

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	14 November 2017
<b>Subject:</b> St Paul's Cathedral St Paul's Churchyard London EC4M 8AD Installation of a pair of symmetrical stone ramps with metal handrails and guardrails laid out either side of a new central stone stair with central handrail. The proposed ramps would replacing the current single temporary ramp. Relocation of the west gate to the North Churchyard to the north within the existing wall and historic Grade I Listed Churchyard railings, alterations to existing gates and railings.	<b>Public</b>
<b>Ward:</b> Castle Baynard	<b>For Decision</b>
<b>Registered No:</b> 17/00790/FULL	<b>Registered on:</b> 1 August 2017
<b>Conservation Area:</b> St Paul's Cathedral	<b>Listed</b> <b>Building:</b> Grade I

### Summary

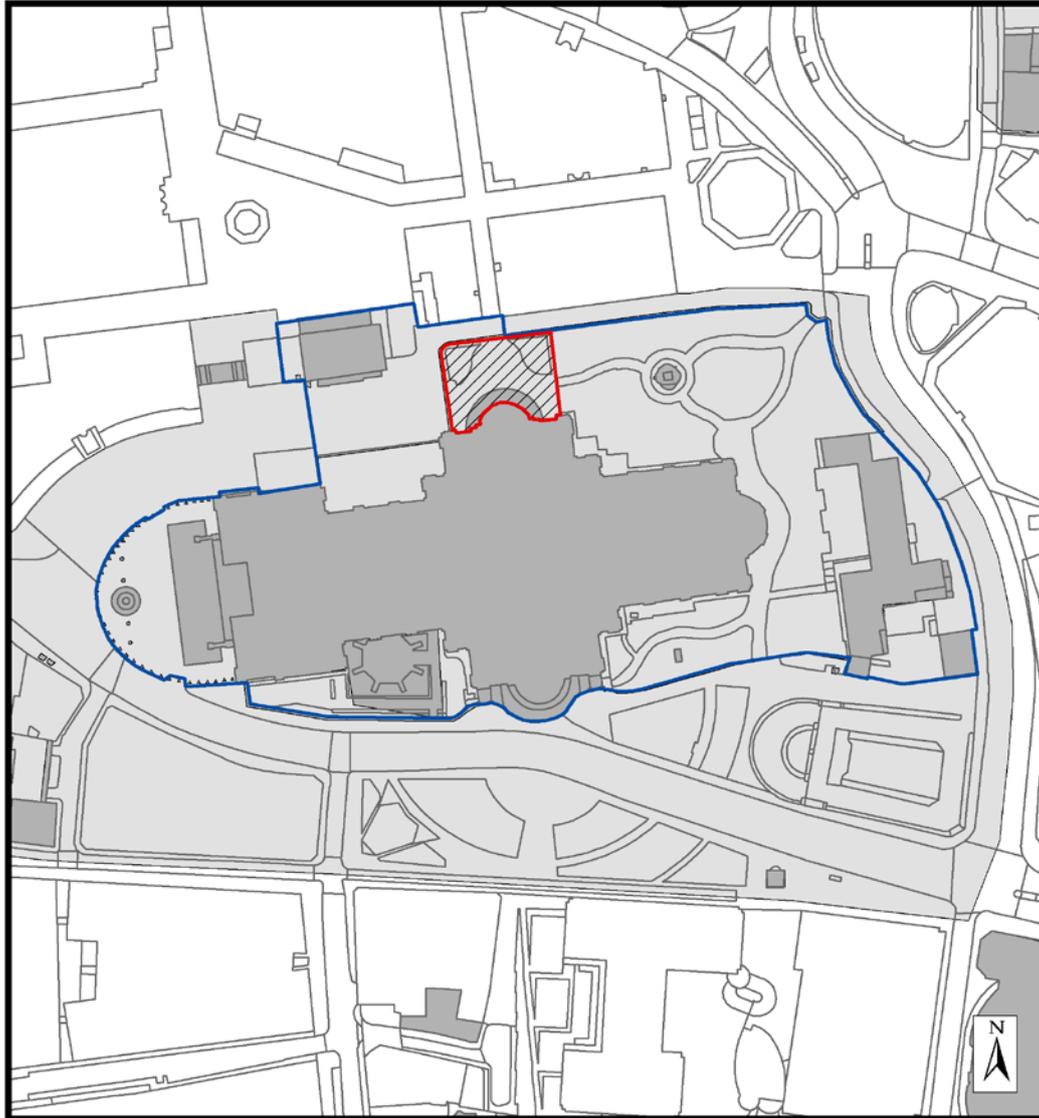
Planning permission is sought for the installation of a permanent, equal, step free access between the North Transept of St. Paul's Cathedral and the North Churchyard, with a pair of symmetrical stone ramps with metal handrails and guardrails, constructed above the existing steps, with a central stair and central handrail. This would replace the existing single temporary ramp. The new ramp would extend further into the Churchyard than the existing steps and some landscaping is proposed. These works are subject to approval by the Cathedrals Fabric Commission for England (CFCE), therefore a Listed Building Consent application is not relevant. Planning permission and listed building consent are sought for alterations to the west gate to the Churchyard, to dismantle and move it to the north of its current position, dismantling and moving the plinth wall and railings to the position of the existing gate, on a like for like basis. One objection has been received from the City of London Conservation Area Advisory Committee. Letters of representation have been received from the Georgian Group and City Heritage Society. The proposal has been assessed in accordance with the relevant statutory duties, and having regard to the development plan and other relevant policies, and relevant advice including the NPPF. The proposals would result in less than substantial harm to the special architectural or historic interest of the Cathedral, and the setting of St. Paul's Cathedral Conservation Area. The harm is outweighed by the public benefits of the proposal to install a

