



City of London Local Plan

Publication Stage Representation Form

Ref:
(for official use
only)

Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

Part A Personal Details

Part B Your representations(s). Please fill in a separate sheet for each representation you wish to make.

Privacy Notice

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's website and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

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Part A

1. Personal Details*

*If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.

First name: NAME REDACTED

Last name: NAME REDACTED

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3: Line

Line 4:

Post code: [REDACTED]

Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

3.4.4

Policy

Spatial Strategy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant

Yes

No

4.2 Sound

Yes

No

4.3 Complies with the duty to co-operate

Yes

No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments here

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I share the concerns and support the amendments/supplements proposed by London Sephardi Trust and the Spanish & Portuguese Sephardi Community in respect of the Spatial Strategy and Policies DE3, S11, HE1, S12, S13, S21.

To these concerns I add that the indiscriminate construction of tall buildings in the immediate surrounding of Bevis Marks Synagogue also infringes on the religious rights of our Jewish community. Jewish worship is fundamentally tied to the sky as the appearance of the sun, moon and stars respectively determine the times of prayers, the hours of the Sabbath day (nightfall to nightfall) and the Jewish calendar and new month (according to the lunar cycle). The blocking of clear sky views to the east and south of the synagogue would prevent certain prayers from being recited and dislocate Jewish prayers from their poetic relationship to the celestial bodies in the sky. The only way to protect the fundamental rights of the Jewish community in the City of London is through specific and binding measures to prevent any further loss to said clear sky views.

Strong concern has also been expressed across the Jewish communal, Faith, and Heritage world. The leading institutions of each have called on the Local Plan to institute specific and binding protections around Bevis Marks Synagogue. These letters have been submitted as a separate attachment to this. They include the Chief Rabbi, The British Board of Deputies, The Conference of European Rabbis, The Jewish Historical Society of England and The Jewish Museum of London as well as Historic England, The Georgian Society, The Society for the Protection of Ancient Buildings, Royal Palaces, and others including the Archbishop of Westminster and the Archdeacon of London. Note some of these letters refer to specific buildings, but all are fundamentally calling for enforceable future proof protections. We would be happy to submit even further letters as these are only a portion of those submitted to the City of London to the same effect. We would therefore hope to see the Inspector calling for a further review to take these substantial voices into account and to amend the Local Plan accordingly. It CANNOT be allowed to be approved as is. We only get one chance to protect the heritage and religious rights of Bevis Marks Synagogue for future generations. Once any further buildings are erected the clear view sky will be lost forever, and the harm cannot be undone. We therefore ask that you ensure that these rights are enshrined in law and detailed protections are put in place.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination

9. Signature:

Date: 10/5/21

Calls For Protection of Bevis Marks Synagogue

Heritage Bodies

1. GLA - Greater London Authority
2. Historic England
3. The Foundation for Jewish Heritage
4. Historic Royal Palaces
5. The Society for the Protection of Ancient Buildings
6. The Georgian Group
7. Institute of Tourist Guiding
8. The National Lottery Heritage Fund
9. The Furniture History Society
10. Friends of the City Churches

Government and Faith Leaders

11. Nickie Aiken MP
12. Jonathan Djanogly MP
13. Archbishop of Westminster
14. Archdeacon of London
15. Chief Rabbi of British Jews
16. The Conference of European Rabbis

Jewish Organisations

17. The Board of Deputies of British Jews
18. The Jewish Museum of London
19. The Jewish Historical Society of England
20. The Montefiore Endowment

City of London Worshipful Companies

21. Solicitors
22. Ironmongers
23. Drapers
24. Leathersellers

GREATER LONDON AUTHORITY

Good Growth

NAME REDACTED
City of London Corporation
Development Management
Department of the Built Environment
EC2P 2EJ

Our ref: GLA/2020/6850/S1
Your ref: 20/00848/FULEIA
Date: 15 February 2021

By email

Dear NAME REDACTED

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

Bury House, 31 Bury Street, London

Local Planning Authority reference: 20/00848/FULEIA

I refer to the copy of the above planning application, which was received from you on 1 December 2020. On 15 February 2021 the Mayor considered a report on this proposal, reference GLA/2020/6850/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not fully comply with the London Plan and Publication London Plan for the reasons set out in paragraph 156 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

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

Bevis Marks Synagogue

86 View 45 of the TBHVA, is one view that illustrates the impact on the Grade I Listed Bevis Marks Synagogue – the oldest synagogue in Britain. Whilst some modern development is visible to the west, namely The Scalpel at 52 Lime Street, the majority of the synagogue's roofline is set against a clear backdrop of the skyline. The applicants' TBHVA sets out that the proposal would not compromise the courtyard setting of the synagogue, however it does not consider how the current experience of the enclosed character of the courtyard would be affected, nor how any changes would be experienced taking into account the proposed development at 100 Leadenhall and 20 Bury Street. The character of the building as well as the interior space would be affected by the proposals with regards to loss of light. The proposed development, together with the future proposed development of 1 Undersholt and 100 Leadenhall, would alter the setting of the synagogue and result in harm.

Holland House

87 Immediately adjacent to the site lies Holland House which is a Grade II* Listed building. It is said to illustrate an interesting point in the architectural transition between Art Nouveau and Art Deco and was designed to be seen in oblique views along a very narrow street. Whilst the applicant states that the setting of Holland House has changed dramatically following the construction of 30 St Mary Axe within a large, open plaza, the impacts of the proposed development should be considered in the context of the heritage asset's current setting. The proposed development would increase the sense of scale of development in the streetscape and though it is offset to the rear of the building, the proposed development would have an impact upon the ability to appreciate the heritage asset. From views adjacent to 30 St Mary Axe Holland House has a clear backdrop of open sky. GLA officers consider that it would clearly have an impact on the setting of the heritage asset and the contribution it currently makes to the ability to appreciate the architectural significance of Holland House.

Church of St Helen at Bishopsgate

88 The Grade I Listed Church of St Helen at Bishopsgate is a rare survival of a medieval building in the City of London and was founded in 1210. It is located within the St Helen's Place Conservation Area. Much of its architectural significance lies in the age of the fabric and that it is one of two surviving gothic churches in the City of London. Whilst the applicants' TBHVA acknowledges that the setting of the church is characterised by long-established contrasting modern buildings, the proposal would alter the viewer's ability to appreciate the setting of the heritage asset. However, in consideration of the future development of 1 Undersholt, it may be likely that the proposal would not constitute change such that it would further impact on the setting or the wider conservation area. View 44 illustrates the view in the summer months and as such the tree occludes much of the view. The applicant should provide a revised view showing the proposed development in the winter months to allow a fuller assessment of the impact on the setting of the heritage asset and wider conservation area.

Trinity Square Gardens

89 View 47 is of Trinity Square Gardens, set within a conservation area, and orientated north towards the site and is dominated by the former Port of London



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Ms NAME REDACTED
City of London PO Box
270 Guildhall London
EC2P 2EJ

[REDACTED]
Our ref: P01305330

11 December 2020

Dear NAME REDACTED

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

**BURY HOUSE 31 BURY STREET LONDON EC3A 5AR
Application No. 20/00848/FULEIA**

Thank you for your letter of 12 November 2020 regarding the proposed redevelopment of Bury House subject to planning permission. Historic England was briefly involved in pre-application discussions regarding these proposals earlier this year, and I attach a copy of our advice at that stage for your information. I repeat the main points set out in that letter here for completeness.

Historic England Advice

Summary

The development of a building of the height proposed at Bury House would cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site in our opinion. This is principally because of the visual impact presented by the proposed development in the view from the North Bastion of Tower Bridge (LVMF View 10A.1) which would reduce the ability to appreciate the Tower of London's strategic and dominant position along the river, set apart from the mercantile City.

We have not seen clear and convincing justification for this harm or evidence that the harm would be outweighed by public benefits, and we therefore cannot support the proposals. We are disappointed that the concerns we raised at pre-application stage have not been addressed. We continue to recommend that a significant reduction in height is explored so that the proposals would no longer affect the setting of the World Heritage Site from this viewpoint, avoiding the harm identified.



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Significance of the Historic Environment

Bury House is a modern office building located at 31 Bury Street in the City of London. The building is not listed or in a conservation area; however it is physically attached to the Grade II* listed Holland House – a progressive steel-framed office building of 1914 designed by renowned Dutch architect Hendrik Petrus Berlage. It is a very rare and important example of Berlage's work in England.

The building is also located very close to the Grade I Bevis Marks Synagogue (1699-1701) which is the oldest synagogue in England in continuous use. The synagogue is located at the eastern fringe of the City of London near Aldgate, and accessed via a secluded courtyard. The deliberately enclosed surroundings contribute to the setting and therefore significance of the listed building. However, the courtyard has been encroached upon by recent tall building development in the area which has caused some harm to the significance of Bevis Marks through development within its setting.

The Tower of London World Heritage Site (WHS) is located approximately 550 metres south-east of the development site. 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.

At its centre is the White Tower – an example *par excellence* of a Norman castle, standing as a symbol to the successful invasion of England and illustrating the architectural innovation of the era. With its layers of later defences and associated palace buildings, the Tower of London is also a major reference for the history of European military and royal architecture.

The UNESCO inscription explains that the Outstanding Universal Value (OUV) of the WHS is partially derived from the Tower of London's strategic and landmark siting on the River Thames to protect and control the City of London. Sited strategically at a bend in the River Thames, it has been a crucial demarcation point between the power of the developing City of London, and the power of the monarchy.

Today this juxtaposition continues in the Tower's physical relationship to both the River Thames and the evolving City of London, as a fortress and gateway to the capital. The inscription does, however, acknowledge that "the Tower's physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. It explains that "such development could limit the ability to perceive the





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Tower as being slightly apart from the City, or have an adverse impact on its skyline as viewed from the river."

The site is within the City of London's local plan policy area of the Eastern Cluster defined for tall buildings and a number of existing and consented tall buildings are located in the vicinity including The Gherkin (194.90 metres AOD) and 100 Leadenhall Street (263.4m AOD) which was approved in 2018. If approved, the "Tulip" development site (Land Adjacent to 20 Bury Street London EC3A 5AX, application ref: 18/01213/FULEIA) would be located approximately 50 metres to the north-west. The proposals for that site are subject to a live public inquiry at which Historic England has recently attended as a Rule 6 Party opposing that development.

The Proposals and their Impact

The proposals by Stiff + Trevillion Architects seek to replace Bury House with a tall, two-tiered, office building rising to a height of 197.94 metres AOD (ground plus 48 storeys). The building would be slender in its form with orderly fenestration and vertically ribbed cladding.

The submitted Townscape, Built Heritage and Visual Impact Assessment (Montagu Evans, October 2020) assesses the impact of the proposed development on a wide range of heritage assets. It concludes that no harmful impacts to any heritage asset in the study area would result from these proposals. However, on the basis of this assessment, we disagree with this conclusion.

The proposed development would be particularly noticeable in View 9: LVMF 10A.1 Tower Bridge: upstream (p114-117). In this view the proposed tall building would diminish the visual dominance of the Tower by significantly exceeding the height of its corner turrets. The development would also erode the appreciation of the Tower of London's strategic siting on the River Thames set apart from the mercantile City of London by blocking part of the skyline between the Eastern Cluster and the White Tower. In our view this would result in harm to an attribute of the Tower of London World Heritage Site's Outstanding Universal Value.

The proposals would also appear also appear in cross-river views of the Tower of London, in particular LVMF 25A.1, 25A.2 and 25A.3 (Views 16-18, p142-153) from the Queens Walk at City Hall. In these views, the development's height and form would appear as a more coherent part of the developing Eastern Cluster in relation to the Tower of London. Whilst the development of a prominent tall building in this location would present further encroachment on the strategic riverside setting of the Tower of London, we consider the harm to be relatively minor in this view.





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The proposed development would also be visible within the Tower of London Inner Ward. It would be particularly noticeable in the view towards the Grade I listed Chapel Royal of St. Peter ad Vincula as set out in View 23 of the submitted views assessment (p170-173). In this view, the proposed development would appear above the roofline of the Chapel, adding to the modern visual intrusions of various tall building developments within the Eastern Cluster.

The appearance of modern tall buildings above this roofline is undesirable as it further diminishes the self-contained ensemble of historic buildings. Although not a pristine view, further encroachment contributes to a diminution of the impact of the sense of history in this special place and its separation from the modern city beyond. We therefore consider that a degree of cumulative harm would result from these proposals.

Following our pre-application advice, visualisations have now been prepared in the report in relation to the impact on the Grade I listed Bevis Marks Synagogue (View 45 from within the courtyard, p258-261) and the Grade II* listed Holland House (View 42 from Bury Street and View 43 from Bury Court, p246-253).

View 45 as proposed illustrates a major juxtaposition in scale between Bevis Marks and the proposed development which encroaches on the secluded courtyard setting of the synagogue. However, the cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. Nonetheless, the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion.

Views 42 and 43 demonstrate that Burlage's sleek and progressive steel-framed west elevation of Holland House can be appreciated against a clear skyline. The proposed development would be highly visible in both views, and would rise up directly behind Holland House in View 43, breaking its clear roofline. We consider that this would diminish the appreciation of the striking architectural form of the building, therefore causing some harm to its significance. We do, however, consider this harm to be low due to the wider tall building context in the area.

Policy

Sections 16 and 66 of the **Planning (Listed Buildings and Conservation Areas) Act 1990** impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings.



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Government guidance on how to carry out this duty is found in the **National Planning Policy Framework** (NPPF, February 2019). At the heart of the framework is a presumption in favour of ‘sustainable development’ where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at Paragraph 193 that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give ‘great weight’ to preserving the asset’s significance. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional. In the case of Grade II* or Grade I listed or registered assets or World Heritage Sites, substantial harm or loss should be wholly exceptional (Para 194).

In considering applications, local planning authorities should also require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance (Para 189).

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, Paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

The draft **New London Plan** (2019) has robust policies to protect London’s WHSs. Draft policy HC2 states that “development proposals in WHSs and their settings ... should conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes (Intend to Publish Version [clean], p326).

This approach to WHSs is also evident in draft policy D9 (Tall Buildings). This requires that “buildings in the setting of a WHS must preserve, and not harm, the OUV of the WHS, and the ability to appreciate it” (p150).

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



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Of the views identified in the London Plan, river prospect view 10A.1 from the North Bastion of Tower Bridge, and view 25A.1-3 from the Queen's Walk are most relevant. While these do not capture all elements of the Tower's setting, they are two of the best locations to appreciate the Tower and its relationship with its setting. The LVMF provides management guidance for both views relevant to the development of tall buildings in the City.

The LVMF requires that new development in the views "should be of appropriate height" and "should safeguard the setting of landmarks [including WHSs] and, where tall, should ideally contribute to the development or consolidation of clusters of tall buildings that contribute positively to the cityscape (Para 57). It reinforces that "new development should not harm a viewer's ability to appreciate the OUV of a WHS" (Para 57).

For view 10A paragraphs 183, 186 and 187 of LVMF are crucial for protecting the OUV of the WHS. They state that "the Tower of London should not be dominated by new development close to it" and that "some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background" (Paras 183 and 186). While noting that the City Cluster will be 'consolidated' paragraph 187 states that "any proposed building which would add to the skyline, must take account of the way it relates to existing skyline features.

For view 25A, the LVMF states that all "new development in the setting of the Tower of London should be of appropriate height, scale, massing and materials" and "should respect the setting of the Tower of London and should not dominate the WHS" (Para 414-415).

The **Tower of London World Heritage Site Management Plan** (WHSMP, Historic Royal Palaces, 2016) seeks to ensure the effective management of the WHS. It states that "the greatest challenge to the WHS... remains the impact on its setting of development and tall buildings" (p4). Key elements of the Tower's setting that are sensitive for the management of its OUV are highlighted in paragraphs 7.3.17-18 (p99) and 7.3.27 (p101), namely the potential of new development to change the relative scale of the Tower in views, and the degree to which the Tower's relationship with the City can be understood by the sky space around the White Tower.

The WHSMP acknowledges the expansion of the cluster has "reinforced its identity, verticality and scale and begun to change its relationship with the Tower" (p100), with tall new buildings in the eastern part of the City eroding the OUV of the Tower to some extent (p37). The WHSMP states that to effectively manage this part of the Tower's setting, proposals "will continue to need to consider their effect on the





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established eastern cluster, the space between it and the Tower and the effect on the ability to recognise, understand and appreciate the OUV of the Tower" (p101).

Underpinning the WHSMP is the **Local Setting Study** (2010), which supports the management of the Tower's local setting, identifying key views of and from the Tower. Representative views include the freely accessible LVMF views from Tower Bridge and the Queen's Walk, and from within the Tower's Inner Ward.

The development site falls within the Eastern Cluster area as set out in the **City of London Local Plan** (2015, p72). The vision for this area is to "provide a cluster of attractive, sustainably designed tall office buildings, providing an iconic image of London that will help to attract significant global investment" (p22). Tall buildings in this area are supported where they would "support the City's reputation as an international financial and business centre" p26-7). However, the Local Plan also aims to resist proposals that "detract from heritage assets and their settings, or adversely affect significant views, especially of the Tower of London" (p23).

Historic England's advice note on Tall Buildings (HEAN 4, 2015) advises that "in a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications" (p4).

In relation to clusters of tall buildings it states that "where a proposal is promoted as part of a cluster, a successful design will have a positive relationship within the cluster; the altered impact of a cluster itself needs to be considered" (p8).

Historic England's advice on The Setting of Heritage Assets (GPA3, 2017) sets out guidance, against the background of the NPPF and PPG, on managing change within the settings of heritage assets. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

Notwithstanding the policy and guidance framework described above, it should be noted that the World Heritage Committee and its cultural heritage advisor ICOMOS (the international body based in Paris) interpret the World Heritage Convention in a way that places great weight on the need to avoid any harm to OUV. Only if it is clear that proposed development is essential and cannot occur without harm to OUV does ICOMOS concede in its 2011 Guidance on Heritage Impact Assessment that balancing harm against benefit is acceptable.



