



Matter 7 Hearing Statement: Addendum
On behalf of The S&P Sephardi Community

May 2025





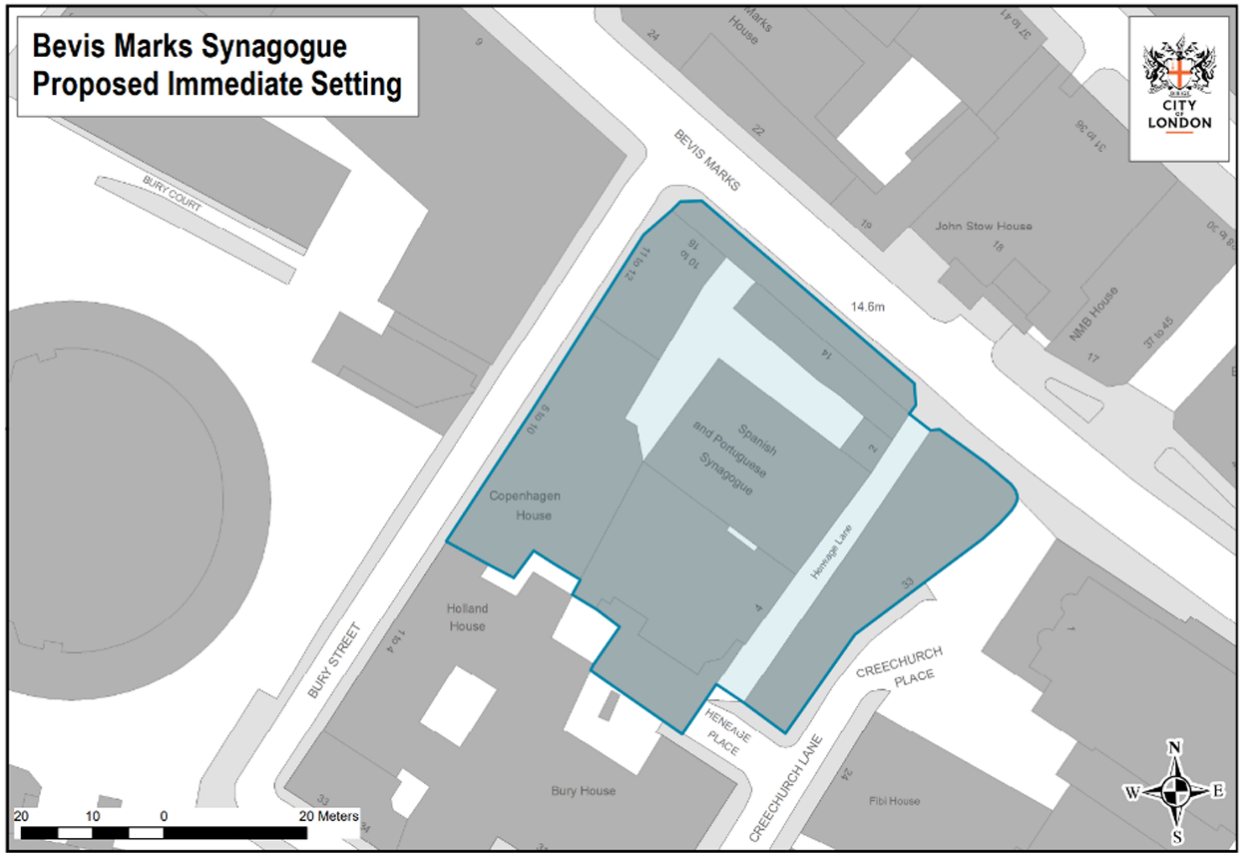
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1.0 HEARING STATEMENT ADDENDUM

