

Comments for Planning Application 20/00311/FULMAJ

Application Summary

Application Number: 20/00311/FULMAJ

Address: 81 Newgate Street London EC1A 7AJ

Proposal: Part refurbishment and part demolition, excavation and redevelopment involving the erection of an additional four storeys to provide a ground plus 13 storey building with publicly accessible route through the site, incorporating gym and swimming pool (Use Class D2) at lower basement levels (1,737 sqm), gym and flexible floor area uses (Use Classes A1-A5, B1, D2) at basement level (1,343 sqm), retail (A1-A5) at ground floor level (4,398 sqm) with access to offices and rooftop restaurant and public viewing gallery, office accommodation (Use Class B1a) from levels 1-13 (67,802 sqm), roof top restaurant (Use Class A3) (107sqm) and publicly and privately accessible roof terraces (1,231sqm), landscaping (699 sqm) and other associated works.

(Creation of an additional 27,375 sqm of floorspace)

Case Officer: Alison Hayes

Customer Details

Name: Mr Henry Ward

Address: 40 Wolseley Road Godalming

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: This is a big improvement on the existing building, which I have always felt detracts from all the improvements which Paternoster Square made to the locality.

The planned terracing effect will soften the lines of what is a large building. I am also really pleased to read they will reuse some of the original stone/cladding. This will have a greater positive environmental impact than many "green buildings" in the city.

If they can sort out pedestrian access to and through the site, the improvement will be significant, especially given the current dangers that evidently exist at the moment, when trying to cross New Gate, King Edward Street or Aldersgate Street. Activating the ground floor with mixed leisure and retail will also open up what is currently a dead zone in the local environment.

I work quite locally to this site, so see this as a clear improvement, following on from New Change and Paternoster Square, which has made the local environment more accessible and interesting of pedestrians. It gets my support.

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Case Officer: Alison Hayes

Customer Details

Name: Mr Mark English

Address: 1 Girton Court Rusells Ride Cheshunt

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I have worked in the City for many years and know the BT building well.

I have taken the time to look at the planning application and would like to offer my support.

The current building is run down, tired and way past its best.

The look of the new building is fantastic, particularly from the King Edward Street side.

The whole idea of the new roof and the ground floor use with the new internal throughway is a very good idea.

I hope that the Council grant consent to this application. The City needs better, up to date offices like this if London is to remain a global leader, particularly in a post Brexit, post coronavirus world.

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Case Officer: Alison Hayes

Customer Details

Name: Mrs Aine Killilea

Address: 34 Wentworth Drive Pinner

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I have reviewed the planning application & feel that the proposal will add to the area that I currently work in. The original building is jaded & the new one appears to be more environmentally friendly.

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Case Officer: Alison Hayes

Customer Details

Name: Mr Rob Madden

Address: 1 Trowley Heights Friendless Lane St. Albans

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I work in the immediate vicinity and recently visited the public exhibition out of curiosity.

Having regard to the current BT building I believe the plans as proposed offer a fantastic improvement to the streetscape. The architecture and building lines have clearly been given very careful consideration in the context of the surrounding buildings and would amount to a well thought through sensitive improvement. At the same time evolving to deliver much needed high quality office development / amenity the City of London needs for the future.

The whole Paternoster Square area is amazing with the design / sense of place working in tandem with the iconic Cathedral. This proposed development would further build on those achievements to date.

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Case Officer: Alison Hayes

Customer Details

Name: Ms Sally Leonard

Address: Faraday Building 1 Kinghtrider Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Really striking building , and delighted that they are retaining the existing structure which is a very environmentally responsible approach. Great that the ground floor will become active street frontage , which will add to the retail and hospitality offerings in the area. A well thought out and designed scheme.

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Case Officer: Alison Hayes

Customer Details

Name: Mr David Bailey

Address: Brockhurst Stocking Pelham Herts

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I was employed in the City of London for 30 years and walked past the subject property in many occasions, indeed for some time I occupied a building in St Martins Le Grand/Gresham Street with a direct view of it.

The building, one could say is seriously architecturally challenged and indeed gives the appearance of a bunker, uninspiring and unfriendly..

I have seen what the applicant is proposing and, in my view the new building would be a massive improvement over the old in both architectural and user terms. The vitality and vibrancy of this part of his part of the City would be much enhanced. In particular the inclusion of retail would greatly improve the street scene.

The provision of the roof-top restaurant, public viewing area and garden experience are very special, as is the publicly accessible route through the site. The vastly improved views of St. Pauls from King Edward Street is also a very important feature.

The application illustrates how a building can be reinvented and enormously improved with minimal effect on the environment without the need to demolish and start anew.

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Case Officer: Alison Hayes

Customer Details

Name: Mr James Neve

Address: Flat 32 Terrace Apartments 40 Drayton Park London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: I often have the need to walk past the BT building at Newgate Street, which is not a particularly nice or welcoming experience.

Having taken the time to look at the planning application, I can see that what is proposed is a very big improvement.

I particularly like the architecture, and the way the ground floor is intended to be used with increased permeability and access.

I also note that a new restaurant and garden are proposed for the roof, which I welcome.

I am very supportive of this application and would encourage the City Corporation to grant consent.

From: [Greg Renwick](#)
To: [PLN - Comments](#)
Subject: 81 Newgate Street London EC1A 7AJ - 20/00311/FULMAJ
Date: 15 May 2020 14:26:54

To whom it may concern,

Having reviewed the documents on the planning portal website, I have some comments regarding this new development opposite our residence at 2 Greyfriars Passage, EC1A 7BA.

In principle we welcome the redevelopment of this site. I feel the overall design of the building, including the use of verdure and a 'stepped' design are very positive, as well as the improved streetscape and pedestrian communication between King Edward Street and St Martin's Le Grand.

