelle
15-May-24, Madeira Filipe, Andre
15-May-24, Klein, Mark
15-May-24, Piper, Esther

15-May-24, Cohen, Amalya
15-May-24, Cohen, Judith
15-May-24, Baer, Michael
15-May-24, Valencia, Esther
15-May-24, Vogel, Michele
15-May-24, Wilton-Morgan, Taylor
15-May-24, Levy KC, Robert
15-May-24, Flower, Isabelle
15-May-24, Palmer, Joel
15-May-24, Mourtzilias, Georgios Michail
15-May-24, Jackson, Michael
15-May-24, Erginsoy, Ali
15-May-24, Jackson, Judith
15-May-24, Julius, Lyn
15-May-24, Sneader, Philippa
15-May-24, Swade, Shelley
15-May-24, Hakim, Robert
15-May-24, Pinch, Sarah
15-May-24, Pereira-Mendoza, Marc
15-May-24, Dias, Daniel
15-May-24, Saleh, Ruth
15-May-24, Kay, Gideon
15-May-24, Rowland-Hill, Michael
15-May-24, Margetson, Zanine
15-May-24, Macmull, Ira
15-May-24, Dias, Lorraine
15-May-24, Martins Dos Santos, Jonatan Ismael
15-May-24, Kotlowski kinsley, sharna
15-May-24, SICSIC, Laurent
15-May-24, Silver, Jason
15-May-24, Nunes, David
15-May-24, Webber, Jonathan
15-May-24, Ozer, Ketty
15-May-24, Abulafia CBE FBA, Prof David
15-May-24, Jonas, Daniel
15-May-24, Garcia, Robyn
15-May-24, Goldin, Jon
15-May-24, Elia, Israel
15-May-24, Gee, L
15-May-24, birnbaum, Laura
15-May-24, da Mota, Leandro
15-May-24, Ozer, David
15-May-24, Chazan, Marcos
15-May-24, Marks, Simon

15-May-24, Dawood, Cindy
15-May-24, Salem, Mark
15-May-24, Sinyor, Pamela
15-May-24, Lebrecht, Elbie
15-May-24, Benaim, David
15-May-24, Shapiro, Caroline
15-May-24, Sieff, Alison
15-May-24, Masri, Danny
15-May-24, Rahamim, Marina
15-May-24, L, Matthew
15-May-24, Stoleran, Suad
15-May-24, Ashton, Martin
15-May-24, Perez, Lorna
15-May-24, Ibgui, Simon
15-May-24, Kopaloff, Stephen
15-May-24, Rahamim, Joseph
15-May-24, Eliasov, Dean
15-May-24, Mesrie, Elizabeth
15-May-24, Cohen, Samantha
15-May-24, Twena, Diane
15-May-24, Goodkind, Karen
15-May-24, gilbey, georgia
15-May-24, sueke, john
15-May-24, Kenley, Holly
15-May-24, Sabbah Bensimon, Raymond
15-May-24, ANI, MICHAEL
15-May-24, Sabbah Bensimon, Raymond
15-May-24, Rahamim, Vivian
15-May-24, Aaron, Scott
15-May-24, Sasson, Laura
15-May-24, Delvalle, Arthur
15-May-24, Kos-Est, Alessia
15-May-24, Foundation For, Jewish Heritage
15-May-24, Nunes Vaz, Joyce
15-May-24, Dawood, Richard
15-May-24, Schimmel, Noam
15-May-24, Turner, Joanne
15-May-24, Fhima, Simon
15-May-24, Sopher, Edward
15-May-24, Dacosta, Bernice
15-May-24, Cowen, Anne
15-May-24, adler, sarah
15-May-24, Hornstein, Rodney
15-May-24, Newman, Amanda

15-May-24, Golanski, Karen
15-May-24, Hurst, Ann Stephanie
15-May-24, Rejwan, Salman
15-May-24, JNatali, JNatali
15-May-24, Turner, Jacob
15-May-24, Speigel, Maureen
15-May-24, Attan, Mark
15-May-24, Dias, Max
15-May-24, Maya, Gaston
15-May-24, Ward, Joanna
15-May-24, Gilmont, Jason
15-May-24, Garcia, Philip
15-May-24, Sabbah, Nethali
15-May-24, Gleen, Carmen
15-May-24, Dale, Priscilla
15-May-24, Wood, Abigail
15-May-24, Smouha, Derrick
15-May-24, Silver, Rachael
15-May-24, Bard, Julia
15-May-24, Rubie, Michael
15-May-24, Wake-Walker, Richard
15-May-24, Rubie, Michael
15-May-24, Goldstein, Adele
15-May-24, Bowman, Andrew
15-May-24, Phillips, Keith
15-May-24, Grossman, Seth
15-May-24, Moss, Martin
15-May-24, Castiel, Gilah
15-May-24, Ettinghausen, Daniel
15-May-24, shaoul, doreen
15-May-24, Wassermann, Charlotte
15-May-24, Keiner, Judy (Celia Judith)
15-May-24, Wan, Elizabeth
15-May-24, Guivarch, Johanna
15-May-24, ZEHAVI, Leora
15-May-24, Ashton, Paul
15-May-24, Abery, Nic
15-May-24, Bloch, Anna
15-May-24, Eddy, Nathan
15-May-24, Sidley, Deanna
15-May-24, Jammer, Leon
15-May-24, Blackshaw, Myer
15-May-24, BEN-NATHAN, Geoffrey
15-May-24, Cuby, Dahlia