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Position

Historic England's guidance recognises that city skylines evolve and that tall building development can make a positive contribution to urban life as part of a planned approach. The Tower of London WHSMP also acknowledges the expansion of the Eastern Cluster and provides guidance for its future development. We therefore accept the redevelopment of the site with a building of increased height in principle as part of the established and evolving Eastern Cluster area. We also have no in-principle issue with the proposed design of the building, in terms of its architectural approach and materiality.

However, and from our perspective, more importantly, the policies and guidance set out in this letter, including those relating to further expansion of the Eastern Cluster in the City of London Local Plan are clear that new development should avoid harm to designated heritage assets. For the purposes of this scheme this principally relates to the Tower of London – one of the world's great historic monuments. The WHS-specific policies and guidance set out in London Plan, the LVMF and the Tower of London WHSMP, make clear that new development should preserve or enhance the ability to appreciate the OUV of a WHS, which reflects the heritage-related policies of the NPPF.

As set out in this letter, the OUV of the Tower of London as a World Heritage Site is partly derived from its strategic and dominant position along the river, set apart from the mercantile City, and LVMF Views 10A.1 and 25A.3 are two of the best locations to appreciate this aspect of OUV.

For the reasons set out in this letter, we consider that these proposals would cause harm to this aspect of OUV due to the impact as demonstrated in the visual assessment of LVMF View 10A.1 (View 9), and to a small degree LVMF Views 25A.1-25A.3 (Views 16-18 in the visual assessment). As previously expressed, some incremental harm to the Tower of London would also result from the impact presented in View 23 from the Inner Ward.

In our view, this scheme is an example of the type of development proposal highlighted in the inscription of the WHS that threatens the ability to perceive the Tower of London as being slightly apart from the City. This impact is also at odds with the guidance in the LVMF SPG and The Tower of London WHS Management Plan as set out in this letter.

A small degree of additional harm would also result from these proposals to the significance of the Grade I Bevis Marks Synagogue and the Grade II* Holland House as previously set out.



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LONDON OFFICE

The Planning Act 1990 and the NPPF indicate that heritage assets as significant as a WHS or a Grade I listed building, should be afforded the greatest weight in terms of their conservation. The NPPF also states that any harm to the significance of a designated heritage asset should require clear and convincing justification, and that any harm should be weighed against the public benefits of a proposal. In light of the extraordinary significance attributed to the Tower of London as set out in this letter, we are unconvinced that this harm has been justified or demonstrably outweighed by public benefits. We are therefore unable to support these proposals in their current form.

Please note that due to the physical connections to Holland House, the works are very likely to require listed building consent. The City of London would be required to consult us on any such application. Further details of the work affecting Holland House should be provided at an early stage.

Recommendation

On the basis of the information provided we consider that the development would cause a high level of harm to a designation of outstanding significance, principally due to the impact on the Tower of London, particularly evident in LVMF View 10A.1. We therefore object to this application, and continue to strongly recommend that a reduction in height of the proposed development is explored in order to avoid this harm.

As we have identified harm to a World Heritage Site, your Authority is required to notify State Parties (DCMS in this case) who will make a decision on whether to notify the World Heritage Centre.

Finally, we note from the submitted documents that an associated listed building consent application will be submitted for the underpinning of the adjoining wall to the Grade II* listed Holland House. These works would be subject to Historic England's authorisation and so we await consultation in due course.

I hope this advice is helpful but I would be happy to clarify any of the points raised with you. Please note that this letter does not cover any potential impact on unscheduled archaeology. Please contact your Council archaeologist directly regarding these matters.

Yours sincerely

NAME REDACTED
Inspector of Historic Buildings and Areas
E-mail: [REDACTED]



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ADDRESS

REDACTED

NUMBER REDACTED

EMAIL

REDACTED

www.foundationforjewishheritage.com

1 February 2021

Trustees

NAME REDACTED

Chief Executive

NAME REDACTED

Friends

NAME REDACTED

Planning Application for Bury House, 31 Bury Street, London (ref: 20/00848/FULEIA)

The Foundation for Jewish Heritage would like to present the following comments on the planning application for Bury House, 31 Bury Street, London (ref: 20/00848/FULEIA) and register our **strong objection** to the proposed development.

Our response only addresses the potential impact of the proposed development on the significance and setting of the Grade I listed (NHLE List Entry Number: 1064745) Bevis Marks Synagogue.

The synagogue is notable for being the oldest synagogue in the country and the only synagogue in Europe that has held regular services continuously for over 300 years. It was constructed between 1699 – 1701 to the designs of Joseph Avis, a master builder and Quaker who had previously worked with Christopher Wren. It was the second synagogue to be erected in England after the resettlement of 1656. Historic England state in the list entry description that "*in its little altered state (it) is of exceptional historic interest*" and its listed status is a formal recognition of the building's heritage value and high significance. The '**Townscape, Built Heritage and Visual Assessment**' (**Montagu Evans, 2020**) submitted with the planning application also acknowledges the building's high significance and states that it is "*one of the few buildings in the City where most of the original early 18th century fabric survives.*" (s8.49).

Historic England in 'Conservation Principles, Policies and Guidance' (2008) identify four principal heritage values: Evidential (deriving from the potential of a place to yield evidence about past human activity), Historical (deriving from the ways in which past people, events and aspects of life can be connected through a place to the present), Aesthetic (deriving from the ways in which people draw sensory and intellectual stimulation from a place), and Communal (deriving from the meaning of a place for the people who relate to it, or for whom it figures in their collective experience and memory) which might be taken into account when assessing the significance of heritage assets, whether they are statutorily listed or not. The 'National Policy Planning Framework' ("NPPF") (2012, Revised 2018, Updated 2019) suggests that for planning purposes, the significance of heritage assets should be assessed under the headings of archaeological, architectural, artistic, or historic which are essentially the same as the Historic England values. The NPPF also points out that significance derives not only from a heritage asset's physical presence, but also from its setting, being the surroundings in which it is experienced.

The NPPF directs that for planning purposes, local planning authorities should require an applicant to describe the significance of any heritage assets affected by a proposed development.



Sections 5.26 – 5.33 of the '**31 Bury Street, Environmental Statement Volume 2: Townscape, Built Heritage and Visual Impact Assessment**' ("TBHVIA") (**Montagu Evans, 2020**) address the synagogue and provide an assessment of significance. The assessment as presented in these sections is incomplete as it does not evaluate the Communal or Evidential values of the synagogue when these are to be expected, especially the former given that the synagogue has been a focus for community activity from the date of its construction to date. These are marked and concerning omissions and, in our opinion, lead to a flawed impact assessment which is unreliable. A thorough and sound understanding of significance is the baseline for managing change to significant places and the absence of such will not allow for informed decision-making as directed under national and local planning policy.

Although essentially an archaeological measure, Evidential value can also derive from above-ground physical remains which have been inherited from the past. In this regard, our ability to understand and interpret the evidence relies upon the intactness of the extant remains. As noted above, it is acknowledged that the synagogue is little altered and substantially retains original fabric. The synagogue is used for the purpose for which it was originally constructed and the retention of important fixtures, fittings and features evidence historic and prevailing aspects of religious practice and use of space. Historic legibility therefore remains intact and uncompromised.

The synagogue was constructed to facilitate communal worship and provide educational and welfare facilities. Notwithstanding the loss of the congregation's school, almhouses and orphanage, it remains a community-focused building. It continues to serve the congregants, but it also continues to serve an educational purpose with the hosting of tours and events. Both congregants and visitors therefore may have collective memories of their experiences of the synagogue and strong associations with it.

The synagogue is situated within a secluded courtyard and although now surrounded by modern development, it is experienced as a place of calm and contemplation set aside from the frenetic activity of the City. It is acknowledged that the setting of the synagogue has undergone irreparable change and it is somewhat compromised by the proliferation of modern and unsympathetic development in the immediate area. Notwithstanding this, and the attendant impact on the visual experience of the synagogue, it is considered that its immediate setting and how it is experienced is considered a positive contributor to its significance. Furthermore, it is important to highlight the contribution of environmental factors to religious practices in the building, specifically the availability of good, natural light for the reading of the Torah Scrolls. It is considered that the proposed development will have an impact on daylight amenity and in turn, may impact on religious observance and by default, impact significance. The continuing use of the building for religious purposes, which may be impeded by the proposed development, is an important component of Communal value which in turn is a key contributor to significance. The proposed development therefore has the potential to result in harm to significance.



The assessment of impact associated with the operational phase of the proposed development is set out in sections 8.53 – 8.57 and reflects the absence of consideration of the Evidential and Communal values which contribute to the significance of the synagogue.

The assessment concludes that the magnitude of impact of the proposed development on the significance of the synagogue will be Negligible Neutral which is defined as, "*Barely discernible change to the value of the receptor. Very minor loss of or alteration to one or more key elements / features / characteristics of the baseline.*". We fundamentally disagree with this conclusion and believe that an adequate assessment of significance would result in a different conclusion on the magnitude of impact on significance. It therefore follows that we disagree with the statements made in the 'Executive Summary – Heritage' that the proposed development does not adversely impact the synagogue and that it would preserve its significance by virtue of replacing Bury House with a high-quality piece of architecture. The 'Summary' (sections 8.113 – 8.116) expands on impact and the perceived benefits of the proposed development on the setting of the synagogue. From these narratives, it is implied that Bury House has a negative impact on setting and that the proposed development will enhance it. However, there does not appear to be an explicit reference to, or assessment of, the impact of Bury House on the synagogue's setting and therefore the absence of written context does not allow for a full evaluation of the extent of enhancement to setting attendant with the proposed development. Based on the visual impact assessment, specifically view 45: Bevis Marks Synagogue Courtyard which comprises of existing and emerging views, we are of the opinion that the proposed development is not an appropriate replacement for Bury House and would not enhance the setting of the synagogue.

In summary, we expect 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 are concerned by the absence of such.

We also have comments on the following documents,

31 Bury Street Environmental Statement Non-Technical Summary (TRIUM, 2020)

Part 7 - Section 'Townscape, Built Heritage and Visual'

We disagree with the statement in paragraph 169 (p.37), specifically that the impact of the proposed development on the setting and significance of heritage assets in the wider area has been assessed. For the reasons outlined above, we are of the opinion that this is a statement that cannot be applied to the Bevis Marks Synagogue.

Paragraph 172 notes that two minor adverse effects have been identified for built heritage during the demolition and construction phase. These effects, it states, will be temporary and it has therefore concluded that they will be minor adverse in scale. It then goes on to state that "*The most significant adverse effect would be the presence of construction equipment, such as tower cranes.*" Given these



(contradictory) statements of adverse effect associated with the presence of tower cranes of a temporary nature, we are rather surprised by the statement in paragraph 175 that "*For the completed development, no significant effects have been identified with regard to the built heritage assets.*" This appears to be a rather confused and illogical summation that temporary tower cranes may have an adverse effect, but a permanent building of 48-storeys will not. There is a complete absence of reference to the effect on the synagogue where reference is to be expected.

Paragraph 172 further states that, "*Due to the proximity of these receptors to the Site of the Proposed Development, they are considered to experience larger effects than the other built heritage receptors.*" We fully concur with this acknowledgement of the potential for adverse impact on the synagogue and given this, it is expected that a robust and thorough assessment of significance would be undertaken. We are therefore disappointed and concerned that based on the information submitted this appears not to be the case.

31 Bury Street, Environmental Statement Volume 1: Main ES. Chapter 14: Likely Significant Effects and Conclusions (TRIUM, 2020)

The conclusion presented in the section 14.6 'Likely Significant Effects, Demolition and Construction' that there will be "*No significant demolition and construction effects are likely to arise in respect to any of the topic areas which have been the subject of this EIA.*" does not accord with the statement in paragraph 172 noted above that references a significant adverse effect of the presence of tower-crane. There is according to this paragraph a significant adverse effect associated with the demolition and construction phase.

We also highlight the statement in section 14.8 that "*No significant effects have been identified as being likely as a result of the completed and operational Proposed Development in respect of.... Built Heritage.*" This statement is unsurprising when taken in the context of, what is in our opinion, a confused and illogical assessment of effect as presented in paragraph 172 and an inadequate assessment of significance of the synagogue. In our opinion, it is a statement which is debased by these factors and is made on an unsound basis.

Health Impact Assessment (Quod, 2020)

Public Health England has recently produced guidance for local authority public health and planning teams ('Health Impact Assessment in spatial planning. A guide for local authority public health and planning teams', October 2020) which aims to provide them with the practical information needed to embed Health Impact Assessments ("HIA") in the planning system. HIAs offer planning authorities the opportunity to improve public health and wellbeing, and ultimately reduce inequalities. This guidance extends to planning applications (designing proposals for development projects) and how they can influence health and wellbeing outcomes. It recommends that a HIA is submitted as part of a planning application as it will help ensure that health and wellbeing are carefully considered in the planning process.



The guidance further suggests steps that can be taken in determining evidence-based triggers for when a HIA should be required. Amongst these, is the identification of population characteristics. To quote directly from the guidance,

"3.7 Preventing the negative impacts and maximising positive impacts of a plan, policy or planning application on population groups is key to an HIA. It is important to identify how sensitive and susceptible population groups or areas are to the impacts of a development project, whether positive or negative, for example on Black, Asian and Minority Ethnic (BAME) groups (35)." (p.22).

Paragraph 3.8 details the different characteristics to consider including religion and belief which are protected characteristics as defined by the Equality Act 2010.

It is important to highlight that the planning application relates to a major development which will be sited approximately 40m from a functioning place of worship, and in which the form of service is heavily influenced by environmental factors such as the availability of good, natural light. It is therefore expected that the HIA would follow best practice and identify local population characteristics (here it is a sensitive and susceptible population group) and address the potential impact of the proposed development on a statutorily protected characteristic.

The HIA references the factors which influence health including environmental factors, and it also lists wider determinants of health including general socio-economic, cultural, and environmental conditions and social and community influences. It would therefore follow that the HIA would consider the impact on the synagogue, its congregants, and visitors. The synagogue is usually open to visitors daily and hosts tours and events, many of which have an educational purpose.

Furthermore, the key 'Health Priorities' as set out in s3.33 (p.16) make no reference to the congregation of, or visitors to, the synagogue in the sub-points on Air Quality, Noise Exposure or Mental Health and Wellbeing. However, in s2.41 of the '**'31 Bury Street Environmental Statement Volume 1: Main ES, Chapter 2: EIA Methodology'**', the synagogue is listed amongst the "Potentially Sensitive Receptors" in terms of Air Quality: E19 Bevis Marks Synagogue and Rabbi's flat (Religious (Synagogue) and Residential); Noise and Vibration: R2 Bevis Marks Synagogue (religious) (Note: the Rabbi's flat is omitted); Daylight and Sunlight: Bevis Marks Synagogue (religious) (Note: the Rabbi's flat is omitted); Overshadowing: Bevis Marks Synagogue; and Light Intrusion: Bevis Marks Synagogue (non-residential). We would therefore expect that which is set out in the Methodology to be reflected in the HIA which appears not to address the religious and educational uses of the synagogue.

It is our observation that throughout the documents reviewed, there appears to be a complete and unacceptable absence of acknowledgment and understanding of the historic and prevailing use of the Bevis Marks Synagogue. This is also carried through into, what we consider to be, the inadequate assessment of significance of the synagogue which does not reference the key contributory communal and evidential heritage values associated with the building's religious and educational use, both



historic and existing. On this basis, we believe that the impact assessment is also inadequate as it is not founded on a robust or thorough assessment of significance. It therefore follows that we disagree with the conclusion that the proposed development when constructed will have a magnitude of impact on the synagogue's significance that is Negligible Neutral. For these reasons and those set out above, we urge your authority to withhold consent and seek the information that is required for informed decision-making as directed under the NPPF, the National Planning Practice Guidance, The London Plan and the City of London planning policies, and relevant guidance.



24th February 2021

To NAME REDACTED

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Dear Sir

Bevis Marks Synagogue

The Bevis Marks Synagogue has an important place in the long history of Jewish communities and the City of London, a history that is also bound up with the Tower of London. The Constable of the Tower was the main official for administering the affairs of all the Jews of England, the Constables' Court dealing with all Jewish legal cases. The Tower served as a place of refuge for the Jewish community during violent pogroms, as their prison when they refused to pay taxes and as their port of exile when they were expelled from England in 1290.

As the Grade 1 Listing status attests, the Bevis Marks Synagogue in Heneage Lane is a building of *exceptional* historic interest. It was the 2nd synagogue erected in England after the resettlement of Jews here in the 1650's when the Commonwealth allowed their faith to be practised openly, is the oldest surviving synagogue in the UK and likely the longest continually operating synagogue in the world. As the 'Cathedral Synagogue' of British Jewry it continues to hold many special services in celebration and/ or commemoration of significant national events.

Importantly, the building and its fittings survive in almost unaltered state. The architecture reflects non-conformist chapels of the period and its two tiers of large arched windows, glazed in plain glass, flood the interior with light. The intangible qualities that contribute to the significance of the synagogue as both a historic building and a continuing place of worship include the ambience of the interior and the serenity of the courtyard setting, which are both at substantial risk of harm through the ever encroaching nature of the tall buildings of neighbouring development.

Although the synagogue does not sit within a Conservation Area, its exceptional historic importance demands careful consideration and planning to protect and preserve both the tangible and important intangible aspects of its significance including its rights to light and the serenity of its setting, for the long term.

Yours faithfully

NAME REDACTED
Palaces & Collections Director

Direct Line: [REDACTED]



From: PLN - Comments
Subject: FW: 33 Creechurch Lane, London EC3A 5EB (18/00305/FULMAJ) & 31 Bury Street, London EC3A 5AR (20/00848/FULEIA)

18/00305/FULMAJ 33 Creechurch Lane, London EC3A 5EB
20/00848/FULEIA 31 Bury Street, London EC3A 5AR

33 Creechurch Lane

Further to our response of 1st March 2019 to the previous application for 33 Creechurch Lane, we wish to register our objection to the revised scheme.