permanent, equal (step free) access between the North Transept of St. Paul's Cathedral and the North Churchyard and alterations to the west gates and railings to the Churchyard.

### **Recommendation**

That planning permission be GRANTED for the above proposal in accordance with the details set out in the attached schedule.

# Site Location Plan



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ADDRESS:

St. Paul's Churchyard

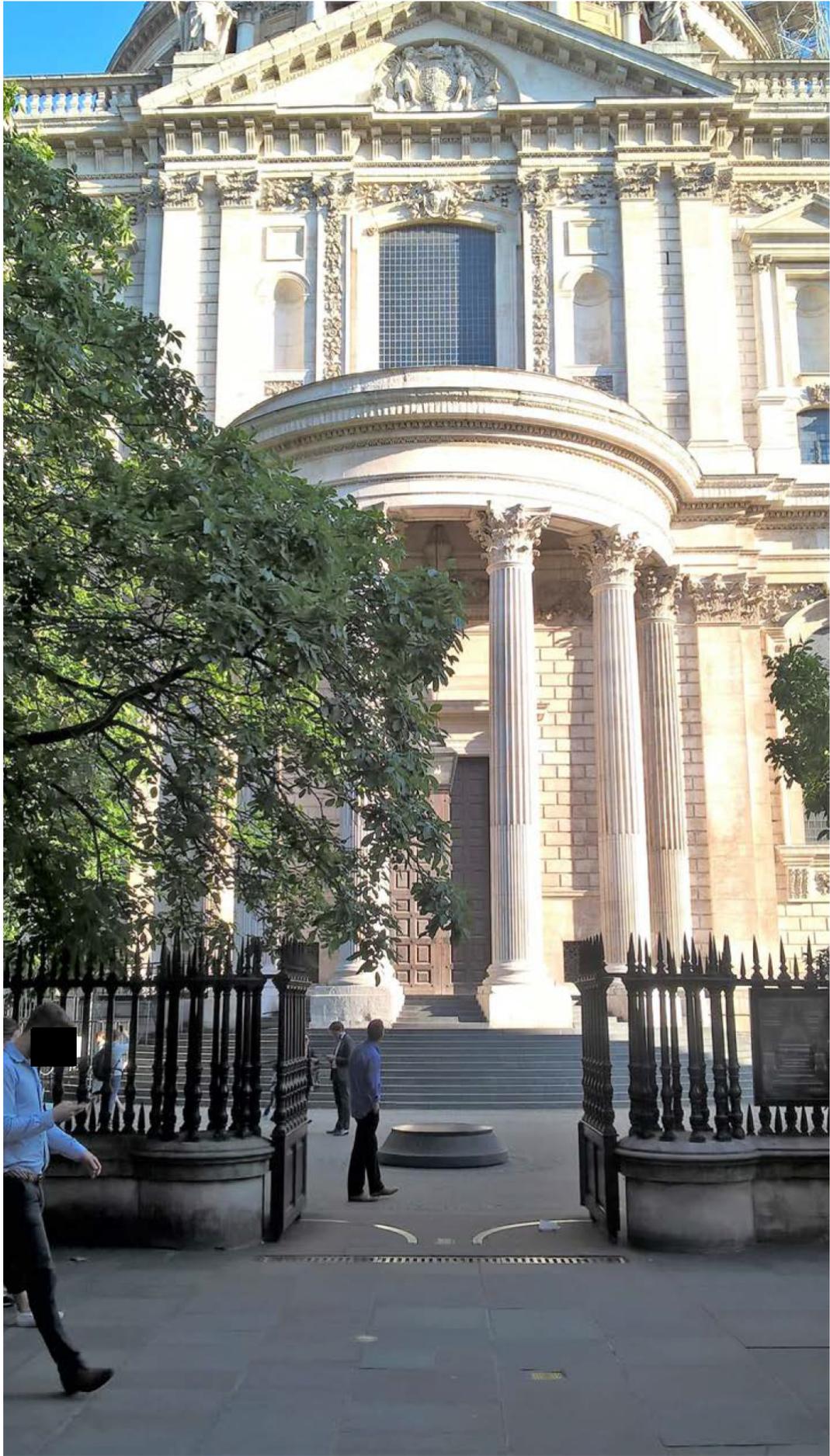
CASE No.