We are however concerned in connection with the following 3 matters:

1. The increased height of the new development, especially that part of it to the North and the effect that this will have on our VSC, especially at lower levels of the tower;
2. The rooftop bar and risk of associated noise and overlooking
3. Light trespass from internal lights

Increased height and VSC

While we nominally accept the argument regarding the granularity or otherwise of the St Paul's Heights Grid system, as well as appreciating the efforts taken by the development team to measure the loss of VSC at the various levels of the tower, we do note that there were some errors on that report - most notably that the walls are of a considerable thickness and so the apparent vertical dimensions of the window apertures when viewing at an angle from the horizontal is reduced. In some cases, for instance in the kitchen, this makes a very marked difference in the percentage loss of VSC and Maintained Lit Area. We note that the amount of skylight through fourth floor bedroom window as calculated falls below the threshold for the NSL methodology. As such we would welcome a reduction in height of the building, particularly that part to the north, or else an increase in the 'stepping' back of these additional top floors.

Rooftop Bar

Could there be some clarification as to what restrictions there will be on noise emanating from the rooftop bar and public space? Will this be a matter for licensing? We would be concerned that any music and/or noise from the public present should not cause an unreasonable disturbance.

Ambient Light Levels / Light Trespass

With regards the findings of the GIA Light Trespass Assessment, I must say that I have some serious questions and reservations about the predicted lux levels within this report. It seems extremely improbable to me, for instance, that the light trespass from the building will be <0.1 lux at the fourth floor window. That would be to say that the light trespass will be approximately equal to that of moonlight from a full moon. It would also - by my calculation - be the equivalent of merely two 100W lightbulbs at the distance that the building is away ($2 \times 1600\text{lum} / 4 \times 3.14 \times 50\text{m} \times 50\text{m}$). This is simply not conceivable given the proposed workspace illumination of 500 lux and the reflective spill inevitable from all of the glazed openings. If we say that the glazed area of the facade is approx. 2000m² and miraculously only 5% of the internal lumination spilled out of the windows then we would already have an illumination at least 10-15 times the calculated amount.

I know full-well from experience that the building in its current instantiation gives multiple levels of post curfew light trespass than 0.1 lux despite having something like 50% of the proposed new glazed area.

Could I ask that the calculations in this report be looked at again? I would also like to note that the

only 3 levels of the tower were looked at. This is obviously understandable if light trespass was calculated as being much below the threshold but should be borne in mind if any recalculations are undertaken.

If the calculations are redone and the light trespass is, as predicted, much higher, could I ask that some form of shading is proposed for the windows?

Many thanks and I look forward to hearing back.

Yours sincerely,

Gregory Renwick
Christchurch Tower
2 Greyfriars Passage
London, EC1A 7BA

Adjei, William

From: PLN - Comments
Subject: FW: 81 Newgate Street London EC1A 7AJ - 20/00311/FULMAJ
Attachments: IMG_20200522_223558.jpg; IMG_20200602_125422.jpg; IMG_20200602_125430.jpg

From: [REDACTED] >
Sent: 02 June 2020 13:43
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Re: 81 Newgate Street London EC1A 7AJ - 20/00311/FULMAJ

Good afternoon,

Following on from my email and comments of 15th May in regards the development at 81 Newgate Street I would like to add some further notes, if I may.

1. I take on board the explanation from GIA as to the use of the pointcloud and virtual sensor location for daylight and sunlight calculations and am confident that the thickness of the walls is appropriately taken into account in their original calculations. Thanks to them for the clarification.
2. On closer inspection of the report I have noticed, however, that the ground floor room is not included in the calculations or reported data for VSC, NSL or APSH. The first room is labelled 'F01 Kitchen', which is inaccurate. The kitchen is on Level 2 and there is a Dining Room on Level 1, which unfortunately seems to have been omitted. My assumption is that this is because, on the set of plans that were used, this room is marked 'entrance', and hallways and entrances are excluded from the regulations relating to daylight and sunlight as non-habitable rooms. Regardless of the nomenclature, however, it is clear from the floorplan layout that this room does not solely function as a hallway. There is a dining table visible on the plans and indeed it has functioned as a dining room since the completion of the development in 2006, The dining table that can be seen in the attached photograph was designed in the studio of the architect as part of the redevelopment. That photograph, together with the floorplans, which clearly shows Level 1 labelled as 'Dining Room' was taken from a sales brochure created in 2006. Furthermore, and worth noting for point 3 below, the original planning permission was amended by condition. There does not seem to be online access to these plans through the City planning portal at the moment, so I cannot confirm whether the labelling of this room has changed from 'entrance' to 'dining room' in those submissions. I would suggest that the question of whether it has or has not, however, should not have a bearing on the fact that the originally intended, but also established, use of the room is as a habitable dining room and so it should be treated as such for the purposes of these calculations.

Could I ask, therefore, that a similar set of calculations be carried out on this ground floor dining room just to be sure that it also will receive the necessary levels of daylight and sunlight? The data for this room are particularly important as there is only one window, one which faces the new development, and of course lower level rooms suffer more from loss of light due to surrounding buildings.

3. With regards the bedroom on Level 4, another issue arises from the use of the original set of planning approved plans and rather than those associated with the discharge of conditions: the bedroom is in fact smaller than indicated on the NSL Contour plans but is double height, with a gallery and a south facing window on the upper level. Please see the attached floorplans and the

plans associated with various discharge of conditions to the original planning application. My guess would be that on the lower level of the bedroom, the loss of area in the NSL calculation will be marginally greater, however when the gallery area is included, with the south facing window, probably the aggregate loss will be some number of percentage points lower. The BRE guidance that bedrooms are of less significance when evaluating loss of daylight seems fair and I would not push an objection on the grounds of a loss of >20% here, even were the changes from the updated layout not to bring the loss below this threshold.

4. With regards the light trespass and the correspondence relating, it is clear that levels will not exceed 5 lux post-curfew so I can certainly accept the general assurance given by Dr Jacobs and also accept that it was somewhat moot to have queried the level of realism of the calculated figures since there is so much headroom anyway. I do however attach a photograph which shows to what extent the current BT building at least falls short of reaching the light containment levels of the referenced ideal luminaires.

In conclusion, if the Daylight/Sunlight calculation could be carried out for the level 1 Dining Room that would be much appreciated. In the event that this does not show a significant loss of daylight or sunlight I will be happy to withdraw my objection in so far as it relates to these two grounds.