15-May-24, Schmetterling, Dori
15-May-24, Arkush, Jonathan
16-May-24, Glaser, Robert
16-May-24, McKinsty, David
16-May-24, Hakim, Jonathan
16-May-24, Jackson, Adam
16-May-24, richards, ivor
16-May-24, Harris, Josh
16-May-24, Walker, Susan
16-May-24, Catignani, Sergio
16-May-24, Sochall, Ingrid
16-May-24, Joshua, Michael
16-May-24, Jolly, Andrew
16-May-24, HOPKINS, PAUL
16-May-24, Freudenthal, Bernard
16-May-24, Natali, David
16-May-24, Pereira-Mendoza, David
16-May-24, Priddle, Stephen
16-May-24, Dreyfuss, Vera
16-May-24, Bahar, Raquel
16-May-24, Roberts, Elaine
16-May-24, Adler, Elias
16-May-24, Hart, Barbara
16-May-24, Brown, Louise
16-May-24, Goldsmith, Jonathan
16-May-24, ISAAC, LORRAINE
17-May-24, Chandler, Julie
17-May-24, Kerbel, Sorrel
17-May-24, Kerbel, Sorrel
17-May-24, Juggler Crook, Lauren
17-May-24, Ben hur, Sharon
17-May-24, Yuchetel, Richard
17-May-24, Oyawale, Agnita
17-May-24, Wiseman, David
17-May-24, Wilkinson, Guy
17-May-24, Bear, Michael
17-May-24, Davies, Beryl
17-May-24, Beradida, Micol
17-May-24, L sner, Susan
18-May-24, Straus, Martin
18-May-24, Cave, John Nigel
18-May-24, Rozas, Simon
18-May-24, Whitear, Nick
18-May-24, Roberts, David

18-May-24, Segall, Marilyn
19-May-24, Hasson, Steven
19-May-24, Morgan, Susan
19-May-24, Myers, Sidney
19-May-24, Beral, Mike
19-May-24, Somekh, Natalie
19-May-24, Mann, Deborah
20-May-24, Cowan, David
20-May-24, Schiller, Michael
20-May-24, Gelbier, Stanley
20-May-24, Brent, Janice
20-May-24, Osen, Elana
20-May-24, Fox, Julie
20-May-24, Jacobs, Tony
21-May-24, Van Straten, Craig
21-May-24, Pinto, Ruby
21-May-24, Arden, David
21-May-24, Adam, Ralph
21-May-24, Hojsteen, Architect Aharon
21-May-24, Amal, Ruti
21-May-24, Storey, Nicholas
21-May-24, Amar, Janine
21-May-24, Main, Kathryn
21-May-24, Blasebalk, Tony
21-May-24, Litwin, Holly
21-May-24, Seaford, William
22-May-24, Malins, Leo
22-May-24, Mautner, Roger
22-May-24, Findlay, Katherine
22-May-24, Halfon, Daniel
22-May-24, Klionsky, Naomi
22-May-24, Roodyn, Michael
22-May-24, Mourtzilas, George-Michael
22-May-24, Berman, Gerald
22-May-24, Weiner, Estelle
23-May-24, Frost, Adele
23-May-24, Szlesinger, Brenda
23-May-24, Rodrigues Pereira, Nachshon
23-May-24, Filer, Wendy
24-May-24, Reeve, Yvonne
24-May-24, Evans, Nicholas
24-May-24, King, Norman
24-May-24, Grossman, Jenni
25-May-24, O'Shea, Elaine

25-May-24, Papouchado, Elliot
25-May-24, Goldberg, Ivor
25-May-24, Hanks, John
25-May-24, Cohen, Jonathan
26-May-24, Burg, Jonathan
26-May-24, Gilbert, Richard
26-May-24, Marks, June
26-May-24, Marnham, Andrew
27-May-24, Sepulveda, Elishevah
27-May-24, Gocman, Michael
27-May-24, Needham, William
28-May-24, Fairbairn, Barrie
28-May-24, Judah, Jonny
28-May-24, Johnson, Colin
28-May-24, Hales, Allan
29-May-24, Mendoza, David
29-May-24, Ehrlich, Daniel
29-May-24, Rafaeli, Barbara
29-May-24, Roback, Deborah
29-May-24, Leigh, Lord
29-May-24, Edwards, L Joan
29-May-24, Bear, Michael
29-May-24, Rothman, Gerald
29-May-24, Sloam, Nigel
29-May-24, Morganstein, Louise
29-May-24, Eskenzi, Anthony N
29-May-24, Rowland, Jon
29-May-24, Lincoln, Francesca Raphael
29-May-24, Gordon, Mark
29-May-24, Jacobus, Laura
29-May-24, Dimoldenberg, Paul
29-May-24, Jorgensen, Reverend Laura
29-May-24, Brennan, Clare M
29-May-24, Callaghan SJ, Brendan
29-May-24, Cherry, Brigid
29-May-24, Parkes, Henrietta
29-May-24, Ruben, Caroline
30-May-24, Barkway, Janet
30-May-24, Stern, Sharon
30-May-24, Birrell, Stephen
30-May-24, Kaufmann, Aviva
30-May-24, Eirew, Gabrielle
30-May-24, Baum, Colin
30-May-24, Samuels, Adrian

31-May-24, Kielty, Pauline
31-May-24, Royo Moreno, Luis J
31-May-24, Applegate, Sharon
01-Jun-24, Booth, Judith
01-Jun-24, Richardson, Will
02-Jun-24, Cable, Rory
02-Jun-24, Shahrabani, Ihsan or Eliyahu
02-Jun-24, Shahrabani, Ihsan or Eliyahu
02-Jun-24, Viana de Oliveira, Sezefredo
02-Jun-24, Viana de Oliveira, Sezefredo
02-Jun-24, Howell, Jacqueline
03-Jun-24, Levin, Brian
04-Jun-24, Goodman, Namy
04-Jun-24, Jackson, Matthew
04-Jun-24, Spencer, Michael
04-Jun-24, Johnson, Rachel
04-Jun-24, Gubbay, Candice
04-Jun-24, Glyn, Simon
04-Jun-24, Glyn, Tamar
04-Jun-24, Singer, Amanda
04-Jun-24, Barrie, Francine
04-Jun-24, Cohen, Sasha
04-Jun-24, Cohen, Warren
04-Jun-24, Barrie, Michael
04-Jun-24, Shaw, Julian
04-Jun-24, Shaw, Karen
04-Jun-24, Einhorn, Hilary
05-Jun-24, Tenzer, Karen
05-Jun-24, Parton, Adam
07-Jun-24, Smith, Amanda
07-Jun-24, Beloff, Jonathan
08-Jun-24, Henley, R
12-Jun-24, Jacobs, Richard
18-Jun-24, Clapinson, Hannah
18-Jun-24, Forshaw, Kirsty
18-Jun-24, Rosen, Andrea
18-Jun-24, Keeney, Katie
19-Jun-24, The Honourable Company of Master Mariners,
19-Jun-24, Lester, Sara Kyte
19-Jun-24, Hepher, Roger
19-Jun-24, Arwas, Paul
19-Jun-24, Filipe, Andre
19-Jun-24, Shiach, Gordon
19-Jun-24, Woolich, Anthony