17/00790/FULL

-  SITE LOCATION
-  CHURCHYARD BOUNDARY
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



## **Main Report**

### **Site**

1. St. Paul's Cathedral is Grade I listed, of exceptional and international significance and located within St. Paul's Cathedral Conservation Area. Designed by Sir Christopher Wren after the Great Fire of London; it is considered to be Wren's masterpiece, is a symbol of London and has strong associations with significant names and events in the history of London and the nation. The railings and gates to St. Paul's Churchyard are separately Grade I listed. It is a site of considerable archaeological potential with known survival of remains from the Roman period, with extensive burials and structural remains relating to the medieval and Wren Cathedral. The proposals affect the setting of a number of listed buildings: St. Paul's Cross is Grade II listed and Chapter House is Grade II\* listed. Temple Bar to the north of the Cathedral is listed Grade I. St. Paul's Churchyard contains four trees protected by Tree Preservation Order's (TPO's) and is a Site of Local Importance for Nature Conservation.

### **Relevant Planning History**

2. Planning permission 16/00662/FULL was granted on 03.08.2016 for the 'Provision of a metal modular temporary access ramp to the East side of the North Transept entrance of St Paul's Cathedral for a temporary period of three years'.

### **Proposal**

3. Planning permission is sought for the installation of a permanent, equal, step free access between the North Transept of St. Paul's Cathedral and the North Churchyard, with a pair of symmetrical stone ramps with metal handrails and guardrails, constructed above the existing steps, with a central stair and central handrail. This would replace the existing single temporary ramp. The new ramp would extend further into the Churchyard than the existing steps and some landscaping is proposed. These works are subject to approval by the Cathedrals Fabric Commission for England (CFCE), therefore a Listed Building Consent application is not relevant.
4. Planning permission and listed building consent are sought for alterations to the west gate to the Churchyard, to dismantle and move it to the north of its current position, dismantling and moving the plinth wall and railings to the position of the existing gate, on a like for like basis.

### **Consultations**

5. The views of other City of London departments have been taken into account in the consideration of this scheme.
6. Following receipt of the planning application and listed building consent the applications were advertised in the press, site notices were put up on the site, and statutory and non-statutory bodies were consulted.
7. Copies of the representations are appended.

8. Historic England does not wish to comment in detail but offer some general observations: they have been involved in substantive pre-application advice which has included consideration by the London Advisory Committee. The submitted designs reflect those that they gave advice previously on which is supported in principle.
9. The Georgian Group does not object in principle to the proposals but has a number of concerns regarding the proposed design. They agree with the principle of a ramp in this location but highlight the importance of detailing, particularly the handrail, to the success of the scheme.
10. City of London Conservation Area Advisory Committee objected to the proposal. They accept the need to carry out works for permanent alterations to this iconic Grade I listed building and that there was a need to incorporate appropriate access for the disabled. However, the design was not considered appropriate and was detrimental to the Conservation Area and the setting of the listed building.
11. City Heritage Society accept that it is necessary to provide disabled access to the Cathedral and presume that all options have been considered before this location was chosen, and that a symmetrical layout is necessary. There are a number of aspects of the proposals that they find disturbing:
  - spaces left between the ramps and the Cathedral would look awkward particularly at the top of the ramp
  - the stone base of the railing to the ramp would vary in height – it has an unclear purpose and would not enhance the design
  - the balustrade is not consistently formed of vertical balusters (though this may be a misunderstanding of the plans)
  - the width of the flat balusters would reduce the transparency of the balustrading compared to square narrower balusters
  - the ledge at the base of the ramp is too narrow in places to be of use as seating and encouraging people to sit here is questioned; if seating is required classical stone benches are suggested
  - the plain stone walls of the plinth to the ramp would become streaked and stained as no coping is proposed
12. A representation has been received commenting on the proposed balustrade design.
13. The above objections and comments are addressed in the considerations section of this report.

### **Policy Context**

14. The development plan consists of the London Plan and the Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
15. Government Guidance is contained in the National Planning Policy Framework (NPPF).

## **Considerations**

16. The Corporation, in determining the planning application, has the following main statutory duties to perform:
17. To have regard to the provisions of the development plan, so far as material to the application and to other material considerations (Section 70 Town and Country Planning Act 1990);
18. To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) Planning and Compulsory Purchase Act (1990).
19. For development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features which of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990) and;
20. For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
21. Paragraph 131 of the NPPF advises, 'In determining planning applications, local planning authorities should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.'
22. The NPPF states at paragraph 4 that 'at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking..... For decision taking this means: approving development proposals that accord with the development plan without delay....' It further states at paragraph 2 that: 'Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise'.
23. It states at paragraph 7 that sustainable development has an economic, social and environmental role.
24. In considering the application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.

