From: [redacted]
To:
Subject: RE: Planning Application Consultation: 24/00836/FULEIA
Date: 09 September 2024 17:24:01

Afternoon Amy,

Reviewing the utility report, all is satisfactory for 99 Bishopsgate.

Kind regards, Sye

Sye Thevathas
Strategic Infrastructure & Highways Asset Manager
City of London | Environment Department | City Operations Division
Guildhall | London | EC2V 7HH
[redacted]

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, September 9, 2024 2:52 PM
To: Thevathas, Sye <[redacted]>
Subject: Planning Application Consultation: 24/00836/FULEIA

Dear Sir/Madam

Please see attached consultation for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

From:	PlanningGatewayOne
To:	PLN - Comments
Subject:	RE: Planning Application Consultation: 24/00836/FULEIA (Our ref pgo-5851)
Date:	10 September 2024 09:43:50
Attachments:	image001.png

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website here.
Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-5851) in all future correspondence.
Kind regards

Lisa Gaskill
Operational Support for Planning Gateway One
Health and Safety Executive | Building Safety Division
PlanningGatewayOne@hse.gov.uk

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, September 9, 2024 2:49 PM
To: PlanningGatewayOne <PlanningGatewayOne@hse.gov.uk>
Subject: Planning Application Consultation: 24/00836/FULEIA

Dear Sir/Madam

Please see attached consultation for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

Amy Williams - Case Officer
Development Division
Environment Department
City of London

NATS Safeguarding Office
4000 Parkway
Whiteley
Fareham PO15 7FL

T: [redacted]
E:
W: www.nats.aero/windfarms

NATS / CRM Ref: SG36305

11th September 2024

Sent via email: [redacted]
cc:

Dear Ms Williams,

24/00836/FULEIA - 99 Bishopsgate London EC2M 3XD

I refer to the application quoted above. NATS has assessed the application and has identified the significant potential for an impact on its operations. Specifically, the proposed development is of a significant scale and massing, as well as being offset from the bulk of the City Cluster. As such, the line of sight from the development to the H10 radar, operated by NATS but located at Heathrow airport is unobstructed above 120m.

NATS therefore anticipates the top half of the building to be sufficiently illuminated by the radar to reflect radar signals and cause false aircraft targets to appear on air traffic controllers' displays. This has an unacceptable impact on ATC workload.

The potential impact can be affected by the design of the building (finish, massing/scale, orientation) or in the worst case can be mitigated by modifying the radar system. As such, NATS is satisfied that subject to a commercial agreement with the applicant in respect of timescales and funding, mitigation measures are available.

Accordingly, should the LPA be minded to grant planning permission to the development, NATS respectfully requests that the planning conditions overleaf are imposed on any consent.

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002 prior to granting any permission.

Yours faithfully

[redacted]

Mr Sacha Rossi
For and on behalf of NATS En-Route plc

Aviation Planning Conditions

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

2. No construction work shall be carried out above 120m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

3. No construction work shall commence on site until the Developer has agreed a “Crane Operation Plan” which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the “Radar Operator”.

Construction at the site shall only thereafter be operated in accordance with the approved “Crane Operation Plan”.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

For the purpose of conditions 1-3 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act).

"Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator.

"Crane Operation Plan (COP)" means a detailed plan agreed with the Operator which defines the type of crane and the timing and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the H10 Primary and Secondary Surveillance Radar systems at Heathrow Airport and associated air traffic management operations of the Operator.

-----Original Message-----
From: Russell Pengelly
Sent: Monday, September 9, 2024 3:28 PM
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00836/FULEIA

Dear Amy,

I have reviewed the plans of the build at length with QCIC, who were the main security consultants on the project.

Whilst I have no objection to the build/refurb, I have raised concerns over the public/private walkway between Wormwood Street and Bishopsgate. The building integrates the cycle storage facilities into the back aera of the building and have allocated space for them over several floors. My concern is that this area is likely to become a through route for cyclists avoiding the busy junction of Bishopsgate, also the location of the storage access is along the back corridor.

I have recommended that some of this area should be stepped to minimise this, subject to appropriate DDA access.

We have discussed controlling access to the building during spontaneous protest/attack and they have placed mitigation into the design for this.

Best wishes

Russell

PC Russell Pengelly
Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor Partnerships and Prevention Hub

City of London Police |Bishopsgate Police
Station|182 Bishopsgate, London, EC2M 4NP

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Monday, September 9, 2024 2:50 PM
To: Doco
Subject: Planning Application Consultation: 24/00836/FULEIA

CAUTION:This email came from outside the force. Do not open attachments, click on links or scan QR codes in this email unless you recognise the sender's e-mail address and know the content is safe.

Dear Sir/Madam

Please see attached consultation for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to HYPERLINK "mailto:PLNComments@cityoflondon.gov.uk"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

creating a better place
for people and wildlife

Environment Agency

Amy Williams
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137426/01
Your ref: 24/00836/FULEIA

Date: 12 September 2024

Dear Amy,

99 Bishopsgate, London, EC2M 3XD.

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Thank you for consulting us on the above application on 9 September 2024.

Environment Agency Position
Based on the information currently available, the development raises no environmental concerns for us. We therefore have **no comments** on the Environmental Statement.

Advice to applicant

Water Resources
Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or

refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

Commercial/Industrial developments
We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the BREEAM 'excellent' standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your local planning authority for more information.

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

Final comments
Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Isabel Smith
Planning Advisor

Email: HNLSustainablePlaces@environment-agency.gov.uk
Direct Dial: 020 7714 2206

From: Active Travel England Planning
To: PLN - Comments
Subject: LPA Reference: 24/00836/FULEIA Standing Advice Response
Date: 17 September 2024 11:43:44

LPA Reference: 24/00836/FULEIA

ATE Reference: ATE/24/01069/FULL

Site Address: 99 BISHOPSGATE, LONDON, EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing

advice can be found here:
https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter **@activetraveleng**

Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw000000r8U5IAI;d510699c560d5cf25a65147f36c935c1:ref]

LPA Ref: 24/00836/FULEIA

London City Airport Ref: 2024/LCY/211

Date: 18/09/2024

Dear Amy Williams,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	24/00836/FULEIA
Proposal	Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

	This application is accompanied by an Environmental Statement which is available for inspection with the planning application.
Location	99 Bishopsgate London EC2M 3XD
Borough	City of London
Case Officer	Amy Williams

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Radar Conditions

No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON: In the interests of aircraft safety and the operations of London City Airport.

No construction work shall be carried out above 120m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON: In the interests of aircraft safety and the operations of London City Airport.

No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator". Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON: In the interests of aircraft safety and the operations of London City Airport.

Instrument Flight Procedures (IFPs) Impact Condition

No construction works above ground level shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. The IFP assessment must consider all tall buildings and proposed construction cranage.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.

Construction Methodology Condition

No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport.

Reason: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.

Building Obstacle Lighting Condition

Details of these obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q 'Visual Aids for Denoting Obstacles' and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.
Obstacle Lighting can be installed on the western edge of the roof. This is to ensure the western edge of the building cluster is marked sufficiently.

Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make you aware of the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London Council are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).
The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

Crane advice:

Given the heights of the cranes to be estimated to be over 250m AGL, the crane operator is required to submit all crane details such as maximum height, operating radius, name and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system.

For notification, please follow the link via CAA website:
Crane notification | Civil Aviation Authority (caa.co.uk)

Once crane notification has been received from the CAA, London City Airport safeguarding team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.

Specific CAA guidance for crane lighting/marking is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking (caa.co.uk)

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale
On behalf of London City Airport

From: lauren underwood
To: PLN - Comments
Subject: Our DTS Ref: 75721 Your Ref: 24/00836/FULEIA
Date: 20 September 2024 14:52:59

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 75721 Your Ref: 24/00836/FULEIA 20 September 2024

Dear Sir/Madam

Re: 99, BISHOPSGATE, LONDON, GREATER LONDON AUTHORITY, EC2M 3XD

Waste Comments
The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. “No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We’ll need to check that your development doesn’t limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: “A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water is currently working with the developer of application 24/00836/FULEIA to identify and deliver the off site COMBINED WASTE WATER infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the combined waste water network to serve 17,800 sqm of office space but beyond that, upgrades to the combined waste water network will be required. Works are ongoing to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn’t outpace the delivery of essential infrastructure. “There shall be no occupation beyond 17,800 sqm of office space until confirmation has been provided that either:- 1. All combined waste water network upgrades required to accommodate the additional flows from the development have been completed; or 2. A development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed, no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.” Reason - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk

Planning and Place
Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place
Amanda Reid

THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA

City of London
Environment Department
PO Box 270 Guildhall
LONDON
EC2P 2EJ

Date: 20/09/2024
My Ref: OB/24/06001

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

99 Bishopsgate, LONDON, EC2M 3XD

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

SCHEDULE

Development: This Council is asked for its observations on an application submitted to the City of London for:
Partial demolition of the existing building,retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118

Site Address: **99 Bishopsgate, LONDON, EC2M 3XD**

RBKC Drawing Nos: OB/24/06001

Applicant's Drawing Nos:

Application Dated: 09/09/2024

Application Completed: 09/09/2024

FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S) ATTACHED OVERLEAF

CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION

INFORMATIVE(S)

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see Advice for Builders on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at **http://www.rbkc.gov.uk/OB/24/06001 .** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid
Director of Planning and Place

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/292972 **.** If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

Amy Williams
Environment Department
City of London
PO Box 270, Guildhall
London EC2P 2EJ

25 September 2024

Dear Amy

Re: Planning Application No: 24/00836/FULEIA – Partial demolition & construction of a 53 storey mixed use building at 253.5m AOD, with associated works at 99, Bishopsgate, London EC2M 3XD

Our Ref: LGW5631

Thank you for your letter/email dated 09 September 2024, regarding the above-mentioned consultation.

The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria for London Gatwick. We therefore have no objections.

This response relates to London Gatwick only, other airports will have different requirements.

For information, please note that the DfT Circular 'Town & Country Planning (safeguarded aerodromes, technical sites & Military Explosives Storage Areas) Direction 2002, under Annexe 2 'High Structures', requires that Local Planning Authorities notify CAA of any building or works extending 91.4m or more above ground level as soon as permission has been granted. Please notify CAA at arops@caa.co.uk

For details of the information to be submitted please refer to the circular at The town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 - GOV.UK (www.gov.uk)

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer
For and on behalf of London Gatwick

Email: gal.safeguarding@gatwickairport.com

Historic England

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00836/FULEIA
Our Ref: 223801

Contact: Helen Hawkins
[redacted]

26 September 2024

Dear Ms Williams,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

99 Bishopsgate London EC2M 3XD
Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Recommend Archaeological Condition

Thank you for your consultation received on 09 September 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

The planning application is accompanied by an Environmental Statement which contains an archaeological chapter and archaeological baseline report by MOLA. The archaeological baseline demonstrates that, despite the site being located within the Roman and medieval city walls, archaeological remains over the majority of the site will have been removed by the current basement. The baseline highlights that archaeological survival is likely to be limited to three areas: in the north-east of the site under the current mezzanine, the extreme west of the site next to Wormwood Street and the access ramp in the south. It is therefore recommended that archaeological evaluation takes place in these three areas early in the development programme to establish the extent of archaeological survival on the site and allow a mitigation programme to be designed and programmed in.

GLAAS requested within the scoping response that public benefit relating to archaeology be included in the Cultural Plan for the site. It is therefore very welcome to see that the applicant has worked with the London Museum to provide publically accessible display spaces for archaeological finds within the ground floor space, and these should be taken forward in the final development.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
B. Where appropriate, details of a programme for delivering related positive public benefits
C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater

London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Date: 26 September 2024
Our ref: 487934
Your ref: 24/00836/FULEIA

City of London

BY EMAIL ONLY
PLNComments@cityoflondon.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Planning consultation: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
Location: : 99 Bishopsgate London EC2M 3XD

Thank you for your consultation on the above dated 09 September 2024 which was received by Natural England on 09 September 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Helen Churchill
Consultations Team

Annex A –Natural England general advice

Protected Landscapes
Paragraph 182 of the National Planning Policy Framework - GOV.UK (www.gov.uk) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the Levelling-up and Regeneration Act 2023 (legislation.gov.uk) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes
Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance.

Biodiversity duty
Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information.

Designated nature conservation sites
Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities - GOV.UK (www.gov.uk).

Protected Species
Natural England has produced Protected species and development: advice for local planning authorities (gov.uk) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A –Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply - GOV.UK (www.gov.uk) for more information.

Local sites and priority habitats and species
The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England - GOV.UK (www.gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains
Development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. Major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

For further information on the timetable for mandatory biodiversity net gain, we refer you to Biodiversity Net Gain moves step closer with timetable set out - GOV.UK (www.gov.uk). Biodiversity net gain - GOV.UK (www.gov.uk) provides more information on biodiversity net gain and includes a link to the draft Biodiversity net gain - GOV.UK (www.gov.uk) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric - GOV.UK (www.gov.uk) for more information. For small development sites, The Small Sites Metric - JP040 (naturalengland.org.uk) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land

Annex A –Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees
The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 186 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils
Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 180 and 181). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk).

The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure
For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A –Natural England general advice

The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation
Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails
Paragraphs 104 and 180 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Further information is set out in the Planning Practice Guidance on the Natural environment - GOV.UK (www.gov.uk).

Heathrow Airport Limited
Airside Operations Facility
Heathrow Airport
Hounslow, Middlesex TW6 2GW
Tel: +44(0) 208 757 0887
Email: Safeguarding@Heathrow.com

Amy Williams
Development Division
City of London
By email

27/09/24

Dear Amy,

Re: Planning Reference: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Location: 99 Bishopsgate London EC2M 3XD.

Our Ref: LHR6013

We refer to your email dated 09/09/24, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the conditions detailed below:

H10 Radar Mitigation Condition
No Development can take place until:

- mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar at Heathrow Airport.

Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.

Submission of a Construction Management Strategy
Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters*:*

- details of cranes and other tall construction equipment (including the details of obstacle lighting) – Such schemes shall comply with Advice Note 4 'Cranes' (available at http://www.aoa.org.uk/wp-content/uploads/2016/09/Advice-Note-4-Cranes-2016.pdf*).*

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not breach the Safeguarding Surfaces surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

CAA Building Notification
If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

Building Obstacle Lighting
Any proposed buildings exceeding 45m AGL will be required to install obstacle lights, medium intensity type A, B or C. refer to **Book 1 chapter Q - CS ADR-DSN.Q.848**

CAA Crane Notification
Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

From:	Location Enquiries
To:	PLN - Comments
Subject:	RE: Planning Application Consultation: 24/00836/FULEIA
Date:	27 September 2024 11:05:44
Attachments:	image001.png image002.png

THIS IS AN EXTERNAL EMAIL

Good morning,

Application No: 24/00836/FULEIA
Site address: 99 Bishopsgate London EC2M 3XD
Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- our right of support is not compromised;
- the development will not have any detrimental effect on our structures either in the short or long term;
- the design must be such that the loading imposed on our structures is not increased or removed;
- we offer no right of support to the development or land.

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
a) provide details of demolition including design and Risk Assessment Method Statement (RAMS);
b) provide details of associated temporary works including design and RAMS;
c) identify and accommodate existing London Underground structures in the vicinity of the proposed development;
d) provide details of changes in loading to LU's infrastructure considering sequence of works;
e) provide an assessment of ground movement impact on London Underground structures and

tunnels due to temporary and potential long term changes in loading for the demolition stage;
f) mitigate the effects of noise and vibration on and arising from adjoining railway operations.
g) provide technical specifications related to the proposed plant. Upon review of the technical specifications, an independent EMC impact assessment may be required to be submitted for TfL Engineers' approvals. This is to ensure any EMC issues emanating from the plant or equipment to be used on the site or in the finished structure will not adversely affect London Underground electrical equipment or signalling systems.

2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
a) provide details of demolition, excavation and associated temporary works including design and RAMS;
b) provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent) including design and RAMS;
c) provide details of changes in loading to LU's infrastructure considering sequence of works;
d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the sub-structure construction stage;
e) mitigate the effects of noise and vibration on and arising from the adjoining railway operations – an assessment in relation to the basement excavation should be provided in accordance with the London Plan 2021 Policy D10;
f) no claims to be made against TfL or London Underground by the Local Authority purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
a) provide details of super-structure including design and RAMS;
b) provide details of associated temporary works including design and RAMS;
c) provide details of changes in loading to LU's infrastructure considering sequence of works;
d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and permanent changes in loading for the super-structure construction stage;
e) mitigate the effects of noise and vibration on and arising from the adjoining railway operations – an assessment of the effects from groundborne noise and vibration to the occupants of the building should be provided.
f) no claims to be made against TfL or London Underground by the Local Authority purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as a Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li
Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 09 September 2024 14:45
To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Subject: Planning Application Consultation: 24/00836/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 99 Bishopsgate London EC2M 3XD .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0041

Date of issue of this decision: 27/09/2024

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0041 **Date of Issue of Decision:** 27/09/2024
Your Ref No.:

Applicant Ms Amy Williams City Planning
City of London

NO COMMENTS made in reference to your consultation on the following development:

Partial demolition of the existing building, retention and partial extension of existing
basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD)
building to provide commercial floorspace (Class E); with market hall space on the ground
floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b))
and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-
storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or
performance space, learning, community use, creative workspace (Class F1, Sui Generis and
Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm
improvement works, hard and soft landscaping, provision of basement cycle parking and
means of access, highway works and other works associated with the development of the Site.

At 99 Bishopsgate London EC2M 3XD

In accordance with your letter received on 9 September 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

DECISION NOTICE

LBS Registered Number: 24/OB/0041

Date of issue of this decision: 27/09/2024

www.southwark.gov.uk

Transport for London

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

PLNComments@cityoflondon.gov.uk

30 September 2024
Crossrail Ref: CRL-IP-3273

Dear Amy Williams,

24/00836/FULEIA : 99 Bishopsgate London EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5 storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 09 September 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN
……

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

From:	Haringey Planning Services
To:	PLN - Comments
Subject:	No Objection - HGY/2024/2490 - 99 Bishopsgate, London, EC2M 3XD (Your Ref: 24/00836/FULEIA)
Date:	03 October 2024 14:17:08

Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) Order 2015

Application No:	HGY/2024/2490
Proposal:	Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. (Observations to City Of London - their planning reference 24/00836/FULEIA)
Site Address:	99 Bishopsgate, London, EC2M 3XD

Dear Sir/Madam,

I am writing to inform you that the Council has no objection to your application.

Thank you

Planning Service

[ref:a0iTu000000VHqzIAG;42b4710288789bcf330fdca816064199:ref]

Planning | Placemaking and Housing | Haringey Council
Alexandra House (5th Floor), 10 Station Road, London, N22 7TR
www.haringey.gov.uk/planning-and-building-control/planning

London Borough of Hammersmith & Fulham

Development Management, Place Department
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk

Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

7th October 2024

Applicant:
Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Application Reference: **2024/02262/OBS**

Registered on: **10th September 2024**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

99 Bishopsgate London City Of London EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground
floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.
This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of Place
Department: Joanne Woodward

[redacted]

Joanne Woodward Chief Planning Officer of Place Department
Duly authorised by the Council to sign this notice.

Your Ref:
Our Ref: 24/02841/OBS

Lambeth

0000/01/0000/0000000/69975362
1619970/006195/001/001

Amy Williams
PO Box 270
Guildhall
London
EC2P 2EJ

8th October 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amy Williams

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS
I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 24/02841/OBS Date of Application: 10.09.2024 Date of Decision 08.10.2024

Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For:	Observations on a proposed development within the adjoining Borough of City of London with respect to partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the site at 99 Bishopsgate London EC2M 3XD.

Approved Plans

Cover Letter dated 9th September 2024

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Conditions

1 The London Borough of Lambeth raises no comment to the proposal.

Notes to Applicant:

Yours sincerely

[redacted]

Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 8th October 2024

Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/24/01558
Your ref: 24/00836/FULEIA

Enquiries to: Steven Heywood
Tel:
Email: [redacted]

10 October, 2024

Dear Amy Williams,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location 99 Bishopsgate, London, EC2M 3XD
Proposal Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above applciation. I would be grateful if you would take the observations set out about into consideration:-

1. A Scoping Opinion (CoL reference 23/01122/SCOP) for the Proposed Development was issued by the City of London Corporation on 8 March 2024. The City of London planning register states that LBTH were consulted on this application on 16 October

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

2023. However, there is no record that LBTH received this consultation, as it is not registered on LBTH's planning register. It is requested that CoL provide the consultation email, so that LBTH can review procedures accordingly.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. While LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, associated listed buildings and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given in the Heritage, Townscape and Visual Impact Assessment (HTVIA) of the Environmental Statement (ES).

The ES concludes that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Traffic and Transport, and Climate Change.

The following aspects and matters that could affect LBTH will result in significant adverse effects, however, none of the affected receptors are located within LBTH: Noise and Vibration, Daylight, Sunlight, Overshadowing and Light Pollution, and Wind Microclimate.

The HTVIA concludes a major significant adverse effect on View 6: Aldgate Square within LBTH during construction.