- 1.1 This Hearing Statement Addendum has been prepared on behalf of The S&P Sephardi Community and should be read in conjunction with the Hearing Statement submitted in March 2025. This Addendum responds specifically to the additional evidence, revised contour lines and policies map published by the City of London on 9 May 2025. The S&P Sephardi Community notes that the proposed amendments within this additional information include the introduction of a new tall building area at Broadgate and changes to the contour lines elsewhere which have the effect of increasing the overall capacity for office floorspace within the plan.
- 1.2 The S&P Sephardi Community has no objection to these amendments in principle. This Statement sets out that with only very minor further amendments to the contour lines, there is an opportunity to protect Bevis Marks Synagogue from inappropriate development, while ensuring that the City's overall growth objectives are met. The remainder of this Statement sets out the Community's proposals for ensuring protection of the Synagogue through the City Plan.
- 1.3 The S&P Community is concerned generally about the City's future, and it recognises that change and development are inevitable and will often be desirable. However, such change needs to be properly balanced against other important planning considerations, which includes protecting the City's heritage assets and the particular needs of the City's communities.
- 1.4 Against this context, the Community's essential objective can be stated quite simply: it is to secure the protection of Bevis Marks Synagogue as one of the world's most significant heritage assets and the focus of a living community that has been rooted there for over 300 years.
- 1.5 It is particularly important that (a) the symbolic importance of the Synagogue is protected (i.e. that it retains its sense of majesty to those who enter the courtyard that was fundamental to the original planning and design); (b) the clear sky backdrop (and particularly the ability to observe the passage of the moon, which is significant in terms of religious ritual) is maintained; and (c) the Synagogue retains enough of what relatively little natural light remains that it can function effectively.
- 1.6 The Synagogue is a Grade 1 Listed building and it sits within a Conservation Area. This gives it some measure of planning protection. However, this is insufficient to protect it properly, and the Corporation's proposed policy shift to allow tall buildings within Conservation Areas will reduce the level of protection significantly if the examining inspectors allow it to proceed.
- 1.7 The Community seeks a specific protection for the setting/clear sky backdrop. This backdrop is to the south which means that by ensuring this space remains clear, it will contribute to the protection of not only the setting, but also interior light levels and the religiously and historically important view of the moon and the night sky. The Corporation has already put forward a proposal to protect the "immediate setting" (see Figure 1 overleaf). Whilst welcome in its own right, this simply does not go far enough. It would offer some added protection against immediate neighbouring buildings being redeveloped to an unacceptable height, but it would do nothing more to protect the setting/sky view.

Figure 1: Map showing extent of immediate setting



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- 1.8 Furthermore, the immediate setting policy does not specify what protection it would provide. The Community's view is that it should restrict buildings within the immediate setting to the height of the existing buildings. It is always open to the Corporation to allow minor deviance from policy if a particularly well-designed new building was proposed, but the height of the existing buildings should be the default. The City Plan examining inspectors are asked to propose a modification to this effect.
- 1.9 Even with the immediate setting policy defined as suggested above, the City Plan as drafted would allow an extremely damaging destruction of the setting of the Synagogue. Below is the existing setting and the potential setting. The contrast is stark.