## **Impact on St. Paul's Cathedral, Churchyard gates and railings and their setting, and St. Paul's Cathedral Conservation Area**

25. The proposed new structure would comprise of a symmetrical ramp and central stair and has been designed to have a minimal visual and physical impact on the existing steps and column bases of the North Transept. It would be a contemporary design of high quality materials that would be sympathetic to the Cathedral. The structure would sit above the existing steps, leaving them protected, and would project beyond the steps into the churchyard. The structure would be totally reversible and no historic fabric would be removed or lost. The proposed materials would be Portland Stone for the ramp walls and bench seating and black granite paving for the steps. The balustrade and handrail would have a bronze finish with concealed, integrated lighting. The plinth of the ramp wall would have a 'French drag' vertical tooled finish to aid rain runoff and prevent staining of the stone and drainage would be incorporated into the ramp paving. The paving in the churchyard would be York Stone to match the existing and the existing radial paving would be reused as far as possible. Some new foundations would be required and the lower part of the column bases would be visually obscured.
26. Two temporary ramps have been installed at the North Transept, the first in 2005, and the current installation, which has planning permission for a temporary period of three years and would expire on 02 August 2019.
27. The temporary ramps have provided an opportunity to assess the visual and physical impact of a new structure in this location, and its impact on views of the Cathedral and its setting. The current proposal is considered to have some impact on the appearance of the Cathedral but this is minimised by it following the form of the North Transept steps and by a structure that integrates steps and ramps. The structure would extend beyond the footprint of the steps in order to achieve the necessary ramp gradients.
28. There would be some harm caused by the height of the structure which would obscure the lower part of the column plinth. The ramp wall would diminish in height and the balustrade would increase in height as the ramp is ascended. The ramp wall would be at its lowest at the top of the steps next to the plinth of the portico columns and this detail would minimise the solid appearance of the plinth. The railings have been designed to have a minimum number of verticals, placed at varying intervals as the ramp ascends; which with the integrated handrail would maximise transparency and visibility of the Cathedral and base of the portico. The railing is proposed to be rectangular to give the required strength to protect the ramp edge and support the handrail and to maximise dynamic views. Alternatives to the proposed balustrade were considered, including a glass balustrade which would have a lack of transparency due to the curved sections of the structure and be vulnerable to damage and graffiti with consequent maintenance issues; perforated metal or decorative panels which would reduce visibility; no

handrails or a handrail with no guarding which would not meet regulations. The alternatives were considered to be materials not used within the Cathedral and which could look alien, out of place or become dated, and were discounted. In addition a wall surface which could be used as seating would impede use of the ramp and be unsafe.

29. The base of the ramp structure would be bench seating. This would provide additional seating in the Churchyard which would be beneficial as there are a high number of visitors. In addition it would allow the wall behind to be low and the railings to be wider spaced which would maximise the visual permeability of the balustrade and the structure.
30. The Churchyard has been an important gathering place and burial ground for many centuries and has a high community and amenity value. It is one of the largest green spaces in this part of the City, and with the Cathedral, is a defining element/*characteristic* of the St. Paul's Cathedral Conservation Area. By incorporating the ramp and stair into one structure, encroachment into the Churchyard would have a minimal impact on the character and appearance of the conservation area and the amenity of the Churchyard, with some alterations to one planting area on the north east side.
31. The alterations to the Churchyard gates and railings would reuse all existing materials. They would be dismantled and rebuilt with the gates in the position of the present railings, and vice-versa, on a like-for-like basis. This would enhance access to and from the Churchyard and not impede the area around the proposed ramp structure. The upper courses of the medieval well inside the churchyard would be reduced to be consistent with the new paving level. This would be acceptable as only modern brickwork would be affected.
32. There would be some impact on the landscaping and paving of the Churchyard. The existing paving would need to be altered to match the existing levels, the planting beds and path to the east would be redesigned, and the People of London Memorial would need to be re-sited. It is proposed to carry out further consultation on this and seek a location in the churchyard appropriate for quiet contemplation. A new information board would be provided as well as information about the John Wesley statue. There would be no impact on the John Wesley statue or the granite bollards and no trees would be affected.
33. The ramp and stair structure would be a visible alteration to the Cathedral and churchyard in close and more distant views and would affect the setting of the conservation area. In moving around the churchyard a viewer would have a changing view of the structure in relation to the North Transept and the base of the column. From longer views from the north, the proposed structure would be seen in the wider context of the North Transept portico and the Cathedral and the lower elements would be seen in relation to the Churchyard wall and railings and landscaping. The proposed work would be within the existing Churchyard railings and would have a minimal visual impact on the setting of the Chapter House.

34. Conditions are recommended to cover the re-siting of the People of London Memorial, a new information board, information and interpretation of the John Wesley statue, re-landscaping and paving of the churchyard, materials of the ramp wall, railings, lighting and paving and the treatment of the area between the Cathedral and the new structure.