Two cumulative schemes in LBTH have been considered in the cumulative assessment, however there are additional schemes in LBTH which should be considered as follows:

- 1-10 Bishops Square (One Spitalfields) (PA/24/01198). Planning application submitted.
- Royal Mint Court (PA/24/01229). Planning application submitted.
- 101 Whitechapel (PA/24/00173). Planning application submitted.
- Trumans Brewery (PA/24/01451, PA/24/01475, PA/24/01439, PA/24/01450). Planning applications submitted.
- Ensign Street (PA/13/03068); Planning permission granted.
- London Dock (PA/19/00764 – noting the latest s73 application granted for the site, previous permission including PA/17/02112 and PA/14/02819, original hybrid permission PA/13/01276) and the associated reversed matters applications (Plot D – PA/18/00331; Plot E – PA/19/00766; Plot F – PA/19/01684; Plot G – PA/21/00716 & PA/22/02666); Planning permission granted.
- London Dock Blocks H & J (PA/23/02079); Resolution to grant planning permission.
- Bishopsgate Goodsyard (LBTH Reference PA14/02011; London Borough of Hackney Reference; Greater London Authority Reference: 2014/2425); Planning permission granted.
- Land bounded by Elder Street, Folgate Street, Blossom Street, Norton

Folgate, Shoreditch High Street and Commercial Street (PA/14/03548) (PA/14/03618) (PA/19/00773); Planning permission granted.
- Enterprise House, 21 Buckle Street (PA/16/03552); Planning permission granted at appeal.
- 55-56 Chamber Street (PA/19/02837); Planning permission granted.
- 34-40 White Church Lane and 29-31 Commercial Road (PA/15/02527, PA/21/02666). Planning permission granted. (PA/24/00644); Planning application submitted.

A HTVIA has been provided within Volume 2 of the ES. The townscape assessment has considered the effects on Spitalfields Townscape Character Area within LBTH and has concluded a minor neutral effect.

The following views within LBTH, or relevant to the assessment of effects on the Tower of London have been identified and considered in the assessment:

- View 5: Commercial Road – Minor Neutral Effect during construction and operation.
- View 7: Butler's Wharf (not within LBTH) – Minor Neutral Effect during construction and operation.
- View 8: LVMF 25A.3 Queen's Walk (not within LBTH) – Minor Neutral Effect during construction and operation.
- View 9: LVMF 10A.1 Tower Bridge – Minor Neutral Effect during construction and operation.
- View 10: Tower Bridge Approach – Minor Neutral Effect during construction and operation.
- View 11: Tower of London, South Wall – Minor Neutral Effect during construction and operation.
- View 12: Tower of London, Inner Ward – Minor Neutral Effect during construction and operation.
- View 13: Tower of London, Inner Curtain Wall, east of Deveraux Tower – Negligible Neutral Effect during construction and operation.

LBTH has noted that the Non-Technical Summary (NTS) inconsistently reports the significant effect on View 6: Aldgate Square during construction, whilst this is correctly reported in paragraph 161 of the NTS, it is not stated in Table 8. In addition, Table 8 and Paragraph 165 of the NTS, reports that during operation View 6: Aldgate Square would experience a moderate beneficial significant effect, which is incorrect. The NTS must be updated in this regard.

Additional model views have been rendered and provided as Appendix 1 of the HTVIA, and the following views are located within LBTH, or relevant to the assessment of effects on the Tower of London:

- View 1: Ali Altab Park
- View 2: Wentworth Street
- View 4: LVMF 25A.1 Queen's Walk (not within LBTH)
- View 5: LVMF 25A.2 Queen's Walk (not within LBTH)

- View 6: Tower Hill Scaffold

With the exception of view 6, it is considered that the other views should have been fully assessed within the ES given the visibility of the Proposed Development in these views.

The Zone of Theoretical Visibility (ZTV) provided as Appendix 3 of the HTVIA demonstrate the Proposed Development would likely to be visible across a wider area of LBTH than is represented by the view point assessed, particularly within Allen Gardens. It is not clear from the ZTV whether the Proposed Development would be visible from LBTH Borough Designated View 2 View from Wapping Wall bridge to St Paul's Church (as shown on Figure 6 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020).

The date the photo of each view was taken cannot be located in the HTVIA. This should be provided to ensure the baseline is reasonably up to date and can be relied upon.

The TBHVIA assesses the likely significant effects of the Proposed Development on above-ground heritage assets. The following heritage assets within LBTH have been assessed:

- Tower of London World Heritage Site (WHS) and associated designations – Minor neutral effect during construction and operation.
- Christ Church – Negligible neutral during construction and operation.

It should be noted that the assessments within the THVIA are subjective. The City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

The City of London Corporation must consider whether the ES is considered to be adequate in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulations.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,

Sripriya Sudhakar, Director Planning and Building Control

Place Division / Development Management
Web: www.richmond.gov.uk/planning
Email: envprotection@richmond.gov.uk
Tel: 020 8891 1411
Textphone: 020 8891 7120

LONDON BOROUGH OF RICHMOND UPON THAMES

City Of London
City Of London
PO Box 270
Guildhall
London
EC2P 2E

Letter Printed 14 October 2024

FOR RECOMMENDATION DATED
14 October 2024

The Town and Country Planning Act 1990, (as amended)
Consultation – Raise no Objection

Application: **24/2265/CON**
Your ref: 24/00836/FULEIA
Our ref: DC/KNP/24/2265/CON/CON
Applicant: City Of London
Agent:

LOCATION
99 Bishopsgate London EC2M 3XD

for

PROPOSAL
Partial demolition of the existing building, retention and partial extension of existingbasement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground
floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5- storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

That the City Of London be advised that the London Borough of Richmond upon Thames raise no objection to the above mentioned proposal.

Yours faithfully,

Robert Angus
Head of Development Management

Historic England

Ms Amy Williams
City of London Corporation
Guildhall, PO Box 270
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01582264

11 October 2024

Dear Ms Williams

T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

99 BISHOPSGATE LONDON EC2M 3XD
Application No. 24/00836/FULEIA

Thank you for your letter of 9 September 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The proposed development would introduce a very steep edge to the City's tall buildings cluster, close to St Paul's cathedral, in the strategic view of it from Waterloo Bridge. As such, it would reduce the pre-eminence of the cathedral on the skyline, resulting in clear harm to the significance of one of the nation's most important buildings. The proposals fail to accord with important development plan policies, including the London View Management Framework (LVMF), which seek to protect the cathedral as a Strategically Important Landmark by ensuring its visual prominence on the skyline.

Additional harm would be caused to the striking ensemble of the highly graded listed buildings near Whitehall in the protected LVMF view from St James' Park. Further information is required in order to fully understand the potential impacts on the significance of the grade I listed Church of St Ethelburga opposite the site.

Historic England strongly objects to the grant of planning permission.

Historic England Advice

Significance of the heritage assets impacted by the proposals

a) St Paul's Cathedral

The cathedral sits on the highest point in the City and is a world-famous landmark. It was founded in 604; the rebuilding of the previous medieval cathedral on the site was undertaken by Sir Christopher Wren from 1675-1710. His Baroque design, incorporating a great dome, is instantly recognisable and has long presided over London's skyline. It is seen amongst the spires of Wren's City churches and represents the crowning achievement of one of the most highly regarded figures of western architecture. It's symbolism of London as a City and Diocese is unrivalled.

The cathedral was designed to be seen from all over London, towering over its surroundings. Its prominence has been eroded by twentieth century and later development, which has in turn resulted in various long-standing protection regimes that sit alongside the regular statutory protection of listed buildings and their settings. Protected strategic views of the cathedral are currently formalised in the London Plan and associated London View Management Framework (LVMF 2012).

A new setting study has been commissioned with the intention of filling the gaps in understanding left by these management tools and presently exists as a mature draft: *The Setting of St Paul's Cathedral and its Contribution to Heritage Significance: An Analysis and Evidence Base* (City Plan 2040 Regulation 19 Consultation version, June 2024). This provides the most comprehensive understanding of significance, as derived from setting, currently available.

The document describes key elements of the cathedrals setting which are fundamental to its significance and the way it is experienced (SB1, p22-23). Clear sky and the space around the cathedral ('clear skyspace') contribute because it 'enhances and ensures visual prominence and therefore the intended architectural effect'. Similarly, the river corridor contributes to an appreciation of the scale and visual prominence of the cathedral, the connection with the majority of the celebrated artistic representations of it, and the appreciation of the architectural and cultural significance of it in its wider urban context. The study concludes that 'any incursions into the sky space around the cathedral have the potential to cause harm to its significance' (para 6.5).

Waterloo Bridge is widely regarded as providing some of the best panoramic views of the City, with St Paul's as their focus, and of Westminster in the opposite direction. Such views are experienced by huge numbers of people daily. The cathedral derives significance from its setting in these important views in the way it is seen as the pre-eminent landmark. In order to fulfil its architectural and symbolic intent, it must be possible to appreciate its monumental character. The clear sky backdrop to St Paul's, which was once much more expansive, is critical to this appreciation.

LVMF 15B.1 and B.2 Waterloo Bridge Downstream are the eastward views and mark the beginning and end of the sequence of views experienced from the bridge. The cathedral is seen with the cluster to its right. A visual relationship between the

cathedral and the tall buildings of the cluster as two distinct forms with space between them has been established as the cluster has been shaped, mindful of the cathedral's significance, over the past 20 years. The cathedral then dominated the foreground and middle ground of the view, with clear sky around it, while the modern tall buildings of the cluster form the background to the right.

b) St James's Park, the Horse Guards and Whitehall Court

St. James's Park (Grade I), Horse Guards (Grade I) and the Whitehall Court (Grade II*) capture another important symbolic aspect of London: the relationship between its governmental and royal legacies. Highly important in their own right, these assets are also essential to London's character and identity. They are appreciated from a variety of places and their settings are of heightened sensitivity in strategic views. One such vantage point is captured by LVMF View 26A.1, a view from the centre of the bridge across the lake in the centre of the Park, where the buildings create a lively, picturesque roofline in the backdrop. Historic architecture and landscape complement each other to form a highly significant place.

c) Former Church of St Ethelburga within Bishopsgate

St Ethelburgas is one of few medieval churches (rebuilt c.1411) that survived the fire of London but severely bomb damaged in 1993. It was thoughtfully rebuilt and reopened as the Centre for Reconciliation and Peace in 2002. The church is Grade I listed indicating its exceptional interest. It is surrounded by tall buildings which contrast dramatically with its miniature scale, leaving the church vulnerable to further change.

Impact of the proposals

The proposals are for the part demolition and part retention of the existing tall building on the site, to create a new 53 storey tall building designed by RSHP. This would see the reuse of the existing core with a new, taller externally braced structure with glazed curtain walling formed around it. The existing building height of 121.5m AOD would be approximately doubled to 253.5m AOD.

a) St Paul's Cathedral

The proposals would erode the clear sky back drop above the Heron Tower adjacent to the cathedral, as seen from Waterloo Bridge - LVMF View 15B.1 in particular. Here, it would create a new profile for the cluster, rising abruptly from Angel Court, resulting in a cliff edge which is noticeably higher than the overall height of the cathedral. The chamfered form of the top of the building offers little mitigation - its leading edge would rise steeply to the apex. In this key view, the impact on the significance of the cathedral would be most damaging.

As a consequence of the scale and massing of the proposed development, it would compete with St Paul's Cathedral and would contribute to its visual prominence becoming further diminished, resulting in clear harm to significance and the ability to appreciate it. The large, bulky form of the cluster as a whole would be brought closer to the cathedral, increasing its dominance and cumulative impact.

The cathedrals prominence on the skyline would be affected in much wider ranging river views and harm to significance would therefore occur more broadly than just strategic views, albeit to a lesser extent. The view from Somerset House, from where Canaletto's celebrated depiction of the City was painted, is important. The visual impact would be more extreme due to the closer proximity of the cluster to the dome of St Paul's, as shown in View 32 of the Heritage and Townscape Visual Impact Assessment, albeit partly screened by trees.

b) The Whitehall buildings

The proposals would result in further harm to the Whitehall buildings and St James's Park, where the development would be seen alongside the consented 55 Bishopsgate behind Duck Island. Though of a lower height, so that a smaller proportion of the development would be visible compared to the latter, it would sit directly behind the southern end pavilion roof of Whitehall Court and encroach further into the characterful view.

The proposal would harm the significance of these buildings by reducing their prominence and also by visually competing with their picturesque roof forms. This harm would also occur to the registered landscape, which derives some of its significance from its interplay with the historic buildings in its setting described above. It is likely that this harmful impact, in the case of both developments, would be more prominent at darker times of the day.

c) The Church of St Ethelburga's

The potential visual impacts on the setting of the church as experienced from its churchyard have not been tested; the cumulative change of both schemes 55 and 99 Bishopsgate could be dramatic.

We understand that present wind conditions generated by existing tall buildings has caused a window on the northern elevation of the church to buckle and this has now been boarded up. The proposed development appears likely to further worsen wind conditions around the church. The increase in scale alongside the removal of the existing podium directly opposite it would likely exacerbate the existing problem. Alongside construction impacts, the proposed development may have implications for the viability of the existing use of the former church, which provides for its on-going conservation.

Legislation, policy and guidance considerations

a) The Planning (Listed Buildings and Conservation Areas) Act 1990

- Section 16 (2) and 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the statutory duty on local planning authorities to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.
- Section 72 (1) of the Act also requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

b) The Local Plan

The City of London's adopted Local Plan (2015) seeks to safeguard the City's listed buildings and their settings (CS12), and requires significant views of the cathedral to be protected or enhanced, including views from Waterloo Bridge (CS13). The site sits within the Eastern Cluster policy area (CS 7); which alongside the tall buildings policy (CS14) allows for tall buildings where their architecture is of the highest calibre and they would not harm the City's historic environment or the wider London skyline.

The broad aims of these policies are carried forward in the emerging City Plan 2040. Regarding St Paul's, it further states that 'In views from the south bank west of Blackfriars Bridge and from Waterloo Bridge the Cathedral is seen in relation to the City's eastern cluster of tall buildings. The cluster appears to the right of the Cathedral and does not intrude into its backdrop. There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and should be maintained.' (para 11.6.11).

This ambition is not borne out in the profile of the cluster envisioned in the emerging plan as viewed from Waterloo Bridge, however, and would not be achieved by this proposal either. Both illustrates a sheer rise up to the apex, rather than any stepping up from the gap. Historic England has, on this and other grounds, raised issues with the soundness of the draft City Plan.

c) The London Plan

St Paul's Cathedral is one of only three Strategically Important Landmarks identified by the Mayor, as a landmark that makes a very significant contribution to the image of London and is consequently protected in strategic views.

London Plan Policies HC3 and HC4 concern strategic views and the LVMF. The latter policy requires that 'Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate…as seen from designated viewing places.'

The LVMF SPG provides guidance specific to views 15B.1 and 15B.2, stating that 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect' (Para 266). It also states 'Development should not dominate the peristyle, drum, dome or western towers of St Paul's Cathedral in the background of the view (Para 267).

The guidance for View 26A.1 (St. James's Park) advises that development in the background of this view should be of a scale, mass or form that does not dominate, overpower or compete with either of the existing two groups of built form or the landscape elements between and either side of them. New buildings should appear as part of the existing groups of buildings; buildings that appear above the central part of Duck Island would damage the viewer's ability to see these groups of buildings in conjunction with the landscaped foreground and should be refused.

c) The National Planning Policy Framework (NPPF)

Chapter 16 of the NPPF concerns the historic environment. It requires a robust and proportionate understanding of the significance of any affected heritage assets and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (paras 200-201).

Any finding of harm is a consideration to which the decision-maker must give "considerable importance and weight" and "less than substantial harm" in NPPF terms does not imply "a less than substantial objection".

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 193 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

d) Historic England guidance

Historic England's **The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning: 3)** provides general guidance on understanding setting and its contribution to significance. The following staged approach to decision-taking is recommend:

- Step 1: Identify which heritage assets and their settings are affected
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes

Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- Proximity to asset
- Position in relation to key views to, from and across
- Prominence, dominance or conspicuousness
- Competition with or distraction from the asset
- Change to skyline, silhouette
- Lighting effects and 'light spill'

Historic England's **Tall Buildings HEAN 4** (March 2022) provides guidance on planning for tall buildings within the historic environment. Para 4.15 notes that strategically planning for tall buildings in clusters can bring townscape benefits while avoiding or reducing the potential impacts upon the historic environment. When considering the formation of tall building clusters, it is important to take account of:

- Maximum building heights and horizontal extent;
- Variations of building heights e.g. to allow the stepping down of heights towards the edges of the cluster, or to create layering of buildings that can add

townscape interest;
- § Cumulative impacts;
- § Profile, silhouette and edges;
- § Impact on and response to the historic environment; and
- § How the townscape benefits of the cluster can be maintained.

Historic England's position

Historic England objects strongly to the application. The proposals would harm the significance of St. Paul's Cathedral, one of the nation's most important buildings. They would make the form of the cluster more assertive and less deferential, in contrast to its existing edge, formed largely by the Heron Tower (110 Bishopsgate), which steps up from the sky gap to a lower apex.

That development bore significant scrutiny at public inquiry in 2001. The Secretary of State found that it would not harm the setting of St Paul's and granted consent. It might be concluded that a critical point in its acceptability was the overall height of the proposals relative to the cathedral, which it did not exceed, and its sympathetic stepped form as viewed from Waterloo Bridge (IR 15.15, 15.35).

At the time, Tower 42 was the apex and importantly appears to be of a similar overall height to the top of the cathedral. The progression in building mass rising up from Angel Court to this point was considered to be a better resolution for the emerging cluster, and consequently St Pauls, than 'the abrupt change that is currently seen'. We broadly agree that stepping up from the sky gap helps to retain the ability to appreciate the significance of the cathedral to a greater extent than an abrupt step would.

More recently, consent has been granted for 55 Bishopsgate, a building which would appear only slightly shorter than what would be the very tall apex at 1 Undershaft, creating a substantial step up in height much closer to the cathedral as the outer edge of the cluster. There was consensus among Historic England, St Paul's Cathedral, the GLA and City officers that this would harm the cathedral's significance. In our objection to that application, we noted that increased bulk and prominence at the edge of the Cluster would draw the eye away from the cathedral, and add to its overall cumulative impact.

The current proposals would create an abrupt upward step at the edge of cluster, much taller than the overall height of the cathedral and closer to it, showing little regard for its significance in the strategic view. The development has instead been designed to step down slightly from a consented scheme that has already been acknowledged by your Authority as harming the significance of the cathedral.

Adopted policy and guidance seeks to manage change in a way which would preserve and, where possible, enhance viewers' ability to recognise and to appreciate the

cathedral as a Strategically Important Landmark. In respect of the guidance specific to the Waterloo Bridge views, the proposals would not maintain the visual prominence of the cathedral and would instead dominate it.

The proposals therefore fail to comply with adopted policies in the Local Plan and London Plan which seek to protect these strategic views. The proposals further appear to directly contradict emerging policy which establishes that the gap and buildings stepping up from it should be maintained (para 11.6.11, City Plan 2040).

In the language of the NPPF, harm to significance would be less than substantial and in the middle of this range. Harm to an asset of the highest significance attracts the greatest possible weight. We are not persuaded that the design has evolved to overcome this serious harm in a meaningful way and do not consider that could therefore represent good design as envisaged by the NPPF and NDG. The resolution of the cluster in this way would greatly diminish the townscape benefit of clustering tall buildings as a means of protecting London's historic environment, which is one of its core purposes.

In the case of St James's Park and the Whitehall buildings in LVMF View 26A.1, the development would compete with the picturesque roofline of the highly significant listed buildings. Harm to their significance and that of the park would be less than substantial and low in the range, but would contribute to a higher level of cumulative harm with 55 Bishopsgate.

The potential impact on St Ethelburga's requires further investigation as described above, in order to better understand potential adverse impacts. Once this is established, we would like to meet with you and other stakeholders to discuss how the building and its existing beneficial use can be appropriately safeguarded.

We do not consider that the proposals would deliver any heritage benefits. We note that increasing the permeability of the block and the reinstatement of historic routes through may be beneficial to the character of the City in principle. However, we do not consider that this would be achieved in a sympathetic way and could be achieved by a different development.

Given the considerable disbenefit that the additional height these proposals would impart, we query whether retention and upgrade of a greater proportion of the existing building would be a more sensitive and sustainable way to redevelop the site.

Recommendation

Historic England strongly objects to this application and recommends that it should be withdrawn or refused. While it will be for your authority to balance all considerations in this case, the harm entailed by these proposals to the significance of one of the

nation's finest buildings, to that of the historic buildings and landscape at Whitehall and St. James's Park, should attract the highest weight.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

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Amy Williams
Development Division
Corporation of the City of London
Sent via email only

18 October 2024

Dear Amy,

Planning Application Response Letter: 99 Bishopsgate (ref: 24/00836/FULEIA)

Introduction

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, in response to a live planning application for proposals at 99 Bishopsgate.

This letter has been prepared following a review of material on the planning portal, and pre-application material received to date. It has been informed by a review of the documentation issued to us to date and the pre-application consultation meeting held on 8 November 2023.

It will not be unexpected to the City, nor the applicant, that Chapter have substantial concerns about this application. Our strong recommendation to the City decision makers is to refuse approval for this development. We set out the reasons why in the following. However, before doing so, we do want to express regret for this situation. Our discomfort in-part arises because, whilst there have been good conversations which have been respectful and cordial, it appears to us there has been no real listening or receptiveness to our concerns. The scheme as submitted is, to our understanding, unchanged materially from that at pre-application.

It is also really unfortunate, after many years of conversation and engagement, that there is not a much more robust consensus within the development and planning community about how the setting of St Paul's Cathedral should be protected. Emerging planning policy has clearly been engineered to facilitate this damaging, harmful development of 99

Bishopsgate, without consideration for the harm and broader consequences and loss for London's citizens. At the Corporation's own heritage event on the City Plan 2040 (held in May 2024) the City described the 'pivotal role' that heritage would play in the plan with regard to 'placemaking, the economy, and wellbeing.' It is difficult to see how this publicly expressed objective is achieved through the proposals for 99 Bishopsgate – given the evident and significant impact on St Paul's.