Having reviewed the changes to the proposal in detail, and while welcoming the additional greening of the scheme, we remain concerned that the scale and proximity of this new building will cause considerable harm to the setting and significance of the Grade I listed Bevis Marks Synagogue. Grade I listed buildings are the most nationally important historic buildings with a presumption that any harm requires careful consideration and justification. The Synagogue is little altered in over 300 years and continues with its original religious and community use. It is the oldest synagogue in the United Kingdom and the only non-Christian place of worship in the City of London.

We acknowledge the recognition of the high communal value held by the Synagogue in the Heritage Assessments, which has been underlined by the public responses to the consultation, but regret that the proposals do not respond to this in a meaningful way. We note that the 2018 Heritage Townscape and Visual Impact Assessment dated 8 November 2018 (HIA) says that the proposed development will be 'partially visible within the sky space to the east of Bevis Marks Synagogue' and that the Synagogue is 'already surrounded by buildings of a greater mass and scale'. We do not accept this as an argument for the current height of the building which we consider will adversely affect the setting of the Synagogue. Neither do we accept the argument that the compromise to the setting already effected by the building at One Creechurch Lane provides a rationale for this development, as that building sits further away from the Synagogue, whereas the 33 Creechurch Lane site is adjacent.

The changes to the north façade in the revised proposals are intended to soften the impact on the setting of the Synagogue. However, we consider that contrasting the new facade with the 'hard line' of the current building is somewhat disingenuous. The current building may be uninspiring in design with its lack of connection to the Synagogue, but the new façade treatment will only slightly lessen the adverse effect of the overall scale and massing of the new building.

The HIA says that 'in regards to the height of the new proposal, given that the synagogue is already surrounded by buildings of a greater mass and scale, it is not considered that additional height would cause harm to its setting'. We disagree. Although the Synagogue is surrounded by other tall buildings, the proximity of 33 Creechurch is such that a building of this height and scale will dominate the Synagogue.

31 Bury Street

We note that Historic England have commented extensively on the proposal for 31 Bury Street. In their letter of 11th December 2020, they say that:

the cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. Nonetheless, the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion

In our view the cumulative impact of the two developments on the Synagogue will amount to serious harm.

Policy

The Tall Buildings policy D9 of the new London Plan concerning the impacts of Tall Buildings states that:

1 (d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

Policy HC1C (Heritage, conservation and growth) states that:

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Paragraph 193 of the NPPF 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. In addition, paragraph 194 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.

Conclusion

As the proposals currently stand, we believe that these new buildings will cause considerable harm to the setting and significance of the Synagogue and as such, they do not meet the planning requirements set out above. As a result, we do not feel able to support them.

With best wishes

NAME REDACTED
Head of Casework

ADDRESS REDACTED

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THE
GEORGIAN
GROUP

Dear NAME REDACTED

I am writing on behalf of the Georgian Group, which as one of the six National Amenity Societies, acts as a statutory consultee in the planning process in England and Wales. Beyond this statutory role the Group is active in protecting eighteenth and early nineteenth century architecture and designed landscapes and promoting a better understanding of them.

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

The architectural interest in Bevis Marks Synagogue is evidently high, as is the potential for archaeological interest. On top of this, clear from the submitted concerns over the development, is the extremely high historic interest associated with Bevis Marks Synagogue. Intertwined within this is the communal importance of a place to a specific community. Bevis Marks is the only synagogue in Europe which has held regular services continuously for more than 300 years and marks an important moment in British History which saw the resettlement of the Jewish community in 1656.

Protecting this heritage asset is of the upmost importance and any development within the setting of the grade I designated synagogue must not adversely harm its significance. One of the three purposes of a synagogue is to house community meetings, the courtyard of Bevis Marks is integral to these meetings taking place. Further encroachment on the courtyard would threaten the ability to utilize this space due to the reduction of light caused by developments of a height which are currently proposed. With the courtyard being viewed as an extension of the

Patron [REDACTED]
Vice-Patron [REDACTED]
President [REDACTED]
Chairman [REDACTED]
Director [REDACTED]



synagogue, any subsequent harm to it will also be inflicted on the significance of the grade I designated heritage asset. Therefore, similar protection must be put in place for the courtyard as is in place for the fabric of the building.

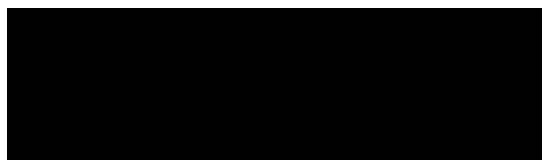
The provision of light into a synagogue is fundamental to the practices of Judaism and would have been an influential factor in Joseph Avis's designs. Bevis Marks admits natural light through the large windows on the first floor, providing a suitable environment for the reading and reciting of prayers. This is particularly necessary on the eastern wall of the synagogue where the Ehal is located, which, in the case of Bevis Marks, is made up of three ark cupboards divided by pilasters of the Corinthian order. Setting is influenced by environmental factors, as set out within Historic England's guidance document GPA3 *The Setting of Heritage Assets* and reducing the amount of light into the synagogue would harm its setting and therefore significance.

A recent award of funds from the NLHF has cemented the future of the Bevis Marks Synagogue complex as a place to visit and learn about the synagogue and the community associated with it. Preserving Bevis Marks and those elements which contribute to its significance will allow its important story to continue to be told and contents appreciated.

The Group calls on the City of London to implement specific protections for this historic synagogue within the City Local Plan 2036, setting out clear directives as to what is acceptable in terms of surrounding development. Doing so will help potential applicants shape their proposals, whilst protecting this exceptionally important heritage asset for future generations.

Your sincerely,

NAME REDACTED(Conservation Adviser for London and South East England)



Patron [REDACTED]

Vice-Patron [REDACTED]

President [REDACTED]

Chairman [REDACTED]

Director [REDACTED]

From: ITG President (NAME REDACTED)
Sent: Wednesday, March 31, 2021 2:54:35 PM
To: NAME REDACTED

Subject: Bevis Marks Synagogue

Dear NAME REDACTED

I have read with some concern the development plans for buildings of 21 storeys in Creechurch Lane and 51 storeys in Bury Street in close proximity to the Bevis Marks synagogue. I have been a Blue Badge guide in London since 1988 and a City of London guide since 1990, and in that time I have seen many changes in London, especially in the City. I understand that the City of London needs to adapt to the 21st century, but it is also the cradle of London, founded some 2,000 years ago. Historically London has welcomed people from around the world, some seeking refuge others their fortune. So many seeking refuge here did so to avoid religious persecution, in London they found the freedom to follow their beliefs. I have travelled to many cities around the world, but there is no city that can compare with London as far as diversity in its inhabitants. Bevis Marks Synagogue symbolises this history of religious freedom, whenever I have visited with others, from this country as well as from overseas, they are all impressed with the Synagogue. The fact that Bevis Marks has received funding for a visitor museum, educational and exhibition space emphasises its importance not just to visitors but to the people of London. A balance between the history of London and its everyday life is not easy, and I truly feel that if these developments go ahead in their present form it will be to the detriment of the area.

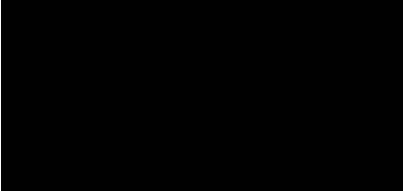
The Institute of Tourist guiding, of which I am President, is the regulatory body responsible for the qualification of guides, not just in London, including the City of London, but around the country, and I know that many of my colleagues will share my concerns with regard to these developments.

We have passed the details of the proposals to our members and I am sure that many will echo my concerns.

Yours

NAME REDACTED

NAME REDACTED
President Institute of Tourist Guiding



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Telephone

Textphone

Social



By email

NAME REDACTED

Bevis Marks Synagogue Heritage Foundation

ADDRESS REDACTED

[EMAIL ADDRESS REDACTED](#)

9 February 2021

Dear NAME REDACTED

**Bevis Marks Synagogue, 2 Heneage Lane EC3
(HG-16-06740)**

I am writing to you to set out the investment that The National Lottery Heritage Fund has made to date in the restoration of Grade-I listed Bevis Marks Synagogue, and our reasons for making this significant financial commitment.

Our Committee for London & South awarded a grant of £2,799,400 in June 2019 to the Bevis Marks Synagogue Heritage Foundation towards a £5.8million, five-year project. In making a grant award of this magnitude, the Committee recognised the high heritage importance of the building alongside the integrity of its historic setting. As a much loved community asset, the Synagogue is also of huge significance to the story of Anglo-Jewish heritage.

The project was considered to deliver a number of heritage and community benefits, which were collectively seen as real strengths in attracting National Lottery funding. For example:

- Repairs to the Grade I-listed Synagogue will help to secure its physical future;
- Access improvements will be made, not only benefiting the congregation but also improving the welcome for visitors, widening and increasing access to the building and sharing its story with new audiences;
- Work to the historic undercroft will provide a secure and atmospheric space to display the Community's treasures including its important and unique silver connection, much of which has never been shown to the public;
- Work to the annexe will create space for an exhibition, enabling the history of the Synagogue and its community to be told through objects, oral histories and a digitised archive. It will also provide a new learning space and a detailed activity plan aims to deliver a schools programme in partnership with the Jewish Museum.
- A strong community learning programme will be delivered, both on site and in partnership with other local organisations, and a structured volunteering programme for community members, local residents and city workers;
- The project will also enable an expansion of operations supporting a new, sustainable and resilient business model.



Facsimile

Textphone

Website

www.heritagefund.org.uk

Telephone

Social



Finally, the continuity of the congregation from 1701 until today, makes the site very much 'living history.' As a result, we would consider any action or development which could undermine the community's ability to function, or the ability of visitors to appreciate the site's heritage, to be at odds with the significant investment made by us to support the future of Bevis Marks Synagogue and its new Heritage Centre.

We are pleased that work continues, and that the Synagogue was recently successful in attracting Government support of £496,900 through the DCMS Capital Kickstart programme, which will help to cover project cost increases caused by COVID-19 related delays.

We very much look forward to seeing the Foundation progress this hugely important project that will help protect, preserve and welcome new audiences to a key cultural asset and landmark in the City of London.

Yours sincerely,



Director, England - London & South

The FURNITURE HISTORY SOCIETY

c/o Department of Furniture,

17 March 2021

NAME REDACTED

NAME REDACTED,

I am writing on behalf of the Furniture History Society, which was founded in 1964 ‘to study furniture of all periods, places and kinds, to increase knowledge and appreciation of it, and to assist in the preservation of furniture and its records’. A third of its membership is overseas and it has extended its reach to include interior decoration. The Society publishes a learned journal, *Furniture History*, which is recognised as the international authority on the subject. Its lively and informative newsletters contain reports of the Society’s visits to study furniture and historic interiors. The Society was fortunate to have visited Bevis Marks Synagogue in 2018 to study the remarkable survival of its furniture and woodwork in the untouched interior.

The significance of light in the design of Bevis Marks synagogue, which has already been impaired by the development of high-rise buildings in the area, is fundamental both to the architecture and to the appreciation of its historic contents. The proposed structures at 33 Creechurch Lane and at 31 Bury Street will reduce the light considerably within the building and will dwarf both the synagogue and the Rabbi’s House. This is a sad example of lack of consideration for the historic environment of the financial centre of the capital.

Happily, by contrast, the seventy-four windows of the monumental Sephardi synagogue in Amsterdam, completed in 1675, whose surviving interior, bathed in light, was painted by Emmanuel de Witte in c.1680, still receive the same amount of daylight as they did in the seventeenth century. The Amsterdam synagogue is of the greatest rarity in terms of its

President: NAME REDACTED

Chairman: NAME REDACTED

Registered Charity No. 251683

www.furniturehistorysociety.org

original furniture, some constructed with exotic woods brought from Brazil. Bevis Marks is the most complete historic synagogue in Britain – its design based on the Amsterdam equivalent – and needs to be treated with the greatest respect as an embodiment of Jewish worship in the City of London following its reconstruction after the Great Fire. The changing light during the day is fundamental not only to the proper appreciation of its historic fittings but plays a part in the spiritual purpose of the building.

Little has changed since the synagogue was inaugurated in 1701 and elements of its design are comparable to the churches built by Sir Christopher Wren. Its furniture includes the oak benches of the previous synagogue in Creechurch Lane, which are now placed in the back rows. Apart from some improvements and additions in 1787 and 1830, the interior is unchanged. The dark oak of the furniture and woodwork is complemented by the brasswork including chandeliers and candelabra, which glitter in the light. The chandeliers are comparable in style to those in the Sephardi synagogue in Amsterdam. The survival *in situ* of all its different elements, which even include the hinged bar behind the choir seats to prevent the ingress of intruders, makes any alteration of its historic ambience undesirable.

The Furniture History Society hopes that the City of London will take its objections into account and protect the Bevis Marks synagogue, a Grade I listed building, from these unsympathetic proposals to create buildings so markedly out of scale with their surroundings.

Yours faithfully

NAME REDACTED

Chairman

The Furniture History Society



NAME REDACTED
Principal Planning Officer
Department of the Built Environment
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

10th March 2021

By email to: PLNComments@cityoflondon.gov.uk [REDACTED]

Dear NAME REDACTED,
Planning Application: 18/00305/FULMAJ - 33 Creechurch Lane London EC3A 5EB.

We wish to object most strongly to this application and its various amendments.

This huge development will cause substantial harm to the setting and significance of the grade I listed Bevis Marks Synagogue. This is a building of international importance and as its listing states- it was "*the second synagogue erected in England after the resettlement of 1656 and in its little altered state is of exceptional historic interest*".

Any public benefits and justifications put forward for the scheme do not outweigh the harm that will be done.

For these reasons we call on the Local Planning Authority to refuse planning permission.

It cannot have escaped the Corporations notice that you are steadily eroding the significance of the City's heritage, but it is incredibly sad to see yet another example being put before you.

Will you allow such buildings to appear beside all your Grade 1 City Churches??

Look what your Corporations money has done to Norton Folgate – effectively erased it – all within a conservation area

[REDACTED]



HOUSE OF COMMONS LONDON SW1A 0AA

Email: [REDACTED]

NAME REDACTED

NAME REDACTED

19 March 2021

Dear NAME REDACTED,

Re: Bevis Marks Synagogue

I understand that in connection with the City's new Local Plan, there are proposals to allow development of tower buildings that could have the effect of blocking light and degrading the privacy and integrity of the Grade 1 listed Bevis Marks Synagogue.

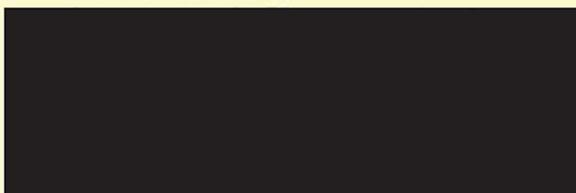
The cultural and historical importance of this institution, and I imply more than as a beautiful place of worship, is in my view of the highest rank to the Anglo Jewish community. It was this building which represented the resettlement of Jews in this country and it could only have been this same building which was used, in 2006, to hold the ceremony attended by the Prime Minister to celebrate the 350TH anniversary of that resettlement.

I had the honour of attending that ceremony myself, and it was a memorable occasion. But I am also keen to preserve this heritage site given my Commons seat being that of the Lord Protector Oliver Cromwell, who permitted the readmission.

The synagogue is itself a gem of a building, whose beauty and spiritual preserve has for generations, amidst the hurly burly of the City, provided succour and peace, to both congregants and visitors to the City. This has included, from the poorest of immigrants, to some of the most successful of the City – and even a future Prime Minister.

I do accordingly sincerely hope that when the new Local Plan is drawn up, full consideration will be given towards protecting this unique synagogue.

Yours faithfully,



[REDACTED]

[REDACTED]

By email: [REDACTED]

30 March 2021

Dear [REDACTED]

I understand that you have received a letter from the Chief Rabbi, regarding proposals for developments adjacent to the Bevis Marks Synagogue.

I write to associate myself with the concerns that the Chief Rabbi has expressed. Historic places of worship, both Christian and of other faiths, are hallmarks of the London architectural landscape. The Bevis Marks Synagogue in Aldgate has a particular significance as it is the oldest synagogue in the UK to be in continuous use.

I hope that the concerns of the Jewish community receive a proper hearing, and that everything possible is done to protect the Bevis Marks Synagogue from developments that would be detrimental both to its architectural context and to the needs of the worshipping community.

With all good wishes,

Yours sincerely,

[REDACTED]

[REDACTED]

Fr NAME REDACTED
Archdeacon of London

March 2021

Dear **NAME REDACTED**

Bevis Marks Synagogue

It was very good to meet with you recently. Thank you for sharing your exciting plans for the visitor centre at what is the oldest synagogue in the City of London and the premier Synagogue in the United Kingdom. You shared your concerns about the encroachment of new buildings around the historic site.

I would be very happy for you to share this letter about the encroachment with the planners at the Corporation and others whom it would help to know my views.

The synagogue is of crucial importance in and of itself. The only purpose-built non-Christian place of worship within the Square Mile, it has a deep and significant history. You explained that within the Jewish community it is as important as Saint Paul's Cathedral is to the Church of England. It is also one of the small number of historic buildings in the City which go back to the period immediately after the Great Fire of 1666. Of secular buildings only the Guildhall dates from before the Fire; of the six medieval churches, five are in the Eastern Cluster, under the tall buildings. Across the City the unique clustering of churches by Sir Christopher Wren join the Synagogue and the precious few medieval buildings to provide the deep historic fabric of the City of London which is one important reason why it is such a good place to work.

Not only are these buildings centres of culture and of worship, but they also provide to people of all faiths and none a "sanctuary in the city." They make a unique contribution to the well-being of City workers, visitors and residents. Part of what marks the City of London out from other cities is that these places are available, and one of the things that gives the City an edge over its

competitors is that the places of worship are available within it – whether or not one is a worshipper.