19-Jun-24, Beenstock, Gerrard
19-Jun-24, Florentin-Lee, Balthazar
19-Jun-24, Emerson, Christina
19-Jun-24, Aiken MP, Nickie
19-Jun-24, McLeod, Stuart
19-Jun-24, Lyons, Simon H
19-Jun-24, Samuel, Hope
20-Jun-24, Lebon, Scott
24-Jun-24, Miles, Keith
24-Jun-24, Epand, Ted
25-Jun-24, Winston, Steven
25-Jun-24, Kalev, David
25-Jun-24, Levy, Daniel
25-Jun-24, Kett, Russell
25-Jun-24, Burchell, James
25-Jun-24, Loftus, Jacob
26-Jun-24, Martins, Jonathan
26-Jun-24, Verber, Naomi
26-Jun-24, Benjamin, William
26-Jun-24, Ross, Michael
26-Jun-24, Jackson, Alexandra
01-Jul-24, Garbett, Zoe
01-Jul-24, Morris, Alexander
01-Jul-24, Jacobus, Laura
01-Jul-24, BEN-NATHAN, Geoffrey
01-Jul-24, Judaism, Messiah Is
01-Jul-24, Morris, Shalom
01-Jul-24, Tidswell, Bella
02-Jul-24, Black, Keith
02-Jul-24, Der Zyl, Marie Van
02-Jul-24, E M Johnson, Rachel
02-Jul-24, Gartenberg, Peter
02-Jul-24, Heller, Daniel
03-Jul-24, Salem, David
03-Jul-24, Samuel, Tony
03-Jul-24, Shaw, Geoffrey
08-Jul-24, Whyte, Christopher
08-Jul-24, Eldridge, Charlotte D'Alton
08-Jul-24, Phillips, Jackie
08-Jul-24, Goldberg, Rachelle
08-Jul-24, Barber, Keith
09-Jul-24, Frankenberg, Paul
09-Jul-24, The Honourable Company of Master Mariners,
09-Jul-24, The Honourable Company of Master Mariners,

10-Jul-24, Dremach, Agniya
10-Jul-24, Tessa Sanderson, Troy Richards &
10-Jul-24, Salem, Freddy
10-Jul-24, Carp, Debbie
10-Jul-24, Sackman, Sarah
15-Jul-24, Fox, Julie
15-Jul-24, Einhorn, Stanley
22-Jul-24, Gleen, Carmen
22-Jul-24, Magnus, Alfred
22-Jul-24, Yudkin, Michael
23-Jul-24, Dweck, Joseph
23-Jul-24, Palmer, Joe
24-Jul-24, Mirvis, Ephraim
03-Sep-24, Chambers, Christopher
11-Sep-24, Keliris, Jan
11-Sep-24, Samuels, Lydia
11-Sep-24, Shovelton, Claire
11-Sep-24, Asare-Djan, George
11-Sep-24, Chohan, Tej
16-Sep-24, Greenhalf, Mike
18-Sep-24, Hood, Ralph
18-Sep-24, Lemanski, Mark
24-Sep-24, King, Emma
24-Sep-24, Dell, Becky
09-Oct-24, Blain, Barry
09-Oct-24, Gauthier, Charlotte
10-Oct-24, Jacobson, David
14-Oct-24, Bennett, sarah
15-Oct-24, Baharier, Linda
15-Oct-24, Goldsmith, Jonathan
15-Oct-24, Rose, Peter
15-Oct-24, Green, Edwin
15-Oct-24, Frost, Adele
15-Oct-24, Mendoza, David
15-Oct-24, Amado, Can
15-Oct-24, Parsons, Kathleen
15-Oct-24, Eskenzi, Anthony N
15-Oct-24, Jackson, Judy
16-Oct-24, Wakeman, Lindsay
16-Oct-24, Platt KC, Eleanor
16-Oct-24, Salako, Ara
16-Oct-24, Parker, Christopher
16-Oct-24, Blaga, Erika
21-Oct-24, Salter, Amy

21-Oct-24, Mendoza, David
22-Oct-24, Burg, Jonathan
22-Oct-24, Solomons, Jonathan
29-Oct-24, Denham, J
31-Oct-24, Stone, Jeremy
05-Nov-24, Amado, Can
05-Nov-24, Callaghan SJ, Brendan
05-Nov-24, Gauthier, Charlotte
05-Nov-24, Teeger, Edward
05-Nov-24, Moreland, Lee S
05-Nov-24, Patel, Dhruv
05-Nov-24, Roache, Anne
07-Nov-24, Jessop, Manuella
07-Nov-24, Jessop, David
11-Nov-24, Moses, Selina
12-Nov-24, Burg, Jonathan
12-Nov-24, Dimoldenberg, Paul
12-Nov-24, Ben Garcia, Lawrence
13-Nov-24, Green, Charlotte
13-Nov-24, Bonnet, Joel
13-Nov-24, Jackson, Judy
13-Nov-24, Sicsic, Laurent
13-Nov-24, Timan, Ezra
13-Nov-24, Timan, Ruth
13-Nov-24, Obadiah, Sophie
13-Nov-24, Morgan, Leslie
13-Nov-24, Morgan, Cyril
13-Nov-24, Zubaida, David
13-Nov-24, Mendoza, Alan
13-Nov-24, shamash, david
13-Nov-24, Baroukh, Vivien
13-Nov-24, Bilbul, Jonathan
13-Nov-24, Lampert, Dorothy
13-Nov-24, Salem, Freddy
18-Nov-24, Conolly, Paul
19-Nov-24, Yudkin, Ben
19-Nov-24, Bogod, Howard
19-Nov-24, Ridler, Katharine
19-Nov-24, Jacobs, Everett M
19-Nov-24, Felcher, Dave
19-Nov-24, Lawrence, Beverley
19-Nov-24, Lieber, Stephanie
19-Nov-24, Timan, Ruth
19-Nov-24, Sacerdoti, Daniel