Whilst Chapter is fully and vocally in support of the City Corporation's aims for creating a diverse, culturally rich, energising and economically prosperous planning environment, we do not understand the judgements that have resulted in, what we perceive as, the supportive promotion by the City of this site for a harmful, very tall building which impacts detrimentally on the setting and significance of St Paul's. Does this arise from an elective corporate blindness to the harm, or perhaps this is a more deliberate choice by the opinion formers to allow commerce to over-ride the duties of stewardship and care for our collective values of heritage and identity? Either way, we suggest that the approach is both mistaken and also is not necessary.

The City Plan 2040 envisions a major enlargement of the tall buildings cluster that is now conceived. We have concerns with aspects of this cluster and the harm it would cause St Paul's, and suggest that there must be land with sufficient capacity for the sustainable commercial growth of the City that does not necessitate significant and irrevocable harm to St Paul's such as that caused by 99 Bishopsgate. We submit that the quantum of development offered by the proposals could, and definitely should, be delivered elsewhere by other, non-harmful means, and is not justified by economic argument on this site in this harmful manner.

Summary

The Cathedral wishes to object to this planning application, which is contrary to both policy and conscience. This objection is due to the adverse impact of the scheme in relation to the character and composition of strategic and local views in which St Paul's is a Strategically Important Landmark, and crucially the heritage harm that the scheme would cause to the Grade I listed Cathedral through detrimental and ill-considered alteration of its setting.

Viewed in isolation the design itself is of high quality – to be respected and admired. However, in our evaluation this is a good building which,

simplistically, is in the wrong place, with the wrong form, and substantially out of scale for its proposed location, causing multifaceted heritage harms. In our view, these issues are all avoidable but could only be redeemed by major changes to the proposals, which should therefore be refused. There has been no receptive listening to representations at pre-application stage; there has been no attempt to address the harms, in part it seems because the City planning team are not attempting to require design changes, in a process of managed facilitation we have not experienced in the past.

Background to Comment

The Cathedral welcomed pre-application discussion regarding this scheme, which lies within a key part of the setting of the Cathedral. A meeting was held on the 8th of November 2023, and further information was subsequently provided in early 2024.

We do commend and acknowledge the approach to consultation undertaken by the project team, the breadth of information issued for discussion, and the involvement of our colleagues in the planning team at the Corporation of the City of London.

In particular, the sophistication of the visuals utilised to illustrate the emerging proposals (especially in kinetic views) have assisted our understanding of the scheme at pre-application – an understanding we have applied to review of the full submission scheme.

We further note that the submission scheme has not meaningfully changed to address any of our core concerns since our last comments were issued. As such, much of the commentary below has been adapted from our earlier letter of engagement.

Relevant Planning Policy

For concision in this submission, the well-rehearsed and understood relevant planning policies are included as an enclosure to this letter.

Comment

Heritage Assessment Provided (at Pre-Application, to Inform Design Development, and at Full Application)

We thank the project team for the heritage assessment concerning the Cathedral, circulated to us after the pre-application meeting. This pre-

application assessment is evident within the final heritage assessment submitted.

While the spirit of assessment was welcome, at pre-app we noted the need to see greater detail on the nuance of setting considerations. These should be more detailed and nuanced and go beyond either just LVMF views for wider appreciation, or the immediate setting of the cathedral as part of the St Paul's Cathedral Conservation Area for local views. Unfortunately, this heritage assessment has not been meaningfully developed for the formal submission, leading to a heritage baseline assessment that is substantially lacking in key areas.

Therefore, we submit to the City that heritage impacts cannot be understood and weighed in the planning balance appropriately. In general, we do not consider the level of assessment provided is proportionate or satisfactory to inform the decision-makers fully and correctly.

We understand the need for proportionality within the planning process, however paragraph 200 of the NPPF states that 'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.' In this case, we do not consider the assessment provided is proportionate to the exceptional significance of the Grade I listed heritage asset which is impacted and does not allow a meaningful understanding of the specific heritage impacts of the proposals.

Understanding the Setting of St Paul's and its heritage significance.

We submit and represent to the City that a fuller, more satisfactory and relevant evaluation of the heritage context is needed for this development. We proffer 'The Setting of St Paul's Cathedral its Contribution to Heritage Significance: An Analysis and Evidence Base (City Plan 2040 Regulation 19 Consultation version, June 2024)' as a relevant basis for critical evaluation of this project. The 'Setting Study' was jointly commissioned by Chapter with Historic England. [1]

[1] The enclosed version of the report was issued for the Regulation 19 consultation on the City Plan 2040. The version referenced above is appended to this letter. A final version of the report will follow at a later date. This will add case studies (Part Three) and additional photographs and images, but no substantive changes to the wording of Parts One, Two and Four are planned.

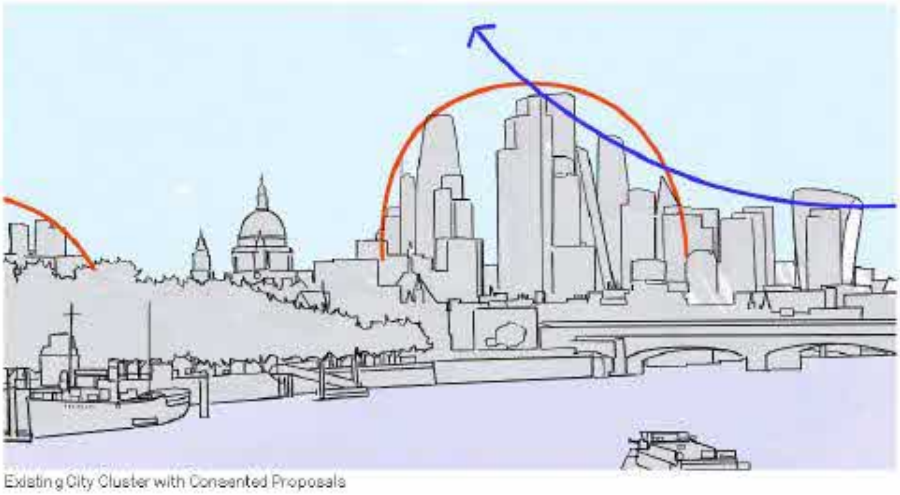
The mature draft of the Study includes detailed research and assessment, undertaken in-line with Historic England Guidance, most notably 'GPA3: The Setting of Heritage Assets'. Even in its present incomplete form, the report is of great use in understanding the contribution of the setting of the Cathedral to the heritage significance of the Grade I listed building, and how this significance can be appreciated. In turn, this assists the regulator with a greater (and appropriate) understanding of the potential heritage impact of development in the setting of St Paul's.

Impact to Local and Strategic Views

The proposals involve the construction of a new very tall, massive building on the edge of the Eastern Cluster. As such, the proposals will be appreciable in local views (As outlined in the City's Protected Views SPD) and strategic views as identified within the LVMF.

Within these views the cluster appears to the right-hand side of the Cathedral. It has long been the aim of policy and guidance to ensure that the visual prominence of the Cathedral is maintained within these views, especially in relationship with the Cluster, which was intended by policy to have a central high point (around 1 Undershaft) and to diminish in height down to the context of St Paul's to the left and the River Thames to the right. The dominance of St Paul's was also to be preserved by establishing suitable 'stand-off' and space around the Cathedral.

This policy approach is even broadly indicated within the application material (pg. 14 of the Design and Access Statement) which includes the diagram below, noting that The site is situated on the edge of the cluster and forms an important transition from the lower buildings to the north and the taller buildings of the cluster further south.



Existing City Cluster with Consented Proposals

Given its form and location, this development does not therefore accord with that well understood and long-managed policy and urban design objective for the cluster. We therefore consider the proposal will harm key strategic and local views.

The height and massing of the proposals will harm the character and composition of strategic and local views contrary to policy and guidance. We consider that the height and massing of the scheme will further add to the breadth and harmfully obtrusive presence of the Cluster in these views. In addition, the proposals will create an edge condition at this side of the Cluster, directly adjacent the Cathedral, will be a sheer drop off, rather than a sloped and considered 'designed form' comprised of multiple buildings of different massing. This will further harm identified views. This effect will also unacceptably erode the skygap between the Cathedral and the Cluster, important to the character of key views, the ability to read the Cathedral and which is vital to both prominence and dominance of the edifice, which is a defining characteristic in and for the globally recognised City of London. All of these aspects will negatively affect an appreciation of the Cathedral as a Strategically Important Landmark.

This is evident in strategic views, such as LVMF views 15B.1 and 15B.2. Here, guidance states that the proposals should *'seek to complement the City's* eastern cluster of tall buildings with buildings of a height appropriate to their site.*'* We consider that this proposal is materially at odds with this guidance, which is not satisfactorily assessed within the applicants HTVIA, which for 15B.1 notes 'the projecting principal cores and slope of the

western edge would articulate a subtle step down within the City Cluster, from 22 Bishopsgate to Angel Court beyond its edge.'

We fundamentally disagree with this erroneous characterisation by the applicant's heritage, townscape, and VIA assessors. We do not consider the step-down depicted subtle, successful, or appropriate for the site. As noted above, we consider the scheme will not complement the cluster in this regard and thus is impactful to St Paul's as an SIL. The assessment submitted by the applicant is so deficient, we suggest, that the regulator should either undertake their own new assessment, or commission a more properly objective and professional evaluation (see below for more on this concern).

In addition, guidance states that the character of a view should be preserved if proposals draw the cluster closer to the cathedral, which also evidently is not achieved. Furthermore, we do not consider the cathedral's relationship with its clear sky background has been preserved as required by guidance. Guidance also states that proposals 'should not dominate the dome or western towers,' and that 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect.' Evidently this is not achieved by the proposals.

For the reasons outlined above, we consider that the scheme would unduly dominate the dome when understood cumulatively with the rest of the consented cluster, contrary to the wording of guidance. Ultimately, we do not consider that the proposals would accord with the LVMF guidance to positively 'show how they contribute to the spaces and buildings immediately fronting the river, including the strategically important landmark of St Paul's Cathedral'.

This is most evident in LVMF views 15B.1 and 15B.2 as outlined above. The aggressive massing of the proposals and their negative effect on the balance between the cluster and the cathedral, important to the character and appearance of strategic views, would also be appreciable in views 17B.1 and 17B.2 from Hungerford bridge and 16B.2 from Gabriels Wharf, which are also harmed.

We also consider these issues affect those views of the Cathedral identified within the City's Protected Views SPD (2012). Here, the Backdrop and Skyline Setting of the Cathedral section is relevant. We consider that the proposals are contrary to guidance that states proposals should not worsen

the already detrimental effect of development that 'crowd(s) close to the Cathedral on the skyline.' Crucially, the guidance states that:

'There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain. The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and the cluster, and so should be maintained.'

We consider that the proposals do not adhere to this guidance on strategic and other local views.

We therefore do not consider that the proposals satisfactory comply with adopted policy within the City's Local Plan (January 2015), specifically policies CS13 Protected Views, Policy CS14 Tall Buildings or Policy CS7: Eastern Cluster. We also do not see how the proposals comply with the relevant policies within the London Plan.

Heritage Impact

We consider that the proposals will cause significant harm to the heritage significance of the Grade I listed building, and how this significance is appreciated.

This harm will arise through alteration of and detriment to the Cathedral's setting, linked to the visual impact described above. The contribution of the setting of the Cathedral to its heritage significance is described and understood within the Setting Study, as noted above. This is related to, but goes beyond, impact to views (see para 1.9 of the Setting Study).

Of particular relevance to this impact is the 'clear skyspace' factor of the setting of the Cathedral, and how this contributes to significance. Also of relevance is 'the river corridor' wherein the proposals would be most appreciable and impactful. Both are assessed within the Setting Study.

In terms of heritage significance, the visual prominence of the Cathedral is indicative of its multifaceted historic interest. St Paul's was designed as a spiritual, cultural, civic and architectural focal point of the City. Its height, massing, and form, rising above wider London, has historically encapsulated these elements of its significance. It also allows for an understanding of the building's relationship with the topography of London, and the historic reason why such an important place of worship would have been

constructed on Ludgate Hill. In addition, its visual prominence and location against clear sky has historically contributed to and allowed for an appreciation of its architectural interest, from the baroque detailing of the western towers to the poignant and striking form of the dome.

The Cathedral is the most prominent historic structure in the City of London. Policies for the City cluster of tall buildings were intended to maintain the dominance of the Cathedral within the City skyline. Key to these two characteristics (prominence and dominance)- both today and over 25 years of design management of the cluster - is the skygap between the cluster and the Cathedral and thus also the form of the cluster (see p.108 of the Setting Study, which discusses the curated nature of the cluster, and that *'*maintaining skyspace with the Cathedral sustains the visual prominence of the dome.*'*).

We consider that a correctly informed heritage assessment, based on a methodology centred in published Guidance and evaluated in line with the baseline of the Setting Study, would conclude that there is significant heritage harm caused by this proposal.

This harm arises, in-part, through the erosion of clear skyspace around the Cathedral, which contributes to the significance of St Paul's and the way this significance is appreciated as outlined in the Setting Study (see, for instance, pp. 22-23, and in particular paragraph 6.5 of the Study). The proposals would therefore also detrimentally affect the skygap – the clear sky distance between the cathedral and the cluster – causing harm. Harm also arises through increasing the height, massing and physical presence of the cluster relative to St Paul's, and through creating an obtrusive hard cliff-edge to the cluster close to the Cathedral.

The proposed extended and hard-edged cluster, enabled by an eroded skygap, would detrimentally alter the way in which the historic pre-eminence of the Cathedral, signified through its scale and size in comparison to its setting, is appreciated. This contribution to the significance of the Cathedral would be disrupted by the massing of the cluster, which would alter the 'centre of gravity' for the views of the Cathedral, leading to it to be further challenged and dwarfed by the cluster, thus diminishing its dominance and affect its features of architectural interest, the dome and the towers, and how they are appreciated. This is evident in strategic views (such as 15B.1, above) and would affect an

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appreciation of the significance of the building from the river corridor, as described in the Setting Study.

This heritage harm is not limited to strategic views. Local views not identified elsewhere (such as the view from Somerset House) also illustrate this heritage harm. We comprehend the screening effect of trees in this location – though would seek to note that the management of trees along the embankment and elsewhere is a long-held aspiration of the Cathedral.

Meeting the evidence and evaluation requirements of the NPPF

As we note above, there is a duty under the NPPF paragraph 200 for the regulator to be informed by a sufficient and satisfactory assessment of significance, provided by the applicant. We invite the planning team to consider that these matters are not addressed thoroughly, objectively or meaningfully in the Heritage Appraisal by the applicant. We suggest that the planning team should either require the applicant to resubmit this unsatisfactory appraisal, or the City should commission their own expert opinion – which we suggest could use the Setting Study as a more satisfactory baseline for understanding the heritage significance of the Cathedral and its context.

As NPPF 201 states *'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal'* which should take into account *'the available evidence and any necessary expertise'*. We suggest the Setting Study could be used in this regard.

We particularly note the role the planning authority has with regards to paragraph 203 of the NPPF, to have regard to 'the desirability of sustaining and enhancing the significance of heritage assets' and 'the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality' and 'the desirability of new development making a positive contribution to local character and distinctiveness'.

We suggest that the materials submitted by the applicant in support of their proposed development are unsatisfactory and that the City should much more closely scrutinise the baseline significance, the objective evidence of impacts and the proper consideration of care and stewardship for heritage assets. We submit that, performed correctly, the only conclusion can be that this application, which runs counter to policy, should be refused.

Discussion of Design Development & Attempts to Avoid, Minimise, and Mitigate Impacts

The pre-application presentation from the applicants and associated information described, in part, how the architectural proposals have been adapted to the site to limit visual impact and heritage harm. This design methodology is also outlined within the submission material.

Our understanding is that the 'chamfered edge' of the proposals, coupled with the materiality and massing, is intended to reduce the overall massing and presence of the proposals in key views.

We submit that, whilst selection of materials and the cut-away winter-gardens of the design as proposed may in some way soften the visual harm and impact in certain conditions, it is impossible to fully or adequately mitigate the harmful reality of a building of this height and massing as proposed, in such close proximity to the sky space around the dome. The visual and heritage impact will remain and will be significant. We suggest that the design will inevitably be more dominant and harmful, as it appears in certain changing conditions i.e. light levels, sun glare and weather – however expensive and well detailed the cladding package will be.

We reviewed the additional design development information shared with the Cathedral in March 2024 which is broadly echoed within the submission material. The initial options modelled at first sight appear extensive. We understand that the 'modelling profiles' explored in the massing studies, despite having been requested to lessen visual impact, have clearly not achieved this aim: we question whether really there was any sincere motivation to do so, as there was no meaningful or evident consideration of reduction in the quantum of development. In fact, the massing studies appear to show that the development brief requires a pre-determined development area and value – and the massing studies are playing architecturally within a fixed metric. There is no thorough analysis of any scheme that markedly reduces the bulk, height and heritage impact of the building, informed and led by a conservation-management approach. The options therefore do not illustrate how the clearly harmful impacts could be entirely designed out.

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There are aspects of the Design and Access Statement that speak to options other than full redevelopment (see pp. 39-41). We cannot discern the exact reasoning behind the eventual, most intrusive and harmful, option chosen.

We submit therefore that the options appraisal is unsatisfactory from a heritage perspective and therefore not in accordance with NPPF 206 that any harm should require clear and convincing justification.

If there is no attempt to design out harm due to viability judgments, this brings us back to the necessary conclusion that this is the wrong building on the wrong site. 99 Bishopsgate is the wrong site for a tall building at all given its prominent 'edge condition' in the cluster. If the site has been bought at too high a cost, this temporal and material error should not be an excuse or rationale for irreparably harming the setting of the Cathedral and how this public good is enjoyed and appreciated by all, forever.

Historic England guidance, the British Standards in relation to heritage conservation, and crucially the policy drivers NPPF, PPG, London and indeed City Policy & Guidance related to heritage conservation, all seek to see heritage harm avoided, mitigated, and minimised. Furthermore, this is linked to the clear and convincing justification for such impacts required by the NPPF.

Unfortunately, we do not consider that this has adequately been borne out within the development of the scheme and is inherent to the principle of a tall building in this location.

We also notice, and mention cannot be avoided here, that it appears that emerging policy has enabled, rather than critically appraised, this oversized and harmful development proposal within the approach to the City Plan Tall Buildings contours policy – which suggests to us at least some form of pre-determination of an approval being granted for this project. We have written separately to raise this as a concern and expand further on this issue below.

Relationship with the Emerging City Plan 2040

As outlined within our Regulation 19 response to the planning policy, the Cathedral has articulated concerns regarding the soundness of the plan in relation to tall buildings, heritage, and key views. This is a concern which is also echoed by Historic England, HMG's statutory advisors on heritage matters. Despite making representations as early as 12th December 2023

on the emerging contour map (and associated 'jelly mould') policy definition, the current draft of the City Plan, unfortunately, retains the most problematic and harmful issues in this regard. As we phrased it in our representations, the 2040 Plan policies 'bakes-in' harm to the setting and heritage of the Cathedral, which we find incomprehensible as much as it should be found – in its present form, on examination, to be unsound.

As such, whilst the spirit of many such policies within the City Plan 2040 is laudable, we consider that their weight is limited in relation to this application. NPPF 48 notes that the weight given to emerging plans is based upon, in part, the extent to which there are unresolved objections and the degree of consistency between the emerging plan and the NPPF. As noted above, there remain real concerns with the plan in numerous ways, in part related to its compliance with the NPPF. Therefore, even though the City Plan 2040 Tall buildings policy and contour map evidently has sought to enable this type of development in this location. Our feeling remains that this facilitation is inappropriate and without due regard to wider policy nor process, in our view.

As observed above we also have articulated concerns over the relationship between the proposed development and the emerging policies governing development within the City as part of the City Plan 2040. We understand from our meeting that the scheme has directly influenced the parameters of the planning assessment. We continue to feel that this is at best ill-advised and was not soundly grounded in an assessment of heritage impacts. We have previously raised a concern in relation to process directly with the City of London.

We also made clear within our representation on the City Plan 2040 that there could be a perceived conflict of interest with regard to the assessment underpinning the Tall Buildings policy (prepared by the Townscape Consultancy) who are here acting on behalf of this applicant.

We would still welcome further information as to how such processes interrelate and to what extent this project team has interfaced with emerging policy.

As noted, in our view as yet there has been no properly or fully consulted planning policy development which would correctly establish this proposal within the bounds of an acceptable shift in the envelope of the cluster, which will be so objectively and unnecessarily harmful.

Conclusions

The Cathedral wishes to object to the scheme. We cite above our concerns over unacceptable levels of heritage harm to the Grade I listed Cathedral, impact to the character and composition of key views, and harm to the ability to appreciate the Cathedral as Strategically Important Landmark.

This harm – which is avoidable in our view but appears to have been enabled by the formulation of questionable emerging policy for this site - occurs principally due to proposed overdevelopment to the edge of the cluster. For decades, the policy objective has been to allow for both the form of the Cathedral to be appreciated and there to be 'breathing space' between St Paul's and the Cluster, preserving both prominence and historic dominance of St Paul's in the City landscape. This has long defined the overall massing and form of the cluster in relation to the Cathedral. This policy aim also forms the central premise around view management policy and guidance.

We have seen the cluster grow ever taller and it is now spreading ever wider in recent years. The recent consent of 55 Bishopsgate is an example of this trend in action; a project on which Chapter also raised major concerns, but which was nevertheless approved.

We have always supported and can be excited about the contrast between the modern City and the heritage of St Paul's when this juxtaposition is in a right balance. Our comments relating to 55 Bishopsgate were clearly indicating a marked discomfort with a harmful and encroaching design at the edge of the Cluster. At the time we were critical of what we felt was its excessive height and massing given its location in the cluster, and what it does to the 'gravity' and centrality of the cluster as perceived in views such as 15B.1. That scheme will harmfully draw the eye inexorably away from the Cathedral and cause adverse visual and heritage impact.