Although often “hidden gems”, these buildings are part of the street scape of the City. Boxing them in with amorphous modern glass blocks is a failure of imagination and planning. We have examples of good practice from the recent past which can and should be copied. The Rothschild building was designed in order to open up rather than encroach on the churchyard of Saint Stephen Walbrook, which on its other aspect, along with the Mansion House, has similarly benefited from the opening of space by the Bloomberg Building. Another example would be the way in which the view from Cannon Street to St Nicholas Cole Abbey was maintained by providing a curve on Scandinavian House which incidentally opens up an area of green space, further contributing to the well-being of the City. The iconic images of Saint Andrew Undershaft in front of the Gherkin demonstrate another aspect of what is possible, as will the way that the Clothworkers’ Hall will enhance the setting of the medieval tower of All Hallows Staining. All this shows what can be done when imagination and good architectural thinking are brought to bear on the issues.

These kinds of planning approaches which have worked in the past give helpful models for new applications such as those close to the Synagogue.

I hope that all those who are considering the development of the City think how new developments interact with the historic buildings which contribute so much to the quality of the environment.

Yours sincerely



NAME REDACTED
Archdeacon of London

Office of The CHIEF RABBI

ADDRESS REDACTED



EMAIL REDACTED

www.chiefrabbi.org

The NAME REDACTED

ADDRESS REDACTED

By email:

3rd March 2021

My NAME REDACTED,

I hope this letter finds you well during this exceptionally challenging time.

I write in relation to the special significance the Bevis Marks Synagogue in Aldgate has to the Jewish community in London, and right across the UK.

As I imagine has been drawn to your attention, 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 synagogue was built, the UK Jewish community has become a valued part of the fabric of British society. Bevis Marks Synagogue 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.

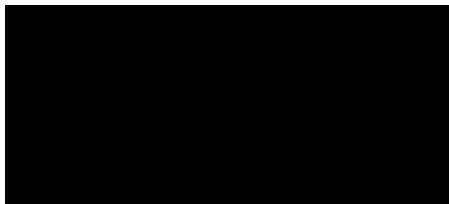
I have been greatly concerned to read that there is a proposed development on the doorstep of the synagogue, with the potential to significantly affect the natural light that can reach the building and, in turn, disrupt prayers taking place inside.



This 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, especially when coupled with a separate planned development on Creechurch Lane.

The synagogue is considered to be a cherished landmark of our community, and a source of great spiritual sustenance to British Jews. I believe it is essential that it be carefully protected, as any other place of worship so steeped in history would. I hope that the views of the local community will be received with the utmost seriousness, and that the necessary arrangements can be made to ensure that this new development does not cause lasting damage to Bevis Marks Synagogue.

With my very grateful thanks and best wishes,



NAME REDACTED
Chief Rabbi of the United Hebrew Congregations of the Commonwealth





PRESIDIUM

PRESIDENT

NAME REDACTED

ASSOCIATE PRESIDENT

NAME REDACTED

PRESIDENT OF

THE RABBINICAL COURT OF EUROPE

NAME REDACTED

CHAIR OF STANDING COMMITTEE

NAME REDACTED

1st VICE PRESIDENT

NAME REDACTED

VICE PRESIDENTS

NAME REDACTED

NAME REDACTED

NAME REDACTED

MEMBERS OF PRESIDIUM

NAME REDACTED

NAME REDACTED

EXECUTIVE COUNCIL

NAME REDACTED

NAME REDACTED

NAME REDACTED

RABBINICAL DIRECTOR

NAME REDACTED

EMAIL REDACTED

CEO & CHIEF OF STAFF TO THE

PRESIDENT OF THE CER FOUNDATION

NAME REDACTED

EMAIL REDACTED

SECRETARY

NAME REDACTED

March 5, 2021

Dear **NAME REDACTED**,

We are writing to express our deep concerns and serious reservations concerning the development around Bevis Marks Synagogue located within the boundaries of the City of London.

I would like to take the opportunity to introduce our Organization. The Conference of European Rabbis (CER) is the primary Rabbinical Alliance in Europe. It unites more than 700 religious leaders of the mainstream synagogue communities in Europe. It was founded in 1956 on the initiative of British Chief Rabbi Sir Israel Brodie, in order to revive the vanquished Jewish communities on the European mainland. Chief Rabbi Sir Brodie was supported by the Chief Rabbi of France, Jacob Kaplan, the Chief Rabbi of Amsterdam, Aharon Schuster and the British Sephardic Spiritual Leader, Hacham Gaon.

We are sure you aware of Bevis Marks Synagogue's historical significance to the British Jewish community, as the oldest synagogue in the UK, but you may not be aware of its importance to all of European Jewry. While there are synagogues across Europe, there are none which have been in continuous use since 1700, save for one, Bevis Marks Synagogue. While there are older synagogue buildings, none of them have been worshipped in throughout due to the horrors of the Holocaust when six million European Jews were slaughtered by the Nazis. Britain remained one of the few countries in Europe to withstand Hitler's onslaught and to protect its Jewish inhabitants. As a result, the UK's Jewish community remains robust, perhaps the most vibrant in Europe. For that reason, Britain has always been looked to by Europe's other Jewish communities as a safe haven for Jewish people. And the symbol of that home is Bevis Marks Synagogue. It alone connects all of Europe's Jews to its earlier roots, a place where Jews have lived for millennia.

You can therefore understand why we are keenly watching to see what will transpire. Should further development be allowed, currently with towering proposals at 33 Creechurch Lane and 31 Bury St, the synagogue will come to be enveloped in shadow, its necessary light blocked, its privacy lost, and its prayers disturbed by noise. These things will cause serious detriment to the functioning of this historical community, and in some respects, make it simply impossible for them to carry out their religious duties. Let us, therefore, be clear, from our perspective, causing harm to a Jewish community's function is not only tantamount to bulldozing a synagogue building; it is worse. That after this past century's horrors, that Europe's most historic Jewish community would face a threat to its very existence, is simply unbelievable.



Conference of
European Rabbis

We, therefore, urge you and the City of London to immediately take steps to ensure protections are put in place around Bevis Marks Synagogue - that it's light, views, privacy, and very future are protected. No doubt other cities in Europe will follow the City of London's example on whether or not to protect their historic synagogues too.

On behalf of Europe's Jewish communities, we implore you to learn from the mistakes of the past and to halt all further development plans immediately. Any development on this site would be a profound desecration for the United Kingdom that would resonate throughout history.

As in the past, we pray that Britain will lead and ensure the survival of Bevis Marks Synagogue and its worshipping community.

I look forward to hearing from you.

With Blessings,

NAME REDACTED
President of the Conference of European Rabbis

The NAME REDACTED
ADDRESS REDACTED

24 February 2021

Dear NAME REDACTED,

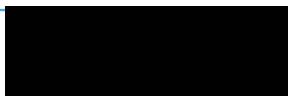
I hope you are keeping well in these difficult times. I write to you concerning the fate of the Bevis Marks synagogue, the mother synagogue of the UK Jewish community.

As you may know, there are currently two planning applications that would affect the synagogue if they were approved. A development on Creechurh Lane may undermine the foundations of the synagogue, as well as block incoming light. During the building works, disabled access may be severely hindered to Bevis Marks. Meanwhile, the proposed Bury House development would block out light. To be clear, as a 300-year-old building, it was designed with natural light in mind and any severe restriction to that would be detrimental to worshippers.

I would urge you to impress upon those who will make the decision concerning these developments to understand the importance of Bevis Marks as a living symbol of the place of British Jews in this country. Since it was built in 1701, the Jewish community has not once been the victim of an organised programme of state violence, unlike the vast majority of our sister communities in Europe. Bevis Marks Synagogue stands testament to that.

It is also a symbol to wider society, of how diversity is integral to London. Before the first red bus or tube train; before pearly kings and queens; before even Buckingham Palace, there was Bevis Marks Synagogue, proclaiming cosmopolitan values at the heart of London.

Worship has been held there continuously for more than 300 years, through blitzes and political upheavals. Attendance has been a tradition passed on through generations and links all British Jews to those who came before and built the community. Like most British Jews, I have Ashkenazi (Eastern European) heritage. But as President of the Board of Deputies of British Jews, I am aware that my organisation emerged out of the Sephardi tradition or those with Spanish and Portuguese heritage such as the founders of the Bevis Marks Synagogue. The synagogue is a link to those who came before me in leading the community, and whenever I am there I am humbled by that fact.



BOARD OF DEPUTIES OF
BRITISH JEWS
ADVOCACY FOR THE JEWISH COMMUNITY

The notion that we would wish to risk the synagogue's foundations, shroud it in darkness or restrict disabled access is heart-breaking. It would be a terrible wound to a living monument of British support for Jewish life and the Jewish contribution to British life.

Bevis Marks Synagogue is of such enormous significance that we urge the City of London to consider explicit long term protection for the building and its surrounds so that they no longer have to fight each development individually.

I would urge you to share with those who will finally make the relevant decisions, how important the Bevis Marks Synagogue is to the UK Jewish community and the UK as a whole so they can come to the best decision regarding our shared heritage.

Best wishes,

NAME REDACTED

President



ADDRESS REDACTED

NAME REDACTED

23 February 2021

NAME REDACTED

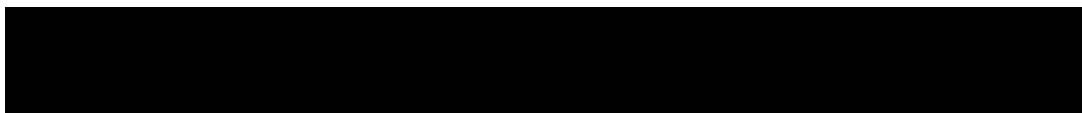
Dear NAME REDACTED,

I am writing to you to vocalise our support to Bevis Marks Synagogue in reference to the risks you are facing from developers on your doorstep.

Bevis Marks Synagogue is a place of outstanding significance both to the City of London and to the nation. It represents the re-birth of the Jewish people in the UK following the re-admission in the mid-17th Century. It is much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government.

The City of London should feel a position of pride to institute protections around the Synagogue to preserve not only the building itself but the context of its location. This historically significant building does not exist within a vacuum and its relation to the proximity of other buildings and most importantly the light that fills the Synagogue, brings with it the symbolic meaning as it was designed. The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers.

The Jewish Museum London has been in a long term partnership with Bevis Marks Synagogue for several years. We will be playing our part in delivering the multi-million pound investment from the National Lottery Heritage Fund to both protect and preserve the heritage within this unique space and also build a centre for learning for people of all faiths and none. Together with the Foundation, we will be delivering an activity programme designed to increase visitors, particularly school children, to the Synagogue to understand the importance of the unique aspects of our shared heritage and history. The experience of visiting the Synagogue is based on the awe that can be inspired by visiting a place of splendour and understanding the importance of beautifying worship, a fundamental commandment in Judaism. By being able to see the Synagogue with natural light illuminating the sanctuary through the windows and reflecting on the symbolism behind this message from the architect, students will understand the shared belief systems between faiths when it comes to our relationship with the natural world and how we create space that compliments and works with it even in urban areas.





ADDRESS REDACTED

Telephone: NUMBER
REDACTED

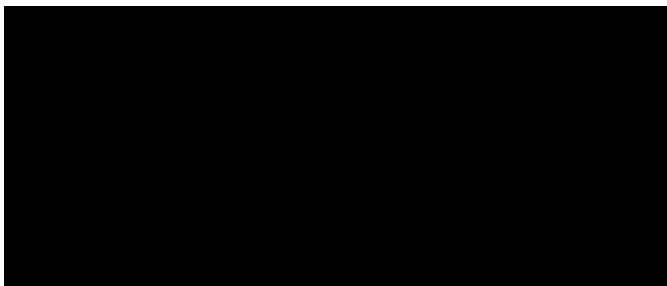
EMAIL REDACTED
www.jewishmuseum.org.uk

Royal Patron: NAME REDACTED

The Synagogue is a living, breathing community space that is readying to welcome more visitors than ever before and act as a place for interfaith and inter-community understanding. The City of London welcomed the Jewish community back to London over 360 years ago and has maintained positive relationships with the Jewish community ever since. This is the moment in time for the City of London leaders to demonstrate their understanding of the cultural, historical and religious significance not only of the Bevis Marks Synagogue building but of the context of its surroundings and the importance of privacy and light within the faith and the architecture.

Ensuring the Synagogue is protected in this way ought to be a point of pride and I sincerely hope that we see this demonstrated and our heritage preserved by those with the power to do so.

With kind regards,



NAME REDACTED
Museum Director

From: PLN - Comments
Subject: FW: About the Bury Street and the effect on the Bevis Marks Synagogue

To Members of the Planning Department of the City of London

I write to you as President of the Jewish Historical Society of England (JHSE). JHSE has had a long-standing relationship with Bevis Marks Synagogue going back to the establishment of the Society in 1893. This relationship included the publication of many of the Bevis Marks' vital historical records, as well as co-sponsorship of events. As you know, Bevis Marks is the first synagogue built after the resettlement in 1656 of Jews in England (resettlement following the expulsion of 1290). Bevis Marks has played an important role in the development of Anglo-Jewry, by hosting key events in the life of British Jewry, and as an architectural gem as I am sure you know well. For these reasons we object strongly - and respectfully - to the proposed development.

The Bury Street development will be profoundly detrimental to the unique heritage of the Bevis Marks Synagogue. It is clear that the development would result in the Synagogue losing much of its light, both to its courtyard and to its interior, and that this would affect significantly the experience of worshippers in the sanctuary, and of those visiting this important site of Jewish History from the UK and abroad.

It is deeply concerning to members of the JHSE as it should be to other Londoners, that the disruption of this unique site is being considered. What will be lost simply cannot be replaced, or reconfigured.

Members of the JHSE are of course aware how difficult and fine are the decisions you are asked to take almost daily. We beseech you to consider the significance of the development for a site that is uniquely historical, an elegant trace of a formative moment of English history - as well as that of English Jews - as a Jewish community was reconstituted in Cromwell's England, and ultimately was able to build its synagogue - Bevis Marks.

With best wishes and most sincerely,

NAME REDACTED

President of the Jewish Historical Society of England

Professor of Medieval and Early Modern History

Queen MArY University of London

ADDRESS REDACTED



The Montefiore Endowment



18th January 2021

To whom it may concern,

It is with the greatest of concern that I write this objection, as not only one, but now two towers threaten the beauty, grandeur, and tranquillity of Britain's oldest synagogue Bevis Marks Synagogue. I served as Senior Rabbi of the Spanish & Portuguese Jews of Great Britain for over four decades, of which Bevis Marks is the crown jewel. I often said that Great Britain has been good to the Jews, and the Jews have been good to Great Britain. This sentiment is particularly true when reflecting on our relationship with the City of London over the course of the past three and a half centuries.

Over my tenure we celebrated multiple thanksgiving prayers for Jewish Lord Mayors, hosted Prime Minister Tony Blair in 2006 to mark the 350th anniversary of readmission of the Jews to England and Prince Charles in 2001 to celebrate the synagogue's tercentenary. Bevis Marks Synagogue is the Cathedral Synagogue of British Jewry.

HRH The Prince of Wales has since added further acknowledgment and support by becoming Royal Patron to the synagogue's new Heritage Centre, a place for people of all faiths and none to learn more about Jews, Judaism, and the longstanding relationship between the Jewish community and the City of London. The erection of two overbearing towers over Bevis Marks Synagogue surely diminishes that message, and a relationship which Bevis Marks Synagogue and the City of London have always celebrated.

I therefore encourage and insist that the planning committee reject these proposals and instead reaffirm the City of London's longstanding and trusted relationship with Bevis Marks Synagogue and Britain's Jewish community.

With best wishes,



THE CITY OF LONDON SOLICITORS' COMPANY



ADDRESS REDACTED

[REDACTED]
Facsimile NUMBER
REDACTED DX 98936 –
e-mail [REDACTED]
Website: www.citysolicitors.org.uk

NAME REDACTED

MASTER

16th March 2021

Dear **NAME REDACTED**

I write on behalf of the Worshipful Company of Solicitors of the City of London to express our concern about the potential impact of two proposed developments adjacent to Bevis Marks Synagogue situated at Bevis Marks, EC3A 7LH.

The developments in question are 33 Creechurch Lane and 31 Berry Street (Planning Application City of London 20/00848/FULEIA).

Bevis Marks Synagogue is a well-known City institution and a vital part of the City's diverse cultural and historical heritage. The Synagogue is the only non-Christian place of worship in the City. It is a Grade I listed building and has had a tradition of continuous worship since it opened in 1701. It is probably the only Synagogue in the world that can make this claim. In addition, I believe a National Heritage Lottery Fund Visitor Centre, whose patron is HRH The Prince of Wales, is due to open soon and the functioning Synagogue is at its heart.

The two developments mentioned above look set to have a dramatic impact on the Synagogue's access to natural light and therefore to represent a substantial loss of amenity which could well pose an existential threat to the Synagogue and the community it serves.

The first development relates to the erection of a 20+ storey building at 33 Creechurch Lane. If built, we understand that this development would be just four metres from the eastern wall of the Synagogue. We also understand that it would completely block all light from the window at this end of the Synagogue for most of the day. Due to the Grade I listing of the Synagogue, it is not possible to increase artificial light to compensate. Further, it will also have a substantial impact on the light in the much-used courtyard of the building.

I understand that this proposed development replaces a 1978 building. When the City Planning Committee considered this earlier development, I believe, they adjusted the proposal to preserve the level of light into the Synagogue.

The other application at 31 Berry Street is for a 50 Storey building. This also promises to significantly reduce the light into the Synagogue's historic courtyard and represent a major loss of amenity.

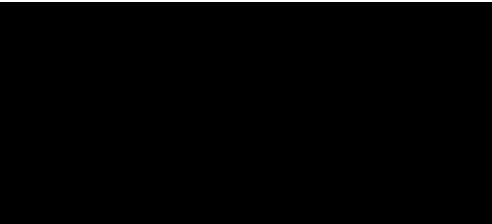
As you will appreciate the cumulative effect of both developments, if they were to be built as proposed, could have a devastating impact on this important centre of worship.