Figure 2: Existing view from Synagogue courtyard

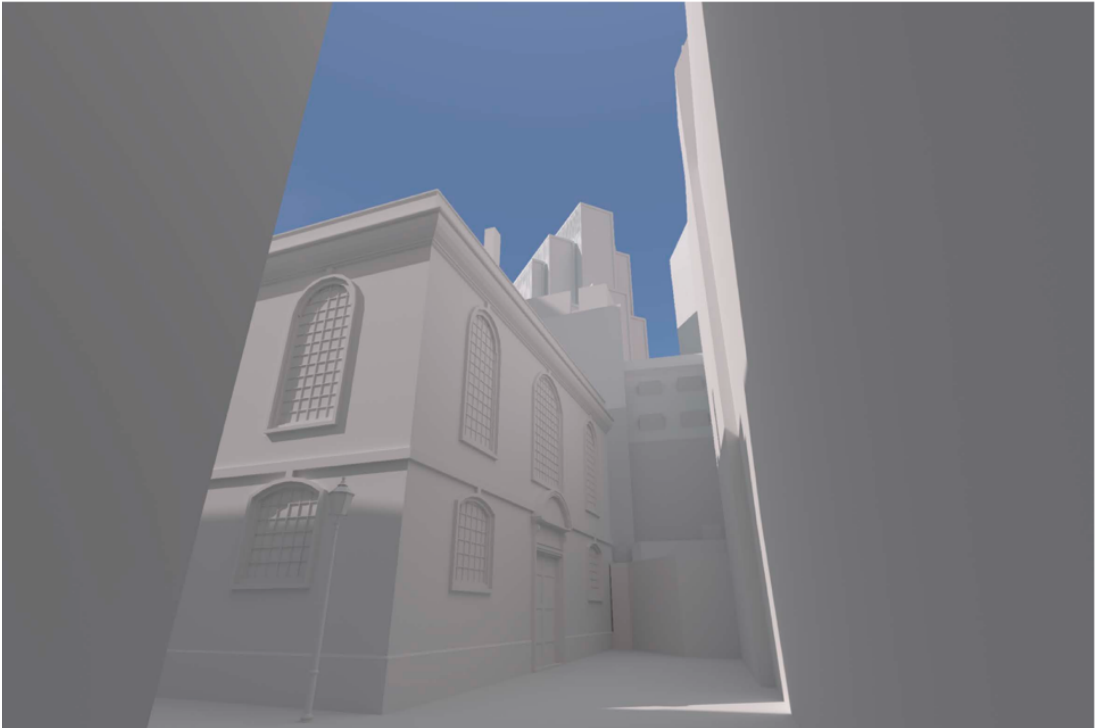
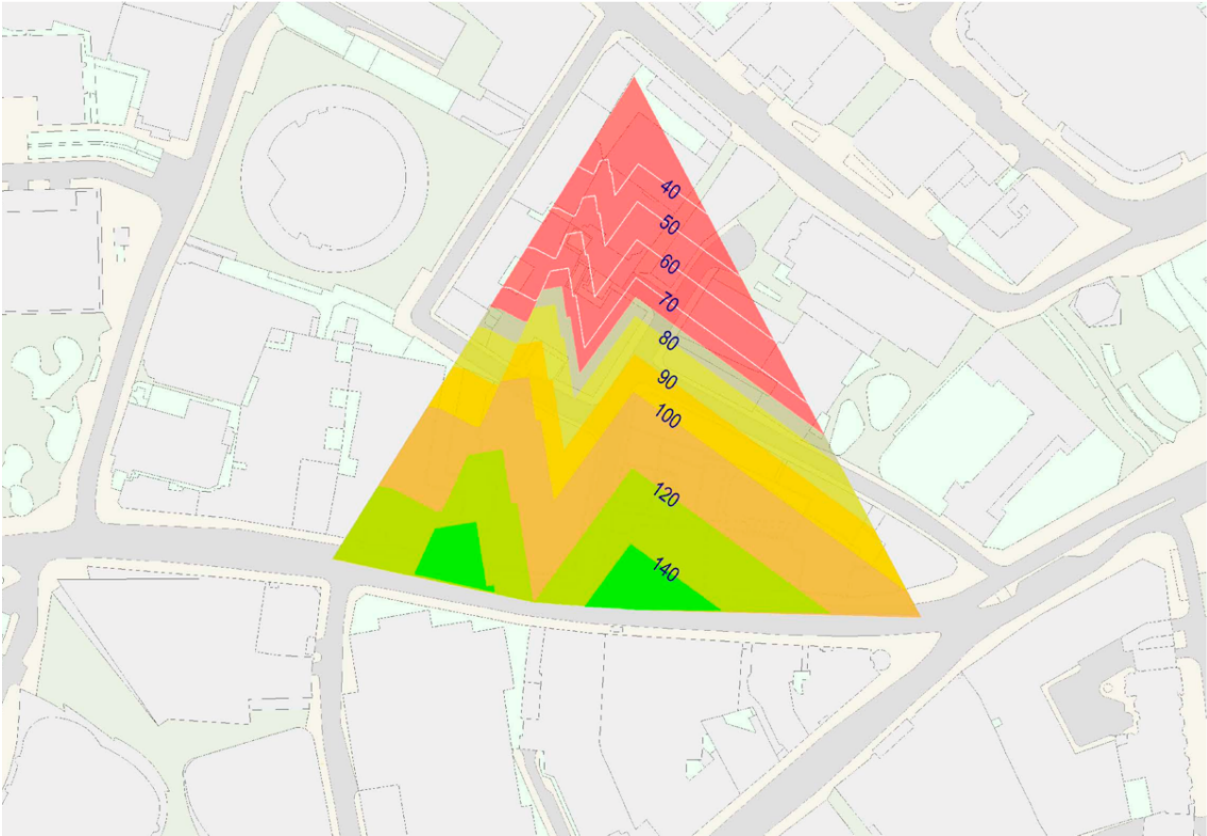