This multifaceted harm is consolidated, exacerbated and entrenched through the proposed building to 99 Bishopsgate. We therefore feel, with regret, that there is no alternative but to object.

We have also indicated with these representations a number of matters of concern over process and evaluation methods, which we submit should inform the decision-makers. We will be glad to further discuss these issues, if given the opportunity.

We hope that this is a letter of comment that strengthens meaningful dialogue concerning the future of the development site in relation to St Paul's Cathedral.

Yours sincerely,

[redacted]

Surveyor to the Fabric

Encl: The Setting of St Paul's Cathedral its Contribution to Heritage Significance: An Analysis and Evidence Base (City Plan 2040 Regulation 19 Consultation version, June 2024)

cc: Rebecca Thompson: Director of Property, St Paul's Cathedral
Tom Foxall: Historic England
Tom Nancollas: Assistant Director (Design), City of London Corporation
Joanne Parker: Principal Planning Officer (Design), City of London Corporation

Relevant Planning Policies

A number of key policies are relevant to this proposal in relation to the Cathedral. These are drawn from the adopted City of London Local Plan 2015, the London Plan 2021, and the National Planning Policy Framework. We have also given some consideration to the emerging draft City Plan 2040 (previously City Plan 2036). Whilst a broad range of policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.

The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below:

City of London Local Plan 2015:

- Core Strategic Policy CS10: Design
- Policy DM 10.1 New Development
- Policy DM 10.4 Environmental Enhancement
- Core Strategic Policy CS12: Historic Environment
- Policy DM 12.1 Managing change affecting all heritage assets and spaces
- Core Strategic Policy CS13 Protected Views
- Core Strategic Policy CS14 Tall Buildings

We note the emerging local planning policy within the City Plan 2040, which has recently been submitted to the Planning Inspectorate for examination. We discuss the weight, relevance and issues we have with the 2040 Plan further within our response letter.

The London Plan 2021:

- Policy D1: London's Form, character and capacity for growth
- Policy D4: Delivering Good Design
- Policy D9: Tall Buildings
- Policy HC1: Heritage Conservation and Growth
- Policy HC3: Strategic and Local Views
- Policy HC4: London View Management Framework

National Planning Policy Framework:

- Chapter 12: Achieving well designed places
- Chapter 16: Conserving and enhancing the historic environment

The Setting of St Paul's Cathedral

Its contribution to heritage significance: an analysis and evidence base

City Plan 2040 Regulation 19 consultation version

June 2024

Historic England

St PAUL'S CATHEDRAL

The Setting of St Paul's Cathedral

Its contribution to heritage significance: an analysis and evidence base

City Plan 2040 Regulation 19 consultation version June 2024

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Historic England

St PAUL'S CATHEDRAL

FOREWORD


Ye Olde
Cheshire
Cheese
PRET
FRESHLY MADE FOOD
88

St Paul's Cathedral is more than a masterpiece of the English Baroque. This is a building both of exceptional architectural ambition and renown, and also a spiritual focus for the people of the Square Mile, of wider London and the nation. St Paul's will never just be a physical symbol, beautifully crafted in stone, lead and gold: St Paul's is a vital and active community of worship. The Cathedral is a living expression of Christian faith and collective endeavour, as well as an architectural marvel: a sanctuary and a beacon.

It is fitting then that these multifaceted values and shared interests can be so clearly understood by the presence of the Cathedral in its surroundings, in the way St Paul's is perceived and interpreted. The Cathedral has a tangible visual presence on the internationally recognised London skyline. It is an important symbol of London and the nation. To those who interact with and in our capital city, the presence and resonance of the Cathedral is much more nuanced, complex and textured. Its presence is missional today and plays an important role in our collective memory.

St Paul's Cathedral has watched over the City of London for over 300 years in this form, but four earlier buildings stretching back over 1,400 years preceded Wren's masterpiece on this site with the arrival of St Mellitus in 604 A.D. As the city we serve has grown and evolved, the Cathedral has remained resolute at its heart. It has stood through celebration, destruction, upheaval, and change. More than simply an elaborate backdrop, the Cathedral has been at the heart of events that have shaped our nation and formed our self-perception. A confluence of church and state, St Paul's remains uniquely important to the nation and city it serves, representing faith at the heart of the nation. The cathedral is an anchor point on the continuum of London's growth and change, offering continuity, solidity and reassurance for those who come into contact with this place.

There is a symbiosis and partnership between the dynamic, evolving and vibrant City and the Cathedral at its heart. Our partnership with the City is reflected in the structures of the planning system and the role of the Cathedral within these frameworks. As active participants in the spiritual and social landscape of London, we acknowledge that when the capital thrives, so does St Paul's. This fruitful common interest can be facilitated through the planning system.

In partnership with Historic England, we are therefore pleased to present the St Paul's Cathedral Setting Study. The Setting Study describes and understands the history of the unique setting of the Cathedral, so that all participants in the planning system are aided with evidence and greater certainty in planning for change, now and in the future. This important work is not solely about protection of the setting, which has long been understood in the City processes, but in our terms is about ensuring this incredible building can be appreciated long into the future. It is about celebrating success and seeking clarity about further areas where, collectively, we could better reveal the unique

significance of this building of exceptional heritage value for wider public benefit. We therefore hope that this report helps those who drive, shape and sustain the energetic progress of our capital into the future.

Very Reverend Andrew Tremlett
Dean of St Paul's

Foreword from Duncan Wilson, Chief Executive, Historic England, to follow in final version.

PART ONE:
Technical Summary

1.0 Purpose of this report

What is it and who is it for?

1.1 The purpose of this document is to assist those who are engaged or interested in the management of the setting of St Paul's Cathedral. The Cathedral is a Grade I listed building of exceptional architectural and historic significance. As a listed building, the preservation of the setting of the Cathedral is given the same weight in law as its fabric (s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, see Appendix 2, p.168). To assist in the discharge of this statutory duty, this report provides a robust, evidence-based assessment of the ways in which setting contributes to the Cathedral's significance and to the appreciation of that significance. This evidence can be used in plan making and in the development and determination of proposals that have the potential to affect the heritage significance of St Paul's.

1.2 The contents of the report equate to steps 1 and 2 in Historic England's *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017), and provides information and analysis to inform the preparation of steps 3 and 4.

Relationship to policy

1.3 This is not a planning policy document. It is evidence to assist the implementation of policy and the formulation of new policy. Although, in the report, views are considered to illustrate particular contributions made by setting to significance, this is not a views study (see paragraphs 1.9-1.12) and the document does not identify new viewing places to add to the many that already exist as part of planning policies regarding views (see Appendix 3 p.170).

Endorsement

1.4 St Paul's Cathedral and Historic England will use the study as an evidence base for comment and advice on plan making and development proposals affecting the setting of the Cathedral.

1.5 The City of London and GLA were consulted during the preparation of this document. They have welcomed its substantial contribution to improving public and professional understanding of the Cathedral's setting, but this version of the report (v10) does not represent their views or form part of the formal suite of development plan documents.

Version status

1.6 This version of the report was issued for the Regulation 19 consultation on the City Plan 2040. A final version of the report will follow at a later date. This will add case studies (Part Three) and additional photographs and images, but no substantive changes to the wording of Parts One, Two and Four are planned.

Wider interest

1.7 In addition to its primary role, the evidence base and case studies provide a wealth of information for people who are interested in how the physical context of the Cathedral, including different aspects of its setting, have changed over time.

The Technical Summary

1.8 In this first part of the study, the Technical Summary, the reader will find an explanation of the report's structure, a statement of the Cathedral's heritage significance and the summary analysis of the contribution made by setting to significance. This part of the report also contains concluding remarks, and an explanation of the methodology followed in its preparation.

The difference between setting and views

1.9 This report is about the setting of St Paul's. Views are considered as part of this analysis, but the two are not one and the same. It is important therefore to understand the distinction between setting and views as they apply to heritage assets:

1.10 **Setting** is more comprehensive. It is the surroundings in which a heritage asset or place is experienced and perceived today, and includes the relationship of an asset to its surroundings both in the present and in the past. It is not only visual but can include other environmental factors like noise and historical connections such as land use and architectural intent.

1.11 **Views** are a defined visual impression of a place or asset, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to understanding and appreciating the setting of heritage assets and can constitute part of an asset's significance.

1.12 See Appendix 1 on p.166 for further discussion of this subject.

2.0
Report structure

PART ONE: Technical Summary, p.6
An overview and summary of the study, the analysis and findings, encapsulating what matters and why.

PART THREE: Case Studies. p.161
Three case studies will follow in the final version of the report. The case studies will be selected as a tool kit to illustrate how the contribution of close, intermediate, and distant setting to the Cathedral's heritage significance can be assessed using the fourstep process recommended by Historic England.

PART TWO: Evidence Base, p.34
The baseline analysis, first of the Cathedral (chapter 8), then of the historical evolution of its setting (chapter 9) and finally of the present contribution of setting to the building's heritage significance (chapter 10).

These chapters provide a detailed examination of the subject. They also contain summary boxes that present this analysis in a concise form. A list of these summary boxes and links to them can be found on p.26.

PART FOUR: Appendices, p.164
Part Four contains useful background information:

- an explanation of the difference between the concepts of setting and views in the planning system;
- the legislation and policy for the management of heritage assets, their setting, and views in London;
- relevant Local Plan policy; and,
- a bibliography and list of sources.


OXO

3.0 Background

3.1 St Paul's Cathedral is first and foremost a focus for faith in London and beyond. It has been an enduring symbol of Christian worship on this site for c.1,400 years and it continues to play a powerful role in the lives of individuals and the nation. But it has always also been universally acknowledged that the Cathedral is, perhaps equally, a place of exceptional cultural importance. Such national and international significance requires careful management to sustain.

3.2 From the time of its completion until the middle of the 20th century, the Cathedral literally and symbolically dominated London. It became central to the identity of the capital as a world city, and the majestic silhouette of the dome and the west towers became embedded in our national consciousness.

3.3 The ability to appreciate the distinctive outline and form of the Cathedral remains for many the most tangible way to engage with and understand its architectural, historic and cultural importance. It is a mark of this special importance that protection of the silhouette has been embedded in planning policy for almost a century, predating nationwide statutory protection of setting by decades.

3.4 Once the City adopted this pioneering policy, St Paul's Heights, in 1938, its concern proved prescient. Though the physical and cultural context of the Cathedral had always evolved, until the middle of the 20th century its dominance on the skyline remained largely unchallenged. However, over the last 70 years, and particularly in the last two decades, the speed and scale of redevelopment around the Cathedral has radically accelerated, challenging its pre-eminent position.

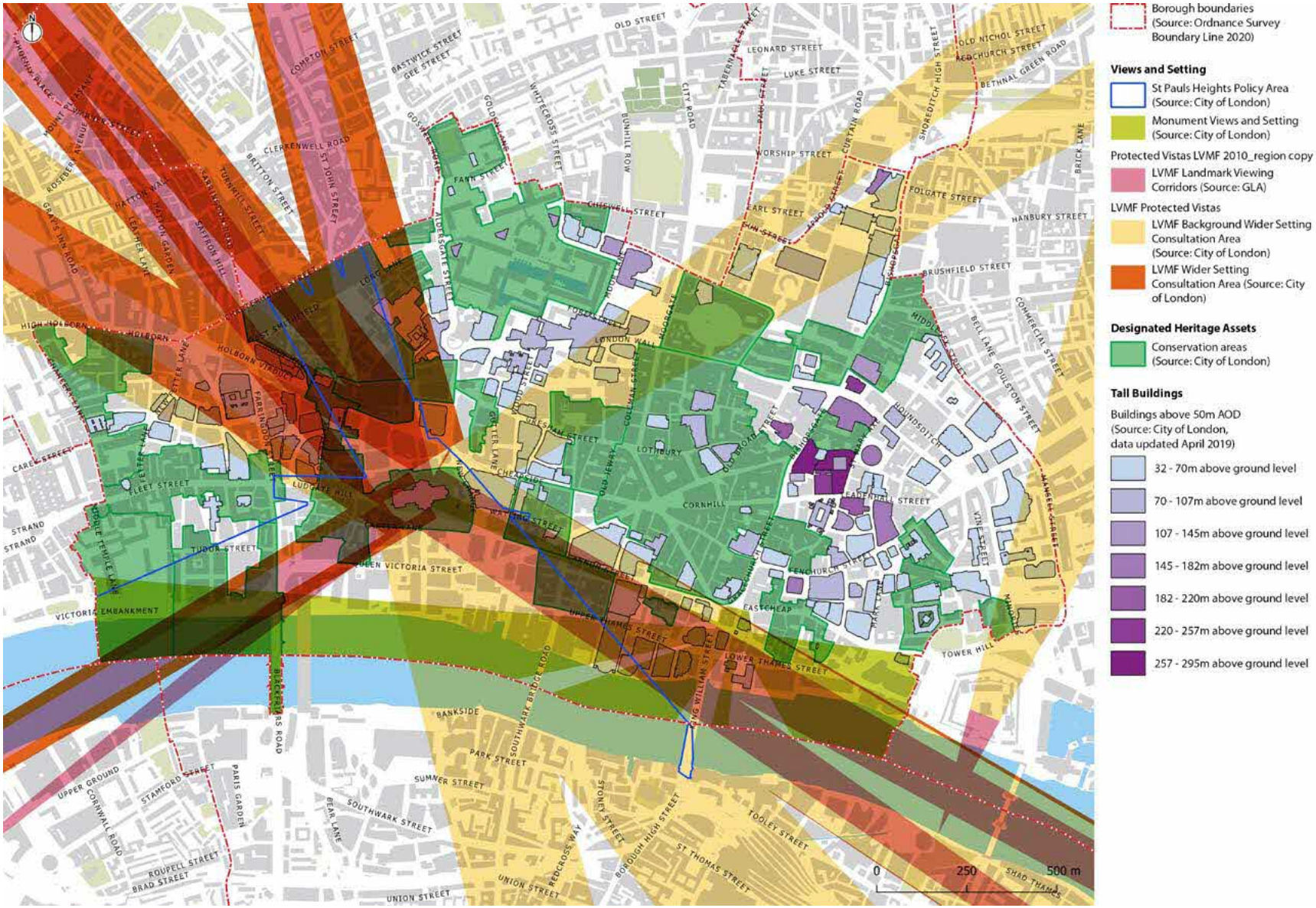
3.5 One response has been to acknowledge the importance of the building as one of only three strategic landmarks in London, the other two being World Heritage Sites (the Palace of Westminster and The Tower of London), and by doing so affirming the significance of St Paul's in both a national and international context. However, the mechanisms for managing change to its significance as a landmark as come to be seen largely through the lens of maintaining specific views, an approach initiated with the St Paul's Heights methodology.

3.6 The sophistication of such views management has increased over recent years and advances in technology, such as verified views and digital modelling, has provided some greater certainty when attempting to

predict the impact of change. But what began as tools are now increasingly regarded and used as a substitute for understanding and consideration of the full impact of development upon the setting of St Pauls and its exceptional heritage significance.

3.7 This is where this study hopes to contribute. The impac of development upon the setting of a heritage asset is distinct from identification of impact upon townscape or a designated view, and one which carries with it statutory duties. However, until now there has been little assessment and explanation of the contribution that setting makes to the heritage significance of the Cathedral, and of the contribution that setting also makes to our ability to appreciate that significance. In other words, what matters and why. For example, the list description, unchanged since designation on the 4th January 1950, runs to a mere 105 words. The weakness of this evidence base is of particular importance becaus of the rate and quantum of development that has occurred within the setting of the Cathedral in the last decades, and especially in the last twenty years.

3.8 Therefore, to assist developers, plan makers and decisio makers, this study aims to fill some of these gaps by t provision of a detailed evidence base and assessment of the contribution that setting makes to the exceptiona significance of St Paul's.



Views and setting policy areas in the City of London, together with conservation areas mapped against tall buildings. Note the relationship between these and the distribution of very tall buildings.


RESVRGAM

4.0
The heritage significance of St Paul's Cathedral

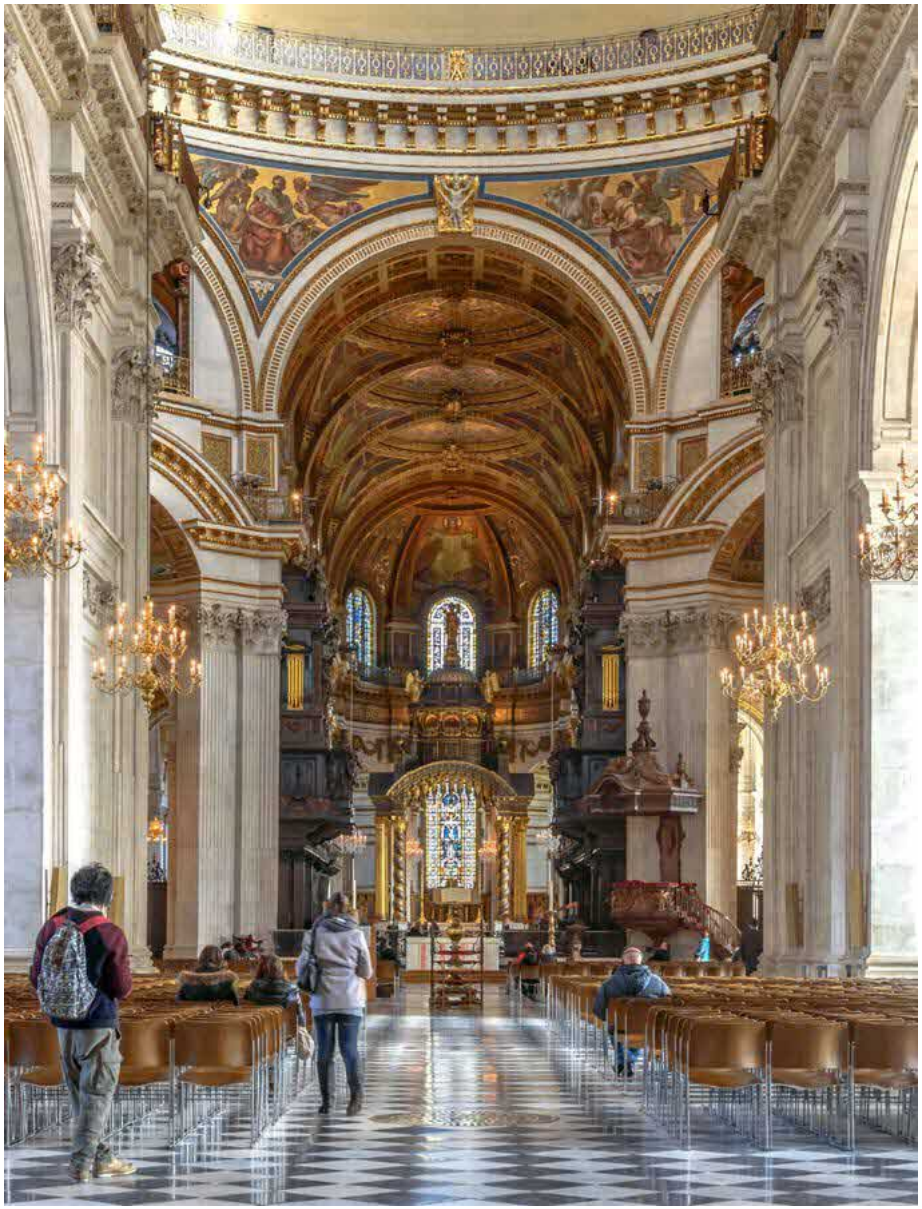
4.1 St Paul's Cathedral was built in 1676-1711, although the design had evolved from first proposals in 1670. It was erected as a symbol of the resurgence of London following the Great Fire and marked the transition in English cathedral building from the Gothic of the Middle Ages to the Classical architecture of the post-Reformation age of the Renaissance. Throughout its life the Cathedral has played, and continues to play, a central role in the lives of both the nation and the capital.