Therefore we would respectfully ask that the interests of the Synagogue and its access to adequate light are specifically taken into account when considering these applications and that the representations made by the Synagogue are carefully considered and given the attention which they deserve.

Similarly, in the event that the Planning Committee were minded to give permission for either development, we would respectfully ask that careful consideration be given to any conditions attached to those permissions with a view to protecting as far as possible the level of light to the Synagogue and its historic courtyard so as to preserve the level of amenity that this unique and very important Synagogue has hitherto enjoyed.

Yours sincerely

NAME REDACTED



NAME REDACTED
Master Solicitor

From: NAME REDACTED

Subject: Planning Permissions for 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)

Date: 8 March 2021 at 09:55:08 GMT

To: [REDACTED]

Cc: NAME REDACTED

Dear NAME REDACTED,

I am writing on behalf of the Ironmongers' Company to oppose two large buildings seeking Planning Permission in very close proximity to Bevis Marks Synagogue. Your Planning reference numbers are shown in Subject above.

I was shown around this famous Grade 1 Listed Synagogue three years ago and as you are well aware it is the only non-Christian place of worship in the City and has been open for worship since 1701, longer than any other Synagogue in the world. It is a building of huge historical significance and occupies an important place in the Jewish religion in this country.

One application is for a 50-storey building at 31 Bury Street and if this proceeded it would massively reduce the light in the historic courtyard of the Synagogue. The proposed building at 33 Creechurch Lane appears to have 22 storeys above ground and is proposed to be just 4m from the eastern wall of the Synagogue so will completely block all light from the window at that end of the Synagogue for most of the day. This proposed building replaces a 1978 building where the Planning Committee adjusted the proposal to preserve the level of light in the Synagogue. Neither of the proposed developments appears to have taken any account of these issues.

Bevis Marks Synagogue is unique by virtue of its location, history, architecture and its cultural and religious significance. I am told that if these developments proceeded they would impact severely on the continuance of Bevis Marks as a functioning Synagogue. The Ironmongers' Company urges the Corporation and the Planning Committee to give due consideration to these factors when the proposed developments are discussed and brought forward for a decision.

Your sincerely,

NAME REDACTED

NAME REDACTED

Master, The Worshipful Company of Ironmongers

From: [REDACTED]
To: [PLN - Comments](#)
Subject: FW: 33 Creechurch Lane (18/00305/FULMAJ) & 31 Bury Street (20/00848/FULEIA)
Date: 10 March 2021 15:10:28
Attachments: [image001.png](#)

From: NAME REDACTED [REDACTED]
Sent: 05 March 2021 17:02
To: NAME REDACTED [REDACTED]
Cc: NAME REDACTED [REDACTED]
Subject: 33 Creechurch Lane (18/00305/FULMAJ) & 31 Bury Street (20/00848/FULEIA)

Dear NAME REDACTED,

On behalf of the Drapers' Company, I would like to register our disquiet over these two proposed developments and, in particular, their likely effect on Bevis Marks Synagogue.

As you know very well, Bevis Marks Synagogue is not only an exquisite Grade 1 listed building, but is also the only non-Christian place of worship in the City. Indeed, it has been used continuously for worship longer than any other synagogue in the world and occupies a crucial place in the history of the Jewish religion in this country. By any objective measure it is a building of huge historical significance. Given the Synagogue's importance for both the City and this country's Jewish community, the Drapers' Company is anxious that the building should be protected.

The proposed 20-storey development in Creechurch Lane will encroach within a few yards of the eastern wall of the Synagogue and is likely to block all light through that wall's window for most of the day. There will also be an adverse impact on levels of light in the courtyard of the Synagogue. The proposed 50-storey development at 31 Bury Street would also have the effect of reducing light to the courtyard of the Synagogue. Neither development seems to take account of these issues.

Bevis Marks Synagogue is unique – by dint of its location, its history and its architectural, cultural and religious significance. The Drapers' Company urges the City to give due consideration to these factors when the proposed developments in Creechurch Lane and Bury Street come up for decision.

Yours sincerely,

NAME REDACTED



NAME REDACTED

Master

📍 **The Drapers' Company**
ADDRESS REDACTED

www.thedrapers.co.uk

📞 NUMBER
REDACTED

✉️ EMAIL REDACTED

NAME REDACTED
Development Division
ADDRESS REDACTED

Date: 11 March 2021
Your ref: 20/00848/FULEIA
Our ref: 303118-000016
Direct: [REDACTED]
Email: [REDACTED]

By Email to PLNComments@cityoflondon.gov.uk and by Special Delivery

Dear Sirs

Planning Application 20/00848/FULEIA – Bury House, 31 Bury Street London EC3A 5AR

1. Introduction

- 1.1 We are instructed by The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London to advise in relation to the above planning application.
- 1.2 We are writing in response to your consultation letter issued on 25 February 2021.
- 1.3 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:
 - (a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;
 - (b) 33 Great St Helens;
 - (c) 52-68 and 88 Bishopsgate;
 - (d) 12/20 Camomile Street; and
 - (e) 25-51 and 61 St Mary Axe.
- 1.4 We have undertaken a review of the available information relating to the above planning application and we have substantive concerns as to the potentially adverse effect the proposed development could have on the levels of available light to the above properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.
- 1.5 We also have concerns regarding the planning merits of the proposed development and the potentially adverse impact it could have on surrounding built environment, important heritage assets and public services. These concerns are set out below.

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Eversheds Sutherland (International) LLP is a limited liability partnership, registered in England and Wales (number OC304065), registered office One Wood Street, London EC2V 7WS. Authorised and regulated by the Solicitors Regulation Authority. A list of the members' names and their professional qualifications is available for inspection at the above office.

Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

2. **Impact on the St Helen's Place Conservation Area and the setting of nearby heritage sites and listed buildings**
- 2.1 As the applicants makes clear the City Council is under an important statutory duty to have regard to the requirements of the Planning (Listed Building and Conservation Areas) Act 1990 (the "Act") in determination of this application. The principle statutory tests of relevance within the Act are:
- Section 66(1) which states that:
- "in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, 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"*
- and
- Section 72(1) which states that:
- "in the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."*
- Paragraphs 193 to 197 of the NPPF explain how the Act is expected to work in practice and makes clear that the City Council must consider the impact of the proposed development on the significance of the designated heritage asset and that "*great weight should be given to the asset's conservation*".
- 2.2 In this context, any substantial harm should lead to the refusal of planning consent in the absence of substantial public benefit (paragraph 195) and where there is likely to be less than substantial harm a "*balanced judgement will be required having regard to the scale of the harm or loss and the significance of the heritage asset*" (paragraph 197).
- 2.3 As is made clear in the Court of Appeal decision in *Catesby Estates Ltd -v- Peter Steer and Secretary of State for Communities and Local Government [2018] EWCA Civ 1697*, this assessment of harm requires careful consideration having regard to the particular facts and circumstances of each case. This is reflected at paragraph 29 of the judgement which indicated that:
- "Under current national planning policy and guidance in England, in the NPPF and the PPG, the decision-maker has to concentrate on the "surroundings in which [the heritage] asset is experienced", keeping in mind that those "surroundings" may change over time, and also that the way in which a heritage asset can be "experienced" is not limited only to the sense of sight. The "surroundings" of the heritage asset are its physical surroundings, and the relevant "experience", whatever it is, will be of the heritage asset itself in that physical place."*
- 2.4 As the Townscape, Built Heritage and Visual Impact Assessment (dated October 2020) makes clear the proposed development has a direct impact upon the setting of a series of significant heritage assets within the immediate vicinity of the application site and, more particularly, in respect of the scheme's relationship with the Tower of London World Heritage Site (ToWWHS). The importance and sensitivity of this relationship is reflected in the more specific supplemental report entitled 'Tower of London Heritage Impact Assessment' (dated October 2020) and in the emphasis and language used in both submissions. In the former submission it is noted that the application site is within 550m of the ToWWHS and that the development would be visible from the assessment point. The assessment (on page

3 in respect of River prospect 10A.1)) recognises the "*fine*" consideration needed in assessment the impact of a proposal that adds to the existing cluster and moves it closer to the White Tower. It is, in this context, that the assessment emphasises the efforts have been made to shape and "*reduce the scale impact*" of the building to lessen this impact on the ToWWHS.

- 2.6 Importantly, the subtlety of that assessment is not supported by the judgement of Historic England in their correspondence of 11 December 2020 in which it is made clear that:

"The development would also erode the appreciation of the Tower of London's strategic siting on the River Thames set apart from the mercantile City of London by blocking part of the skyline between the Eastern Cluster and the White Tower. In our view this would result in harm to an attribute of the Tower of London World Heritage Site's Outstanding Universal Value."

- 2.7 This submission is reinforced and summarised in the concluding remarks of Historic England that:

"On the basis of the information provided we consider that the development would cause a high level of harm to a designation of outstanding significance, principally due to the impact on the Tower of London, particularly evident in LVMF View 10A.1. We therefore object to this application, and continue to strongly recommend that a reduction in height of the proposed development is explored in order to avoid this harm."

- 2.8 Historic England raise further concerns as to the assessment of the impact of the proposed development upon heritage assets within the more immediate vicinity of the application site and place particular emphasis on the relationship with the Grade I listed Bevis Marks Synagogue. The assessment made by Historic England identifies a:

"major juxtaposition in scale between Bevis Marks and the proposed development which encroaches on the secluded courtyard setting of the synagogue" and that "the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion."

- 2.9 Further concerns are raised by Historic England in response to the relationship of the proposed development with the Grade II* listed Holland House and, here again, the Government's advisors on heritage matters concludes that:

"The proposed development would be highly visible in both views, and would rise up directly behind Holland House in View 43, breaking its clear roofline. We consider that this would diminish the appreciation of the striking architectural form of the building, therefore causing some harm to its significance."

- 2.10 We are, in this context, unable to agree with the findings of the Townscape, Built Heritage and Visual Impact Assessment and have serious concerns that the balanced and objective consideration of the findings of the assessment cannot reasonably conclude that the application proposal "*would be at the low end of less than substantial harm under the terms of paragraph 196 of the NPPF*" (page 276).

3. Daylight and Sunlight Impacts

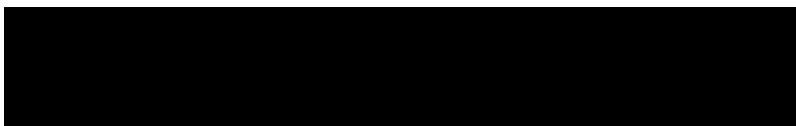
- 3.1 Our client's property at 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe have been identified in the baseline for assessment purposes "*owing to their proximity and orientation to the Site/surrounding receptors*" at paragraph 10.142 of Chapter 10 (Daylight, Sunlight, Overshadowing, Light Intrusion and Solar Glare) of the Environmental Statement submitted with the application. Notably, none

of these properties are the subject of any detailed sensitivity assessment for daylight/sunlight impacts, overshadowing, solar glare or light intrusion.

- 3.2 The basis upon which these properties are identified in the baseline assessment and are then the subject of no further analysis or assessment is not explained in the Environmental Statement. The absence of any explanation of this approach leaves us in doubt that the assessment is complete for the purposes of the relevant Building Research Establishment Guidelines and the requirement of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. We must, in the circumstances, reserve our position to make further submissions in response to this inconclusive approach.
- 3.3 We have yet to conclude our detailed impact assessment of the proposed development and reserves our position in relation to these issues. We do, however, have serious concerns that 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe will experience a significant adverse impact as a result of the construction of another tall building in this area.

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

Yours faithfully



EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP



City of London Local Plan Publication Stage Representation Form

Ref:
(for official use
only)

Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

Part A Personal Details

Part B Your representations(s). Please fill in a separate sheet for each representation you wish to make.

Privacy Notice

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Respondent 141

Part A

1. Personal Details*

**If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name:

Last name:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

2. Agents details where relevant.

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments here

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I share the concerns and support the amendments/supplements proposed by London Sephardi Trust and the Spanish & Portuguese Sephardi Community in respect of the Spatial Strategy and Policies DE3, S11, HE1, S12, S13, S21.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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9. Signature:

Date: 10/05/2021



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Respondent 142

Part A

1. Personal Details*

** If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: NAME REDACTED

Last name: NAME REDACTED

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3: [REDACTED]

Line 4:

Post code: [REDACTED]

Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

3.4.4

Policy

Spatial Strategy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant

Yes

No

4.2 Sound

Yes

No

4.3 Complies with the duty to co-operate

Yes

No

Please add a x as appropriate

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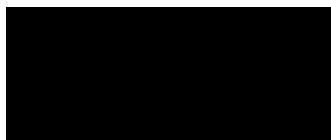
Yes, I wish to participate in hearing session(s)

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Date: 10 May 2021



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Respondent 143

Part A

1. Personal Details*

*If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.

First name: [REDACTED]

Last name: [REDACTED]

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3: [REDACTED]

Line 4: [REDACTED]

Post code: [REDACTED]

Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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9. Signature:

Date: 6th July 2021

Respondent 148

Part A

1. Personal Details*

**If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: [REDACTED]

Last name: [REDACTED]

Address Line 1: [REDACTED] [REDACTED]

Line 2:

Line 3:

Line 4: [REDACTED]

Post code: [REDACTED]

Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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9. Signature:

A black rectangular redaction box covering a handwritten signature.

Date:

10) 5) 21

Respondent 149

Part A

1. Personal Details*

**If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: [REDACTED]

Last name: [REDACTED]

Address Line 1: [REDACTED] [REDACTED]

Line 2:

Line 3:

Line 4: [REDACTED]

Post code: [REDACTED] [REDACTED]

Telephone number: [REDACTED] [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph 3.4.4

Policy Spatial Strategy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No X

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

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9. Signature: [REDACTED]

Date: 9/5/2021



City of London Local Plan

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Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

.Part A Personal Details

Part B Your representations(s). Please fill in a separate sheet for each representation you wish to make.

Privacy Notice

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's web site and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

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Part A

Respondent 153

1. Personal Details*

* If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.

First name: NAME REDACTED

Last name: NAME REDACTED

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3:
Postcode: -

Line 4:
Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B- Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph 3.4.4

Policy Spatial Strategy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No X

4.3 Complies with the duty to co-operate Yes X No X

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please to set out your comments here

See section 6 below.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I share the concerns and support the amendments/supplements proposed by the London Sephardi Trust and the Spanish & Portuguese Sephardi Community in respect of the Spatial Strategy and Policies DE3, SII, HEI, S12, S13, S21.

Prior to my retirement I worked in the City for 30 years and saw many changes in the nature and design of buildings and their impact on the City skyline. I am gravely concerned that a proliferation of tall buildings would have a materially adverse impact on the City's many historic buildings, all of which are inevitably on a much smaller scale. My particular concern is in relation to Bevis Marks Synagogue, which is close to where I worked for more than 20 years and where I have worshipped since 1982, but my concern applies equally to the City's numerous churches and other historic buildings.

Furthermore, I do not consider that the proposed Local Plan properly takes into account the impact of COVID-19 on city centres. Although it is not possible yet to assess the societal changes that COVID-19 may bring about, at the very least the utility and desirability of further skyscrapers that overshadow (literally as well as metaphorically) historic buildings must be highly questionable.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

10-5-21

Respondent 160

NAME REDACTED

From: NAME REDACTED
Sent: 10 May 2021 18:09
To: DBE - Local Plan
Subject: City Plan 2036 consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Local Planning Team,

I'd like to make the following changes to the City Plan 2036:

1. Amendment to paragraph 6.1.15:

'Developers must submit robust justification for demolishing rather than refurbishing and retrofitting an existing building.'

2. Amendment to paragraph 6.1.17:

'Developers will be required to undertake a Whole Life Carbon assessment for all developments of 10 dwellings or 1000sqm and greater in size.'

I don't wish to participate in the hearing session.

Many thanks
NAME REDACTED



City of London Local Plan

Publication Stage Representation Form

Ref:

(for official use
only)

Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

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Respondent 161

Part A

1. Personal Details*

*If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.

First name: [REDACTED]

Last name: [REDACTED]

Address Line 1: [REDACTED]

Line 2: London

Line 3:

Line 4:

Post code: [REDACTED]

Telephone number:

Email address where relevant:

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No X

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments here

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I share the concerns and support the amendments/supplements proposed by London Sephardi Trust and the Spanish & Portuguese Sephardi Community in respect of the Spatial Strategy and Policies DE3, S11, HE1, S12, S13, S21.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

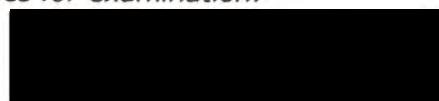
Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:



Date:

10 MAY 2021

Respondent 163

NAME REDACTED

From: NAME REDACTED
Sent: 11 May 2021 17:03
To: DBE - Local Plan
Subject: City Plan 2036

Follow Up Flag: Follow up
Flag Status: Flagged

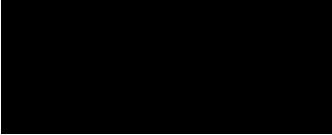
To whom it might concern,

I would like to support the following amendments to the City Plan 2036:

- 1. Amendment to paragraph 6.1.15: developers must submit robust justification for demolishing rather than refurbishing and retrofitting an existing building.**
- 2. Amendment to paragraph 6.1.17: developers will be required to undertake a Whole Life Carbon assessment for all developments of 10 dwellings or 1000sqm and greater in size.**

Thank you, and all best,

NAME REDACTED



Respondent 164

Proposed Submission Draft City Plan 2036 (the Plan)

NAME REDACTED – Response to the Plan

My response relates to various points in Chapter 6 and includes proposed amendments; requests for further and/or better information and/or explanation; and pointing out errors.

Chapter 6 Shape outstanding environments

6.1. Design

Strategic Policy S8: Design

Point 4: It is not possible for proposed development to contribute towards **a zero emission, zero carbon and climate resilient City**. Please delete the words in bold.