I note that (to my knowledge) I have yet to hear on the issue of potential noise pollution from the rooftop bar. Perhaps this is not legislaturally a planning issue. If the City could confirm at some point, one way or another, that would be much appreciated.

Kind regards,

Greg Renwick

[Redacted signature block]

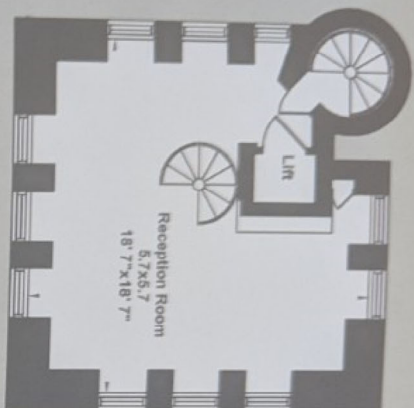


accommodation three reception rooms | three





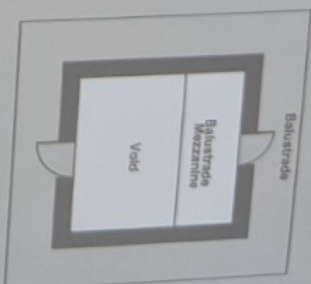
Approximate
Gross Internal Area
213 square metres (2,288 square feet)



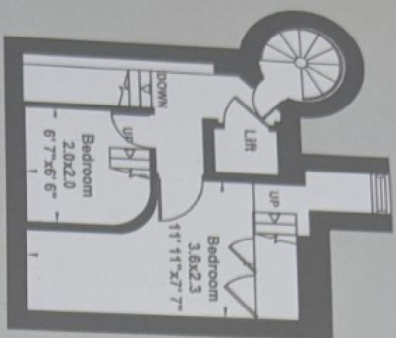
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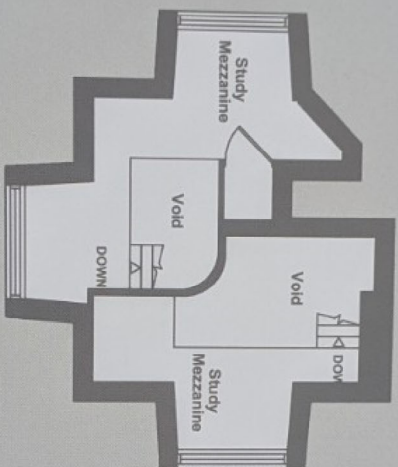
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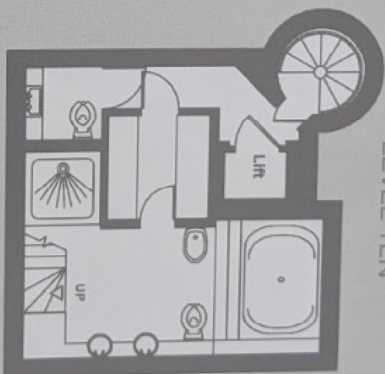
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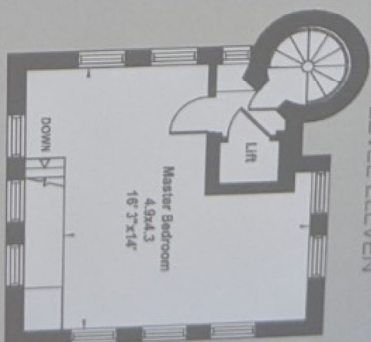
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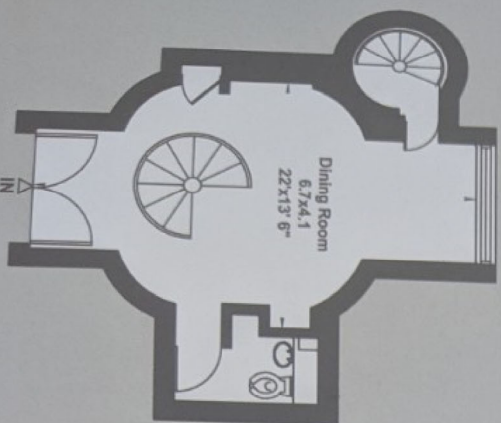
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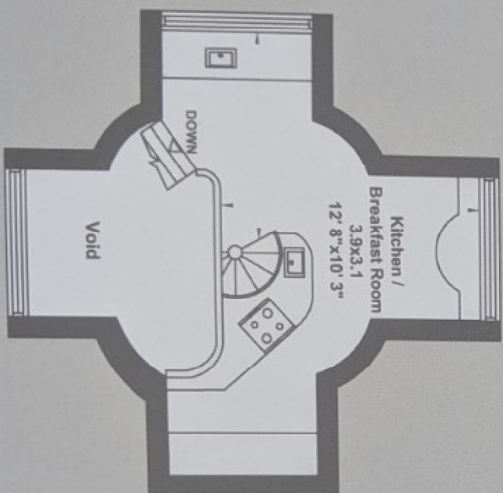
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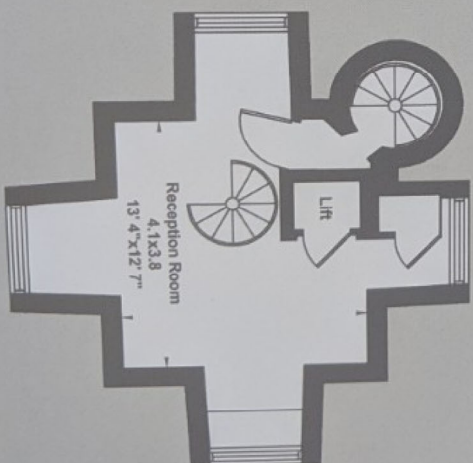
LEVEL EIGHT



LEVEL ONE



LEVEL TWO



LEVEL THREE



LEVEL FOUR

From: [Bush, Beverley](#)
To: [Adjei, William](#)
Subject: FW: FW: PD12560: 81 Newgate Street - 20/00311/FULMAJ - objection
Date: 08 June 2020 16:13:43
Attachments: [imageb94491.PNG](#)

From: [REDACTED]
Sent: 05 June 2020 17:19
To: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>
Subject: Re: FW: PD12560: 81 Newgate Street - 20/00311/FULMAJ - objection

Dear Beverley,

Thanks very much for your email. I attach here the files that were sent with my previous email of 2 June (the 3 'IMG_' files).