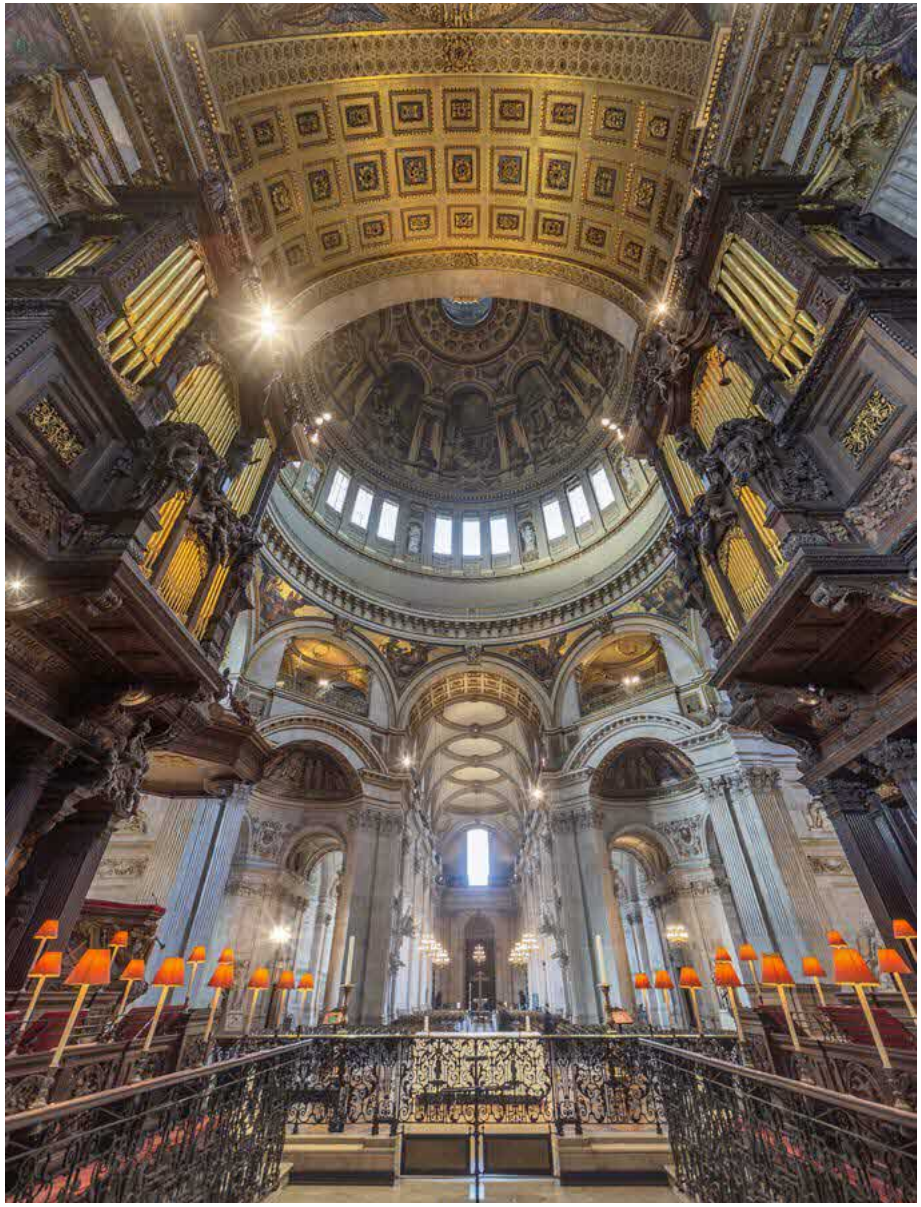
4.2 Sir Christopher Wren, appointed Surveyor in 1672, is regarded as one of England's greatest architects and scientists, and St Paul's is his masterpiece, a building of international architectural importance. In his design, Wren drew on models of early Christian buildings in the Middle East and knowledge of Renaissance and Baroque churches in Europe. This architectural style was a revelation but also a cause of controversy, because it was novel for an English cathedral. The outstanding geometry and structural achievements that underpin the distinctive drum and dome and the iconic silhouette of the dome and west towers have become internationally recognised.

4.3 Through such physical, spiritual and historical prominence, the silhouette of the Cathedral has become embedded in the consciousness of London and the country as a powerful symbol of identity and belonging.

Architectural significance

4.4 The architectural significance of the building, which is regarded as the pre-eminent ecclesiastical structure in the Baroque style in England, is amplified by the outstanding collection of sculptural decoration on its exterior. It is further enhanced by the associations, architecturally, visually, culturally and intellectually, with Wren's other great achievements in London, particularly the Royal Hospitals at Chelsea and Greenwich, The Monument and the City Churches, whose spires provided a delicate, almost romantic counterpoint to the might of the Cathedral on the skyline of London for over 280 years.





The nave and crossing of St Paul's (picture credit: St Paul's Cathedral)

Historical significance

4.5 The historic significance of the Cathedral is central to its status and importance and has been from the time of its first inception. Maintaining the long-established tradition of Christian worship on an elevated site in the City of London, the Cathedral also symbolised the rebirth of the capital, signalling its place as one of the great European cities. The intended symbolism of the building as a representation of the union of Church and Crown was achieved through its position, scale and ornament. It was historically intended to be the principal building in London and one to which the nation could turn in times of celebration and crisis.

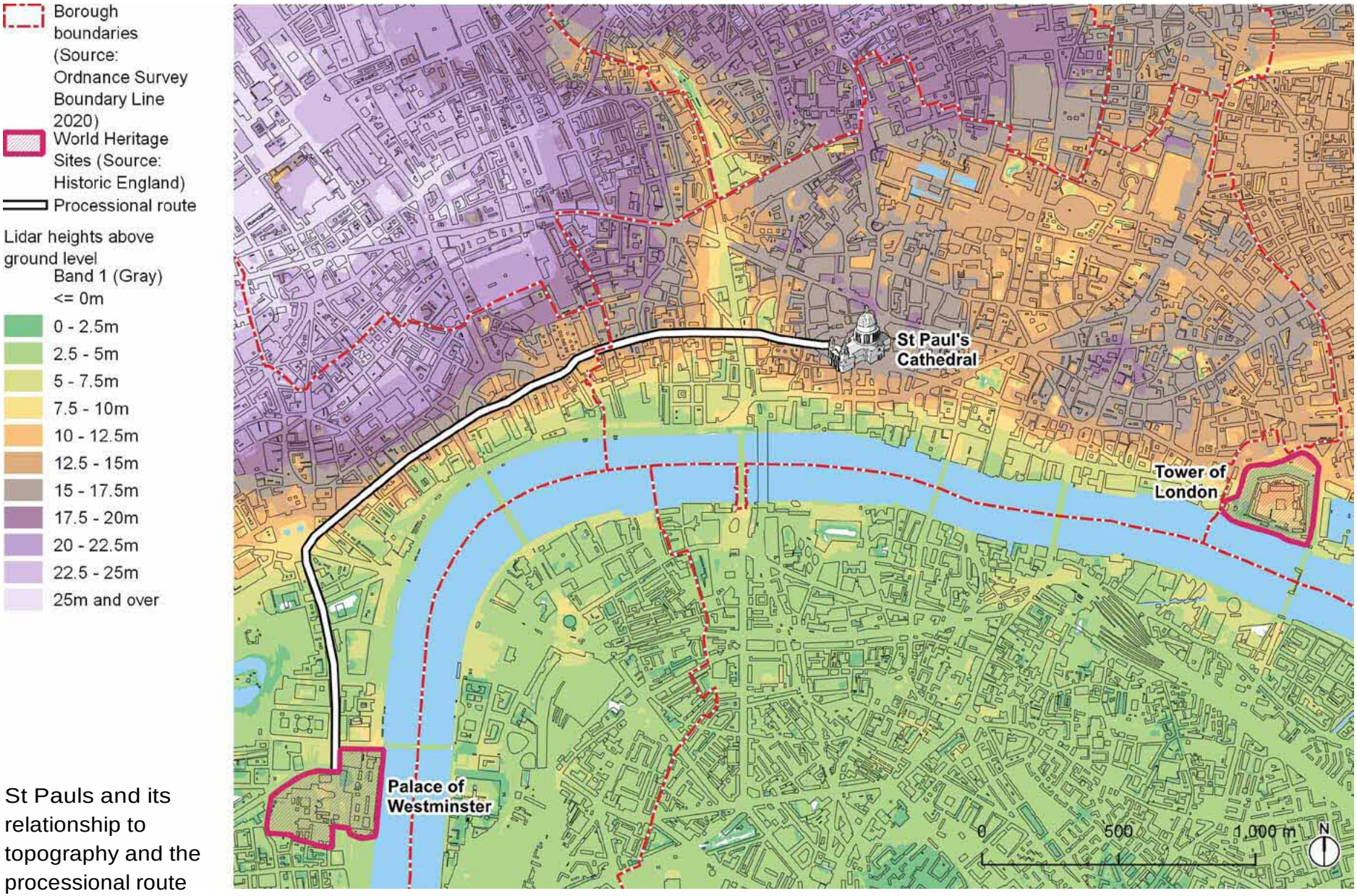
4.6 Those moments of crisis and celebration include the attacks on the fabric of the building by those recognising its symbolic importance and who sought to undermine and diminish it. These included the Suffragettes in the early 20th Century and most infamously, the Luftwaffe during World War II. The commemorative and celebratory roles of the Cathedral include providing the resting place for national heroes including Nelson and Wellington, as well as being the venue for Royal celebrations and services of thanksgiving. The processional route from the City of Westminster, along which monarchs progressed to be formally greeted and admitted into the City of London at the west door of the Cathedral, is an outstanding element of the setting with origins dating back to the time of old St Paul's and beyond.

Cultural significance

4.7 The cultural significance of the Cathedral is wide ranging and includes the role it played in debates and discussions about the Post-War reconstruction of the city and as the venue for the launch of the Festival of Britain which signalled a determination to create a new future for the Country. In popular culture, the fame, symbolism and iconic form of the Cathedral has seen it appear in numerous works of literature, film, television, advertising and the visual and performing arts. Through these many depictions, such as Mary Poppins and the Thames TV logo, and as perhaps the most famous image of British defiance in World War II, millions of people have come to feel that they know the building even if they had never visited it. This "virtual" knowledge and recognition extends internationally, and the silhouette of the dome and towers continues to be used in advertising material by the likes of Transport for London and Visit London, who list it second amongst the best buildings for architecture in the capital. Such recognition contributes to the wide appeal of St Paul's to visitors, over a million of whom visited the Cathedral in 2022.

Further analysis

4.8 Chapter 8 (p.36) explores the history and significance of the Cathedral in more detail. Sections 8.11-8.14 helpfully break down the components of the Cathedral's significance as bullet points.



St Pauls and its relationship to topography and the processional route

5.0
Contribution of setting to the Cathedral's significance

5.1 When built, St Paul's could be experienced, and was intended to be experienced, across the whole of London and, therefore, the whole of the capital was within its setting. The ability to appreciate the interaction of topography, the city and the Cathedral was central to the experience of the building.

5.2 The current setting of the Cathedral continues to extend over considerable distances. It makes a major contribution to the exceptional national and international significance of the building and to people's ability to appreciate that significance.

5.3 That ability is often described in visual terms, particularly when considering the wider setting, but it is also shaped by other environmental considerations and important intellectual and cultural associations. The three main contributory factors are:

- The geographic setting of the Cathedral, which is the capital and the topography of the 'London Basin', ringed to north and south by higher ground, so that the building can still be appreciated from considerable distances.
- The River Thames, historically the main artery for trade and transport both approaching and within the capital.
- The experience of the Cathedral within the City of London as a place of worship, venue for national events and visitor attraction.

5.4 These factors combine in ways that are fundamental to St Paul's significance and how the building is experienced today, as set out over the page under these four headings:

- Elevated topography of the Cathedral
- Clear skyspace
- The river corridor
- St Paul's Churchyard

SB1: The key elements of the setting of St Paul's and their positive contribution to its heritage significance

Elevated topography of the site contributes to:

- The historic interest of the symbolism of the building as the highest point in the City of London and connections to its predecessors on the site.
- Enhancing the intended visual prominence of the architectural design including its scale.
- Enabling appreciation of the architectural composition above the river corridor.
- Emphasising the architectural drama of the western towers and west elevation when approached from the west, which is integral to the Baroque style.
- Enabling an appreciation of St Paul's Cathedral in combination with and alongside other heritage assets.

Clear skyspace contributes as:

- The optimum condition for appreciating the architectural composition and forms of the Cathedral, including the silhouette of dome, western towers and overall composition of the upper parts of the building, which is significant both architecturally and culturally.
- It enhances and ensures visual prominence and therefore the intended architectural effect.
- It enhances the dynamic impact of the Baroque west towers in the round.
- It allows an appreciation of the magnitude and scale of the Cathedral, including when appreciated at a distance.
- It is significant to the understanding and appreciation of the relationships of St Paul's with other heritage assets with a skyline presence, in particular the spires and towers of the City Churches and The Monument which amplifies the significance of the Cathedral.

SB1 cont.

The river corridor contributes to:

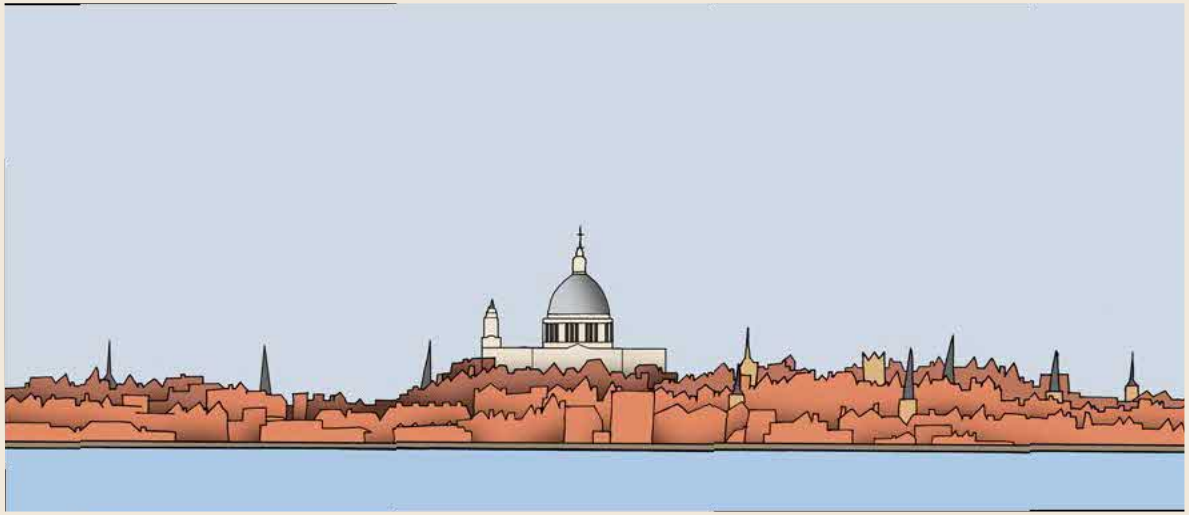
- An appreciation of the scale and visual prominence of the Cathedral.
- Illustrating the historic dominance of the Cathedral in, historically, the principal approach to the capital along the river from the east.
- Understanding of how the Cathedral was built by using the river for transporting construction materials and disposing of construction waste, and the associated relationship with St Benet Paul's Wharf.
- An appreciation of the architectural, visual and historical relationship between the Cathedral and the City Churches.
- An appreciation of the relationship between the Cathedral and the City of Westminster and London to the west, and providing visual connections between these.
- Making connections with artistic representations of the Cathedral usually depicted from the south and west with river in the foreground and, in particular, the views painted by Canaletto.
- An appreciation of the architectural and cultural significance of the Cathedral though a kinetic experience of the Cathedral in its wider urban context, from the water, the bridges or the south bank.

St Paul's Churchyard or close setting contributes to:

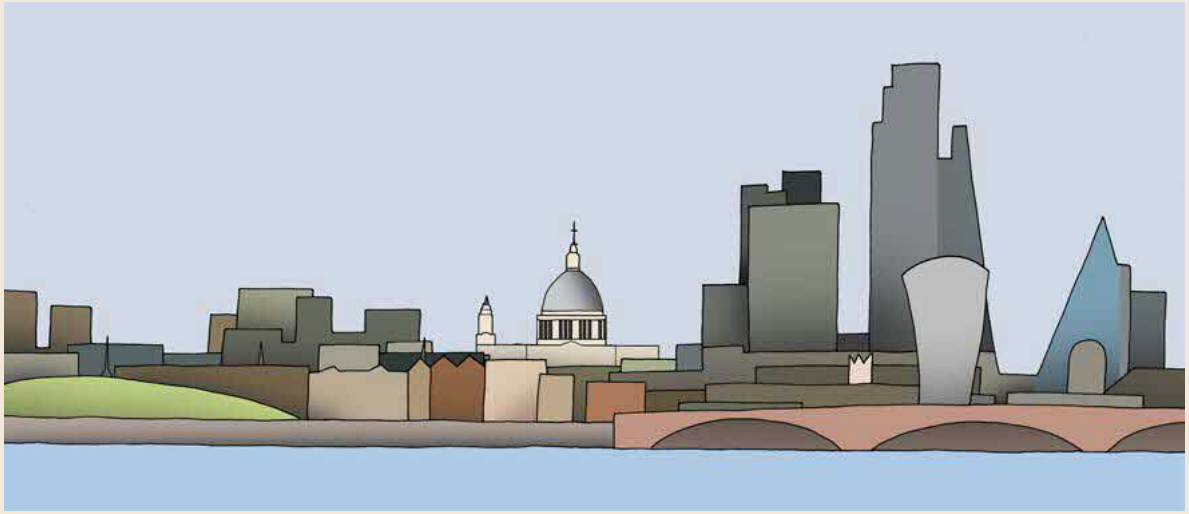
- Experiencing and understanding the architectural scale and composition of the building at close proximity as it towers above you.
- An appreciation and experience of the high quality of architectural detail and decoration including the iconography.
- The cultural importance of the Cathedral, in particular the part played by the west entrance and steps in London's cultural and ceremonial life.
- The culmination of the ceremonial route which is integral to the role of the Cathedral historically and culturally.
- The designed connection with the river over the Millennium Bridge which enhances appreciation of the architectural significance and an understanding of the historic river connections of the Cathedral.

St Paul's changing setting: an illustrative diagram

These sketches illustrate how the close and intermediate setting of St Paul's has evolved since its construction:



As designed by Wren, the Cathedral above aisle level rose clear above the city, and its monumental Portland stone form contrasted with the red-brown brick and tile-roofed buildings of the city. These buildings were of similar height and, through the narrow plots and spans, pitched roofs and chimneys, created a roofscape of finely-scaled texture from which the stone and lead spires and towers of the City churches emerged as delicate vertical counterpoints to the Cathedral.



In the twenty-first century, commercial development has changed this setting in four principle ways: because of the height of new buildings, the Cathedral is no longer pre-eminent; by the agglomeration of plots, buildings in its setting are much longer and wider; through modern materials, the tonal contrast between the Cathedral and the city building stock has reduced; and finally, roofscape forms are now predominantly long planes.

The changing view from Waterloo Bridge, in the 1950s, 2007 and 2024 (picture credits: top left - copyright Historic England Archive; bottom left - copyright Chris Redgrave; bottom right - copyright Historic England)

5.5 PART FOUR: Evidence Base analyses in detail the history of the Cathedral's setting, its evolution and its contribution to setting. It includes a series of summary boxes that encapsulate the analysis in concise form. These are listed here with links. In particular, summary box SB1 and the boxes for the wider, intermediate and close setting (SB9, SB10 and SB11 respectively) are recommended to readers developing and determining development proposals.

5.6 Taken together these boxes provide a robust foundation on which to build greater understanding when carrying out step 3 of the process described in *GPA3 The Setting of Heritage Assets* (Historic England, 2017).

Summary Boxes

SB1: The key elements of the setting of St Paul's and their positive contribution to its heritage significance p.22

SB2: Summary of relationships between St Paul's and the City Churches p.61

SB3: Summary of the relationships between St Paul's and The Monument p.68

SB4: Summary of setting changes from construction until c1800 p.80

SB5: Summary of key changes to setting 1800-1900 p.86

SB6: Summary of key changes to setting 1900-1950 p.94

SB7: Summary of key changes to setting 1950-2000 p.100

SB8: Summary of key changes to setting 2000 to the present p.107

SB9: Summary of the positive contributions of the physical surroundings in the wider setting p.116

SB10: Summary of the positive contributions of the physical surroundings in the intermediate setting p.122

SB11: Summary of the positive contribution of the physical surroundings in the close setting p.131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6.0 Conclusions

6.1 In the first of his Tracts written during the design and construction of St Paul's, Wren advised the architect:

"... to think his judges, as well those that are to live five centuries after him, as those of his own time"

6.2 He was designing for posterity and seeking in this, his masterpiece, to demonstrate the enduring absolute principles of architecture as he understood them. In order to conserve this element of the historic and architectural significance of the Cathedral some three centuries after its completion we also need to think about how those who live after us will judge our actions.

6.3 Today, the legacy of Wren's intent is the architectural expression of his Cathedral, including the composition and interplay of architectural forms and how these are appreciated from its setting. This is fundamental to the heritage significance of the Cathedral and of great importance when considering the impact of new development on the setting of the Cathedral.

6.4 The Cathedral remains a physical and spiritual landmark for London and for the nation and, although its historical pre-eminence has been eroded by later development, the contribution it makes to the skyline of London is still appreciable, discernible, and distinct. And so its setting remains fundamental to our appreciation of its heritage significance. Consequently, the facets of setting identified in this study, such as the legibility of the Cathedral on the skyline, clear skyspace around it, the elevated position, the role of the river corridor and the building's close setting, all contribute strongly to the significance of St Paul's.

6.5 Therefore, where the silhouette of the major architectural elements remains clearly appreciable as part of the horizon, or against clear sky, any visual obstruction of the Cathedral's outline would cause harm to its significance and any incursions into the sky space around the Cathedral have the potential to cause harm to its significance.

6.6 The pressure from what is often described as minor, or incremental, change is another considerable challenge to the management of the Cathedral's significance, for though individual changes and proposals may have a modest impact, cumulatively such change could cause further harm the significance of the Cathedral. This should be taken into consideration during the development management process.

6.7 By no means has all change to the setting of the Cathedral been harmful, however. There have been changes in recent times which have removed past mistakes and, in addition, taken the opportunities to provide new ways to engage with the building. It is not inevitable that the Cathedral will continue to be challenged or harmed by new development: schemes such as Paternoster Square, Millenium Bridge, and the reflecting pool on the corner of Cannon Street and New Change, demonstrate that change can make a positive contribution to the Cathedral's setting if it is informed by a thorough understanding of the ways in which setting contributes to the significance of St Paul's and the historic environment of the City and London.

6.8 This goes further than simply managing strategic views and the architectural appearance of buildings, it involves understanding how people engage with the building, on a physical, spiritual, emotional and intellectual level, all of which changes over time. How the building is approached and how its relationship to its setting is appreciated from St Paul's itself are part of the foundations for successful future conservation management.

6.9 Such management will require informed and detailed understanding of the Cathedral's significance, its history and the contribution of setting to that significance. That is why this study has been prepared. It is expected that it will require revision as new evidence comes forward. In trying to manage different expectations and aspirations for a study of the setting of the Cathedral it inevitably cannot address every emphasis or nuance that different audiences would wish to see. However, if it does deliver a better appreciation of the special importance of St Paul's then it will have achieved its primary objective.