### **Impact of the proposals on access to St. Paul's Cathedral and Churchyard**

35. An assessment of access to and within the Cathedral and Churchyard has been carried out and this has included assessment of entry and egress for services, visitors, visitor management and security. Some alterations have been carried out to improve access, for example a platform lift to the quire and ramp access within the Crypt. This application is part of a larger scheme to create a new inclusive entrance to the Cathedral which is currently being developed.
36. At present, entrance to the Cathedral is from the West-Front steps and a level entrance and lift at the South Transept. The South Transept entrance has been successful, however, it has a limited size and capacity, is not inclusive to all and does not have the capacity for a high number of people to attend services or visit. The Cathedral holds services which can attract up to 2,000 people, are high profile, national events and has a high number of visitors. The Cathedral advises that a high number of visitors require level access for mobility reasons, wheelchair and pram/pushchair use.
37. The temporary ramps have provided opportunities to assess how a ramp at the North Transept entrance would provide ease of access to and within the Cathedral and aspects of a detailed design such as gradient and handrails. This has resulted in detailed design consideration of the balustrade railings, handrail and plinth to reduce as far as possible the visual impact of the proposed structure.
38. A central handrail on the steps is proposed to be removable to facilitate access for moving heavy or bulky material for major events only and would be in place at all other times.
39. The proposals would incorporate a new ramp and stair access in one structure and this would enable a high number of visitors to approach and leave the Cathedral from one location. Details of the paving on the ramp and in the Churchyard, the balustrade, temporary handrail fixings and signage would be covered by conditions.

### **Impact of the proposals on archaeological remains**

40. St. Paul's Cathedral and churchyard are in an area of considerable archaeological potential. There is known survival of remains from the Roman period with potential for burials and industrial activity and for burials and occupation from the Saxon and Norman periods. The first Cathedral was established in 604 although its precise location is not known. There is survival of extensive burials and structural remains

relating to both the medieval, pre-Wren Cathedral and the Wren Cathedral which are both buried and contained in the standing fabric. An archaeological assessment, a report of the archaeological evaluation and foundation proposals has been submitted with the application.

41. Evaluation has been carried out on the steps and in the Churchyard and the findings used to refine the foundation design. Remains of foundations of the Cathedral, a culvert which was part of the Wren drainage system and the medieval well were recorded. Part of the Churchyard is above the Cathedral Works Department which is at lower ground level between the Cathedral and the Chapter House.
42. The proposed works may have some impact on archaeological remains and have been designed to minimise the impact as far as possible. Some new foundations would be required to support the ramp structure and alterations to the churchyard paving would be necessary to match existing paving levels. The proposed structure would be lightweight concrete, designed to sit above and be supported by the existing steps. The steps and column bases would be covered by a protective layer and a movement joint respectively. There may be a need for limited fixing into the steps for additional support foundations. Where the ramp would project beyond the existing steps anchor supports would be fixed in to the existing slab depth and have no below ground impact.
43. Alterations to the gates and railings would affect the medieval well adjacent to the gates. It would need to be altered and lowered to the same height as the paving. This would require the removal of modern brickwork which is thought to date from reconstruction carried out as part of the Works Department development.
44. The proposals would have a minimal impact on archaeological remains and have been designed to avoid disturbance as far as possible. Where the proposed structure covers or obscures the existing steps and column plinths, they would be covered by a protective layer and a movement joint. Conditions are recommended to cover the detailed foundation design, protection of the steps and column bases and archaeological recording.

## **Conclusion**

45. The proposals are considered to cause less than substantial harm to the Listed Cathedral and the St Paul's Cathedral Conservation Area. Improvements to equal access to the Cathedral have been considered in relation to the wider setting of the Cathedral and churchyard and the proposed ramp at the North Transept would provide equal access for the greatest number of people with a minimal visual and physical impact with substantial public benefit.
46. The proposal has been assessed in accordance with the relevant statutory duties, and having regard to the development plan and other relevant policies, and relevant advice including the NPPF. The proposals would result in less than substantial harm to the special architectural or historic interest of the Cathedral, and the setting of St.

Paul's Cathedral Conservation Area. The harm is outweighed by the public benefits of the proposal to install a permanent, equal and step free access between the North Transept of St. Paul's Cathedral and the North Churchyard and alterations to the west gates and railings to the Churchyard.

## **Background Papers**

### Internal

Nil

### External

Letter 21.08.17	Historic England
Letter 23.10.17	Conservation Area Advisory Committee
Letter 25.08.17	City Heritage Society
Letter 23.08.17	The Georgian Group
Design & Access Statement July 2017	
Planning Response Document 4 October 2017	
Archaeological Evaluation August 2017	
Structural Appraisal 30 August 2017	
Accessibility Needs Analysis 27 July 2017	

## **Appendix A**

### London Plan Policies

Policy 3.1	Ensuring equal life chances for all
Policy 4.5	London's visitor infrastructure
Policy 4.6	Support for and enhancement of arts, culture, sport and entertainment
Policy 4.12	Improving opportunities for all
Policy 7.8	Heritage assets and archaeology

## Relevant Local Plan Policies

### ***CS10 Promote high quality environment***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

#### ***DM10.1 New development***

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

### ***DM10.8 Access and inclusive design***

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### ***CS11 Encourage art, heritage and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

#### ***DM11.1 Visitor, Arts and Cultural***

- 1) To resist the loss of existing visitor, arts and cultural facilities unless:
  - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
  - b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
  - c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
- 2) Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

### ***CS12 Conserve or enhance heritage assets***

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.