It is good news about the condition relating to music and the Section 106 agreement controlling opening hours. It is also good to have the clarification from Mr Bovill at Montagu Evans that the proposal is for a restaurant and not a bar. Would they then require planning permission if in future they wished to change usage to a bar?

I have had the chance to read and review the letter with comments from Mr Francis at GIA. I think it is clear that the ground floor dining room will not suffer unduly in terms of loss of daylight or sunlight from the new development. Thank you for requesting the report and please thank them for their response.

There was one final query I had if you don't mind? I mentioned in my initial objection that I was concerned with both noise pollution but also being overlooked by members of the public on the viewing gallery. Particularly so as we are the only residence in view, and probably quite an interesting one, and so might plausibly be the source of some unwanted attention. I know that this was a particular problem for residents of Neo Bankside when the new Tate Blavatnik building was constructed with top level viewing gallery. The concern is that we have a bedroom and a living room at high level which will be overlooked as per the current roof terrace plan layout.

I am attaching a sketch, SK02, of the two galleries which, as far as I can make out, are those which face West towards the premises. While these are stepped back, the (private) terrace below is L10, 3 floors below the viewing gallery, so will not provide any limitation of the line of sight into our property (SK01). I do not know whether provision could be made for bringing the line of the gallery railing back from the building edge so that the floor of L13 might limit the view downwards sufficiently to avoid the issue? Or perhaps some other design solution?

Kind regards,
Greg

Gregory Renwick
2 Greyfriars Passage
London, EC1A 7BA

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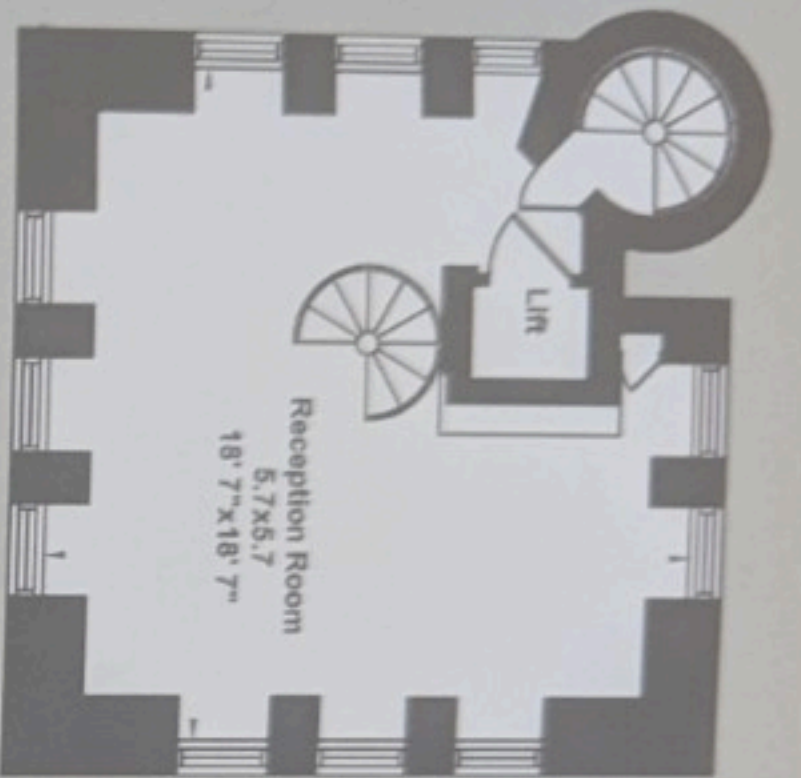


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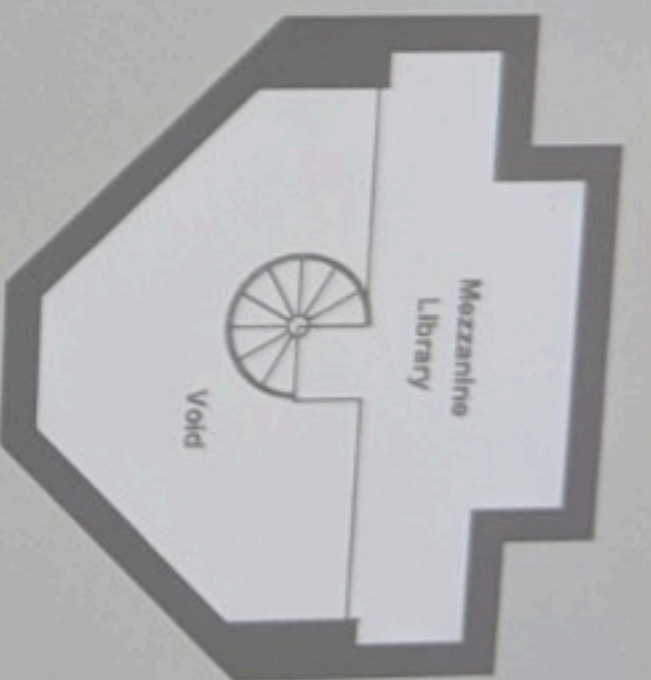




