

3 November 2023

Emma Barral
Development Division
Corporation of the City of London
Sent via email only

Dear Ms Barral,

**55 & 65 Old Broad Street, London, EC2M 1RX (ref: 23/00469/FULEIA) –
Second Consultation Letter**

Introduction

Further to a review of the revised application documents, a meeting with Officers at the Corporation, and previous correspondence, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the revised proposals for a tall building at 55 & 65 Old Broad Street.

This letter has been prepared to respond to revised proposals for the scheme and should be read with previous correspondence issued to the City of London outlining concerns with the submission scheme.

Policy Context

A number of key policies are relevant to this proposal in relation to the Cathedral. These are outlined in our previous letter. For concision these policy matters are not re-iterated here.

Previous Key Issues and Concerns

Broadly, our previous letter outlined the following concerns with the scheme:

- Suitability of this location for a tall building
- Height of Lower Element of the Scheme & Erosion of the Skygap
- Resultant heritage impacts
- Interpretation of heritage harm by the applicant

Response to Changes to the Submission Scheme

A number of the changes to the submission scheme (as outlined in the *Design and Access Statement Addendum*) have not addressed all the concerns we have raised and continue to material impact the heritage significance and setting of the Cathedral and are discussed below.

Changes to Balustrade

We welcome the spirit of the changes to the balustrade to the lower level of the proposals. The height of the balustrade is now less than previously proposed, which presents a very minor lessening of visual and heritage impact. The balustrade itself is also now wholly glass, assisting with transparency, causing marginally less impact.

However, whilst these changes are welcome, the changes are very minor and do not address our concerns. The scheme still quantitatively erodes the skygap, as outlined in our previous letter. It is incredibly disappointing that this revised scheme did not take the opportunity to 'design-out' this impact in its entirety. As such, our previous concerns still stand and we would argue that the applicant has a) not materially mitigated the harm which evidently could be removed if the applicant and design team were minded to do so, nor b) provided adequate justification of this impact.

Change of Enclosure of Rooftop Plant and Upper Floor

The changes to the upper floors present a minor alteration when compared to the submission scheme. However, our previous concerns regarding the suitability of this site for a tall building remain. The changes to architectural expression and materiality do not address our principal concern: that using the 'shadow' of Nido Tower in this location does not fully mitigate the impact of the proposals. In this regard, we suggest that the City officers should not accept the applicant's impact evaluation methodology uncritically (as also referenced within our previous letter). We note and we suggest that Officers should pay full and careful heed to the material impacts of this proposed scheme which would erode the setting of the Cathedral irreversibly and that these should not be approved.

Conclusion

We would again thank officers for their assistance to date with this review of the amended proposals. We also wish to again note the positive approach to engagement undertaken by the applicant, as outlined in our previous letter. Feedback appears to have informed the design process.

Surveyor to the Fabric

However, with regret, the changes made unfortunately do not address our concerns and we would therefore urge officers to give full and due weight to the permanent and irreversible harm that this scheme would have – which in some aspects could very straightforwardly be avoided by further relatively modest design changes.

Whilst the Cathedral welcomes attempts to lessen impact to the skygap, it is regrettable that such impacts have not been ‘designed out’ entirely. Additionally, we would continue to question the suitability of this site for a tall building of this form and size, given its proximity to the Cathedral when compared to Nido Tower beyond. As such, we consider that our previous concerns regarding the impact of the proposals still stand.

We hope that this is a consultation response which strengthens the relationships and common aims of City and the developers.

Yours sincerely,



cc Joanna Parker: Principal Planning Officer (Design).

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