6.1.2: What is **good** as opposed to **bad** growth?

6.1.3: The Plan is ostensibly to 2036, leaving four years only to reverse the increase carbon emissions deemed acceptable up to that date. It must address how compliance with the 2040 target is be achieved in those four years.

Point 7: Laudable as this point is, it is difficult to understand where **public access to nature** is enhanced here. An explanation is required.

Point 8: There are at least ten underground stations with no step-free access. This excludes people from these **communities**.

Point 9: This point is simply subjective opinion and should be deleted.

Point 10: Should there be a policy which excludes innovative or irreverent design? Would the Lloyds Building have been permitted under this point? If not, this point should be deleted.

Point 14: Ensures requires a policy for enforcement.

6.1.5 Currently, the lifecycle of a new building appears to be 25 years. Any development, even refurbishment, creates carbon and other emissions, whether on site or in the supply chain. If this will not create a zero-emission City, it should be deleted.

6.1.6: How is **The City of London will continue to be at the forefront of delivering the highest and most sustainable design standards** to be assessed?

Good design can have a positive impact for the wider community, within the City and beyond, improving access to buildings and the inclusivity of the City to those who may not live or work here. Whilst built under the Local Plan, the Denizen only has limited access

for wheelchair users and creates an obvious danger for evacuation in case of fire, with no occupiers being able to access more than one staircase. This shortcoming is repeated at the 15-storey residential tower the Corporation is building on the City of London Primary Academy Islington site in Golden Lane. Should there be different standards for those who live here and those who work here?

6.1.7: A Design Review Panel is necessary to ensure that all developments meet the highest standards of urban design. The Corporation arrogantly considers it has enough experience within its planning team and that:

Through internal and external consultation the Corporation will undertake assessments of planning applications against adopted policy to ensure that the policy criteria is met.

However, this misses the point. It is not about conformity with planning policies. It is about objectivity in the quality of the visual design of buildings that otherwise meet the policies, whilst acknowledging that design cannot be static, as the City's heritage clearly demonstrates.

3D visualisations should also be available in video format on YouTube or a similar platform. Far too many buildings are approved without a proper view being available, especially to those worst affected by the scheme.

6.1.10: The City Corporation has an active programme of implementing access adaptations and will prepare further guidance for developers. An explanation of adaptions should be included in this paragraph.

Policy DE1 Sustainability Standards

"In exceptional circumstances where standards cannot be met on site **offsetting will be required to account for the shortfall**". Whilst not acceptable as regards tackling the climate emergency, any offsets must be realistic and relevant to the damage caused and this should be confirmed in the policy.

At present, **Citizen** is not providing the forecast emission savings but is the only heating and cooling network. London Borough of Islington's **Bunhill 2 Energy Centre** on City Road shows what can be achieved through innovation. There are numerous underground car parks and the extensive use of roofs for solar power should be encouraged ahead of green roofs, where the latter cannot be properly maintained but BioSolar roofs should also be encouraged.

6.1.11: The pace and prestigious nature of development in the City presents opportunities to incorporate innovative design in both new and existing buildings to provide positive environmental outcomes for the City's priorities. This is simply an opportunistic statement without any evidence. Planning permission for the 300-metre-tall 1 Undersholt was granted in November 2016 for a design submitted that January, where construction hasn't started yet. So how can this be **innovative design**?

Energy etc: The need to meet the Scopes 1 and 2 net zero carbon targets by 2027 and the Scope 3 one by 2040 will be severely prejudiced if the Corporation continues to grant itself planning permission for developments such as the **Fleet Street justice quarter** and also grant developers planning permission for such as **55 Gracechurch Street** and **70 Gracechurch Street** and, most concerning of all, **the Tulip**.

Water: Underground car parks provide opportunities for storage and recycling of rain and grey water.

Demolition and construction are major polluters. The Corporation must ensure that all NRMM used in the City is zero emission with its own register of compliant machinery.

Materials: This must also apply to transportation of materials.

6.1.15: Standards required are those that are in place at the time of submission of a planning application but how is this monitored and/or enforced? In any event, developers must be required submit robust justification for **demolishing** instead of **refurbishing and retrofitting** an existing building.

6.1.17: Please amend to read - **For major development the Sustainability Statement must include.**

Also add - **Developers will be required to undertake a Whole Life Carbon assessment for all developments of 10 dwellings or 1000sqm and greater in size.**

For most minor development: The inclusion of sustainability information in the Design and Access Statement will suffice is unacceptable. Every development must be fully compliant as regards all the requirements of **6.1.17** and be monitored.

Policy DE2 New Development

How is **world-class** to be judged?

6.1.24: But most buildings viewed from on high are not new buildings and the Corporation has no way of effecting change without intervention. How is this proposed?

6.1.25: The requirements in this paragraph are fixed to 2020/2021 and don't take into account likely changes in, for want of a better word, "systems" throughout the period of the Plan, so may be too restrictive against technical change.

Policy DE3 Public Realm

Point 3: The requirement for Biodiversity Net Gain (BNG) is intended to become law during the period of the Plan and should be policy in any event. Wild West End's Vision proposes a green corridor of green stepping stones between two Royal Parks – St James's and Regent – basically along Regent Street. Green stepping stones could be an integral part of green corridors in the City.

6.1.32 Consideration should be given to design features which prevent damage from the activities of skaters, such as metal studs incorporated into street furniture and hard surfaces" Whilst not wanting to see any damage, consideration for the majority of users must have precedence.

6.1.33 Again, consideration for the majority must have precedence and any public artwork should not hinder movement around the public realm, particularly where it adds to the street furniture.

Policy DE4 Pedestrian permeability

Point 4: The lack of step-free access at ten City underground stations restricts access to the public realm.

6.1.36 Experience of the recent profusion of **Legible London** signs suggests a need to address the shortcomings of this signage. This includes being readable by wearers of variable/bi focal glasses without having to kneel on the ground and also the many signs with misleading and/or totally inaccurate information.

6.1.40 It seems that **roof gardens and terraces are becoming increasingly common in the City** in order to provide **public benefit** from otherwise unacceptable designs. Strangely people like to see others as people and not as flies.

6.1.43: Public access to tall buildings within the City is important in creating an **inclusive city** requires explanation. Being 300 metres above street level does not appear to be **inclusive** nor can the Corporation claim public access to tall buildings contributes to diversity when the cost of basic refreshments will always be exorbitant in such places.

Policy DE6 Shopfronts

Point 7: Shops with **openable fronts or large serving openings** have been invaluable during the pandemic. This is also relevant to **6.1.48**.

Policy DE8: daylight and sunlight

6.1.56: Especially, when retailers and their like, are suffering from the pandemic, **which include not permitting A-boards on the pavement** is totally inappropriate and the policy should be objective. On the south side of Long Lane, for instance, there is no conflict between pedestrians and A-boards and the same is the case on the eastern side of Goswell Road. After all A-boards are traditional features of shopping streets.

6.1.59: The second sentence of this paragraph is ambiguous. The phrase **take account of** has to be interpreted as an exception to the BRE guidelines, otherwise it is meaningless. A confirmation of this is required.

6.2. Vehicular Transport and Servicing

6.2.1: Ten of the 12 Underground stations have no step-free access and even the Crossrail Station at Thayer Street, despite the City Corporation's investment and TfL assurances, will not provide step free-access to even one of Barbican Station's two platforms.

Currently Blackfriars Pier is closed pending restoration work on Blackfriars Bridge but, despite the Mayor of London/the Corporation initiative to reduce emissions from river transport, reduction to acceptable levels is some way off.

6.2.2: Showing all roads leading out of the City on Figure 13 might help in **ensuring good connections to neighbouring boroughs.**

Strategic Policy S9: Vehicular Transport and Servicing

3: Promoting further improvements to public transport capacity and step-free access at existing mainline rail, London Underground stations and river piers actually **ensuring** rather than **promoting** would be welcome. The lack of step-free access at virtually all the underground stations in the City is a disgrace, especially for a self-acclaimed world leading City. The Corporation contributed up to £250 million to Crossrail. It hasn't even secured step-free access at Barbican, Moorgate or Liverpool Street stations. Aldgate, where a number of hotels are being, or have been, built is another failure of the City's planning policy.

4. Point 6: The reduced use of public transport, both buses and trains, provides an opportunity for using ZEVs and trains for carrying freight without increasing congestion. The availability of lifts at Crossrail stations and at Liverpool Street, Fenchurch Street, Cannon Street, Blackfriars and City Thameslink should encourage more rail freight. If all the markets are to consolidated at Barking Reach, a rail link via Crossrail could mean the Smithfield meat market could become a modern food market, supplied with zero emissions.

6.2.11: This seems to ignore both the Beech Street Zero Emission Scheme and the wider Barbican Zero Emission Zone.

6.2.12: The Corporation did very little to prevent TfL's rerouting of the number 4 bus, denying Barbican and Golden Lane Estate residents direct access to Waterloo Station.

6.2.13: There is no evidence that the Corporation has made any effort to prioritise investment in accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step-free access as part of new developments and major refurbishments. Indeed, the contrary is the case as developments at 1-12 Long Lane and Aldgate show.

6.2.15: Greater use of the River Thames must respect the need reduce emissions from riverboats to acceptable levels.

Policy VT2: Freight and Servicing

6.2.17: Add **Residents.**

6.2.24: City residents should also be encouraged to use **click and collect** drop off points rather than home delivery, if they are unable to obtain the goods from local retail outlets.

6.2.25: **Pollution** should replace **noise.**

6.2.27: Please delete **or low** should be deleted from **the use of zero or low emission vehicles.**

6.2.28: Please replace **should** with **must.**

Policy VT3: Vehicle Parking

1. Blue Badge spaces are only provided to meet specific demand. There seems to be no provision to enable disabled visitors to park without risk of parking fines.

6.2.32: The word **exceptionally** is used here; the phrase **in exceptional circumstances** is used in point 2 of Strategic Policy SE: **Housing**, to justify the Corporation's failure to ensure delivery of **any** affordable housing on any of the many windfall sites that have been developed since 2012 and, probably before; and/or is also used in Policy DE1: **Sustainability Standards**. In the circumstances, the word and phrase need to be either clearly defined or deleted.

Policy VT4: River Transport

3. The Mayor's £500,000 grant for reducing pollution from boats is probably insufficient and increasing use of the Thames will only add pollution unless additional boats are low/zero emission.

6.2.36: Without Walbrook Wharf also being available for use for freight logistics and without another suitable wharf, the benefits proposed in VT4 will be lost.

6.2.38: The Corporation should be ensuring Swan Lane Pier is reinstated and for freight logistics only.

6.2.39: Without a suitable wharf, this proposal is despite being essential, worthless.

6.3. Active Travel and Healthy Streets

6.3.3: November 2017 seems a long time ago.

6.3.6: "These will consider how to reduce the use of Local Access streets by through traffic, while maintaining access" should not involve creating cul de sacs such as Golden Lane and Bridgewater Street.

6.3.8: If the **Healthy Street Plans** are to be developed by 2022, when are these to be implemented?

6.4. Historic Environment

6.4.2: 1 Poultry is the most recently completed heritage asset. More importantly, although the Plan was drafted a month later, it fails to acknowledge the Grade II listing of the Golden Lane Estate Designed Landscape, meaning that there are, in fact, **five** and not **four** Historic Parks and Gardens. **Figure 18** requires a corresponding amendment.

Strategic Policy S11: Historic Environment

1: Presumably it is not being suggested that the Grade II* listed Crescent House, given its long – 20 years – overdue refurbishment, is contributing to the quality of life and wellbeing of its residents.

6.4.12: As far as non-designated heritage assets are concerned, the Corporation should be required to publish a list of all those it recognises as such and not merely rely on ad hoc identification in the planning process. The existence of a non-designated heritage asset, Eglwys Jewin, on the boundary of the site of the former Bernard Morgan House, did nothing to prevent it being engulfed by the Denizen development. It is note that the Corporation identifies Ironmongers' Hall, adjoining the Barbican Estate, as a non-designated heritage asset but will this be considered if the Corporation proposes developing Bastion House and/or the Museum of London.

6.4.13: The failure of Corporation to include the whole of the area proposed by both Golden Lane Estate Residents' Association and the Barbican Association within the Barbican and Golden Lane estates has left both vulnerable to the redevelopment proposals for the excluded buildings, particularly with the new Permitted Development Rights.

6.4.14: The approved combined redevelopment of 150 Aldersgate Street and 3-4 Bartholomew Place, the latter within the Smithfield Conservation Area, appears to contradict the intentions of this paragraph.

6.4.21: Please replace **should** with **would**.

6.5. Tall Buildings and Protected Views

Strategic Policy S12: Tall Buildings

For the avoidance of doubt, the areas around both the Barbican and Golden Lane and Smithfield Conservation Areas which are not shown as **inappropriate for tall buildings** should also be shown to be **inappropriate for tall buildings** and figure 21 should be amended as below.

The areas on the western side of Aldersgate St, the eastern and northern sides of Silk Street, between Beech Street, Golden Lane and Golden Lane Estate and the south of the Barbican Estate bounded by Aldersgate Street, London Wall and Wood Street should be indicated as inappropriate for tall buildings, including new buildings over ten storeys tall.

The exclusion of the whole area of the proposed Conservation Area submitted by GLERA and the BA must be revisited. In addition, the Smithfield and Charterhouse Conservation Areas should be extended to include the obvious gaps west of Aldersgate Street. The current Certificates of Immunity from Listing for both the Museum of London and Bastion House should be revoked.

6.5.2: September 2019 should, of course, be **September 2019**. There have been a significant number of planning permissions granted for tall buildings since September 2019 and these should be identified. Also, **the City Corporation** should replace **Developers** in **should ensure that any cross-boundary impacts are fully addressed**.

6.5.10: There is a particular opportunity to provide publicly accessible spaces at upper levels, offering wider views across London is subjective. Add-ons which claim to be for the public benefit should not be used to justify development nor should the Climate Action Strategy be ignored.

6.6. Open Spaces and Green Infrastructure

Policy OS 1: Protection and provision of open spaces

Point 1: Existing open space will be protected does not require the qualification of **particularly spaces of historic interest**.

Point 4: Please identify **other land**.

Point 6: How will access to **new open spaces be improved** and is improved.

6.6.9: Finsbury Circus appears to have been overlooked. Also, areas such as St Helen's Churchyard, St Andrew's Undershaft Churchyard and Jubilee Gardens are projects included in the **City Cluster Area – Wellbeing and Climate Change resilience implementation 2021-2024**.

Policy OS2: City Greening

Point 2: Beginning an article in **The Guardian** on 03 April 2021 under the headline **The dirty secret of so-called ‘fossil-fuel free’ buildings**, Ollie Wainwright writes: **Hanging plants smother the walls of a new office block proposed for Salford, giving it a look of something from an abandoned post-Covid city, reclaimed by nature**.

Point 4: Green walls should only be allowed to ensure the delivery of BNG and not for box-ticking to obtain planning permission.

6.6.11: The many basement car parks could accommodate water tanks for the storage of harvested rainwater.

6.6.13: The Corporation granted planning permission in January 2020 for the **greenest building to date** because of its 400,000-plant living façade providing a 3,700sq metre green wall. That building is a proposed 382-bedroom hotel despite - **Vertical greening such as green walls will be sought on buildings which do not provide for overnight sleeping accommodation.**

6.6.15 The acknowledgement of the contribution of BioSolar green roofs but brown and other biodiverse roofs are important for biodiversity, including attracting **black redstarts**, a Target Species.

6.6.19 The City Corporation's UGF Study indicates that an UGF target of 0.3 would be deliverable for the majority of development in the City seems to be creating policy to enable development instead of ensuring that the required UGF be based on each specific development and its local impact. With the forthcoming need to provide BNG, the maximum attainable UGF should be the goal. Also, there is no margin of error in the required UGF or its monitoring/enforcement after completion of developments.

6.6.24 For accuracy, the Grade I SBINC will be identified as the **Barbican Estate, St Alphege Garden and Barber-Surgeons' Garden Site of Borough Importance for Nature Conservation.**

6.6.25 Is **west of Farringdon Street and east of Bishopsgate** is correct, as it implies everywhere on the riverside apart from the area within the City? Better access to nature along the City's riverfront would be welcomed as well as helping relieve pressure on other areas such as the Barbican. However, active consideration should be given to expanding the Grade I SBINC to include the currently excepted areas of planting in the **Barbican Grade II* registered landscape**, as well as the **Golden Lane Estate's Grade II designed landscape** in a **Site of Metropolitan Importance for Nature Conservation.**

6.7. Climate Resilience and Flood Risk

Strategic Policy S15: Climate Resilience and Flood Risk

Point 2: This should apply to species and habitats as well as people.

6.7.3: Does **today's buildings** refer to existing ones or ones that should be described as **tomorrow's buildings**. Certainly, the Corporation is granting permission to demolish buildings between 30 and 40 years old and, in the case of 1-12 Long Lane granting permission to erect buildings with a stated anticipated lifespan of 25 years.

6.7.4: As mentioned, the many basement car parks can be used for rain water storage.

Policy CR1: Overheating and the Urban Heat Island Effect

2: Please replace **should** with **must**.

6.7.18: This is welcomed but the concept of **blue roofs** appears to unique to this paragraph although the benefits of the same seem appropriate to other policies, particularly in respect of enhanced biodiversity. Are there, in fact, any specifically designed blue roofs in the City?

Policy CR3:

6.7.19: The need for dropped kerbs for pedestrians, particularly wheelchair users and those pushing buggies should not be overlooked. Also, the needs for doors at ground floor level and for flood defences has to be addressed.

Policy CR3: Sustainable Drainage Systems (SuDS)

2: Please replace **should** with **must**.

6.7.23: This eventuality is alarming and completely unacceptable. Hopefully, the Thames Tideway Tunnel, when completed, will mean the end to this.

Policy CR4: Flood protection and flood defences

2: Please replace **should** with **must**.