Figure 3: Potential view from Synagogue courtyard based on proposed City Plan contours



- 1.10 What is sought is a level of protection comparable to that already proposed for The Monument, where not only the immediate setting¹, but also important views are protected. The Monument is to have views in and out protected². The Synagogue only needs its remaining clear sky backdrop protecting as shown in Figure 2.
- 1.11 The examining inspectors are asked to require two further modifications to the City Plan to achieve this protection.
- 1.12 The first is to define a protected clear sky backdrop in much the same way as the inward and outward views to/from the Monument are defined. This is shown in the diagram below. However, it is important to be aware that this is a two-dimensional image of a zone of protection that would actually rise upwards from eye level at the entrance to the Synagogue courtyard at a steep angle.

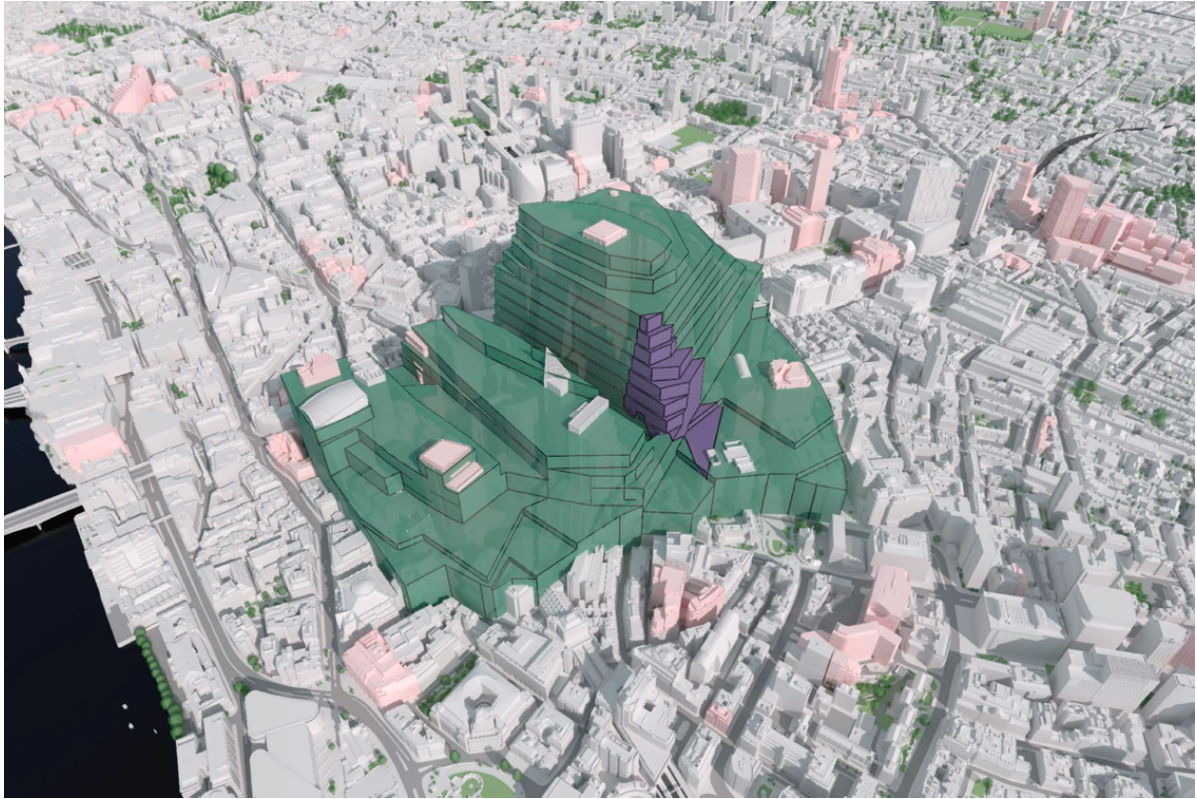
Figure 4: Proposed Zone of Protection for Bevis Marks Synagogue