19-Nov-24, Schmool, Marlena
19-Nov-24, Kramer, Miriam
19-Nov-24, Kramer, Stephen
20-Nov-24, Hephher, Roger
20-Nov-24, Green, Michael
20-Nov-24, Album, Edward
20-Nov-24, Rosen, Andrea
20-Nov-24, vogel, mira
21-Nov-24, Halpern-Matthews, Dalia
22-Nov-24, Fox, Vicki
22-Nov-24, Jackson, Elizabeth
22-Nov-24, Kirby, Jack
23-Nov-24, Shindler, Jeremy
25-Nov-24, Gomes da Costa, Marcus
25-Nov-24, Singh, Param
25-Nov-24, Halpern-Matthews, Dalia
25-Nov-24, Coriell, Lois
25-Nov-24, Jackson, LiLi
25-Nov-24, Kirby, Keith
26-Nov-24, Gordon, Henrietta
26-Nov-24, Clucas, Jane
26-Nov-24, Jeanette R, Rosenberg
26-Nov-24, Warlow, Neil
26-Nov-24, Hopson, Jacqueline Langer
26-Nov-24, Brodie, Philip
26-Nov-24, Brett, Richard
26-Nov-24, Paldi, Amnon
26-Nov-24, Say, Nathan
26-Nov-24, Allan, Tony
26-Nov-24, Seres, Jennye
26-Nov-24, Musikant, Kris
26-Nov-24, Hillman, Basil
26-Nov-24, Patchick, Jonathan
26-Nov-24, Costa, Marcus Da
26-Nov-24, Blake, Rachel
26-Nov-24, Stern, Gerald
26-Nov-24, Musikant, Barry
26-Nov-24, hoffman, jonathan
26-Nov-24, Ten Dam, Melissa
26-Nov-24, Barton, Isn
26-Nov-24, Reginald, S
26-Nov-24, Risenbaum, Danny
27-Nov-24, Pollak, Miriam A.
27-Nov-24, Yudkin, Michael

27-Nov-24, Black, Pat
27-Nov-24, Walker, Anne
27-Nov-24, Keiner, Judy (Celia Judith)
27-Nov-24, Musikant, Adam
27-Nov-24, Simon, Barbara
27-Nov-24, Schonfield, Jeremy
27-Nov-24, Schonfield, Tamar
27-Nov-24, Johns, Leslie
28-Nov-24, Rabbs, Margaret
28-Nov-24, Winch, Dinah
28-Nov-24, Lawson, Susannah
28-Nov-24, Ozer, Ketty
28-Nov-24, Sackman, Simon
28-Nov-24, Chait, Stan
28-Nov-24, Collins, Peta
28-Nov-24, Berman, Gerald
29-Nov-24, Issroff, Rahle
29-Nov-24, Natali, P
29-Nov-24, Gardiner, Marc
30-Nov-24, Freeman, Julian
30-Nov-24, Baxter, Christina
30-Nov-24, O'Hara, Moya
01-Dec-24, Morley, James
02-Dec-24, Segall, Edwin
02-Dec-24, Natali, P

Representations/Consultation Responses

15/03/2024 - NATS Safeguarding
19/03/2024 - London City Airport
20/03/2024 - Active Travel England
20/03/2024 - Heathrow Airport Limited
21/03/2024 - Crossrail Safeguarding
26/03/2024 - Environment Agency
02/04/2024 - Historic England
02/04/2024 - Air Quality Officer
03/04/2024 - Environmental Resilience Officer
03/04/2024 - Westminster City Council
03/04/2024 - Gardens And Cleansing
04/04/2024 - Thames Water
04/04/2024 - Thames Water
09/04/2024 - Transport For London

12/04/2024 - Southwark Council
01/05/2024 - Save Britain's Heritage
08/05/2024 - The Georgian Group
08/05/2024 - Natural England
14/05/2024 - The London Borough Of Tower Hamlets
14/05/2024 - Historic Royal Palaces
14/05/2024 - Transport For London
14/05/2024 - The Society For The Protection Of Ancient Buildings
15/05/2024 - Surveyor To The Fabric - St. Paul's Cathedral
15/05/2024 - Historic England
17/05/2024 - Twentieth Century Society
17/05/2024 - The Victorian Society
17/06/2024 - Historic England
25/06/2024 - London Borough Of Camden
02/09/2024 - Environmental Resilience Officer
08/10/2024 - Lead Local Flood Authority
08/10/2024 - District Surveyors Office
08/10/2024 - Historic England
09/10/2024 - Environmental Health Officer
09/10/2024 - Heathrow Airport Limited
09/10/2024 - Thames Water
09/10/2024 - Active Travel England
10/10/2024 - Historic England
11/10/2024 - Crossrail Safeguarding
14/10/2024 - District Surveyors Office
15/10/2024 - London City Airport
16/10/2024 - Air Quality Officer
18/10/2024 - Environment Agency
24/10/2024 - The Georgian Group
25/10/2024 - Crossrail Safeguarding
25/10/2024 - Westminster City Council
30/10/2024 - Active Travel England
31/10/2024 - Heathrow Airport Limited
01/11/2024 - Crossrail Safeguarding
01/11/2024 - London City Airport
04/11/2024 - Natural England
06/11/2024 - The Society For The Protection Of Ancient Buildings
06/11/2024 - Save Britain's Heritage
07/11/2024 - Historic England
11/11/2024 - Southwark Council
11/11/2024 - The London Borough Of Tower Hamlets
11/11/2024 - Twentieth Century Society
13/11/2024 - Natural England
15/11/2024 - Environment Agency

15/11/2024 - London Borough Of Camden
18/11/2024 - Access Advisor
18/11/2024 - Historic England
21/11/2024 - Historic Royal Palaces
24/11/2024 - Community Facilities Manager (Public Conveniences)
25/11/2024 - Ministry of Housing, Communities & Local Government

Appendix A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in this report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Lift Vehicle Maintenance Strategy, a Travel Plan. Mitigation measures should be secured including wind mitigation to the Level 7 of the proposed development. These as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreement. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspaces
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure

- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI6 Digital connectivity Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016)
- Mayor's Transport Strategy (2018)

Emerging City Plan 2040

- Strategic Policy S1: Health and Inclusive City
- Policy HL1: Inclusive buildings and spaces
- Policy HL2: Air quality
- Policy HL3: Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5: Location and protection of social and community facilities