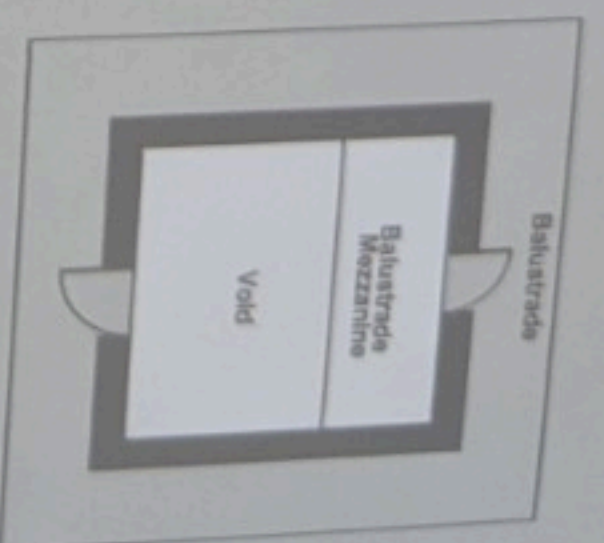
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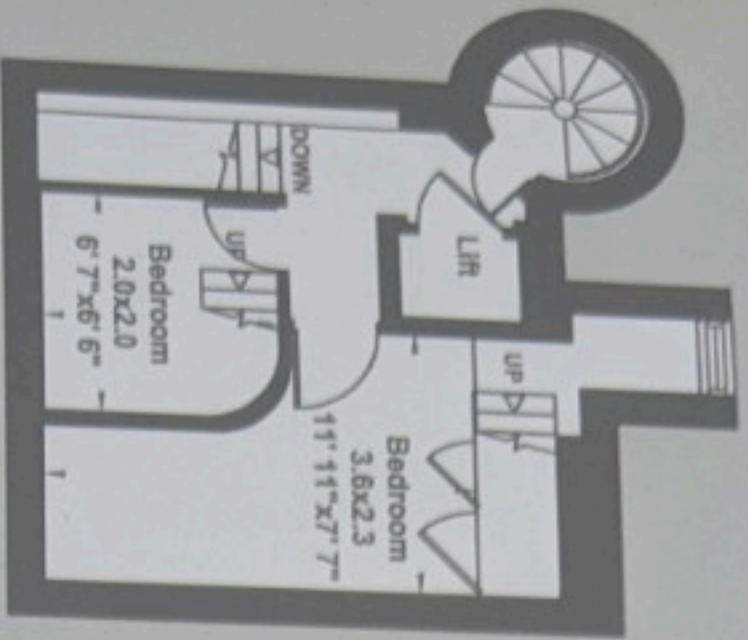
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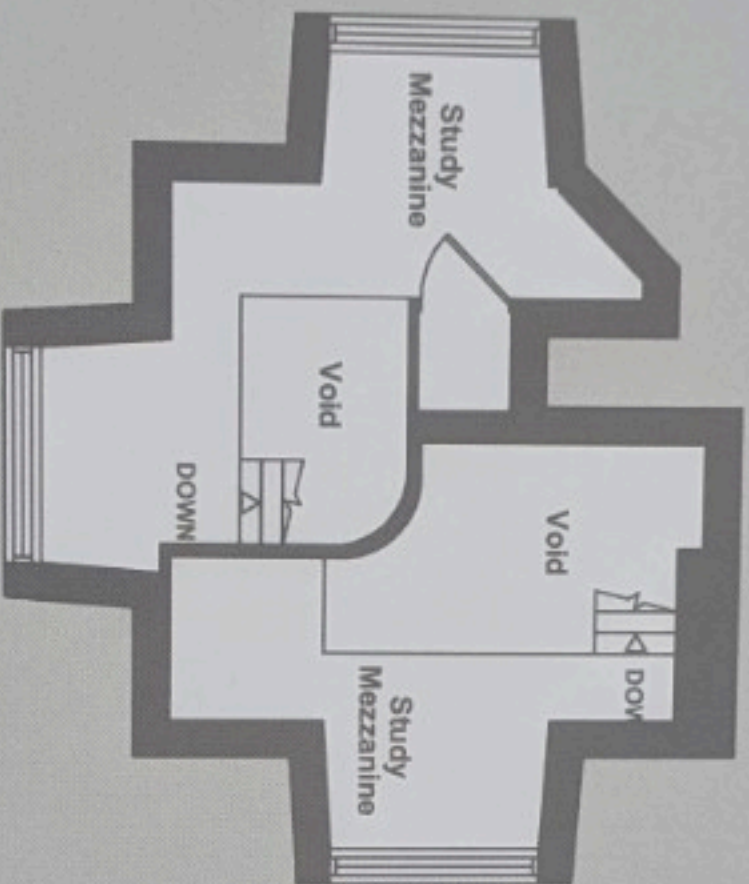
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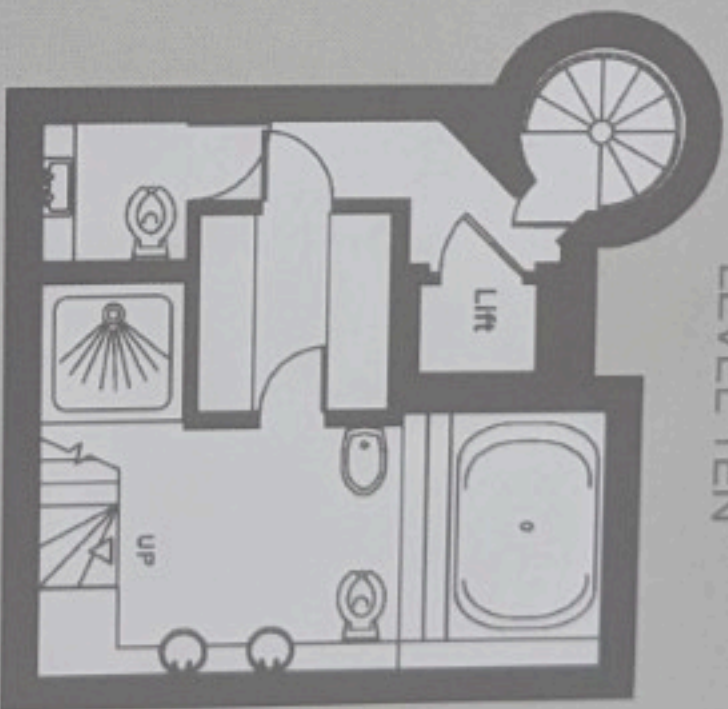
