20 January 2016

Dear Professor Owens,

**Proposed Tower Block adjacent to the Grade I listed Bunhill Fields Burial Ground**

I am writing to draw your attention to a recent planning application that has been called in by the Mayor of London who now acts as the local planning authority. The Mayor is planning to make a decision on this application on Monday 8 February 2016.

If you share our concerns you may wish to write to the Mayor before he takes his decision.

The proposals are for the construction of a 44m high tower, over double the height of the existing buildings, directly adjacent to the Grade I listed Bunhill Fields Burial Ground. As you will no doubt be aware the Burial Ground is of outstanding national historic importance. We determined to refuse the application because we believe that the proposal would substantially harm the setting of the adjoining heritage assets including the listed burial ground as well as the local townscape.

Bunhill Fields Burial Ground is a Grade I Registered Park and Garden containing 1600 historic tombs many of which are Grade II and II* listed and which mark the graves of figures of national and even international cultural importance including William Blake, John Bunyan and Daniel Defoe. The park is also an important and very rare tranquil, green open space which provides workers, residents and visitors with respite from the frenetic activity of the City.

The burial ground is largely surrounded by low rise buildings, including the Grade II* listed Armoury House to the south. The exception to this is the Lexington Apartments, a taller building which demonstrates the harmful impact of such developments (as acknowledged by the Moorfields School appeal decision of 2011 – see below).

The City of London manages the burial ground and has asked for the application to be refused stating that the proposals would ‘overshadow the northern end of the garden, almost trebling the height of the existing property, exacerbating the enclosed effect from a similar height building to the south of the subject development. It would introduce a significantly larger built mass into the skyline and outlook of the garden, overshadowing the garden and greatly affecting its open and natural aspect, impinging upon its character and amenity and tranquility’.

Surprisingly Historic England has raised no objection to the proposals. Yet in 2011 English Heritage (now Historic England) strongly objected to a scheme of six to seven storeys on the north east corner of the burial ground (above mentioned Moorfields School appeal) stating that ‘the proposals would compound
the already somewhat oppressive and negative impact the existing buildings along the north and east boundary of the site have on the setting of the burial ground and conservation area… we would therefore advise that the planning application is refused’.

The Moorfields School application was dismissed at appeal with the Inspector concluding that the development would ‘threaten the sense of seclusion and tranquillity by altering the balance from one of harmony between built form and the open burial ground to one where the surrounding buildings would be oppressive and dominant’.

We are now asking Historic England to reconsider its current position and to come to a view that more closely resembles its 2011 assessment.

The GLA’s Stage II referral call in letter states that the proposed new buildings have ‘a refined and high quality appearance’ which provides a ‘recognisable human scale to the street edges’. We strongly disagree with this assessment. It is our view that the proposals are damaging to the local townscape, streetscape and the surrounding conservation area. The existing 4 and 5 storey buildings sit comfortably and unobtrusively in the street. The height and bulk of the proposed buildings, on the other hand, would be excessive and dominant creating a very uncomfortable pedestrian experience along Featherstone Street and the corner of City Road.

Furthermore, we consider the design to be repetitive and monotonous, the opposite of the articulated, stepped, and varied design of the Victorian buildings that are characteristic of the area and are said to have inspired the design.

There is no doubt that London must be allowed to grow and change and positive change is promoted, enabled and welcomed by Islington Council. Our track record exemplifies this. We also accept that an appropriate higher density development could be permitted on this site enabling employment growth to take place. However, we cannot support a proposal that would cause so much harm to London’s cultural and historic heritage and environment.

Further information about this planning application is available on the GLA website. If you share our concerns, you may wish to write to the GLA Case Officer before 8 February, so that the Mayor can consider your views before taking his decision quoting their reference D&P/3698 and the address (Monmouth House). Their contact details are:

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It would be useful if you could copy your emails/letters to the Council as well at Amanda.peck@islington.gov.uk

A copy of the planning application documents, Islington’s draft decision notice and delegated report can be found on our website at the following link using ref p2015/3136/FUL http://www.islington.gov.uk/services/planning/applications/comment/Pages/planning-search.aspx?extra=10#header
You are also able to attend the public meeting at which the Mayor will reach his decision which will take place at City Hall at 10 am on the 8 February 2016.

Please do not hesitate to contact me if you require any further information.

Yours sincerely,

Karen Sullivan  

*Service Director – Planning & Development*  
Islington Council