



Ms Anna Tastsoglou, Principal Planning Officer,
Environment Department
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

26 March 2024

Dear Ms Tastsoglou,

Re: Bury House, 31 Bury Street, EC31 5AR
Full Planning Permission reference: 24/00021/FULEIA (Bury
House 1 - 4, 31 - 34 Bury Street) and
Listed Building Consent: 24/00011/LBC (Holland House 1 - 4, 32
Bury Street)

The planning application 24/00021/FULEIA and associated application for listed building consent 24/00011/LBC includes for the demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys; partial demolition of Holland House and Renown House; erection of four storey extension resulting in ground plus 8 storeys at Holland House; and a three storey extension resulting in ground plus 5 storeys at Renown House.

The LAMAS Historic Buildings Committee **object** to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area.

24/00021/FULEIA (Bury House 1 - 4, 31 - 34 Bury Street)

We have written on two previous occasions in 2021 expressing our objections to the planning applications submitted for 20/00848/FULEIA Bury House, 31 Bury Street, London, EC3A 5AR. As you will know, this scheme was subsequently refused in June 2022, with the reason cited as:

1. The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities by reason of the overbearing and overshadowing impact of the development on the courtyard of the Synagogue (which harms would not be outweighed by the public benefits of the proposal).

2. The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site, as highlighted by Historic England in their letter of objection.

The City of London Local Plan January 2015; Policy DM 12.2 Development in conservation areas identifies that: *Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.*

Contrary to that stated in the applicants DAS Vol 1; page 14, the proposed development is within the Creechurch conservation area.

24/00011/LBC (Holland House 1 - 4, 32 Bury Street)

Holland House is a Grade II* listed building first listed in June 1972 and amended in September 1997. The scheme 24/00011/LBC proposes the partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys.

The City of London Local Plan January 2015; Core Strategic Policy CS12: Historic Environment identifies the need: *To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.*

Policy DM 12.2 Development in conservation areas, para 3.12.10 further identifies that: *In the design of new buildings or alteration of existing buildings, developers should have regard to the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale,*

Policy DM 12.3 Listed buildings states:

1. *To resist the demolition of listed buildings.*
2. *To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.*

Para 3.12.14 further identifies that: *Where extensions are proposed, in order to be acceptable, they should be located where they minimise the effect on the listed building concerned, and should always be appropriate in scale and character. The bulk, height, location and materials of roof extensions will be particularly critical and should be appropriate to the period and style of the building and its setting.*

This has been reinforced by the establishment of the Creechurch conservation area, which encompasses both the Grade II* Holland House and the Grade I listed Bevis Marks synagogue.

The application 24/00021/FULEIA for the demolition of Bury House and erection of a new building is, in our opinion, materially of little difference to the previous 2020 scheme. The committee therefore still remain of the opinion that:

1. The proposal for the 43-storey tower immediately adjacent to the grade I listed Bevis Marks Synagogue will still profoundly harm the exceptional significance of the Synagogue in its setting by further eroding its prominence in its immediate surroundings. The reason as stated in paragraph one of the letter of rejection therefore still relates
2. Whilst it is acknowledged that the proposed building has a slightly amended profile, we do not consider that this provides sufficient mitigation to change the less than substantial harm on the London View Management Framework view as stated in paragraph two of the letter of rejection.

The application for listed building consent 24/00011/LBC for the partial demolition of the Grade II* Holland House and the construction of four further storeys would cause a significant detrimental effect on the Grade II* listed building, in contravention of Policy DM 12.3 Para 3.12.14

The proposed development is within the Creechurch conservation area, and in the opinion of the committee, will have a significant detrimental impact on the character and appearance of the conservation area, in contravention of Policy DM 12.2.

For the reasons set out above, the LAMAS Historic Buildings Committee therefore continue to object to the planning application and for listed building consent application on the grounds of the harm it would cause to the Bevis Marks Synagogue, a Grade I listed designated historic asset, and the loss of significance of the Creechurch conservation area.

Yours sincerely,

Vicki Fox (Hon. Secretary)
LAMAS – Historic Buildings & Conservation Committee