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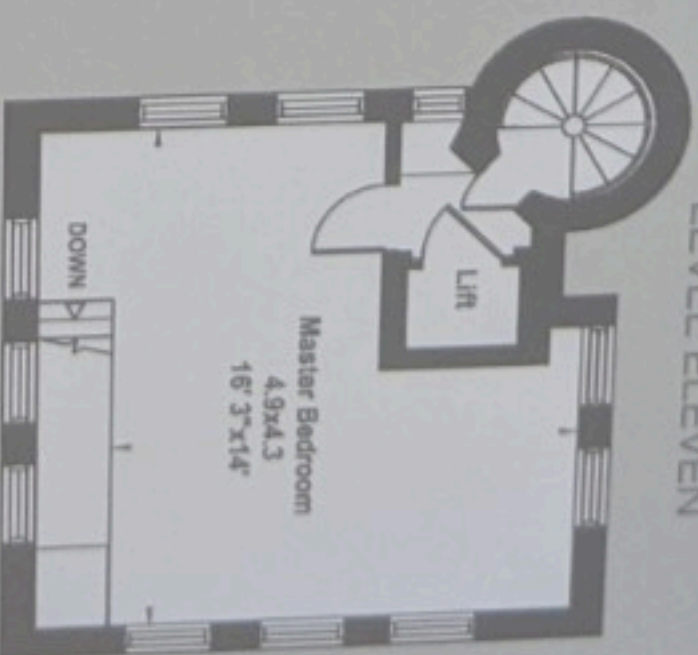
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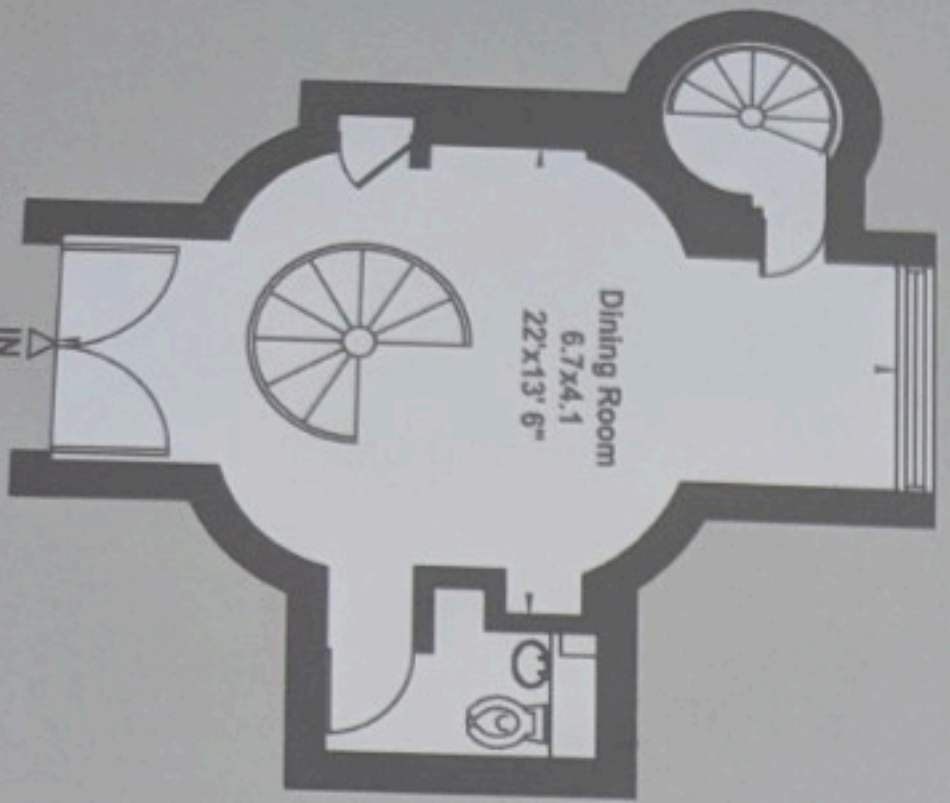
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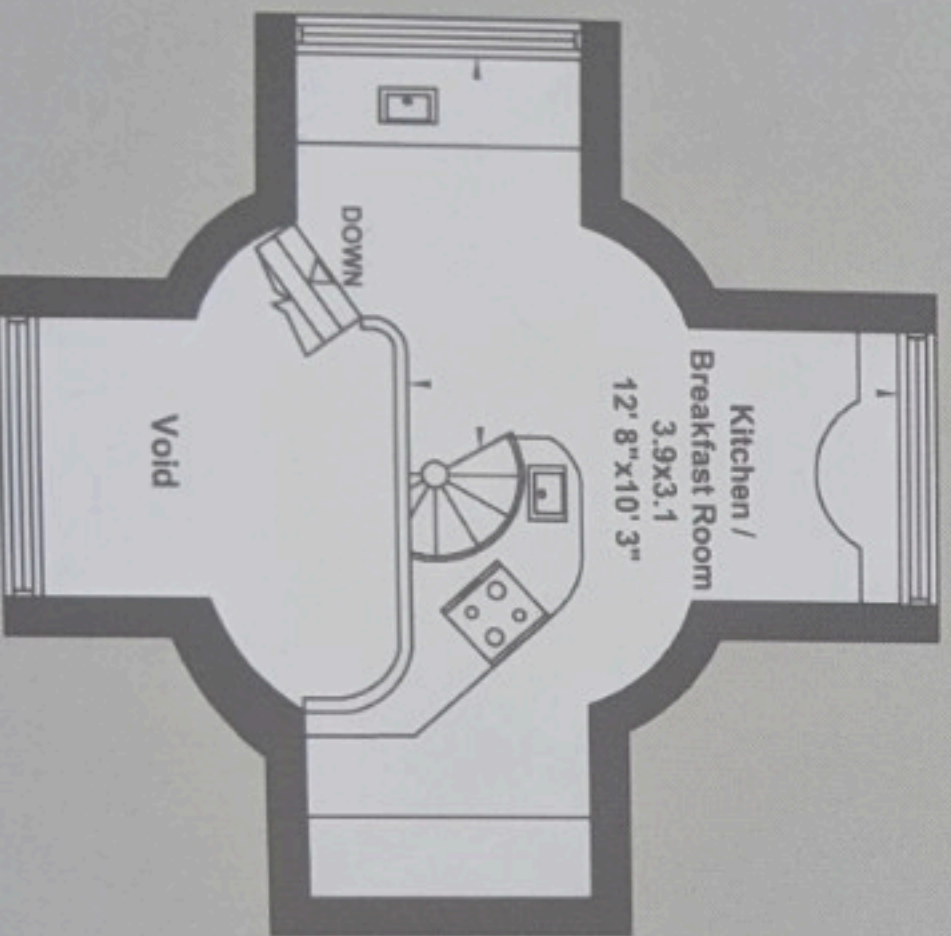
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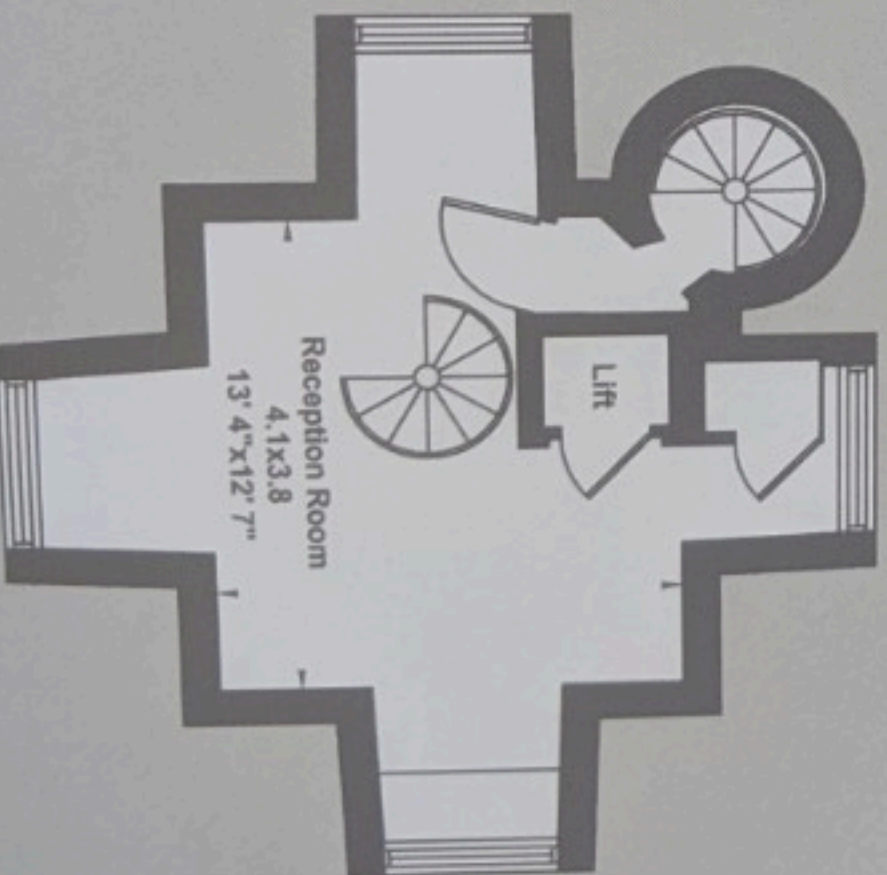
LEVEL EIGHT



