

# MAYOR OF LONDON

**Annie Hampson**  
Chief Planning Officer  
Department of the Built Environment  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

**Our ref:** GLA/4868/02  
**Your ref:** 18/01213/FULEIA  
**Date:** 15 July 2019

Dear Mrs Hampson,

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008**  
**Land adjacent to 20 Bury Street**  
**Local Planning Authority reference: 18/01213/FULEIA**

I refer to your letter of 4 July 2019 informing me that City of London Corporation is minded to grant planning permission for the above application. I refer you also to the notice that was dated 8 July 2019 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report on this case, reference GLA/4868/02 (copy enclosed), I consider that the proposal would not constitute the high standard of design required for a tall building in this location. The proposal would compromise the ability to appreciate the Outstanding Universal Value of the Tower of London World Heritage Site and would cause harm to the historic environment, the wider skyline and image of London, strategic views, as well as the public space surrounding the site. The public benefits of the scheme are limited and would not outweigh this harm. The proposals would also result in a poor quality, unwelcoming, unnecessarily confined pedestrian environment and would provide inadequate cycle parking.

I therefore direct you to refuse planning permission, under powers conferred on me by Article 6 of the above Order. My reasons are as follows:

- **Urban Design:** *The proposed development, by virtue of its height, form, design and appearance would not constitute the very highest quality of design required for a tall building in this location. It would be detrimental to the character and composition of the existing tall building cluster, the wider skyline of London and the public space surrounding the site. The proposals would be contrary to policies 7.1, 7.4, 7.5, 7.6 and 7.7 of the London Plan, draft London Plan Policies D1, D2, D7 and D8, and City of London Local Plan Policies CS7, CS10, CS14 and DM10.1.*
- **Historic Environment - Tower of London World Heritage Site:** *The proposed development would be detrimental to the setting of the Tower of London World Heritage Site by reason of its height, form, design and materiality, along with the proximity and prominence which would adversely affect the following attributes of the Outstanding*

*Universal Value of the Tower; the physical prominence of the White Tower; the site's strategic and landmark setting; and the site's status as an internationally famous monument. The integrity of aspects of the Outstanding Universal Value would also be affected including the concentric defences and the experience of the Tower being apart from the city. The harm would be significant and, whilst it would be 'less than substantial', it would be at the upper limit of this range. The public benefit of the provision of educational floorspace, a visitor attraction and the economic benefit arising from the development would not outweigh the harm identified. The proposals are therefore contrary to London Plan Policies 7.7, 7.8, 7.10, 7.11 and 7.12, Policies D8, HC1, HC2, HC3 and HC4 of the draft London Plan, Policies CS7, CS12, CS14 and DM12.1 of the City of London Local Plan, London's World Heritage Sites – Guidance on Settings SPG (March 2012), the guidance within the Tower of London World Heritage Site Management Plan and the National Planning Policy Framework.*

- ***Historic Environment – Other heritage assets:*** *The appearance of the proposed development within the setting of the Grade I listed St Botolph's Church without Aldgate and its appearance within key views of this heritage asset from the south, would cause harm to the contribution made by the setting to its architectural interest and the ability to appreciate the significance of this Grade I listed building. The proposal would also result in harm to the ability to appreciate the significance of other heritage assets including; the Grade II\* listed 10 Trinity Square, the Grade I listed Bevis Marks Synagogue, the Grade II listed 38 St Mary Axe, and the Grade I listed Church of St Helen's Bishopsgate. The public benefit of the educational floorspace, a visitor attraction and the economic benefit arising from the development would not outweigh the less than substantial harm identified with respect to these heritage assets. In addition, the submitted documents are inadequate to enable a full assessment of the impact on all heritage assets. The proposals are therefore contrary to London Plan Policies 7.7 and 7.8, Policies D8 and HC1 of the draft London Plan, Policies CS7, CS12, CS14, DM12.1 and DM12.3 of the City of London Local Plan, and the National Planning Policy Framework.*
- ***Strategic Views.*** *The location, height, form and appearance of the proposed development within LVMF views 10A.1 and 25A.1, 2 and 3 would fail to maintain the juxtaposition of the Tower of London World Heritage Site and diminish its prominence in relation to the Eastern Cluster, harming the composition of these views and failing to preserve viewers' ability to appreciate this recognisable and important aesthetic and cultural landmark, to the detriment of the image of London, contrary London Plan Policies 7.11 and 7.12, Policies HC3 and HC4 of the draft London Plan, Policies CS7 and CS13 of the City of London Local Plan and the London View Management Framework SPG (March 2012).*
- ***Pedestrian movement:*** *As a result of the significant increase in pedestrian activity within a confined area subject to crowding, the proposal would result in a poor quality, unwelcoming, unnecessarily confined and potentially unsafe pedestrian environment. The proposals are therefore contrary to London Plan Policies 6.1, 6.7, 6.10, 7.1 and 7.5, draft London Plan policies T2, T3, T4, D1 and D7, and Local Plan Policies CS16 and DM16.2.*
- ***Cycle parking:*** *The proposals would fail to provide adequate new short stay cycle parking to serve the proposed visitor attraction and would retrospectively alter an existing building to reduce the quality of its active travel offer. The proposals would therefore fail to comply with Policy 6.9 of the London Plan, Policy T5 of the draft London Plan and Policies DM16.3 and DM16.4 of the City of London Local Plan.*

I would be grateful if you would issue the appropriate notices, giving the above reasons for refusal.

Yours sincerely



**Sadiq Khan**  
Mayor of London

cc Unmesh Desai, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL  
Peter Twemlow, DP9, 100 Pall Mall, London, SW1Y 5NQ