- Policy HL6: Public Toilets
- Policy HL7 Sport and Recreation
- Policy HL8 Play areas and facilities
- Policy HL9: Health Impact Assessment (HIA)
- Strategic Policy S2: Safe and Secure City
- Policy SA1: Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3: Designing in Security
- Strategic Policy S3: Housing
- Policy HS3: Residential Environment
- Strategic Policy S4: Offices
- Policy OF1: Office Development
- Policy OF2: Protection of Existing Office Floorspace
- Policy OF3 Temporary 'Meanwhile' Uses
- Strategic Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy RE3 Specialist Retail Uses and Clusters
- Strategic Policy S6: Culture and Visitors
- Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Policy N1 Infrastructure Provision and Connection
- Policy IN1: Infrastructure Capacity
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5: Shopfronts
- Policy DE6: Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Policy VT5: Aviation Landing Facilities
- Strategic Policy S10: Active Travel and Healthy Streets

- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking
- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Policy HE3: Setting of the Tower of London World Heritage Site
- Strategic Policy S12: Tall Buildings
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S21: City Cluster
- Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);

- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD,
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS7 Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City, by:

1. Increasing the provision of sustainable, energy-efficient, attractive, high quality office floorspace in a range of accommodation types, that meet the varied needs of office occupiers and achieve modernisation of office stock.
2. Promoting the Eastern Cluster as a location for inward investment, providing assistance to potential developers, investors and occupiers.
3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views.
4. Ensuring the safety of businesses, workers, residents and visitors, promoting natural surveillance of buildings, open spaces and streets and protecting against crime and terrorism.
5. Enhancing streets, spaces, and the public realm for pedestrians, providing new open and public spaces where feasible, increasing connectivity with surrounding areas and improving access to facilities and services, particularly in the Cheapside and Aldgate areas and towards the City Fringe.
6. Ensuring the provision of high quality utilities (including CCHP where feasible) and communications infrastructure, encouraging early engagement and joint working between developers and utility providers and maximising the space under the streets, particularly through the use of pipe subways.
7. Delivering improvements to public transport to cope with the demands of the growing numbers of workers and visitors, implementing street and traffic management measures and ensuring that improvements do not compromise the quality of the environment.

CS10 Design

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage

and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

CS13 Protected views

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

CS14 Tall Buildings

To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.
4. Ensuring that tall building proposals do not adversely affect the operation of London's airports

CS15 Sustainable development and climate change

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

CS16 Public transport, streets and walkways

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Open Spaces and Recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
 - 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

Policy DM 3.1 Self-containment in mixed use developments

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

- 1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
 - b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;

- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

Policy DM 10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- respect the quality and architectural contribution of any existing shopfront;
- respect the relationship between the shopfront, the building and its context;
- use high quality and sympathetic materials;
- include signage only in appropriate locations and in proportion to the shopfront;
- consider the impact of the installation of louvres, plant and access to refuse storage;
- incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- resist external shutters and consider other measures required for security;
- consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

Policy DM 10.6 Advertisements

1. To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
2. To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Ancient monuments and archaeology

1. To require 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, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO₂ emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
 - d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO_x).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational

noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

Policy DM 16.6 Public car parks

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

Policy DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

Policy DM 20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000m²) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Appendix C

Methodologies for Assessing Daylight, Sunlight and Overshadowing

Existing Buildings

Daylight to Existing Buildings

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

1. Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.

2. Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the 492 proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE guidelines recommends compliance with both the VSC and daylight distribution (NSL) assessment criteria.

Sunlight to Existing Buildings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although

care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Interpreting Assessment Data

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures, any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Proportionate Percentage change (10% reduced to 8% = 20% reduction); and
- Actual / Absolute change (10% reduced to 8% = 2% change).

Open Spaces

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun 494 is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessing the Cumulative Impact of Development Proposals

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the draft City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

SCHEDULE

Application: 24/00021/FULEIA

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

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

The application is accompanied by an Environmental Statement. Members of the public may obtain copies of the Environmental Statement at a charge from Trium at olivia.allchorn@triumenv.co.uk.

CONDITIONS

Time Limit for Commencement	
1	Time Limit The development hereby permitted shall be begun before the expiration of three years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
Environmental Health	
2	Scheme of Protective Works - demolition There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of

	Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interest of public safety and to protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
3	Scheme of Protective Works - construction There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interest of public safety and to protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
4	Noise, dust and vibration monitoring equipment Throughout the duration of the demolition and construction works the site shall be fitted with live noise, dust and vibration monitoring equipment. The numbers and locations of monitoring equipment shall be agreed with the City of London Pollution Control Team prior to installation. The City of London Pollution Control Team shall be provided with live access to all monitoring data throughout the works.

	REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
5	Acoustic Report Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used to demonstrate that noise levels from the proposed Rehearsal & event space/Sports facilities area shall not exceed the existing background level (lowest LA90(15min)) at 1m from the nearest noise sensitive receptor. The development pursuant to this permission shall be carried out in accordance with the approved scheme and maintained thereafter. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
6	Opening Hours Terraces and Balconies The office terraces and public terrace (Urban Farm) hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
7	Amplified Music No amplified or other music shall be played on the roof terraces. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
8	Plant Noise (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels

	should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data. (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority. REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
9	Sound Insulation office/non-office The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall submitted to and approved in writing by the Local Planning Authority. REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
10	Fume extract arrangement Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the proposed café use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
11	Mounting of plant Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

	REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
12	Contamination No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
13	Contamination Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify

	as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
14	Sewer Vents Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building. REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
SUDS/Water	
15	SuDS Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s. Provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 123 m³ ;

	(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
16	SuDS Maintenance Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
17	Thames Water 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 low / no water pressures 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. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.