6.8. Circular Economy and Waste

Strategic Policy S16: Circular Economy and Waste

2: Having abbreviated **Waste Planning Authority** in 6.8.1, **WPA** can be used throughout the remainder.

6.8.7: It is unacceptable for there to be any CD&E waste, let alone transporting any outside London.

6.8.12 “WPAs”.

Policy CE1 Zero Waste City

2. Please replace **should** with **must**.

6.8.15 The amount of food waste must be reduced and all food waste collected for composting.

6.8.24: Please replace **should** with **must**.

Policy CE2: Sustainable Waste Transport

The use of both rail and water transport must be encouraged, provided the latter is zero emission. There is no need for any **low emission** transport mode and all NTMM should be zero emission.

6.8.28 Veolia's Southwark facility, now that the Corporation is introducing ERCVs should be fully utilised, including for non-recyclable waste, instead of Belvedere, even though it goes there by barge. Alternatives to sending food waste to Milton Keynes, except by rail, should be sourced.

6.8.29 Whilst the choice of private contractor is outside the scope of the the Corporation, restricting access to the Square Mile for non-ERCVs would ameliorate the effects of long-distance transport of waste.

6.8.31 The need to reduce, if not eliminate, emissions from river transport must be a key constituent of this policy.

10 May 2021

NAME REDACTED

Respondent 164

PROPOSED SUBMISSION DRAFT CITY PLAN 2036 (the Plan)

10 May 2021

NAME REDACTED - COMMENTS ON THE “FIGURES” USED IN THE PLAN

For a document that will be viewed, in the main, in digital form and one prepared in the 21st Century, the quality of the cartography is poor. This may be to avoid a licence fee but plans based on the 1:5000 scale OS maps would be both accurate and more legible – thus easier to interpret.

The fact that the Plan will be in digital form should enable the incorporation of enhancing features. In the absence of these then I have the following specific comments:

1. Figure 2: Strategic context: The City of London's location within the Central Activities Zone



Although the Plan relates to the City of London, it hardly stands out in Figure 2.

2. Figure 4: Key Diagram

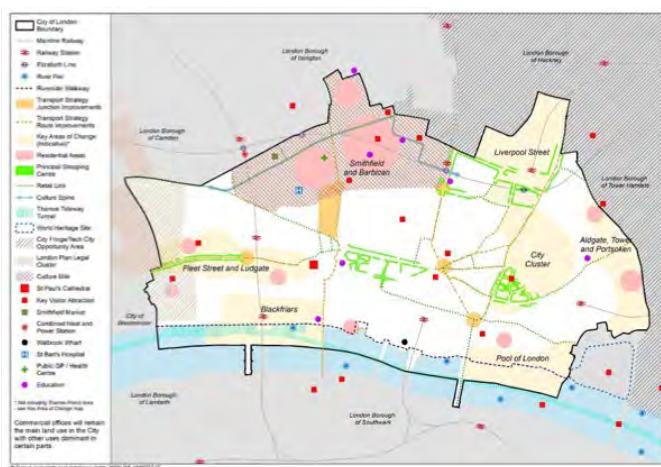


Figure 4 simply fails to indicate all it attempts to indicate and, consequently, irrespective of the absence of the street layout is of limited use. For instance, the Smithfield and Barbican Key Area of Change is missing and specific areas are shown as “blobs”.

3. Figure 5: Distribution of health facilities in and adjoining the City

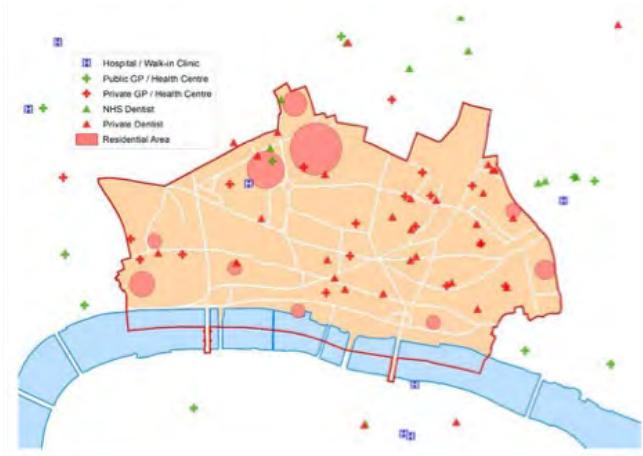


Figure 21 indicates specific areas in respect of tall buildings. The health facilities, as well as the residential areas, should be shown in the same style in Figure 5. If the street network outside the City were also shown in Figure 5, it might be easier to identify those facilities outside the City by way of more precise location.

4. Figure 6: Distribution of skills and education facilities in and adjoining the City



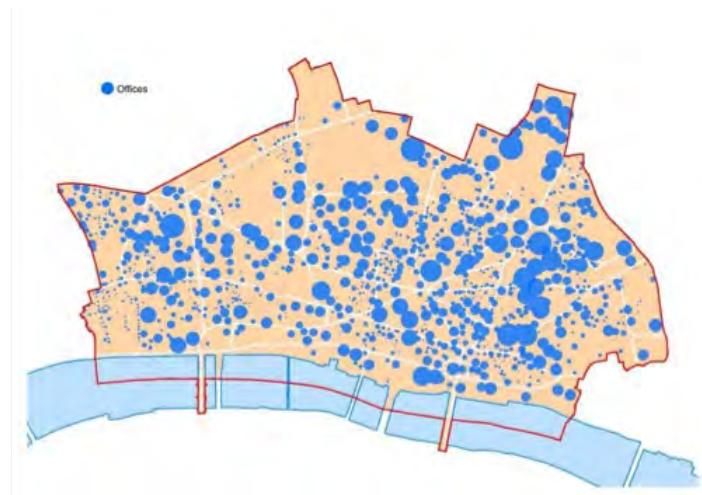
Figure 21 outlines specific areas in respect of tall buildings. The skills and education facilities should be shown in the same style in Figure 6 – students are not “blobs”. If the street network outside the City were also shown in Figure 6, it might be easier to identify those facilities outside the City by way of more precise location.

5. Figure 7: Residential areas



Figure 21 outlines specific areas in respect of tall buildings. The residential areas should be shown in the same style in Figure 7 – residents are not “blobs”.

6. Figure 8: Office distribution



It is well known that there are a lot of offices in the City, so what is the point of Figure 8? Does the size of “blob” relate to the number or sizes of offices?

7. Figure 9: Principal Shopping Centres and Retail Links



Figure 9 would benefit from the inclusion of all rail stations as well as the street network.

8. Figure 10: Hotel and visitor attractions distribution

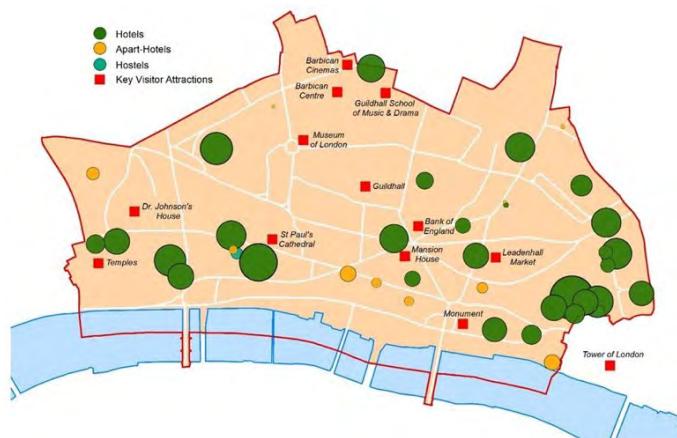


Figure 12 shows hotels and visitor attractions as “blobs” but the inclusion of all rail stations as well as the street network would assist in showing actual locations.

9. Figure 11: Block Size Analysis

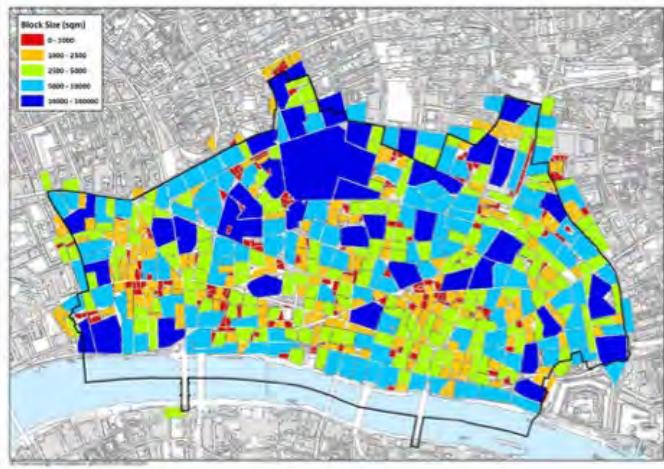


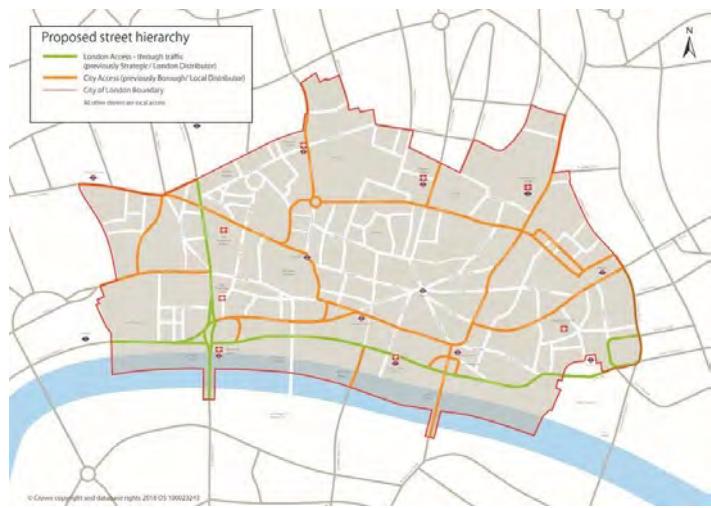
Figure 11 makes the Barbican and Golden Lane estates appear to be almost impregnable, suggesting the need for pedestrian permeability. That is not the case, certainly at the highwalks level.

10. Figure 12: Rail and underground network



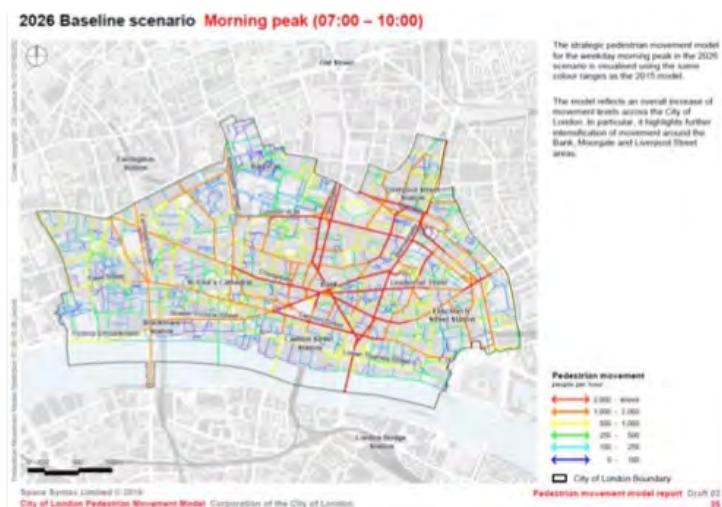
Unlike Figure 13, Figure 12 shows the connectivity of the Square Mile with local areas outside it. For something that should become a reality during the Plan period and will probably be in operation by the time of adoption, the route of the Elizabeth Line should be shown in Figure 12. Also, it would seem appropriate to show the names of all stations within the Square Mile, preferably with an indication of those with step-free access.

11. Figure 13: City of London Street Hierarchy



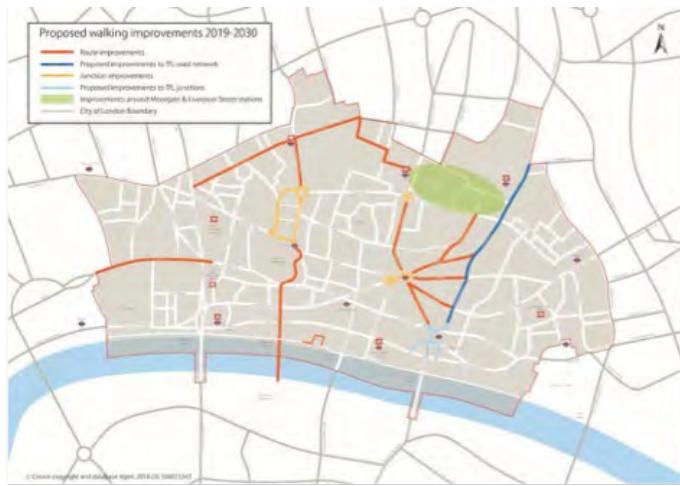
As mentioned re Figure 12, the continuation of both London Access and City Access roads outside the City boundary should be shown in Figure 13.

12. Figure 15: Forecast pedestrian flows in the City of London in the am peak in 2026



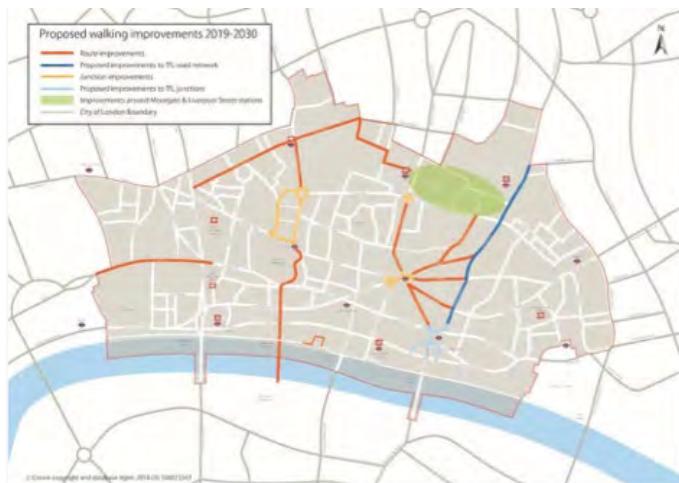
Perhaps the relevance of this forecast requires review. In any event the reproduction quality is poor.

13. Figure 16: Proposed walking improvements 2019-2030



The reproduction quality is poor. The absence of all the street network and the use of shapes and not specific areas is unhelpful

14. Figure 17: Proposed core cycling network and phasing



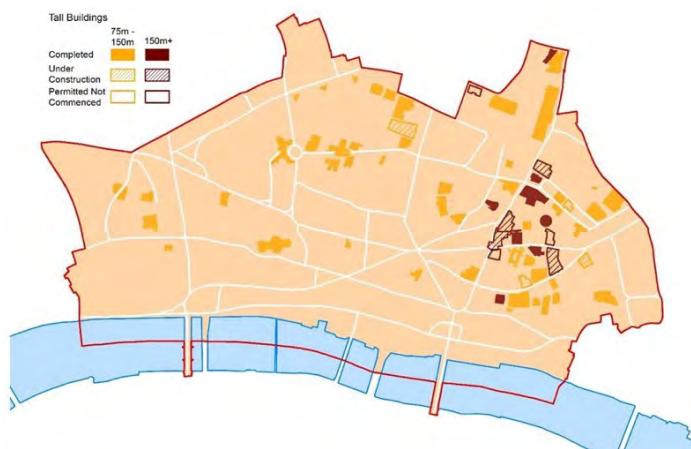
The reproduction quality is poor. The absence of the street network is unhelpful.

15. Figure 18: Designated heritage assets in the City of London



Figure 18 is inaccurate. The tongue of the Grade II* listed Historic Park and Garden adjoining the Scheduled Ancient Monument and the Museum of London, between London Wall and the Barbican shown hatched pink should also be coloured green. The Golden Lane Estate Designed Landscape has been omitted. The amount of information is too much for clarity, especially with the background colour.

16. Figure 19: Tall buildings distribution in the City of London September 2019



The background colour is intrusive. There have been a significant number of planning permissions granted for tall buildings since 2018. No doubt, when the approved version is adopted, many more permissions will have been granted, so it would be helpful to not only update with the granted permissions but also to indicate projects in the pipeline.

17. Figure 20: Components of areas inappropriate for new tall buildings

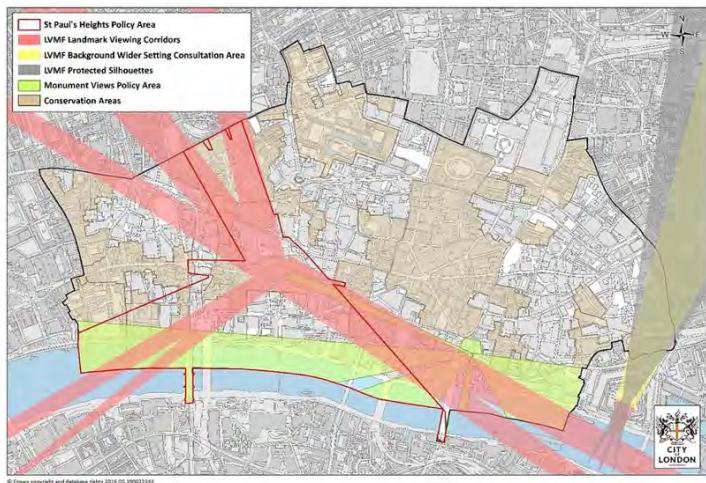


Figure 20 would benefit from the addition of the tall buildings shown in Figure 19.