7.0 Methodology

7.1 It might appear a deceptively simple task to establish what matters about the setting of a historic building and why it matters, but in reality it is a major challenge for somewhere as complex as St Paul's. What matters about the Cathedral is different for different individuals and diverse communities across the capital and beyond.

Guidance

7.2 The approach therefore taken here is based upon the established best practice methodology set out by Historic England in HEGAP 3 *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017).

7.3 The study addressed steps 1 and 2 of the HEGAP 3 approach. In addition, by providing in chapter 9 an analysis of the changes to setting over time it also assists in addressing step 4, which is the exploration of ways to maximise enhancement and avoid or minimise harm when proposing changes within the setting of a heritage asset.

7.4 This study cannot address step 3 of HEGAP 3, which is the impact assessment of a proposed development, but it does provide the foundation upon which the necessary further detailed assessment for step 3 can be carried out for each individual project in the future, as explained earlier in Chapter 5.

Terminology

7.5 The terms "wider setting", "intermediate setting" and "closer setting" are used in the study to help articulate the different characteristics of the setting of St Paul's. The concepts are not based on defined boundaries that can be drawn on a map and they have no formal meaning other than being descriptive. Neither are they hierarchical: the strength of the positive contribution made by an element or feature of setting does not correlate with proximity to the Cathedral, though their nature may be experienced differently depending on distance.

7.6 The study also recognises the clear distinction between setting and views, as set out in the relevant Historic England advice (GPA 3 on Setting and GPA 4 on Tall Buildings). This is discussed further in Appendix 1, p.166.

Research

7.7 The study is based upon professional knowledge of the site and setting gained over several decades, augmented by site visits during its preparation that have focussed upon assessing the current setting. These visits have predominantly been to the closer setting of the Cathedral, although parts of the wider setting have also been visited.

7.8 Site visits were supplemented by examination of a range of secondary sources including academic research and publications and policy, guidance and other material published by Historic England, the Greater London Authority and the Corporation of the City of London. A bibliography and list of sources can be found at Appendix 4, p.164.

Consultation

7.9 The legitimacy and strength of the assessment presented in this study is in large part derived from the extent of consultation on its preparation. A workshop was held on 4 October 2023 to present and discuss the research. It was attended by representatives of the Cathedral, its Fabric Advisory Committee, the Cathedrals Fabric Committee for England, Historic England, the City of London, the Greater London Authority, and independent peer review experts. This group was consulted on a draft and their comments and observations informed the development of the document.

7.10 In April 2024, version 9 of the report was presented to and discussed by Historic England's London Advisory Committee.

7.11 Further review by the City of London and the Greater London Authority is likely and any further comments and observations will inform the final version of the report.

7.12 Beyond that, future iterations of the study would benefit from the results of public consultation, either undertaken specifically for the project or as part of other programmes.

Illustration

7.13 The study contains a range of illustrations, some commissioned specially for the publication, others reproduced from other sources. These include photographs taken by Chris Redgrave of Historic England specifically for the project. Other photographs were taken by the author. Unless otherwise stated, the photographs are the copyright of Barker-Mills Conservation.

7.14 None of the photographs or images are “verified” or Accurate Visual Representations (AVR’s) as defined by the Landscape Institute. They are simply illustrative and intended to assist the user of this document to comprehend the points being made.

Limitations

7.15 The study does not, indeed cannot, provide a definitive statement of significance and how setting contributes to it, not least because of the geographical scale and complexity but also because both are continually evolving and seen through different lens by different communities. In light of the complexity of the asset and the nature of the assessment direct public consultation was not possible.

Author and project team

7.16 Barker-Mills Conservation was appointed to prepare the study. Nigel Barker-Mills, author of this report, has over 40 years’ experience in the management of the historic environment including roles in local government, English Heritage and Historic England. His last role at Historic England was as the Planning Director for London. He is a full, founder, member of the Institute of Historic Building Conservation. Further details of the relevant experience and qualifications of Barker-Mills Conservation are provided in Appendix 5, p.188.

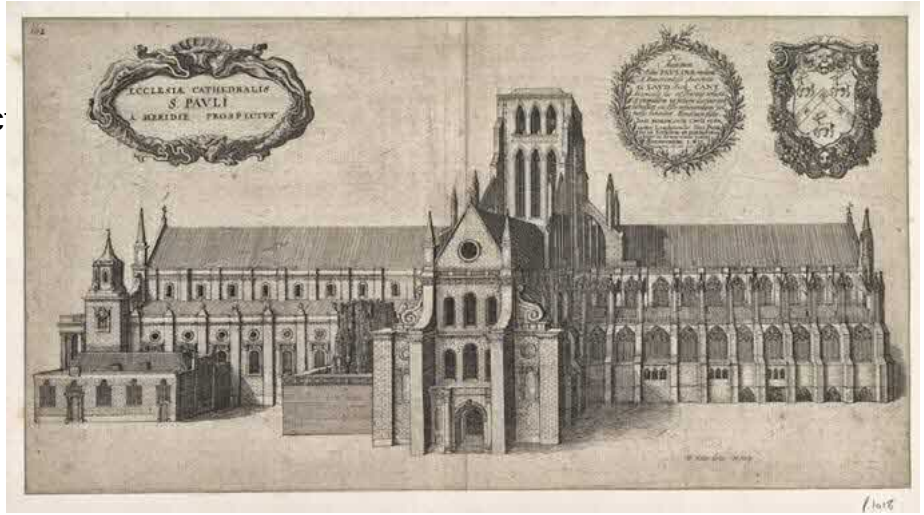
7.17 Alan Baxter Ltd has been extensively involved in the later stages of editing and refinement of the study, including typesetting, graphics and the design of this report.

7.18 The project team also includes the Surveyor’s Office of St Paul’s Cathedral, which has provided assistance and guidance during the preparation of this report on behalf of the Dean and Chapter.

PART TWO:
Evidence Base

8.0
Heritage significance of St Paul's

8.1 The heritage significance of St Paul's forms the basis for its designation as a Grade I listed building. It is an asset of significant complexity that has been the subject of considerable analysis and description. For those interested in gaining a greater understanding of its chronology, architectural history and archaeology, further sources have been identified in *Appendix NPBM 5*. This assessment is therefore a synthesis of existing analysis and does not set out to be exhaustive.



and St Paul's as amended by Inigo Jones engraved by W Hollar when the spire had been lost

A brief history of the building

8.2 The current building stands on the site of at least two and probably more predecessors. The Normans commenced the rebuilding of an earlier Saxon church in 1087 and construction continued until the later 12th century. The immediate predecessor to the current building, "Old St Pauls" contained within it some of the Norman nave, although encased by Inigo Jones in the 17th century. The medieval cathedral was 12 bays long with a crossing tower and two western towers outside the line of the nave and it stood within a broadly oval precinct. At the time of its completion, it was the tallest building in the capital.

Wren and Old St Paul's

8.3 The first documented involvement of Christopher Wren with the pre-existing building was when he was consulted about its repair in 1661 and he subsequently prepared actual proposals in the Spring and Summer of 1666. Christopher Wren has a strong claim to be England's most famous architect and his genius was recognised from an early age. He came from a prominent Royalist and church family whose members included a Bishop of Ely and was born in 1632, the son of a Dean of Windsor. He died in 1723. His early scientific interest and education led to his appointment as Professor of Astronomy at Gresham College at the age of 25 until 1661, when he was appointed Savilian Professor of Astronomy at Oxford; a post he held until 1673 and overlapping with his appointment as Surveyor General of the Kings Works from 1669. His earlier career was thus in the sciences and he became involved in architecture only later, with his first commissions being the result of his acknowledged abilities and skills in geometry and mechanics. These abilities remained an integral element of his architecture underpinning much of his architectural theory and exploration of the origins of architectural style, both through study but also in his practice.

Old St Paul's: Wren's pre-fire proposals for the crossing © All Souls College, Oxford

8.4 The proposals prepared by Wren in the 1660's for St Paul's were obviously informed by his visit to Paris and the Ile de France the year before when escaping the plague. He never visited Rome but did meet the great Italian Baroque architect Gian Lorenzo Bernini then in Paris working on proposals for the Louvre. In May 1666 Wren submitted a formal proposal for repair of old St Paul's and in August drawings for a new domed crossing to the medieval building were developed; which clearly intended to continue the process of improvement of the old cathedral begun in the 1630's by Inigo Jones. The dome was to provide London with a new landmark in place of the decaying central tower of the existing cathedral which had lost its crowning spire about a century earlier. It was described as a ''rotundo, with a cupola, or hemispherical roof, and upon the cupola, a lantern with a spiring top'' Diarist John Evelyn, one of the Commissioners who supported the proposal, described a ''noble cupola, a forme of church-building not yet known in England'', which he believed would provide a distinction to the London skyline akin to the major Renaissance centres of Europe. For Wren, the use of a dome had greater antecedents to be found in the architectural legacy of "the Levant", (or Middle East) and in particular the model of the early Christian cathedral of St Sophia in Constantinople.

Summary of the construction history of the new St Paul's

1670: First model completed

1673: Royal Warrant issued based on the Great Model

1675: May- Warrant for the "Warrant" design

1675: July- first foundation contracts issued and the foundations
of Choir and east side of Crossing commence

1676: November transept foundations commence

1678: September Nave foundations commence

1685: Choir and transepts finished to top of lower order

1687-8: Foundations of west end dug and Inigo Jones portico dismantled

1697: First service in the Choir

1698: Dome reaches Whispering Gallery level

1699: Cibber's carved phoenix in pediment of south transept

1700-1705: Design evolution of the west front and towers by Wren and Hawksmoor

1706: West portico completed

1708: Outer dome leaded, western towers completed

1711: St Pauls declared finished

Wren and the new St Paul's

8.5 Following the destruction of the City in the Great Fire in 1666 Wren's first proposal for a new cathedral was indicatively shown on a drawing produced a few days later as part of a proposal for a new City plan. However, it would be a further two years before proponents for the repair and propping up of the existing, heavily damaged structure finally admitted defeat, following a fall of masonry in April 1668, and the need for a new building was accepted. Wren was formally instructed by Dean Sancroft to design that building later in 1668 and by autumn 1669 had reworked his initial, post-Fire proposal into a new design; illustrated by a wooden model completed in 1669/70, a fragment of which survives.

8.6 In 1670 Wren was appointed Surveyor of the King's Works and also appointed Surveyor to the new Commission established to rebuild the city churches also destroyed in the Great Fire. He was not actually formally appointed architect to St Paul's until 1673, by which time he had produced his first model for the new cathedral. This was in the form of a Greek cross, which aspired to the scale and formal architectural qualities of the great Renaissance and seventeenth century centralised churches of Catholic Europe but were, more importantly in light of the Protestant state religion in England, related to the plan form of earlier, ancient examples of monuments in "the Levant" (or Middle East) including early Christian churches. These designs received Royal approval in 1672.

8.7 In early 1673 amendments, in the form of a timber and portico at the west end, resulted in a design which formed the basis of the Great Model. Formal approval by Royal Warrant, the establishment of the Commission and appointment of Wren as architect based on the Great Model design were all completed in 1673.

8.8 Concerns that the plans were not Latin enough and were also at odds with Anglican Church values in the 17th Century resulted in amendments to the design. A radical redesign to produce a building with a traditional Latin cross plan and Baroque silhouette, capable of construction in stages as was traditional for cathedrals, was confirmed by an informal warrant in November 1673 (The "Warrant Design"). However, with the private approval of the King, Wren set about reworking this compromised design and in broadly two phases he reached the basis of the current building. The key change from the Warrant plan was the reduction of the nave from five bays to three, thus balancing the three bays of the choir and reflecting the earlier, centrally planned model. The removal of the proposed spire shown rising from the dome was also abandoned in a "purification" of the form of the cathedral.

8.9 This redesign must have been substantially complete including the extent of the whole building, the transept porticos, the chapels and the diameter of the dome when first building contracts were issued in 1675. Work commenced on the western piers of the dome in 1676.

8.10 No “Approved Design” was exhibited by Wren following the rejection of the Great Model in 1673 and the final form of the cathedral was, to a certain extent fluid; although constrained by the structural decisions that had to be taken at an early stage. The final form of the western towers was not decided until the early years of the 18th Century when Wren was required to show his design for the completion of the Cathedral in February 1700. The date of the official completion of the Cathedral was 1711, some 38 years after the first Royal Warrant was issued for its construction. The “new” St Pauls was the first Post Reformation cathedral in England and the first in a classical style.

Summary of the significance of St Paul’s

8.11 **St Paul’s Cathedral is of special Historic Interest**:

- As the major building completed as part of the reconstruction of the City of London following the Great Fire. It was originally conceived as the centrepiece or node of a planned city and streets, a layout based on continental principals of urban design which was not implemented.
- As the pre-eminent example of a Baroque ecclesiastical building in England completed when the style was at its height in the late 17th and early 18th century.
- For its relationship with the Commission for the rebuilding of the City Churches for which Wren was the Surveyor.
- As a building funded by a dedicated Coal and Wine Tax originally introduced solely for its construction, but later used to fund the Queen Anne Churches and continuing as a tax until the 19th century.
- For the associations with the Post Fire rebuilding of the City of London in which Sir Christopher Wren and Robert Hooke had leading roles; reconstructing many city churches and The Monument.
- For its role in reflecting the contested ideas and liturgical practices of the 19th century.

- For its associations with the highly influential Deans including John Donne, John Hume, Richard William Church; William Inge; Walter Matthew; and Bishops including Howley, Jackson, Tate, Hope, and Chartres.
- For its role in contested ideas about conservation including the replication and interpretation of earlier failed interior paint schemes, including those by Thornhill undertaken in the early 20th century.
- For the number of urban planning schemes designed in succeeding centuries illustrating the desire to make St Paul's the focal point of views from the south bank and the river itself.
- For the survival of the Cathedral including bomb attacks by suffragettes in the early 20th century, Zeppelin attacks in the Great War and more famously during the London Blitz in WWII when it became a symbol of national resistance.
- For the role of the Cathedral as another national mausoleum in addition to Westminster Abbey and containing 33 state sponsored monuments including those to Florence Nightingale; John Howard (prison reformer); Samuel Johnson; Joshua Reynolds; JMW Turner; Sir Edwin Landseer; Viscount Melbourne; and Frederic Lord Leighton.
- For the role of the building as the venue for national events, both commemorative and celebratory including royal weddings, jubilees and memorial services.
- As the location of the burial site of Sir Christopher Wren, Admiral Lord Nelson and the Duke of Wellington all in the crypt, Wren's tomb being the first in this location. The crypt also includes the OBE Chapel, spiritual home of the order.
- For the social and spiritual values that have been attached to the Cathedral over centuries.

8.12 **St Paul's Cathedral is of special Architectural Interest:**

- As the work of Sir Christopher Wren one of Britain's greatest architects and a figure of international significance in terms of architecture and science. The building is regarded by many as his masterpiece.
- For containing the work of craftsmen including Nicholas Stone, William Kempster, Edward Pierce, Francis Bird, Caius Gabriel Cibber, Grinling Gibbons and Jean Tijou when first constructed.
- For containing the work of craftsmen including James Thornhill; Alfred Stevens; GF Watts; W.E Britten, C E. Kempe; W.B Richmond; in subsequent adaptations and alterations in the 19th and 20th centuries.

- For its relationship with other Wren classical designs including the City Churches and particularly their towers and spires which amplifies the experience of significance and landmarks.
- For its relationship with the monolithic freestanding classical column of The Monument.
- For the use of expertly selected materials and advancing technology in construction, including Portland stone, the favoured material for rebuilding important civic buildings and structures in London from the late17th century.
- For the scale of the design, designed to be visually dominant and located on the site of the previous cathedral on elevated ground.
- For the reconciliation of the traditional Latin cross plan favoured by the Anglican church with the centralised oriental and continental Baroque plan favoured by Wren, illustrated through documented drawings and the Great Model.
- For the south western tower spiral stairs which are an elegant and structurally daring design.
- For the external design of the drum and dome, the largest of its type in England at the time and regarded as one of the most perfect in the world (*Bannister Fletcher, Summerson and Pevsner)*, Wren drew on models from Rome and Paris and his exploration of ancient architecture.
- For the structural ingenuity of the dome with different internal and external profiles and the use of the concealed brick cone to support the lantern.
- For the internal relationship of the dome, drum and peristyle and in particular the volumes of the architecture below and within.
- For the elegant and dynamic Baroque west towers, and their vital contribution to the cathedral's external design.
- For the acoustics internally including the special acoustic of "The Whispering Gallery".
- For the examples of subsequent alteration and conservation practice and the association with Surveyors to the Fabric including John James (1723-46), Robert Mylne (1766-1811) S P Cockerell (1811-19), C R Cockerell (1819-1852) Francis Penrose (1852-1897) Mervyn Macartney (1906-1931), Godfrey Allen (1931-1956), Bernard Fielden 1969-1977, William Whitfield 1985-1990); and Martin Stancliffe (1990-2011) who oversaw the most recent major restoration of the Cathedral.

8.13 **St Paul's Cathedral is of Artistic Interest:**

- For the external sculptural decoration including in the pediments and crowning figural sculptures, including their iconography.
- For the examples of the craftsmanship of Grinling Gibbons, Francis Bird, Cauis Gabriel Cibber, Jean Tjou, Nicholas Stone, Edward Pierce, William Kempster, John Singer Sarjent, John Flaxman, Rossi, (William) Hamo Thorneycroft and John Bacon among many others.
- For the internal monuments and memorials including the earliest surviving one from before the Fire, that to John Donne by Nicholas Stone.
- For the internal decoration including mosaics in the roof vaults and Thornhill's *trompe l'oeil* architectural painting of the dome.
- For the long history of artists engaged in schemes of decoration, many unrealised but still of national significance.
- For the interior fittings including the Grand Organ case and choir stalls designed by Wren's office and the workshop of Grinling Gibbons.
- For the various representations of the building in art and photography including by Canaletto, John O' Connor, Frederick Goff and John Piper.
- For the artistic programme that continues today with new commissions and installations, including Bill Viola, Hughie O'Donoghue, Richard Kindersley and many others.

8.14 **St Paul's Cathedral is of Archaeological Interest:**

- For the potential remains of earlier occupation of the site not removed by the construction of the Cathedral.
- For the 18th century and earlier fabric of old St Paul's within the structure, the majority of the external stonework and fabric being faithful later conservation, restoration and repair.
- For evidence relating to the construction process of Wren's building both within the fabric and also within the ground around the Cathedral.

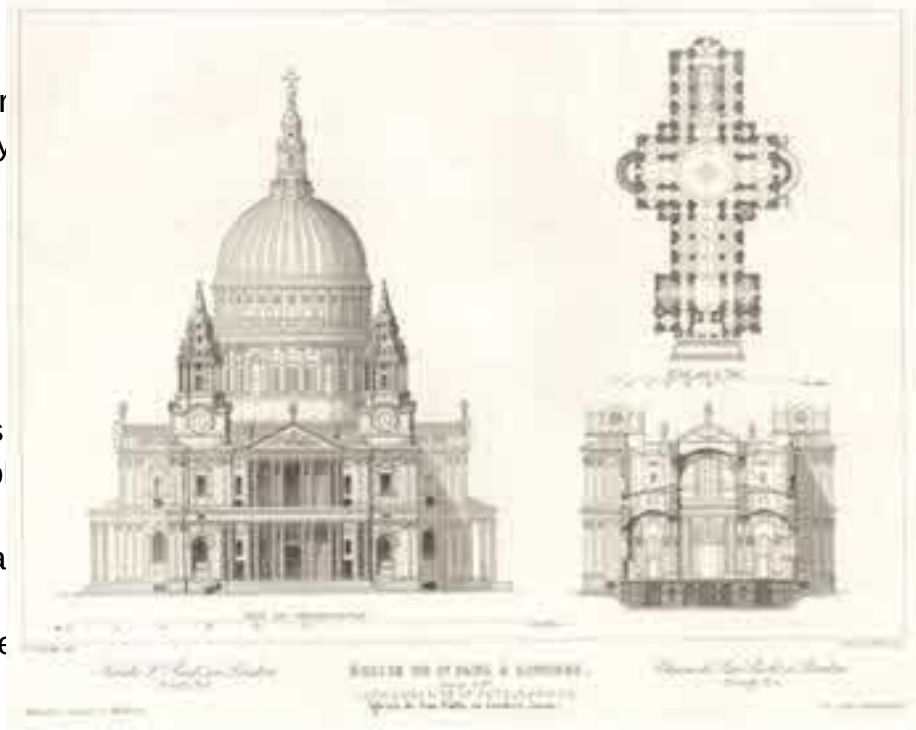
8.15 These interests are the basis for the designation of the Cathedral at Grade I in the National Heritage List for England. Grade 1 listed buildings are a small percentage of the entries on the list and the conservation of their significance attracts the greatest weight under Government policy as set out in the National Planning Policy Framework. The statutory requirements and policy approach for heritage assets is provided in further detail in *Appendix NPBM 3.*

An analysis of the architectural and historical significance of the design

8.16 The new Cathedral has to be seen in the context of English cathedral building established by the Normans and then developed throughout the medieval period. Only by recognising the place of St Paul's within this context can an understanding be gained of the balance between tradition and innovation which is uniquely represented in this building, which was the first post-Reformation cathedral in the country. It was a tradition that Wren knew well as he had been called in to advise on repair Salisbury Cathedral and alterations to Westminster Abbey in addition to his involvement with old St Paul's.