- 1.13 The second is to amend the tall building "contours" to reflect the protected clear sky backdrop. The illustration below shows the effect. The dark blue area is the area shaved off the City's Eastern Cluster "bubble". We use the word "shaved" because, fortuitously, the Synagogue is located at the outer edge of the Cluster. It would be much more problematic if the Synagogue was located well within the Cluster.

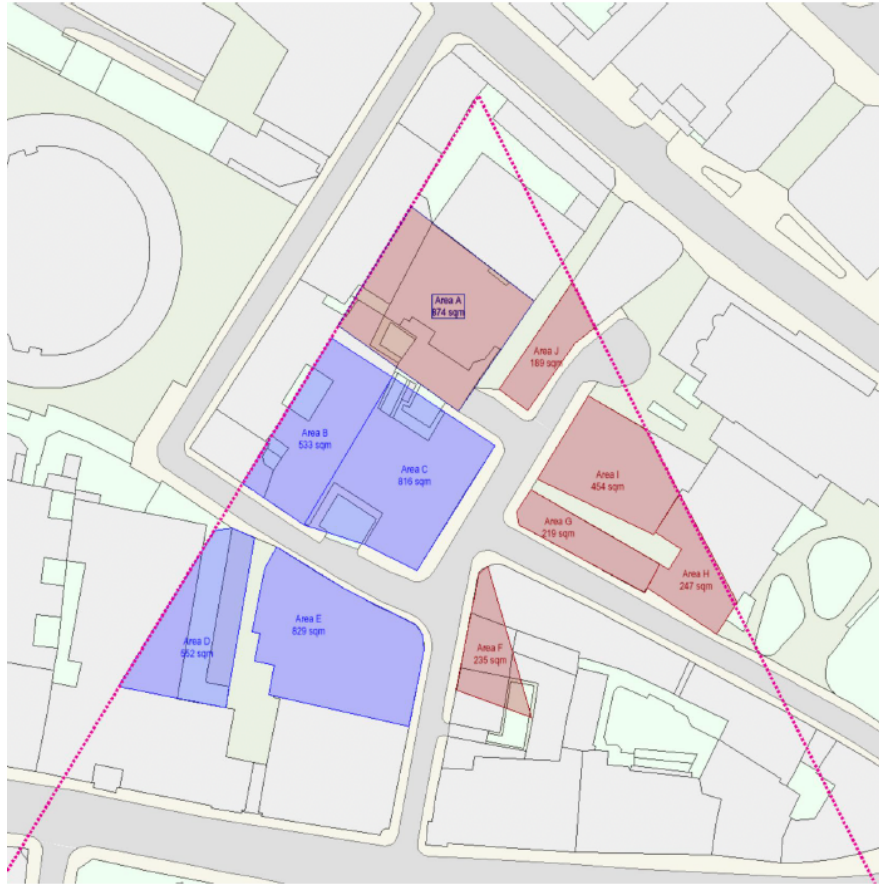
¹ Both buildings are proposed to have their "immediate settings" protected; see para. 11.2.1
² Strategic policy S13