18. Figure 21: Areas inappropriate for new tall buildings

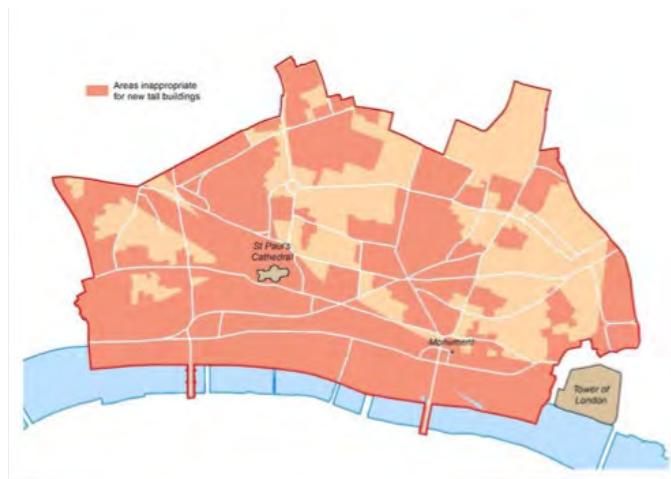
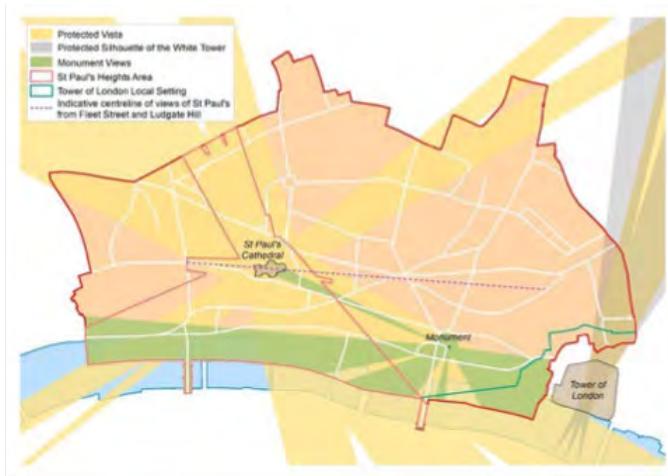


Figure 21 would also benefit from the additions proposed under Figure 20 and the inclusion of areas around the residential clusters not included in Conservation Areas.

19. Figure 22: Areas covered by protected views



The background colour is obtrusive.

20. Figure 23: Open Spaces in the City of London



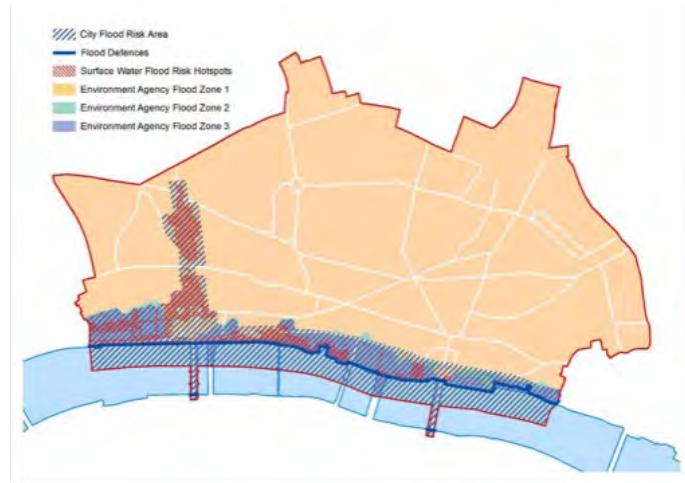
The absence of all the street network, doesn't help identify the location of the numerous open spaces.

21. Figure 24: Sites of Importance for Nature Conservation (SINCs)



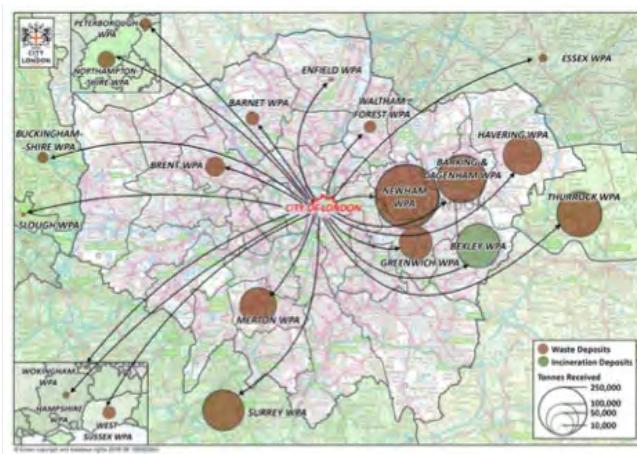
Each SINC could be identified by name and actual location, with the inclusion of all the street network.

22. Figure 25: City Flood Risk Area



The actual area could be shown in more detail and clarity without the rest of the City and the background colour – an expanded Figure 29, in fact.

23. Figure 28: Destinations for the City's waste 2012-2018



Whilst a very helpful illustration, there would be more clarity if unnecessary background were removed. Also, it is now 2021 and an update could be expected.

24. Figure 29: Thames Policy Area

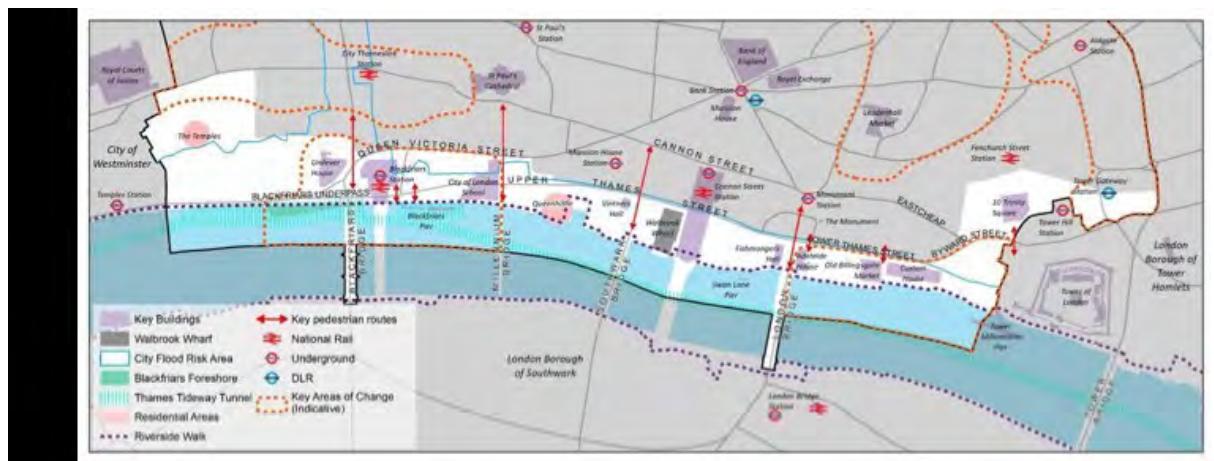
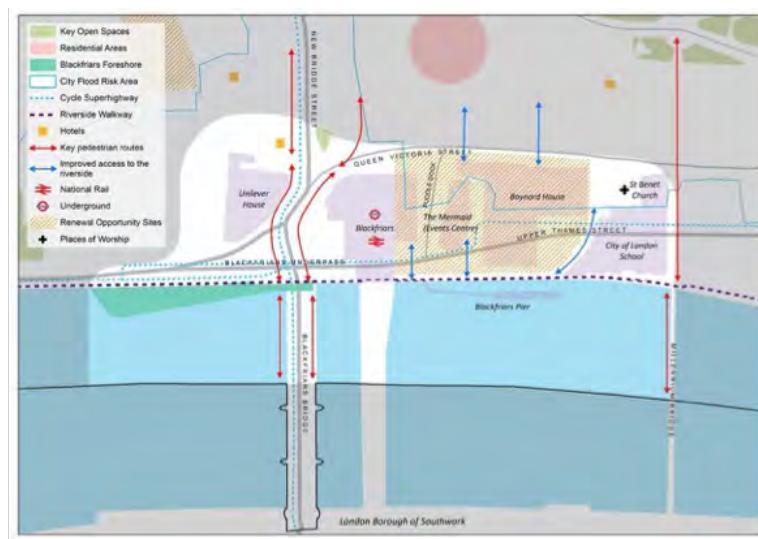


Figure 30 still lacks inclusion of all the street network and open spaces. For instance, Swan Lane Pier – which is necessary for an increase in river transport – is shown but not the means of access to it from, say, Lower Thames Street.

25. Figure 30: Blackfriars Key Area of Change



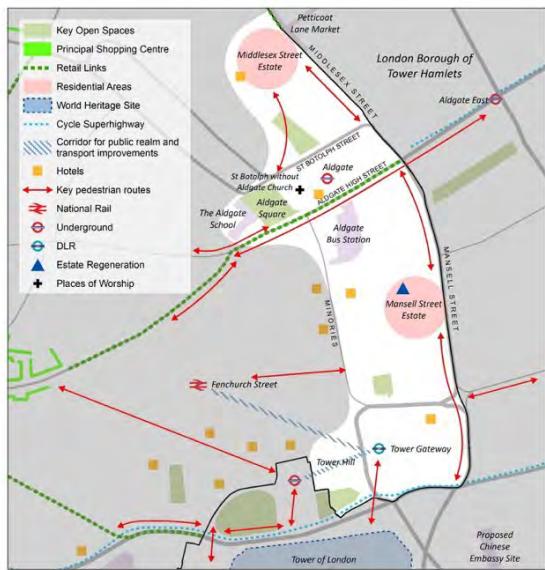
The lack of all the street network and the use of shapes, instead of specific areas is confusing. Individual hotels are shown but no specific residential blocks. “Key” buildings are outlined but not shown on the side key.

26. Figure 31: Pool of London Key Area of Change



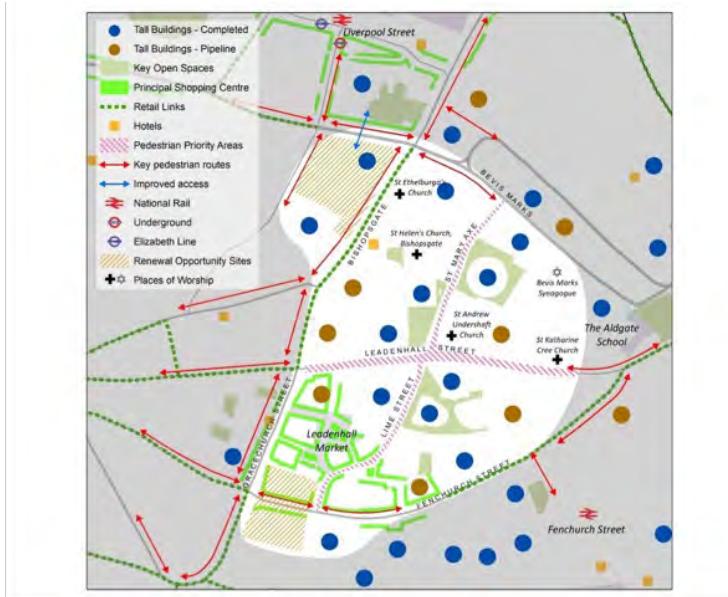
There must be serious concerns regarding the area shown as "Renewal Opportunity Sites". The three buildings shown need to be protected and, in fact, the area indicated includes a significant part of Lower Thames Street. The "gap" between Customs House and Three Quays requires explanation as it is Sugar Quay, a substantial residential block.

27. Figure 32: Aldgate, Tower and Portsoken Key Area of Change



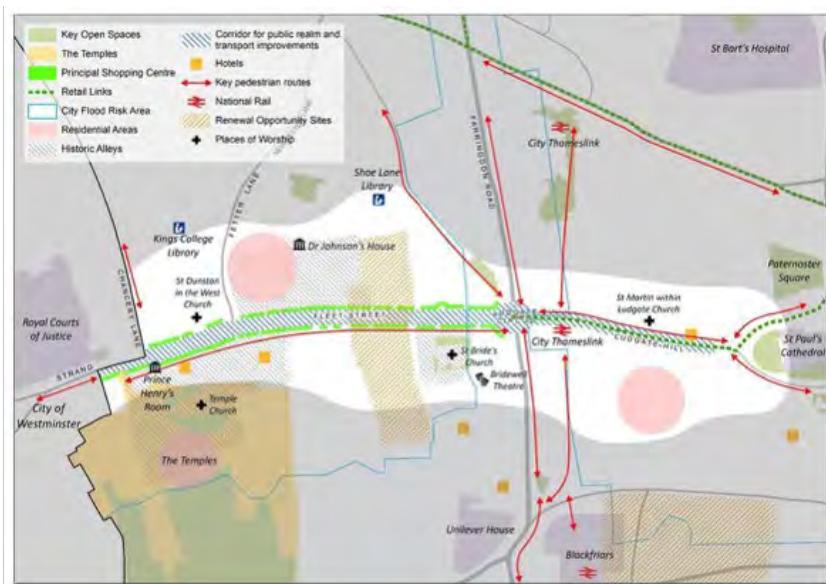
There appears to be an indifference to residents as both Middlesex Street Estate and Mansell Street Estate are shown as shapes instead of, like The Aldgate School and Aldgate Bus Station, as defined areas. The large new student residential accommodation at 52 Minories is missing, as is the Four Season's development around the Bus Station. Also all the street network should be shown.

28. Figure 33: City Cluster Key Area of Change



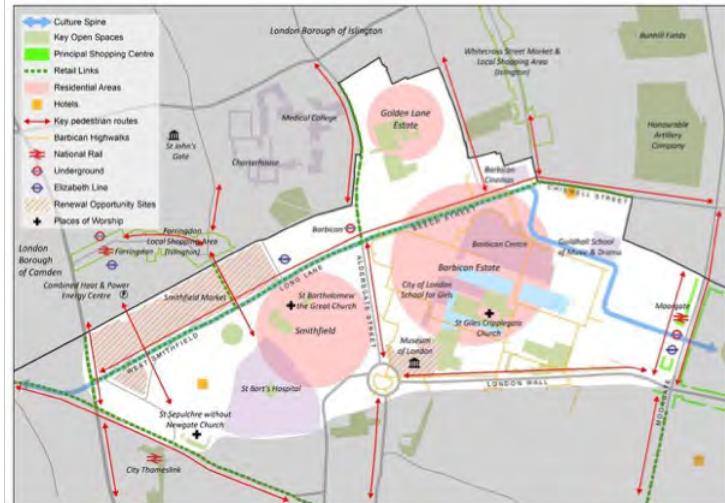
Planning permission has already been granted for the redevelopment of 70 Gracechurch Street the Renewal Opportunity Site on the north of the Fenchurch Street Junction. The owners of 60 Gracechurch Street, the Renewal Opportunity Site on the opposite side of the junction, objected to the planning application for 70 Gracechurch Street because of the affect on the potential redevelopment of 60. 99 Bishopsgate, the other Renewal Opportunity Site, is a 26-storey tower from 1996, which had been systematically renovated since then. The omission of all the street network is unhelpful.

29. Figure 34: Fleet Street and Ludgate Key Area of Change



“Farringdon Road” should be “Farringdon Street” – the only “road” in the City is “Goswell Road”. However, the use of shapes and not physical boundaries, including the street network, is unhelpful, at best. The colour indicating the Temples seems to change but this might be simply indicative of what’s in the Key Area of Change and what’s not.

30. Figure 35: Smithfield and Barbican Key Area of Change



Smithfield General Market, the Poultry Market, the Fish Market and the Red House are under conversion for the new Museum of London, so these hardly qualify as a “Renewal Opportunity Site”, particularly when the current Museum of London and Bastion House are also indicated as a “Renewal Opportunity Site”. The physical boundaries of both the Barbican and Golden Lane residential estates should be shown with the addition of all the street network and not simply indicated by pink “blobs”.

31. Figure 34: Liverpool Street Key Area of Change



This Key Area of Change merges with the City Cluster Key Area of Change around Wormwood Street, so is confusing. Again, all street network is omitted.

NAME REDACT [REDACTED]

Respondent 166

NAME REDACTED

From: NAME REDACTED
Sent: 13 May 2021 19:45 DBE
To: - Local Plan Suggested
Subject: amendment

I wish to propose the following amendment to the City Plan 2036:

- 1. Amendment to paragraph 6.1.15: developers must submit robust justification for demolishing rather than refurbishing and retrofitting an existing building.**
- 2. Amendment to paragraph 6.1.17: developers will be required to undertake a Whole Life Carbon assessment for all developments of 10 dwellings or 1000sqm and greater in size.**

With kind regards,
NAME REDACTED

Respondent 168

Part A

1. Personal Details*

*If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.

First name:

Last name:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments here

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: 9/5/21

Part A

1. Personal Details*

*If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.

First name:

Last name:

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments here

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: 25 - 05 - 2021



City of London Local Plan

Publication Stage

Representation Form

Ref:
(for official use
only)

Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

Part A Personal Details

Part B Your representations(s). Please fill in a separate sheet for each representation you wish to make.

Privacy Notice

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's website and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

The Planning Inspectorate has published a privacy statement for local plan examinations which is available at: [Planning Inspectorate Privacy Notice](#)

Part A

1. Personal Details*

**If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: [REDACTED]

Last name: [REDACTED]

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3: [REDACTED]

Line 4:

Post code: [REDACTED]

Telephone number: [REDACTED]

Email address where relevant:

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant Yes No

4.2 Sound Yes No X

4.3 Complies with the duty to co-operate Yes No

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please set out your comments here

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I share the concerns and support the amendments/supplements proposed by London Sephardi Trust and the Spanish & Portuguese Sephardi Community in respect of the Spatial Strategy and Policies DE3, S11, HE1, S12, S13, S21.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature: [REDACTED]

Date: 07/07/2021 [REDACTED]

Respondent 171

NAME REDACTED

From: NAME REDACTED
Sent: 10 June 2021 09:51
To: DBE - Local Plan
Subject: Protection for Bevis Marks Synagogue

Follow Up Flag: Follow up
Flag Status: Completed

THIS IS AN EXTERNAL EMAIL

Dear Sirs/Mesdames

I am writing to urge that Bevis Marks Synagogue be included in the City Plan as a protected monument. Its importance in the development of the City cannot and should not be forgotten. It is important that any surrounding re-development does not overshadow the building and its courtyard. The Jewish community has contributed greatly to the power of the City as a leading financial centre. To treat its important, historic synagogue as unimportant is a slight to the Jewish community.

Yours faithfully,

NAME REDACTED