### ***DM12.1 Change affecting heritage assets***

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### ***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

### ***DM12.4 Archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

## SCHEDULE

APPLICATION: 17/00790/FULL

### **St Paul's Cathedral St Paul's Churchyard London**

**Installation of a pair of symmetrical stone ramps with metal handrails and guardrails laid out either side of a new central stone stair with central handrail. The proposed ramps would replace the current single temporary ramp. Relocation of the west gate to the North Churchyard to the north within the existing wall and historic Grade I Listed Churchyard railings, alterations to existing gates and railings.**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
  
- 2 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all works pursuant to this consent shall be carried out in accordance with the approved details:
  - a) a method statement for the temporary dismantling of the Churchyard gates and railings and storage details
  - b) a method statement for the reinstatement of the Churchyard gates and railings
  - c) details of the temporary removal, storage and re-instatement, in the Churchyard, of the 'People of London' memorial
  - d) details of all new landscaping, including levels, planting areas, paving materials and reuse of paving
  - e) details of alterations to the medieval well including new capping
  - f) details of new interpretation and information boards for the Churchyard and John Wesley statue
  - g) details of new fixing to support the new ramp and stair structure
  - h) details of the proposed infill grille and paving at the junction of the Cathedral and the new ramp and stair structure
  - i) details of new bench seating at the base of the new ramp and stair structure
  - J) details of new balustrade, handrail and lighting
  - K) details of paving to the proposed steps and ramp including materials and access measuresREASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 3 No works except demolition to basement slab level shall take place until arrangements have been made for an archaeological "watching brief" to monitor development groundworks and to record any archaeological evidence revealed. Details of these arrangements shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the work.  
REASON: To ensure an opportunity is provided for the archaeology of the site to be investigated and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 4 Before any works thereby affected are begun, details shall be submitted to and approved in writing by the Local Planning Authority showing details of the extent of pruning and all other works to trees in the Churchyard  
REASON: To ensure the protection of trees within the Churchyard in accordance with the following policies of the Local Plan: DM10.4, DM19.2
- 5 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: 200, 201, 202, 203, 210, 220, 226, 300, 301, 302, 303, 304, 305.  
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## City of London Conservation Area Advisory Committee

Mr. Ted Rayment,  
Department of the Built Environment,  
Corporation of London,  
P.O. Box 270,  
Guildhall,  
London EC2P 2EJ

23<sup>rd</sup> October 2017

Dear Sir,

At its meeting on 19<sup>th</sup> October 2017 the City of London Conservation Area Advisory Committee re-considered its objection to the following planning application in the light of updated information and requested that the following amended objection be submitted for consideration by the Committee:

**C.122 17/00790/FULL - St Paul's Cathedral, St Paul's Churchyard, London EC4M 8AD**

**St Paul's Cathedral Conservation Area/Castle Baynard Ward. Grade I. No Ward Club rep.**

Installation of a pair of symmetrical stone ramps with metal handrails and guardrails laid out either side of a new central stone stair with central handrail. The proposed ramps would replace the current single temporary ramp. Relocation of the west gate to the North Churchyard to the north within the existing wall and historic Grade I Listed Churchyard railings, alterations to existing gates and railings.

The Committee objected to this proposal to carry out works for permanent alterations to this iconic Grade 1 listed building. It was accepted that there was a need to incorporate appropriate access for the disabled to this nationally important building. However, the design was not considered appropriate and was detrimental to the Conservation Area and the setting of the listed building.

In terms of detailed comment, it was noted that the spaces for the metal railings varied in width along the course of the ramp starting close together at one end and ending with greater width between them. Whilst it was appropriate to leave a gap between the new ramp and the building, it had not been properly considered and would become a place for potential litter. The design would remove views of the base of the columns. The design included elements of solid mass with no articulation. In time with rainfall there were likely to be rain streaks appearing on this solid mass. Part of the solid mass appeared to be designed to allow visitors to sit but this appeared to be a clumsy addition with inappropriate detailing. The current design was overbearing to the classical appearance of the entrance steps on this north elevation.