Figure 5: Proposed Amendments to Tall Building Contours



- 1.14 Without access to the City's modelling software, it is not possible to confirm how much potential floorspace would be removed through this shaving. However, in crude terms, the blue volume in Figure 5 represents only about 1.22% of the volume of the whole Eastern Cluster bubble, and only 1.15% of the Eastern Cluster and Fleet Valley bubbles combined.
- 1.15 In practice, because (a) the protection zone is a quite steeply rising plane, and (b) it rises over various buildings that are highly unlikely to be candidates for redevelopment with tall buildings (e.g. St Katharine Cree church), the effect on the City's office space development potential would be even more limited.
- 1.16 In order to estimate the actual effect on development potential, it is necessary to go through a two-stage process.
- 1.17 Stage 1 involves identifying which sites under the protection zone are realistic candidates for redevelopment with tall buildings. The map below shows what is left if Listed buildings, areas of public open space and recently developed tall buildings are removed from the equation, and if it is assumed that the City's proposed height contours in this area remain as proposed in the Reg. 19 version of the City Plan, but subject to the shaving exercise.

Figure 6: Potential Development Sites in the Protection Zone



- 1.18 Stage 2 involves discounting those sites which are so small and/or irregularly shaped that they would not be feasible to be development sites on their own; or else, if they were potential fragments of larger redevelopment schemes lying under the protection plane, could readily be eliminated on planning balance grounds without damaging the viability of the host projects. These are the areas shown in brown on the map above.
- 1.19 It follows that the restriction would only significantly restrict the potential redevelopment of these sites³:

³ The other site shaded blue in Figure 6 (Area B) is Holland House, a Grade II listed building which would naturally restrict the height of proposed development. Area A is Valiant House; height of development here is already limited by the fact that the freehold interest is owned by The S&P Sephardi Community.

Site	Status	Floor area
31 Bury Street	<p>Redevelopment recently refused for the second time. The recent scheme proposed a net increase of 104,519sqm GIA (from 49,083 to 153,602sqm)</p> <p>This site is within the Creechurch Conservation Area</p>	If redeveloped to the full contour height, a height of up to 180m would be permissible. The protection plane would still allow redevelopment to a height of c. 90sqm.
Cunard House, 88 Leadenhall St	<p>Opened in 2000; there are no known redevelopment proposals. Existing floorspace believed to be c9,000sqm</p> <p>This site is within the Creechurch Conservation Area</p>	If redeveloped to the full contour height, a height of up to 180m would be permissible. The protection plane would still allow redevelopment to a height of 100m.
100 Leadenhall	<p>Development permitted and is implementable, however this has been considered on the basis that development is not currently progressing and a revised scheme could be brought forward.</p>	If redeveloped to the full contour height, a height of up to 180m would be permissible. The protection plane would still allow redevelopment to a height of 100m.

1.20 We do not have the data to estimate the effect on the Corporation's ability to hit its 1.2m sqm target. Presumably it is not anticipating the redevelopment of 31 Bury Street to a height that would damage the Synagogue's setting, given the recent robust refusal of a tall tower primarily for that reason. We have no idea whether any consideration has been given to the redevelopment of Cunard House. Except in respect of 100 Leadenhall, it could well be therefore that what the Community seeks would make no difference to the Corporation's calculations as to its ability to hit the target, and one must accept that 100 Leadenhall would not necessarily be affected by the proposed protection zone because there exists an extant permission.

- 1.21 Given the above, and remembering again that the protection zone would reduce the theoretical volume of new development potential by only a little over 1%, it seems fair to conclude that the protection zone would have an insignificant effect on the economic development potential of the City.
- 1.22 It is the submission of the Community that such a modest impact upon such a small number of potential development sites is more than a price worth paying to achieve the great heritage and cultural benefits that this protective approach would achieve. Moreover, introducing this protection for the Synagogue would not set a precedent: the Synagogue is unique (it and the Monument are singled out on the Plan as possessing "outstanding architectural and historic significance"⁴), and its location at the outer southern edge of the Cluster means its protection will have far less impact on the Corporation's economic aspirations than would be the case if it was located elsewhere.

⁴ Para 11.2.1



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