LEVEL ONE



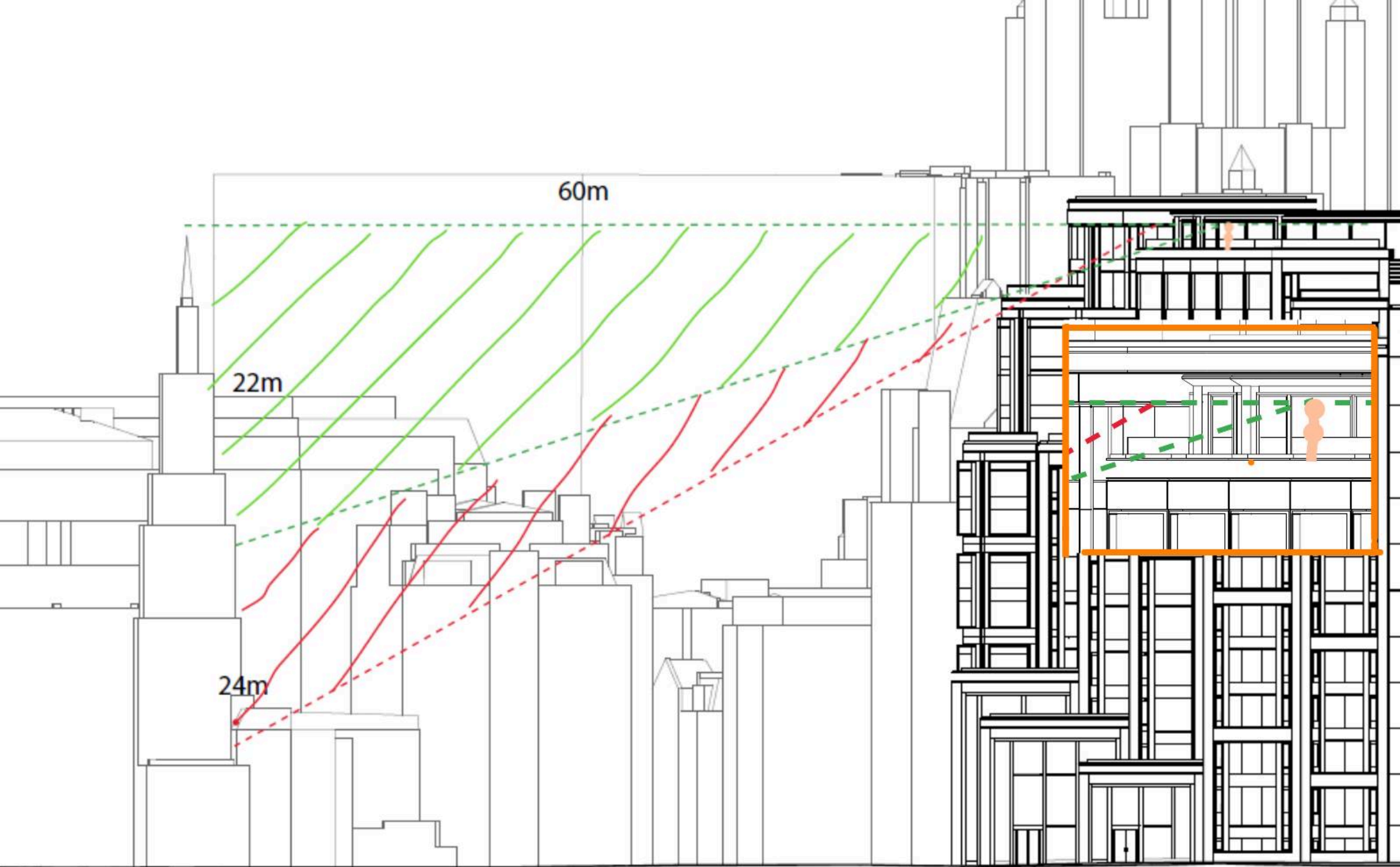
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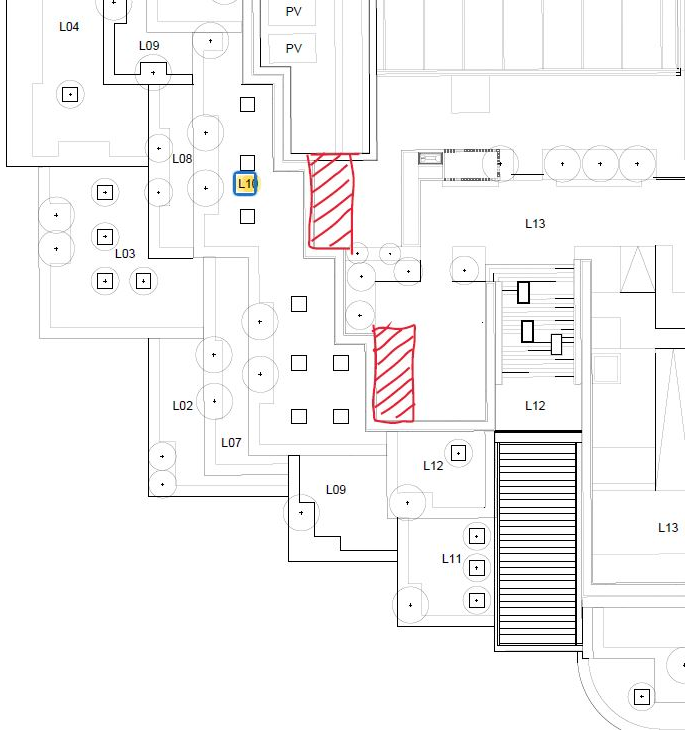