8.17 The new Cathedral is on an elevated site, albeit only modestly higher than its surroundings, but the highest point in the city of London. It re-used that of its predecessor thereby maintaining a continuity of worship on the site that had existed for over 900 years Elevated sites were often used for cathedrals and notab examples in England include Durham, Lincoln, York, Ely, Carlisle, and Lichfield. The choice of an elevated site ha obvious symbolic benefits in addition to ensuring visual prominence. This visual prominence, along with the scale of cathedral buildings themselves, were powerful means of communicating the importance of their role. The tradition of using an elevated site has continued into the twentieth century with the striking example of Guildford Cathedral, dominating Stag Hill which announced the newly created diocese in the 1930's.

8.18 Another characteristic feature often found in earlier cathedrals is the Latin cross plan providing for procession and ceremonial as well as for symbolically referencing the crucifixion. This plan form allowed for architectural emphasis at the crossing and the western



end, which was usually in the form of towers. Examples include Durham, Canterbury, Rochester, York, Southwell, Ely, Bristol, Chichester, Lichfield, Lincoln, Ripon, and Wells. This again was an area of intellectual interest for Wren and he was involved in designing new west towers for Westminster Abbey; although ultimately, they were constructed by his assistant Nicholas Hawksmoor. The importance of towers for cathedrals and indeed parish churches continued into later centuries and the provision of a crossing tower and western towers is a feature of the later 19th Century cathedral at Truro enabling it to dominate that city despite the minimal elevation of its site adjacent to the river. The form and visual interplay between these elements of the design of a cathedral emphasized its scale, added to the sense of power and authority and incited wonder in the lay communities that used or visited the building. As forms of architectural display, they also provide distinct character and enable unique building profiles to be created that then become easily recognisable and often iconic.

8.19 Wren's St Paul's re-uses the elevated site of its predecessor and in its final design also employs the Latin plan, but Wren was also concerned about the relationship of his new building to its' context as an intended ornament for the capital; in particular to the traditional approach to the earlier cathedral from the west. The west end of the earlier cathedral was the ceremonial entrance for royal processions and providing a suitable western vestibule for this purpose of greeting the monarch and associated ceremonial was to occupy much of the design development for St Paul's in the 1680's. Wren's proposed City Plan of 1666 prepared in the days immediately following the Fire indicated an intention to have the rebuilt cathedral related to this western approach by establishing a formal, straight avenue along the approximate alignment of Fleet Street and terminating in a piazza dominated by it. The Cathedral would be at an important node in the plan with routes continuing to other civic buildings to the east at other nodes in the plan. However, with the passing of the Great Rebuilding Act of 1670, it was clear that the desired formality and rational urban plan that Wren was aspiring to deliver would no longer be possible. But in order to achieve some of the intended effect he successfully petitioned the Commissioners to purchase land adjacent to the north west corner of the historic St Paul's churchyard to assist in opening up the western approach and give sufficient breathing space to the west front of the new Cathedral. In addition, Wren adjusted the orientation of his new building in comparison with its predecessor for structural reasons, but also because by adopting slight shift to produce a north-east-to south-west axis he managed to achieve a more direct alignment with Ludgate Hill which formed the last part of the principal historic approach from the west.

8.20 In section the new Cathedral maintains the tradition of the taller nave and lower, subservient aisles but disguises this traditional massing behind screen walls that also perform a structural function in buttressing the nave and the dome. The screen walls also ensured consistency of architectural expression, and avoided what Wren described in connection with other projects as “an unhandsome Medley” or “disagreeable Mixture, which no person of good Taste could relish”. St Paul’s also follows the tradition of providing architectural emphasis at the crossing and west ends but in the hands of Wren it is these elements of the design, in addition to the screen walls, that are innovative both structurally and architecturally and are exceptional in England at this time. Until the construction of St Paul’s, the use of the dome was not widespread in England in contrast to mainland Europe and certainly, there was none of the significant scale intended for the Cathedral. On completion the dome was the largest in country, one of the largest in Europe and it ensured that St Paul’s remained the highest structure in London until the 1960’s.

8.21 In *Parentalia* the memoirs produced by his son, it is claimed that:

“Thus St Paul’s is lofty enough to be discerned at Sea Eastward, and at Windsor Westward, but our Air being frequently hazy, prevents those distant Views, except when the Sun shines out, after a Shower of Rain has washed down the Clouds of Sea-coal Smoke that hang over the City from so many thousand fires kindled every morning, besides Glass-houses, Brew-houses, and Founderies, every one of which emits a blacker Smoke than twenty Houses.’

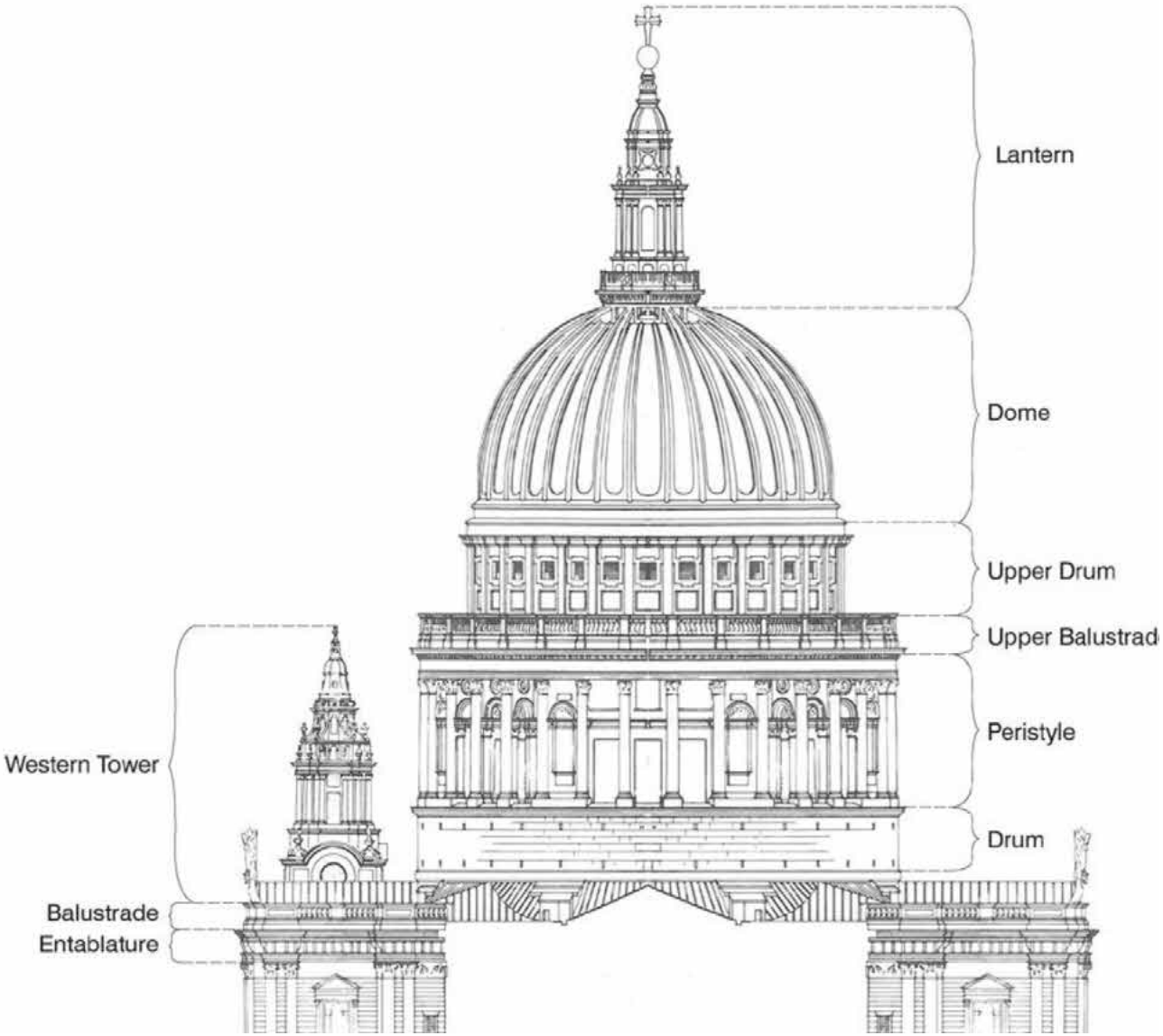
This illustrates that understanding the architectural significance of the cathedral solely through physical experience is and always has been dependent upon environmental conditions which have changed significantly over time. Although it will not of itself be a complete understanding of the intended architectural significance. Some of those conditions even directly affected the appearance of the building as can be seen in photographs of the Cathedral in the 19th and 20th Centuries with its soot blackened lower sections protected by the cornice of the ground floor order from the washing down by acidic rain that resulted in a much lighter colour for the upper sections of the elevation. The understanding of the intentions for the building through an appreciation of its architecture will therefore be different depending upon the distances involved. Broadly speaking at greater distance, the overall silhouette is the most easily appreciated; from intermediate areas of setting the architectural form and massing is appreciable with architectural detail only fully appreciable from within the closer setting of the building.

The dome

"Geometrical Figures are naturally more beautiful than other irregular; in this all consent as to a law of nature. Of geometrical figures, the Square and the Circle are the most beautiful; next the Parallelogram and the Oval."
Wren, Tract 1

8.22 Wren's choice of a domed crossing was not sudden or arbitrary as can be seen by his suggestion of placing a dome on the old cathedral of St Paul's and a dome is a feature in the schematic form of the first new cathedral. It represents an interpretation of early Christian churches as is illustrated in his City Plan of 1666. Throughout the evolution of the design for St Paul's a dome was a central and enduring theme and regarded by Wren as an essential element in making the new building both stately, having more grace in the "remoter aspect" (that is from a distance), but also as a means of conveying its importance in both functional and urban terms. The use and recent development in the design and forms of domes in Europe had been a feature of his recent study in France; although as a member of the Royal Society he and his colleague Robert Hooke had also explored the emergence of the dome as a feature of ancient architecture in the Levant (The Middle East). The structural and mathematical challenges in using such a form must have also have appealed to his scientific interests and the geometrical properties of the dome as a form were also an abiding interest. The geometrical qualities of architecture were, for Wren "the most essential Part of Architecture" and he also noted in his Second Tract that "Geometrical Figures are naturally more beautiful".

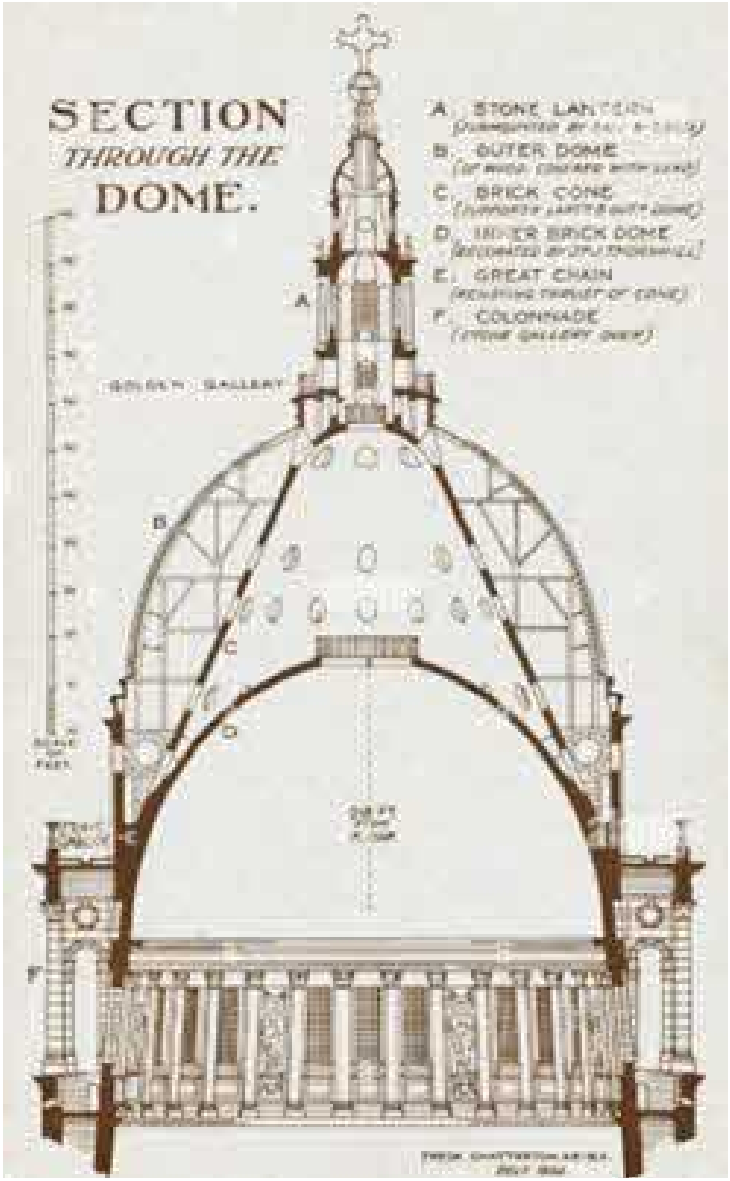
8.23 The continental domes studied by Wren differ from St Paul's although it has been pointed out by Gordon Higgott that the revision to the Warrant Plan which resulted in the addition of the screen walls and larger dome appear to have been influenced by the church of the Hotel des Invalides in Paris by Mansart (1677) which was under construction at the same time. However, unlike those of St Peter's in Rome and the Val-de-Grâce in Paris, the dome of St Paul's rises in two clearly defined storeys of masonry which, together with a lower, unadorned footing, equal a height of about 95 feet. From the time of the Greek Cross design for St Paul's, it is clear Wren favoured a continuous colonnade (or peristyle) around the drum of the dome, rather than the arrangement of alternating windows and projecting columns that Michelangelo had used for St Peter's in Rome and which had also been employed by Mansart in Paris. The peristyle serves to buttress both the inner dome and the brick cone which rises internally to support the lantern, but also provides the large "Basis" upon which the Dome rests. In the finished structure, Wren creates a diversity and appearance of strength by placing niches between the columns in every fourth opening.



The elements of the roof, drum and dome (from the Survey of St Paul's by A.F.E. Poley, 1919)

8.24 Above the peristyle rises the second stage surrounded by a balustraded balcony called the “Stone Gallery”. This stage, the upper drum, is ornamented with alternating pilasters and rectangular windows which are set just below the cornice, creating a sense of lightness. Above this attic rises the dome itself, covered with lead, and ribbed in accordance with the spacing of the pilasters. It is pierced by eight light wells just below the lantern, but these are barely visible. They allow light to penetrate through openings in the brick cone, which illuminates the interior apex of this shell, partly visible from within the cathedral through the ocular opening of the lower dome.

8.25 The lantern, like the visible masonry of the dome, rises in stages. The most unusual characteristic of this structure is that it is of square plan, rather than circular or octagonal. The tallest stage takes the form of a *tempietto* with four columned porticos facing the cardinal points. Its lowest level is surrounded by the “Golden Gallery” and its upper level supports a further, small dome from which rises a cross on a golden ball. The total weight of the lantern is about 850 tons.



Section through the drum and dome of St Paul’s illustrating the structural ingenuity of the crowning feature

Historic England St PAUL'S CATHEDRAL

8.26 The ingenuity of the structure of the dome has often been remarked upon and it illustrates an important aspect of the design. The brick cone is required not only to support the lantern but is also necessary because the external and internal profiles of the dome itself are deliberately different for architectural reasons. The external profile is created through the use of a timber structure covered in lead that produces a distinctive curve, and is based upon Bramante's design for St Peter's published by Serlio; whilst the profile of the inner dome, constructed in brick, has been carefully considered in relation to the volumes and proportions of the interior spaces of the cathedral and is therefore of a different profile. As described in *Parentalia* the reason for such an approach was:

'….It was necessary to give a greater Height than the Cupola would gracefully allow within, tho' it is considerably above the Roof of the Church; yet the old Church having had before a very lofty Spire of Timber and Lead, the World expected, that the new Work should not in this Respect fall short of the old (tho' that was but a Spit, and this a Mountain) He was therefore obliged to comply with the Humour of the Age, (tho' not with ancient Example, as neither did Bramante) and to raise another structure over the first cupola; and this was a cone of brick, so built as to support a stone lantern of an elegant figure, and ending in ornaments of copper gilt.'

The consideration and care taken by Wren regarding the visual impact of this, the crowning feature of his design, is integral to its architectural significance and central to an appreciation of that significance.

8.27 It is also important to recognise that in addition to its visual effect Wren also had to justify the use of a dome as a way of expressing meanings of relevance to Anglicans by reassuring the Commissioners that it was "proper" in an architectural sense for an English Cathedral, in light of the association of domes with Catholic Europe. Wren emphasised that a dome on St Paul's (as proposed for the old cathedral and carried through to the new design) would become "an Ornament to his Majesty's most excellent Reign, to the Church of England and to this great city". The dome was seen by him as symbolising the national unity between Church and Crown and whilst novel or unfamiliar it would in time become recognised as a national "ornament". In this latter claim, Wren has been proved right.

St Paul's dome from the south east where the plain base, the columned peristyle, the upper drum the dome itself and the crowning lantern can all be appreciated as the central crossing point of the design (picture credit: Historic England).

The west towers

8.28 The towers were constructed from 1705-1708 after publication of the “authorised” engravings of the completed design for the Cathedral in 1702. In that published design the towers are shown as cylindrical in form and clearly based upon Bramante’s Tempietto in Rome. In 1700 construction on St Paul’s was reaching the level of the cornice on top of the church, but it then ceased, commencing again in 1705. Within that period in 1700-1702 Hawksmoor and William Dickenson drew several designs in which the belfries and clock stages of the towers were progressively enlarged. The towers that then emerged, following a further re-design by Wren in 1704-5, are of very different form and character from those in authorised publication. Their height was increased and their structure is organised into three, diminishing stages. Above the main cornice, which unites the towers with the portico and the outer walls, the details are boldly scaled, in order to read well from the street below and also from a distance. The towers rise above the cornice from a square block plinth which is boldly modelled with simple panels flanking large oculi; that on the south being filled by the clock, while that on the north is void.

8.29 The towers are composed of two complementary elements, a central cylinder rising through the tiers in a series of stacked drums and paired Corinthian columns at

The SW Tower of St Paul’s Cathedral (picture credit: Historic England).

the corners, with buttresses above them, which serve to unify the upper drums with the lower stage on which they stand. The entablature above the columns breaks forward over them to express both elements, tying them together in a single horizontal band which is an architectural "device" based on ancient models studied by Wren. The cap, an ogee-shaped dome, supports a gilded finial in the form of a pineapple. The vertical emphasis of the towers is provided by the columns and buttresses and enhanced by the urns and finial decorations placed above them, all of which present a lively profile and character that contrasts with the stately character and simpler silhouette of the central dome. The three features, towers and dome, appreciated together illustrate the evolution of Wren's design approach which included testing architectural conventions and they therefore provide an important understanding of the architectural significance of the building.

8.30 Equal care was paid by Wren to the silhouette of the main body of the cathedral which was designed with the cornice containing brackets as the horizontal, terminal feature. The addition of the balustrade above the parapet in 1717-19 slightly weakens the intended expression of the transept pediments and the silhouette of the building and was built against the wishes of Wren. In a letter to the Commission on 28 October 1717 the then 85-year-old Surveyor objected to the principle of a crowning balustrade, which he described as being "contrary to the principles of architecture, and as breaking into the harmony of the whole design" before famously remarking, '*ladies think nothing well without an edging*'.

West front and towers "elevated" view

Elevations and west front

8.31 The function of the western end of the cathedral was as the ceremonial “vestibule” leading to the Nave and subsequently the Choir. The importance of this section of both plan and elevation is indicated by the fact that of the surviving design drawings for the Cathedral fabric prepared between 1675-1710 about a third (80) relate to the west end. The intention from an early stage was to provide spaces on ground and first floor north and south of the central entrance. The precise form of the spaces evolved alongside proposals for the treatment of the western portico which included the use of giant columns and a re-interpretation of Jones’ earlier portico before the two-storey form was settled upon. The uses of the spaces included a library, the trophy room and chapels on the ground floor. The west front is strongly articulated with the lower portico comprising 6 pairs of Corinthian columns. The intercolumniation is subtle, with the central space wider than those flanking to emphasis the central axis of the design. The upper, pedimented portico follows a similar spacing but using Composite columns. The porticos are framed by the outer rusticated lower stages of the towers separated by a narrower bay either side. The paired pilasters to the outer bays are surmounted by the statues of the Evangelists. The simple geometry of the square bases of the free-standing towers containing the oculi under strongly expressed segmental cornices is readily appreciated above and their geometry complements that of the dome when seen in combination. The strongly expressed depth of the central porticos with their deep shadows and modelling contrasts with shallower modelling of the elevations either side characterised by the rustication and decorative cornices and swags.

8.32 There is a similar contrast to the depth of modelling to the north and south transepts with the semi-circular porticos projecting boldly and their modelling echoed by the drum of the dome above. The extensive surface rustication is balanced with concentrated areas of carved decoration including in the spandrels of the arched windows on the ground floor that form, in effect, a continuous horizontal band of foliage decoration. This band incorporates the capitals of the lower orders across the façade. This arrangement is repeated above but with added emphasis created by the vertical garlands of foliage and fruit either side of the main transept window and crowned by the sculpted pediment and free-standing statues above.

South Transept and Portico from Carter's Lane: note the strongly expressed semi-circular form of the portico and the rich decorative carving in bands across the ground and first floors. The statues crown the vertical articulation of the façade organised by the Corinthian and Composite pilasters usually paired (Picture credit: copyright Historic England).

The sculptural decoration and its iconography

8.33 The architectural sculpture of the Cathedral is often overlooked in comparison to the appreciation of the dome, porticos and towers of Wren's design. However, collectively, the architectural sculpture is one of the greatest ensembles of the English Baroque. The west pediment contains the *Conversion of St Paul* by Francis Bird (1706) which is a dramatic composition clearly informed by Italian, Baroque examples. Bird was also responsible for the reliefs depicting scenes from the life of St Paul around the west door.