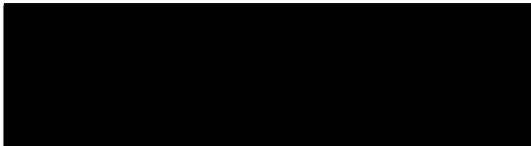
The Committee would wish to see changes to these proposals and, as the changes would be permanent, considered that it might be appropriate for an architectural competition to select a more appropriate design for this extremely important building in the Conservation Area. There was a considerable amount of space to the east of the steps and perhaps some of this could be utilised for the

access. It was considered that any future revised proposal should be more properly explained and illustrated via better, coloured, ground level 3D CAD/montage image studies

The Committee would welcome the opportunity of being involved in any future pre-application discussion process for a revised scheme submission.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox  
Secretary



## City Heritage Society

*Please reply to:-*

35 Eagle Court,  
Hermon Hill,  
London E11 1PD

25 08 2017

City of London, Department of Planning & Transportation,  
The Guildhall,  
London EC2 P2EJ

Dear Sirs,

**St. Paul's Cathedral, St Paul's Churchyard, London EC4M 8AD**

### **Planning Application 17/00790/FULL**

We accept that it is necessary to provide disabled access to the Cathedral and presume that all options have been considered before this location was chosen. We also accept that if the access is to be located to the North Porch of the Cathedral that a symmetrical layout is necessary.

There are some aspects of the proposal that we find disturbing:

- 1] While we understand the need to avoid touching the Cathedral wall the awkward narrow spaces left between the ramps and the Cathedral wall look uncomfortable particularly at the top of the ramp where the difference in level will be greatest.
- 2] As we read the plans it appears that the stone base of the railings varies in height above the walking surface which presumably means that the guardrail, the top of which we presume will be a constant height above the walking surface, will vary in height. The purpose of this we do not understand and feel that it will not enhance the design.

It also appears that the balustrade is not consistently formed of vertical balusters throughout its length, though this may be a misunderstanding of the plans. If this is the case we consider that a change of material for the guardrail would not enhance the design.

3] The flat 50mm wide balusters we believe to be regrettable. They will reduce the transparency of the balustrading compared to standard 25mm square balusters.

4] We are not sure that encouraging people to sit around the base of the ramp is desirable. The odd proposal that the ledge created to provide seating tapers to nothing with sections becoming too narrow to be of use as seating. This seems to be curious and pointless. If seating is required would it not be better detailed as classical stone benches based on the seating in Greek or Roman theatres?

5] The plain stone walls with no coping detail will become streaked and stained. The intrusion of this new element to the Cathedral cannot be hidden would a bolder use of detail not be more appropriate?

Peter Luscombe [CHS Chairman]



**From:** Zachary Osborne  
**To:** [PLN - Comments](#)  
**Cc:** [Consult](#)  
**Subject:** 17/00790/FULL - St Paul's Cathedral, St Paul's Churchyard, London, EC4M 8AD  
**Date:** 23 August 2017 16:45:09  
**Attachments:** [image001.png](#)

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Dear Sir/Madam,

**17/00790/FULL - St Paul's Cathedral, St Paul's Churchyard, London, EC4M 8AD**

The above application for has come to the attention of the Georgian Group. The comments below relate to the present application and were informed by an on-site meeting attended by David McKinstry on 7<sup>th</sup> March 2017, and subsequent comments provided by the Group's Casework Committee. The Group does not object in principle to the proposals, but has a number of concerns regarding the proposed design which are outlined below.

St Paul's Cathedral was built between 1675 and 1710 to the designs of Sir Christopher Wren to replace the previous medieval cathedral destroyed by the Great Fire. Built in the English Baroque Style with a cruciform plan consisting of a large nave flanked by aisles and a pair of towers at the west end, north and south transepts, a choir with aisles and an apsidal east end, and a dome above the crossing raised up on a colonnaded drum and surmounted by a lantern. The west façade has a two-storey portico of coupled columns. The North Transept entrance, which would be affected by the proposals, has a central, semi-circular porch of six Corinthian columns approached by steps with a portico and balustraded parapet above.

The Group recognises the Church's duty, under the Equalities Act, to provide step-free, equal access to the Cathedral and appreciates the difficulty of finding an appropriate solution in light of the building's exceptional importance. In responding, the Group accepts the conclusions presented in the application which identify the North Transept as the most suitable location for the provision of new access.

At the March meeting, the consultees, including the Georgian Group, agreed with the principal of a ramp to provide access to the North Transept doors, but highlighted the importance of the detailing of the proposals, particularly the handrail, to the overall success of the scheme. As such, the Group recommended that a range of options and finishes for the handrail were considered. The Group suggest that the present proposals, which include metal handrails mounted on Portland Stone walls, may have a significant visual impact when viewed from Paternoster Row or when approaching from Queen's Head Passage; from this perspective the handrails would appear superimposed upon one another, would be visually dominant and would largely screen views of the column pedestals, a concern previously raised by the Group. The use of glass in place of the proposed metal balustrades has the potential to reduce this visual impact and better preserve the intended proportions of the porch by maintaining visibility of the column pedestals.