18	Thames Water – Piling Method Statement No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.
Archaeology	
19	Stage 1 Written Scheme of Investigation No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Where appropriate, details of a programme for delivering related positive public benefits C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

	REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
20	Written Scheme of Investigation Preparation Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
21	Public Engagement No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
22	Foundation design No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Aviation	
23	City Airport – Building Obstacle Lighting Condition Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be

	installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development. Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.
Sustainability	
24	Circular Economy (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. (b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 ; S16, CEW 1.
25	Post-construction Circular Economy No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the 501 proposed targets stated

	in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
26	Whole life-cycle carbon emissions Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark (as current at the time of submission) set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life-cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2.
27	Post-construction whole life-cycle carbon emissions Once the as-built design has been completed (upon commencement of RIBA Stage 6 the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk

	REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
28	Façade System Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings. REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the e Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2040 policies DE1 and CE1.
29	District Heating Network connection The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site. REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
33	Climate change resilience measures – completion details Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
31	BREEAM A post construction BREEAM assessment for each use demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local

	planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
32	Updated Biodiversity Net Gain Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.
33	Ecological Management Plan Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring • detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided • Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development
34	Post Construction UGF and BNG Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat

	species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening.
Design/Public Realm including Lighting	
35	Faience façade details Before the works thereby affected are begun, sample panels of agreed sections of the faience facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
36	Design and materials – Tower and Renown House Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces; (b) details of the proposed new facade(s) including typical details of the fenestration and entrances; (c) details of a typical bay of the upper floors of the development (including the tower bays and the roof extensions to Renown House); (d) details of the ground floor triple order and cornice; (e) details of the internal elevations of the Heneage Arcade including the entrances, shopfronts, soffits, walls, lighting, paving, water fountain and any infrastructure required to deliver programmed and varied uses; (f) details of the entrances at Ground, Mezzanine and Level 1 including details of external and internal level ground to first floor including: all elevations: entrances: fenestration; internal circulation and fit out; planters; fixed seating; fixed lighting; signage; and any infrastructure required to deliver the Sui Generis use; (g) details of the proposed programme of public art throughout the external surfaces and faces of the building;

	(h) details of the urban greening proposed throughout the external surfaces and faces of the building; (i) details of the proposed external lighting scheme proposed throughout the external surfaces and faces of the development; (j) details of James Court, including elevations, climbing wall, art wall planters, seating, lighting, wind mitigation measures, drainage, irrigation and any infrastructure required to deliver programming and varied uses; (l) details of junctions with adjoining buildings; (m) details of the integration of window cleaning equipment, building maintenance equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level (n) details of the integration of cleaning equipment, cradles and the garaging thereof; (o) details of plant and ductwork to serve the Class E use(s); - (p) details of ventilation and air-conditioning for the Class E use(s); (q) details of all ground level surfaces including materials to be used; (r) details of external surfaces within the site boundary including hard and soft landscaping (s) details of the works to the entrances and facades of Renown House including but not limited to details of the proposed fenestration, the creation of new, level entrances and any requisite works or cleaning and repairs, and particulars and samples thereof; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
37	Holland House and Bevis Marks Synagogue - Demolition and Construction Methodology and Structural Assessment Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and long-term structural and non-structural implications for the listed buildings Holland House (Grade II*) and Bevis Marks Synagogue (Grade I), including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and those relevant works carried out in accordance with the approved details. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House and Bevis Marks Synagogue in accordance with the following policies of the Local Plan: CS12, DM12.1.

38	Holland House – site meeting Before work begins a site meeting shall be held between the local planning authority and the persons responsible for undertaking the works to ensure that the Conditions attached to the Listed Building Consent are understood and can be complied with in full. Notification of the date and time of a meeting shall be made in writing to the Local Planning Authority. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
39	Holland House - qualified professional specialising in conservation work Before work begins it shall be agreed in writing with the Local Planning Authority the appropriately qualified professional specialising in conservation work who will supervise the hereby approved works of alteration or demolition. Any proposed changes to the agreed supervision arrangements shall be subject to the prior written agreement of the Local Planning Authority. REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1
40	Holland House - Details Before work begins the following shall be approved in writing by the Local Planning Authority. The work shall be carried out in full in accordance with approved details including: 1. Façade repairs and alterations a. Particulars and samples of materials to be used on all external faces of the building including external ground and upper level surfaces b. A method statement for cleaning and repair c. A schedule of works and specification, including details of the quantity and repair of the faience tiles salvaged from the building d. Details of the reopening of the Bury Street entrance and other alterations 2. Repair works to the steel structure a. A condition survey of the existing historic structure b. A method statement for repair works c. A schedule of works and specification 3. Window Replacements a. Particulars and samples of the proposed windows b. A method statement for construction and installation c. A schedule of works and specification 4. Tenants entrance (west elevation) a. Particulars and samples of all materials and features b. A method statement for construction and installation 5. East Elevation (external wall)

	a. A condition survey of the historic fabric behind modern Portland stone b. Particulars and samples of proposed materials c. A method statement for construction and installation d. A schedule of works and specification 6. East Elevation (party wall with Bury House) a. Details of the interconnections between the listed building and the proposed tower floor levels, including alignment and connection of floor slabs and the new lift core 7. Internal works a. Details of works to the Heritage Lobbies including but not limited to any requisite repairs and particulars and samples of the materials thereof; b. Details of the works to the Atrium including but not limited to the junctions of the new floor slabs with the existing elevations, requisite repairs and particulars and samples of the materials thereof, and its presentation c. Details of works to the first floor Heritage Interiors, including but not limited to any repairs, minor alterations and works of re-presentation 8. South Elevation (party wall with Renown House) a. Details of the proposed extension of the floor slabs of the listed building behind, and their junctions with, the retained elevations of Renown House b. Details of the treatment of the retained sections of party wall between Renown House and Holland House 9. Rooftop additions a. Particulars and samples of materials to be used on all external faces of the building b. A method statement for demolition of existing upper level floors and construction of new structure and facades c. A schedule of works and specification, including details of the quantity and repair of the faience tiles salvaged from the building d. External Lighting and landscaping at roof level 10. Details of junctions with adjoining buildings; 11. Details of the integration of window cleaning equipment, building maintenance equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level; 12. Details of ventilation and air-conditioning; 13. Details of external surfaces within the site boundary including hard and soft landscaping; REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House in accordance with the following policies of the Local Plan: CS12 and DM12.1.
41	Holland House – tilework replacement or repairs Prior to practical completion, details of any other repairs and replacement tilework to the elevations resulting from further investigations shall be submitted to and

	approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
42	Holland House – precautions to secure features during building work Before work begins, details shall be approved in writing by the Local Planning Authority to ensure that precautions are taken to secure and protect the interior and exterior features during the building work. The agreed measures shall be carried out in full. No such features shall be disturbed or removed temporarily or permanently except as indicated on the approved drawings or without the prior approval in writing of the Local Planning Authority. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
43	Holland House - new works and finishes to match the existing All new works and finishes and works of making good to the retained fabric shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this consent. REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.
44	Suicide Prevention Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2 DM10.1 and DM12.2.
45	Security Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in

	writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development. REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.
46	Public art strategy Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: Details of a new public art strategy within the public realm or on buildings where appropriate and which is of artistic merit, is deliverable and can be maintained shall be submitted to and approved in writing by the Local Planning Authority. The public art installations shall be carried out as approved and so maintained for the life time of the development. REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2
47	Urban Greening Before any works hereby affected are begun, details of a holistic urban greening strategy including hard landscaping, materials and an appropriate maintenance regime for a. planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; b. the incorporation of green roofs into roof surfaces; and c. the landscaping of the public realm Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
48	Street lighting

	Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
49	Lighting including aviation Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: - lighting layout/s; - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure); - a lighting control methodology; - proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; - all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering. - details of aviation lights including locations All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15.
50	Landscaping All landscaping, including the ground floor and external terraces, shall be treated in accordance with a landscaping scheme, including details of:

	a. Irrigation; b. Provision for harvesting rainwater run-off from road to supplement irrigation; c. Spot heights for ground levels around planting pit; d. Soil; e. Planting pit size and construction; f. Tree guards; and g. Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. To be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
51	Greening/ landscaping/ public realm Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds; b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium; c) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation; d) Details of the method of irrigation and nutrient delivery systems; e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures; f) Details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual; g) Details of landscape lighting; h) A management and maintenance Plan (including ecological management) for all proposed landscaping; and i) Details of permanent wayfinding features and other installations.

	All unbuilt and built surfaces, including the ground floor and roof levels landscaping, shall be treated in accordance with a landscaping scheme, including details of: i) Irrigation; ii) Provision for harvesting rainwater run-off from road to supplement irrigation; iii) Spot heights for ground levels around planting pit; iv) Soil; v) Planting pit size and construction; vi) Tree guards; and vii) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development viii) the green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening; ix) the incorporation of blue roofs into roof surfaces; x) the landscaping of the public realm; All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4, DM12.2 and DM19.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040.
52	Green wall(s) Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
53	Green wall(s) maintenance Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the

	local planning authority before any works to install such green wall(s)/roof(s) are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2
Accessibility	
54	Inclusive Signage and wayfinding Prior to commencement of the development excluding demolition, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, flexible uses, including cultural, community, educational, sports, multi-faith and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority. REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
55	Public toilets Before any construction works hereby permitted are begun details, including drawings at a scale of no less than 1:20, shall be submitted to and approved in writing by the local planning authority of: a. Changing Place, wheelchair accessible and ambulant accessible toilet and baby changing facilities at ground floor level within the building hereby approved; and b. associated signage The approved facilities shall be made available to the general public at all times of the operation of the building and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities onsite, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development. REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.
56	Inclusion and accessibility

	Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) All surface materials including details of slip resistance, contrast, colour, texture and acoustic properties, as appropriate b) Details of wider aisle gates at all controlled points of entry c) Details of planting and maintenance for areas of landscape including how unwelcome touch and scent can be avoided d) Glare analysis for cladding materials e) An inclusive entrances strategy with details of controlled entry systems, entrance doors, thresholds, mat materials, contrast and manifestations with drawings at a scale of no less than 1:20 (as relevant) f) Details and specification for all lifting devices including doors, widths, control panels, floor surfaces, means of operation and internal car dimensions g) Review of potential provision of Mobility Scooter charging with associated fire-protection measures h) Provision of quiet rooms for rest and recovery where appropriate i) Details of all shopfronts including plans and elevations at a scale of no less than 1:20 to ensure that doors are of sufficient width and have suitable door furniture and surface contrast j) Details of inclusive gym facilities REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan
57	Inclusive Access Management Plan Before any works thereby affected are begun the following Inclusive Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for: 1) Website information including photos and an easy read version with information on: a) Travel distances from key points of arrival and rest points b) Location of dropped kerbs c) A protocol for users of the accessible parking bay for disabled users of the development. This should include, but not be limited to: i) Dimensions of the bay and protected zones

	ii) Protocol for reserving the bay iii) Protocol for guided entry into the space iv) Protocol for requesting departure from the space v) Any time limits on occupancy of the space d) Facilities available on site including dimensions and photos for (as appropriate): i) Step-free entrance points and entrances and lift access ii) controlled entry points (showing wider gates) iii) accessible toilets including access to keys for operation including at ground floor and iv) Changing Places toilets provision including but not exclusively at ground floor and for the other publicly accessible areas v) Baby changing facilities including at ground floor and for the other publicly accessible areas vi) 'universal', female and male toilet provision at ground floor and for the other publicly accessible areas vii) facilities for assistance animals viii) equipment loan ix) assistive listening system and other assistive technology x) rest and recovery facilities xi) room for reflection/quiet room xii) community, cultural, sports, educational, multi-faith space xiii) plant species 2) Inclusive community, cultural, sports, educational, multi-faith provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering. 3) Inclusive Entrances Strategy 4) Cleaning and maintenance schedule for lifts to ensure that the lifts are kept clean, in good working order, and available at all times, with lift users kept separate from the refuse store 5) inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs) The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan
Highways and Transportation	
58	Refuse/ Recycling Storage and collection Refuse and recycling, storage and collection facilities shall:

	(a) be provided within the curtilage of the site to serve each part of the development in accordance with details, which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and (b) thereafter be maintained as approved throughout the life of the building. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
59	Restricting numbers of deliveries/servicing There shall be no more than 33 delivery and servicing motorized vehicle daily trips in total over any 24-hour period (accounting for a consolidation rate of at least 50%). REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.
60	Restricting Hours of deliveries and servicing No deliveries and servicing trips to the premises shall be carried out between the hours of 7:00 to 9:00, 12:00 to 14:00, 16:00-18:00 and the hours of 23:00 on one day and 07:00 on the following day, from Monday to Sunday, including Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM 16.1, DM21.3.
61	Site Condition Survey Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.

	REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
62	Demolition and Construction Management Plan Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include: • Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing. • Construction vehicle routes to and from the site to be approved with CoL Highways • Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc). • construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. • encouraging the use of cargo bike deliveries throughout the construction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required. • The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in

	accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.
63	Blue Badge Car Parking One car parking space suitable for use by people with disabilities shall be provided on the premises in accordance with details shown in the plan No's 23747508-STR-HGN-ZZ-SK-D-PL401, 23747508-STR-HGN-ZZ-SK-D-PL402 and 23747508-STR-HGN-ZZ-SK-D-PL403 and shall be maintained throughout the life of the development and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
64	Electric Vehicle Minimum of one electric charging point must be provided within the delivery and servicing area and retained for the life of the building. REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16.
65	Cycle Parking Facilities Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the buildings sufficient to accommodate a minimum of 582 long stay spaces and 85 short stay spaces. All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. REASON: To ensure provision is made for cycle parking and that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy

	and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1, DM 16.3.
66	Accessible cycle parking A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people. REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DMI0.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24
67	Changing Facilities and Showers A minimum of 59 showers and 667 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.3
68	HVM The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
69	Unobstructed headroom on access ways A clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways. REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
70	Ancillary loading and unloading areas

	All loading and unloading areas at basement levels must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto. REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
Air Quality	
71	Generators There shall be no installation of diesel generators to the building hereby approved. Reason: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
72	Filtration Prior to occupation evidence that an appropriate NOx and Particulate filtration system has been installed as part of the ventilation strategy, and a detailed mechanism to secure maintenance of this system should be submitted and approved in writing. Reason: To ensure that future occupants of the proposed development are not subject to elevated levels of air pollution that have been predicted in the local ambient atmosphere.
73	NRMM Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. Reason: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Fire	
74	Fire Safety The development shall be carried out in accordance with the approved details within the Fire Strategy: Fire Strategy, prepared by Semper dated January 2024. REASON: To ensure that the development incorporates the necessary fire safety measures
Use Classes	
75	Offices The areas shown on the approved drawings as Offices (Use class E(g)(i)) and as set out in Condition 78 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
76	Flexible space The areas shown on the approved drawings as flexible community/education/cultural/sports/amenity and as set out in Condition 78 of this decision notice, shall be used for those purposes within Use Classes Class F2(b), F1(a)- (f)/ E (d), E(f) only and for no other purposes of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
77	Terraces The areas shown on the approved drawings above ground floor as offices including internal amenity space and external terraces at all floors other than floor nine terrace at Holland House (Urban Farm), shall be used for Class E office use only and for no other purpose and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as

	amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020). REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
78	Uses The development shall provide (all figures GIA and excluding plant): - 34,584sq.m (GIA) of office floorspace (Use Class E(g)(i)), including 1,176sq affordable workspace; - 504sq.m (GIA) of retail/ food and beverage floor space (Use Class E(a)-(b)); - 1,411sq.m (GIA) flexible community/ education/ cultural/ sports/ amenity (Class F2(b), F1(a)- (f)/ E (d), E(f)) uses; and - 4,794sq.m (GIA) of ancillary basement uses, including plant space, cycle storage space, shower facilities and building management, fire command centre, security room, refuse and storage and servicing areas; REASON: To ensure the development is carried out in accordance with the approved plans.
Approved Plans	
79	Approved Plans The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: - 4458-ST-EX-01-001 - 4458-ST-EX-01-002 - 4458-ST-DM-02-098 - 4458-ST-DM-02-099 - 4458-ST-DM-02-100 - 4458-ST-DM-02-101 - 4458-ST-DM-02-102 - 4458-ST-DM-02-103 - 4458-ST-DM-02-104 - 4458-ST-DM-02-105 - 4458-ST-DM-02-106 - 4458-ST-DM-02-107 - 4458-ST-DM-03-001

	- 4458-ST-DM-03-002 - 4458-ST-DM-03-003 - 4458-ST-DM-03-004 - 4458-ST-DM-03-005 - 4458-ST-DM-07-098 - 4458-ST-DM-07-099 - 4458-ST-DM-07-100 - 4458-ST-DM-07-101 - 4458-ST-DM-07-102 - 4458-ST-DM-07-103 - 4458-ST-DM-07-104 - 4458-ST-DM-07-105 - 4458-ST-DM-07-106 - 4458-ST-DM-07-107 - 4458-ST-DM-07-001 - 4458-ST-DM-07-002 - 4458-ST-DM-07-003 - 4458-ST-PR-01-001 - 4458-ST-PR-01-002 - 4458-ST-PR-02-096 - 4458-ST-PR-02-097 - 4458-ST-PR-02-098 - 4458-ST-PR-02-099 - 4458-ST-PR-02-100 - 4458-ST-PR-02-101 - 4458-ST-PR-02-102 - 4458-ST-PR-02-103 - 4458-ST-PR-02-104 - 4458-ST-PR-02-105 - 4458-ST-PR-02-106 - 4458-ST-PR-02-107 - 4458-ST-PR-02-108 - 4458-ST-PR-02-109 - 4458-ST-PR-02-110 - 4458-ST-PR-02-111 - 4458-ST-PR-02-121 - 4458-ST-PR-02-122 - 4458-ST-PR-02-123 - 4458-ST-PR-02-136 - 4458-ST-PR-02-137 - 4458-ST-PR-02-RF1 - 4458-ST-PR-02-RF2 - 4458-ST-PR-02-RF3 - 4458-ST-PR-02-RF4 - 4458-ST-PR-03-001 - 4458-ST-PR-03-002

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| <ul style="list-style-type: none"> - 4458-ST-PR-03-003 - 4458-ST-PR-03-004 - 4458-ST-PR-03-005 A - 4458-ST-PR-03-006 A - 4458-ST-PR-03-007 A - 4458-ST-PR-03-010 A - 4458-ST-PR-03-011 A - 4458-ST-PR-04-103 - 4458-ST-PR-04-104 - 4458-ST-PR-04-105 - 4458-ST-PR-31-001 A - 4458-ST-PR-31-002 A |
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REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Informatives

1. CAA Crane Notification

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

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

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

2. CAA Building Notification

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

3. Thames Water

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

4. NPPF

In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

5. CIL

The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

6. Roof Gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

7. Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

8. Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

9. Design Team

The current design team or an equivalent team in quality and experience shall be retained for the construction and completion stage of the development to meet London Plan D4 (F) part 4.