LEVEL THREE



LEVEL FOUR





Surveyor to the
Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

Tel: 020-7246-8372
07919 300443
Web: www.caroe.com

9 June 2020

Ms Joanna Parker
Department of the Built Environment
City of London Corporation
PO Box 270
Guildhall
LONDON EC2P 2EJ

Dear Ms Parker

81 Newgate St EC1A 7AJ 20/00311/FULMAJ

Further to a review of the application noted above and meetings with the applicant, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the application for a major re-working of the BT Centre.

We are grateful to the applicant for their consultations with us. As discussed below, we have some matters of common interest in relation to the public benefits that might be achieved, stimulated by this project.

We note and invite consideration of the following matters:

1. In relation to local views from Little Britain, looking South towards the cathedral Dome, that the applicant has taken effective and reasonable steps to mitigate the impact of the increased scale of their proposed development, and there are tangible improvements to the St Paul's Heights views of the Peristyle and Drum.
2. We have considered the impact on the LVMF view from Alexandra Palace. (view 1 in the LVMF). We note with concern that there is an accumulation of relatively minor but cumulative impacts within the Eastern consultation area, of which this proposal to increase the height of the BT Centre is a part. The City should note this cumulative effect and recommend accordingly.
3. We further note there is an LVMF view from Southwark Bridge which is impacted. The increased height will impair the legibility of the East Gable of the cathedral to be seen against clear sky.
4. We also note – which the Heritage and Townscape report fails to observe – that the proposal appears to impact the legibility of the spire of St Augustine's Tower. The tower is a Grade 1 listed building. It is not part of the LVMF tests – but should be afforded due consideration where its Setting and the Conservation Area is affected, as is clear here. The significance which is harmed is the legibility of the many Wren spires that are an internationally

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valuable part of the City townscape. The City should note both these impacts and effects and recommend accordingly.

5. We note the impact on the views of the North West tower as seen from Blackfriars bridge. As observed above, this is regrettable and incrementally reduces the free-legibility of the lower stage of the bell tower.
6. We have been given assurances that the proposed greening of the building facades will be maintained and controlled by enforceable management requirements and conditions. Please may we ask that these conditions equally apply to the 5th elevation which is visible from the upper galleries of St Paul's and that the roof-terrace gardens are required to be maintained and operated to a high standard to safeguard the views and setting from St Paul's.

Turning to matters of wider interest. We would wish to commend a collaborative approach between this applicant, City Planners, St Paul's and London Diocese, Paternoster Square's owners, as well as other neighbours in the Cheapside BID to actively use this development opportunity to convene a programme of action for local public realm enhancements through Section 106 contributions.

Separately from the Planning Committee's determination of the application, we would urge the Planning Committee to request or pass a motion to initiate the gathering of these local interests to address:

1. The potential for pedestrianizing King Edward St, so that the potential for enhancing the open space and public realm of Christchurch Greyfriars gardens is realised – which would be of immense public benefit for the route northwards to the Cultural Mile institutions and southwards to connect, via Queens Head Alley, to the North Transept entrance of the Cathedral and churchyard.
2. The impoverished environs around the St Paul's tube entrance.
3. And more generally the potential for contributions from this development to be allocated to public realm benefits more generally, including the opportunity to breathe new life and resources into the stalled project for the enhancement of St Paul's churchyard.

We hope that these enhancements could be informed by commissioning a more detailed and extended survey of 'Space Syntax' and pedestrian movements, which might be funded by contributions from 81 Newgate Street, if approved.

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We particularly emphasise these important public benefit considerations at this time of national crisis, when - collectively - we must not miss an opportunity for providing high quality open space in the City, in a Covid-19 world where social interaction will need more space and generosity.

Yours sincerely,

Oliver Caroe
Surveyor to the Fabric
On behalf of St Paul's Cathedral Chapter.

cc John Bushell KPF

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