The approach to the North Transept entrance, defined by Paternoster Row and Queen's Head Passage, necessarily restricts views of most of the north elevation of the Cathedral. As discussed in March, the impact of the proposed ramps is therefore most appropriately considered in relation to the north porch alone, and not in relation to the north elevation as a whole. The existing arrangement creates the impression of the porch rising clearly from its plinth and due to

the relatively steep pitch of the steps they terminate in the centre of the outer bays of the transept's north elevation, clear of the railings to the west. In contrast, the proposed ramps would appear to envelop the porch plinth and would occupy the entirety of the outer bays of the transept, affecting the reading of the composition and the proportional relationship of its component parts. Although the Group recognises that the provision of equal access will result in some change to the form of the porch, the essential relationship between the porch and its plinth should be maintained.

As the proposals represent a substantial change to the building and are likely to have a permanent impact on its historic fabric, the long-term suitability of the changes must be assured. This should be considered in terms of the form of the access to ensure that it is suitable for future mobility devices (which are projected to increase in size), and in terms of the projected use of the cathedral and the required access capacity for events. The inherent harm associated with the proposals would only be considered acceptable if they are shown to fully satisfy the building's present access requirements and are likely to negate the need for further access improvement to other entry points to the Cathedral for the foreseeable future.

In light of the above concerns, the Group recommends that aspects of the proposed design are given further consideration to ensure that important elements of the building's original proportions are preserved.

Please keep me informed of the progress of the application.

Yours faithfully,

Zachary Osborne  
South East Caseworker



*The Georgian Group  
6 Fitzroy Square  
London  
W1T 5DX*

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CC



Historic England

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Direct Dial: 020 7973 3707

Our ref: L00643919

21 August 2017

Dear Mr Chipperfield

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015**

**Authorisation to Determine an Application for Listed Building Consent as Seen Fit**

**ST PAUL'S CATHEDRAL ST PAUL'S CHURCHYARD LONDON EC4M 8AD  
Application No 17/00791/LBC**

<i>Applicant:</i>	Ms Emma Davies
<i>Grade of building(s):</i>	I
<i>Proposed works:</i>	Relocation of the west gate to the North Churchyard to the north within the existing wall and historic Grade I Listed Churchyard railings, alterations to existing gates and railings.
<i>Drawing numbers:</i>	Drawings as approved
<i>Date of application:</i>	1 August 2017
<i>Date of referral by Council:</i>	14 August 2017
<i>Date received by Historic England:</i>	14 August 2017
<i>Date referred to CLG:</i>	21 August 2017

You are hereby authorised to determine the application for listed building consent referred to above as you think fit. In so doing Historic England would stress that it is not expressing any views on the merits of the proposals which are the subject of the application.



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Historic England

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Yours sincerely



**Jane Cook**  
Business Officer  
E-mail: 

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.



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LC



Historic England

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Our ref: L00643919

21 August 2017

Dear Mr Chipperfield

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
Application for Listed Building Consent**

**ST PAUL'S CATHEDRAL ST PAUL'S CHURCHYARD LONDON EC4M 8AD  
Application No 17/00791/LBC**

Thank you for your letter of 14 August 2017 notifying Historic England of the scheme relating to the above site. Our specialist staff have considered the information received and we do not wish to offer any comments on this occasion.

**Recommendation**

**This application should be determined in accordance with national and local policy guidance and on the basis of your specialist conservation advice.**

We have therefore drafted the necessary letter of authorisation (draft attached) for your Council to determine the application as you see fit and referred the case to National Planning Casework Unit. Subject to the Secretary of State not directing reference of the application to him, they will return the letter of authorisation to you. If your authority is minded to grant listed building consent, you will then be able to issue a formal decision. Please send us a copy of your Council's decision notice in due course.

Please note that this response relates to historic building matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).



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Yours sincerely



**Jane Cook**  
Business Officer  
E-mail: [REDACTED]

Enc: Draft letter of authorisation

List of documents received by Historic England

ST PAUL'S CATHEDRAL ST PAUL'S CHURCHYARD LONDON EC4M 8AD  
Application No 17/00791/LBC

Documents as approved



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**Chipperfield, Rob**

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**Subject:** St Paul's Ramp Planning Application 17/00790/Full

**From:** peter luscombe [REDACTED]  
**Sent:** 13 October 2017 12:24  
**To:** Hampson, Annie  
**Subject:** St Paul's Ramp Planning Application 17/00790/FULI

Dear Annie,

Having, with some difficulty, revisited the planning documents for the disabled ramp at St Paul's Cathedral in view of Jenny's assurance that a mixture of glass and metal balustrades was not proposed, I now see that what I took to be glazed balustrading is in fact a wider spacing of metal balusters. I find it hard to read some details on screen but by enlarging the notes I now understand what is proposed. The Georgian Society's suggestion of glass balustrading rather coloured my reading of the proposals.

I can understand the thinking behind this suggested larger spacing where the regulations allow in order to try to minimise the screening effect of the overlapping balustrades but I'm really not convinced that it will merely appear odd.

I think that traditional square or circular balusters used throughout would be less intrusive than the proposed flat shaped balusters with inconsistent spacing.

My other comments on the curious seating, lack of detailing to the walls and the proximity to the Cathedral remain.

Regards, Peter

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