8.34 In 1718-21 statues were added to the elevation of the west front. At the lower corners of the two towers are the Evangelists with their associated symbols, all of whom are depicted as seated and writing in books. On the pediment between the towers are three standing statues, St Peter on the north, St Paul to the centre and St James to the south. A further five statues were added to the north transept in in 1720-4 depicting St Barnabus, St Philip, St James the Less, St Jude and St John the Baptist. Five statues were also originally placed on the south transept although the three central ones were replaced in 1898. These were St Thomas, St Andrew and St Bartholomew. At the corners the Bird originals of 1722-4 survived, depicting St Simon and St Matthias. The majority were the apostles of Jesus charged with proclaiming his message and therefore the symbolism of their prominent position on the principal axes of the Cathedral also resonates with the liturgical purpose of the building. St Pauls was one of the first buildings in the City to have groups of statues along its roofline- principally the pediments. These would have originally stood out against a clear sky and formed part of the skyline of the building. They would also have been an unusual and novel feature for a building in the City at this time.

8.35 One element of the sculptural iconography has additional significance which has increased during the course of the subsequent history of St Paul's. In the south portico pediment is the phoenix carved by Caius Cibber as a symbol of resurrection following fire. It is reported that when Wren was on site at St Paul's to draw out the circular dimensions of his dome, he sent a workman to find a piece of stone to mark the centre of the figure and he returned with a piece of tombstone upon which the word Resurgam! (I will rise again) was carved, thereby inspiring the subject of the decoration in the pediment. In light of the subsequent attacks on the Cathedral including by suffragettes, in the two World Wars and those subsequently planned by terrorists, the concept of resurgence has become particularly attached to this cathedral.

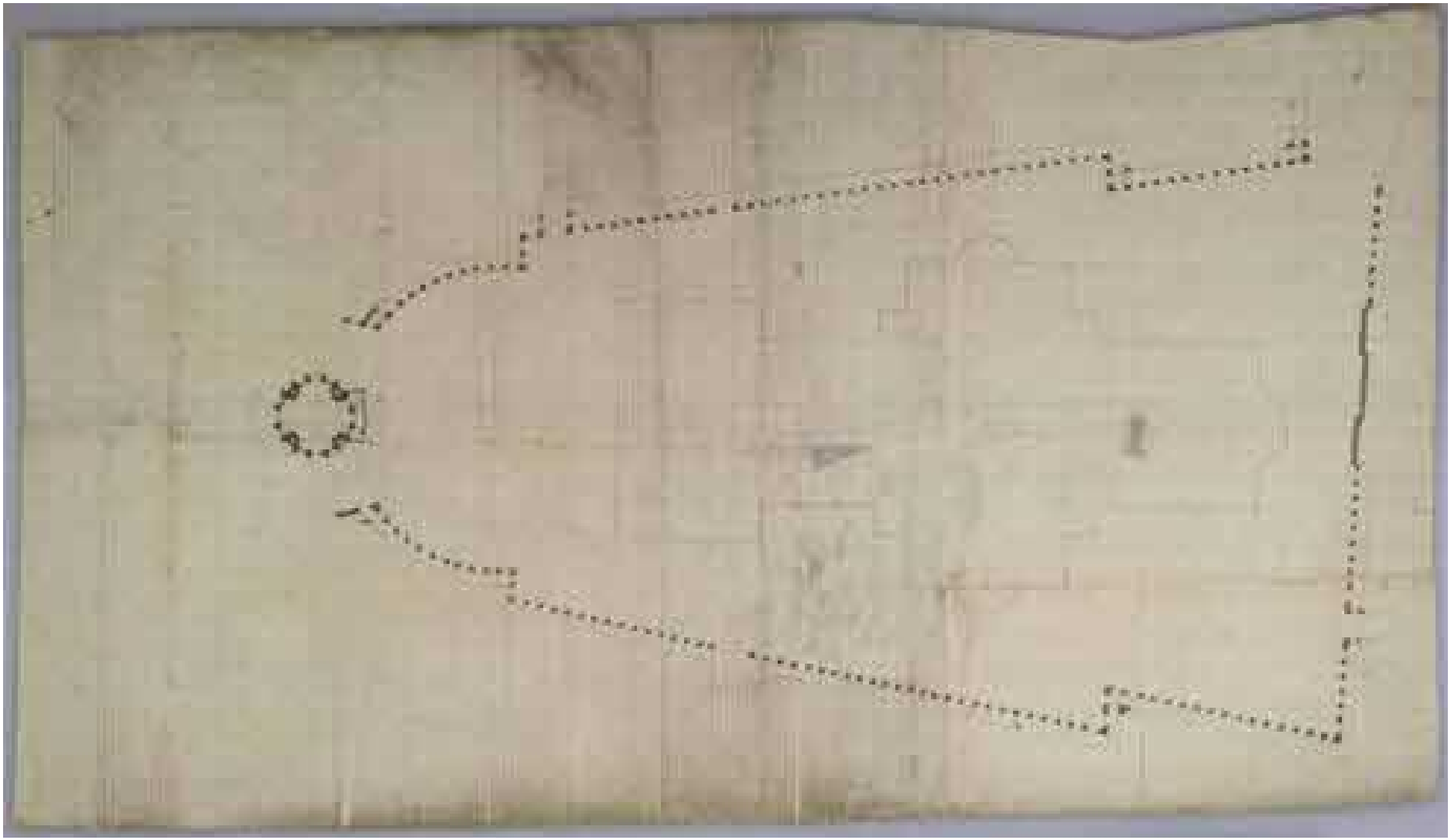
The Phoenix and Resurgam in the South Portico Pediment by Cauis Gabriel Cibber (picture credit: copyright Historic England).

St Paul's Churchyard: the close setting

8.36 The earliest known scheme to improve the Cathedral churchyard is an outline study by Wren and Hawksmoor, drawn over a survey of the whole precinct prepared by William Dickinson soon after he joined the Surveyor's office in 1696. Sketched loosely in pencil – probably by Wren – are the lines of curving frontages on the north and south sides which narrow to a circular space on the west, where Ludgate Hill meets the churchyard. Within this space is a large rotunda on axis with the Cathedral. Hawksmoor redrew the outlines in ink, including with what appears to be a colonnade, to give the piazza a symmetrical, wedge-shaped plan, and also drew the whole plan separately to show the rotunda with internal apses and a grand staircase on the east side. The churchyard scheme – previously dated around 1710 – must have been prepared before the north and south transept steps were built to modified plans in 1698–99 because the completed steps disrupt the overall symmetry of the ground plan and were first shown in engravings of 1701.

8.37 The Building Committee's earliest discussions about the churchyard in 1701–03 were restricted to the removal of two blocks of houses on the north side of the nave. Clearing these houses in 1710 allowed the construction of the churchyard railings. Railings were a new feature in the City at this time as there were no known railings on pre-Fire buildings and they were part of the innovative features that characterised the Cathedral. Wren had proposed several separate railed enclosures around the Cathedral in wrought iron, including one for the statue of Queen Anne (completed in 1712) on the west side. However, in January 1710 the Commission rejected Wren's scheme in favour of a more extensive enclosure bounded by larger, cast-iron railings. The revised scheme drawn by Dickinson in 1709 shows railings in a straight alignment along the north side of the churchyard which then curve around the east end of the Cathedral in close proximity to the apse. The railings along the southern boundary of the precinct are shown attached to the outer walls of the south transept before continuing to create a curved enclosure to the west of the Cathedral with a gate at its apex.

8.38 The great steps at the western end of the Cathedral shown on this plan were of two flights and the landing and lower flight were enclosed by outward-curving walls and railings. These steps were rebuilt in 1872 by the Surveyor FC Penrose, who reverted to an earlier, 1701, plan prepared by Wren. The railings that currently survive, principally along the northern side of the current churchyard are on lower plinth walls and are not in their original positions.



Finished plan of the churchyard by Hawksmoor 1696-7 which illustrates the proposal for a colonnade around the perimeter ©St Paul's Cathedral

The Commission on City Churches and the relationship with St Paul's

SB2: Summary of relationships between St Paul's and the City Churches

Architectural Relationships

- The use of stepped geometrical forms in churches and Cathedral towers.
- The variations on the Baroque style centred on Wren and his circle of assistants and collaborators.
- The shared role of Wren and Hawksmoor as architects for the Cathedral and the Churches.
- The use of Portland stone and lead in both churches and Cathedral.
- The recognition of the architectural effect on the skyline produced by the contrast between the mass and form of the Cathedral silhouette the delicate forest of spires and towers of the churches.
- Use of the same craftsmen and masons including Edward Strong and Nicholas Stone.

Historic relationships

- The role Cathedral and churches make in illustrating the resurgence of London as a new city following the fire;
- The shared importance of re-instating places of worship on their historic sites.
- The appointment of a Commission for rebuilding but with Wren as Surveyor for both.
- The shared source of funding from the Coal and Wine Tax.
- St Benet Paul's Wharf sited originally on the river at the wharf where the material for the Cathedral was landed.

Visual relationships

- The deliberate contrast of scale and silhouette on the London skyline.
- The concentration of the spires and Cathedral illustrating the position of the historic City of London in approaches from the river and the south.

Cultural and intellectual relationships

- The artistic representations of the skyline by Canaletto and others.
- Visitor commentaries and publications highlighting the distinctive contribution that Cathedral and church spires make to the identity of London.

8.39 Alongside St Paul's, the City Churches are Wren's principal contribution to the historic appearance of London and until relatively recently they remained the outstanding accents of the City and enlivened its skyline. At the time of the fire there were 107 parish churches in the City of London of which 85 were burnt. Only 51 were rebuilt following the Fire. The replacements were funded, like St Paul's, from the Coal Tax enacted in 1670 and they received a third of the income generated, which was the same allocation as that for the Cathedral. As Surveyor to the Commission established for their construction Wren was instructed to "*direct and order the dimensions, forms and models of the said churches*" and was supported by Edward Woodroffe and, subsequently, John Oliver. Alongside Wren was Robert Hooke who had been collaborating with him on the designs for The Monument and, on the basis of analysis of surviving drawings, several of the City Churches were probably of his design rather than that of Wren.

8.40 A number of the City Churches were actually being repaired and reconstructed before the Commission could direct their rebuilding so the involvement of Wren in that process would have been minimal. It is also the case that where fabric had survived, Wren was reluctant to demolish it, unless absolutely necessary. Therefore, whilst it is clear that Wren was in overall control of the rebuilding programme, the design of individual examples was often collaborative. The liturgical requirements for parish churches at this time focussed upon the "Auditories" or need to be able to both see and hear clearly. This encouraged the use of galleries and provided opportunities for Wren to experiment with both longitudinal and centralised plans in a similar process to that seen in his design approach for St Paul's.

8.41 In most cases the churches were partly hidden by surrounding houses or faced narrow alleys where architectural display would not have been appropriate, but even the smallest church would have been provided with one formal elevation for show. However, the focus for architectural display for the parish church was the tower or spire, which continued a tradition of City parishes which were proud of their towers and steeples and the bells they housed and therefore required them to be re-provided.

8.42 The towers of the churches were usually square in plan and straight-sided, although there were exceptions. Lower stages would usually have round headed or circular windows but for the bell stage above, straight sided openings could be used. The three major stone towers of St Bride's, St Mary-le-Bow and St Magnus use paired pilasters flanking the bell stage. The addition of a steeples above the tower was often a later consideration and it seems that Wren may have arrived at a vision of a forest of steeples extending across the skyline of London gradually. Of the major steeples, only St Mary-

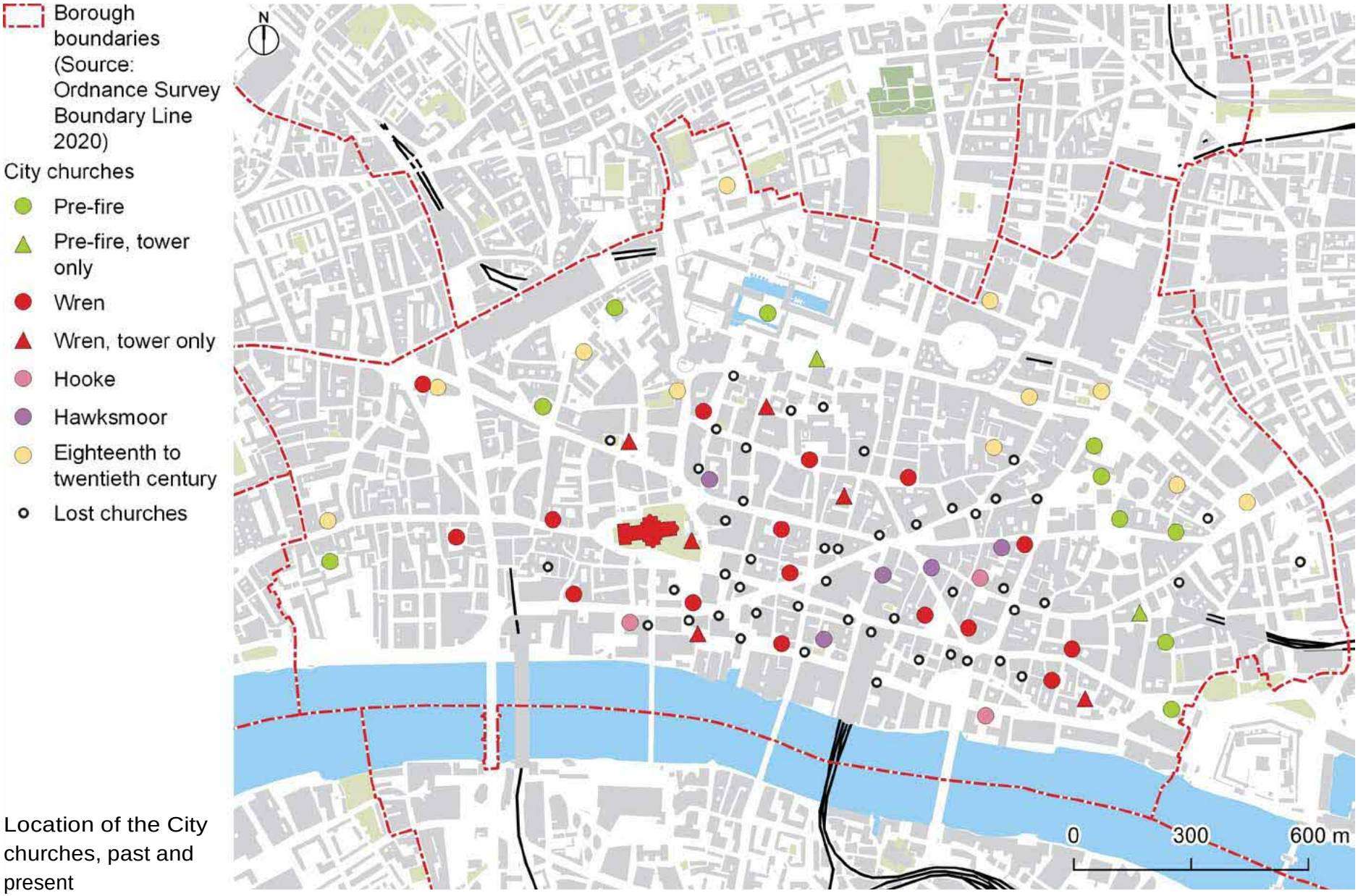
le-Bow was designed and executed in the first wave of church building (up to 1680) although it was clear that St Magnus and St Bride were designed to have steeples from the start, albeit built slightly later. Wren's office would therefore have been busy designing steeples into the first decade of the 18th Century at the same time a the towers of St Paul's were being designed.

St Paul's Cathedral and city from the South by S and N Buck 1749

8.43 At the time when several of the steeples were being designed and added to the City Churches, Wren would have been busy at St Paul's, the Greenwich Hospital and Hampton Court, so delegation and involvement of others in their design and construction is almost certain. The collaboration would have been with Robert Hooke and also Nicholas Hawksmoor, who worked in the Surveyor's office between 1695 and 1701. Drawings for the steeple of St Edmund by Hawksmoor survive although the steeple was not actually built until 1706-7. This raises the interesting possibility of the extent of collaboration and discussion between Wren and others, including Hawksmoor, on the evolving design of the west towers of St Paul's and their more dynamic Baroque character in contrast to the calmer, High Renaissance character of the dome.

City Churches designed by Christopher Wren in whole or in part

- Christ Church Newgate Street 1677-87 bombed but tower 1703-4 remains
- St Andrew by the Wardrobe 1685-94 (reconstructed 1961)
- St Andrew Holborn survived the fire repaired by Wren 1684-86 tower reclad by Wren and raised 1703)
- St Anne and St Agnes Gresham Street 1676-87 (reconstructed after WWII)
- St Benet Paul's Wharf 1677-85
- St Bride's Fleet Street 1670-84 (interior reconstructed in 1950's)
- St Clement Eastcheap 1683-7
- St Edmund King and Martyr 1670-9
- St James Garlickhythe 1686-72 (Tower 1717)
- St Lawrence Jewry 1670-1677 (Spire is a modern replica)
- St Magnus the Martyr 1671-84 Tower 1703-6
- St Mary Abchurch 1681-6
- St Mary Aldermary 1679-82 (some doubt as to extent of Wren's involvement); tower 1701-4 either Hawksmoor or Dickinson
- St Mary At Hill 1670-74
- St Mary Le Bow 1670-80; Steeple 1678-80 first one erected after the Fire
- St Mary Somerset: 1685-94; only tower remains restored in 1956
- St Margaret Lothbury 1683-92 (Tower 1698-1700 by Robert Hooke)
- St Margaret Pattens East Cheapside 1684-87; tower 1698-1702
- St Martin Ludgate 1677-86 with Hooke
- St Michael Cornhill no Wren involvement but tower by Dickinson and then Hawksmoor 1717-1722
- St Michael Paternoster Royal 1685-94; tower 1713-7 possibly by Hawksmoor
- St Nicholas Cole Abbey 1672-8; reconstructed 1961 and upper tower rebuilt
- St Olave Jewry 1671-79 demolished apart from tower now converted as rectory for St Margaret Lothbury
- St Peter upon Cornhill 1677-84 with Hooke
- St Stephen Walbrook 1672-80; spire 1713 probably by Hawksmoor
- St Vedast Alias Foster1695-1701 (tower and spire 1709-12 possibly by Hawksmoor)



Location of the City churches, past and present

8.44 When Wren and his office were designing the City Churches there was little precedent for classical steeples. Inigo Jones had designed small towers for old St Pauls and at Whitehall, but the idea of replacing the steeple which was a priority for the city parishes, but in a classical form, was a new challenge. St Mary Le Bow on Cheapside was Wren's first invention. The bell stage has paired pilasters flanking simple arched openings, a form he used on the Cathedral and also on other churches. Above, a circular *tempietto* supports bows or arches clustered around a drum which in turn supports a further *tempietto* but of square section. The upper console of the steeple is then crowned with an obelisk. The Steeple of St Bride on Fleet Street (1702-4) is related to the proposed termination of the crossing in the Warrant Design for St Pauls, which also featured diminishing octagonal *tempietti*. In this steeple there are four stages each with a pilaster order on a pedestal; but whilst the pilasters diminish in height from stage to stage, the pedestals actually increase which achieves the effect of upward lift. The crowning feature is again an obelisk. The third church steeple which is based on designs that had evolved earlier is St Magnus the Martyr. The steeple constructed in 1705 also has the square bell stage with paired pilasters, but above an octagonal *tempietto* on a simple base is crowned with an ogee dome and spire. These three steeples were contemporaneous with the design and construction of the west towers of St Paul's Cathedral.

St Mary-le-Bow 1678-80

St Brides1702-4

St Magnusthe Martyr 1705

8.45 The knowledge that the great Cathedral and the towers and spires of the City Churches were evolving and emerging in parallel adds to an understanding of their significance. In particular the architectural questions regarding the single authorship of an architect, as opposed to collaboration. The role this had in the development of Wren as a Baroque architect is central to the special interest of these buildings. This is in addition to the architectural impact on the skyline of London created by these buildings which became famous across Europe. Visitors were struck by the delicate “forest” of varied steeples and towers as a counterpoint to the might and repose of the dome of the Cathedral, the mother church of the diocese. Being able to actually appreciate these features and see this symbolic and functional relationship between a cathedral and so many of the parish churches within its diocese was unique in the English context and the result of the compact nature of the historic city. Only 24 of the 51 churches rebuilt by Christopher Wren’s office after the Great Fire of London remain; many have required extensive restoration.

The Monument and its relationship to St Paul's

SB3: Summary of the relationships between St Paul's and The Monument

Architectural relationships

- Both structures originally planned as part of new urban layout based on continental models in the Baroque manner.
- The use of architectural scale for effect; both the tallest structures of their kind when built.
- Classical architectural language.
- Both constructed of Portland stone.
- Designed by Wren and Hooke who worked together on the City Churches and were on the Commission for Rebuilding together.
- Architectural decoration and reliefs designed and executed by the same craftsmen.

Historical relationships

- Both symbols of the reconstruction of the City as well as commemorating its destruction.
- Both symbols of the commitment of the monarch to the future of the City.
- Both drawing on precedents and associations from ancient empires and architecture.
- Both used the river for the transport of materials for construction.
- Both new building types in a national context.

Visual relationships

- Intended visual dominance of the skyline of the City.
- Intended visual relationships with the spires and towers. of the City Churches.
- Both structures had viewing galleries and were intended to provide views to and from each other amplifying their symbolic roles.

Cultural and intellectual relationships

- Illustrations of the intellectual relationships between Wren and Hooke as men of science and members of the Royal Society.
- The use of both structures for scientific experiments and purposes.
- The use of ancient precedents for design and the intellectual associations with those precedents.

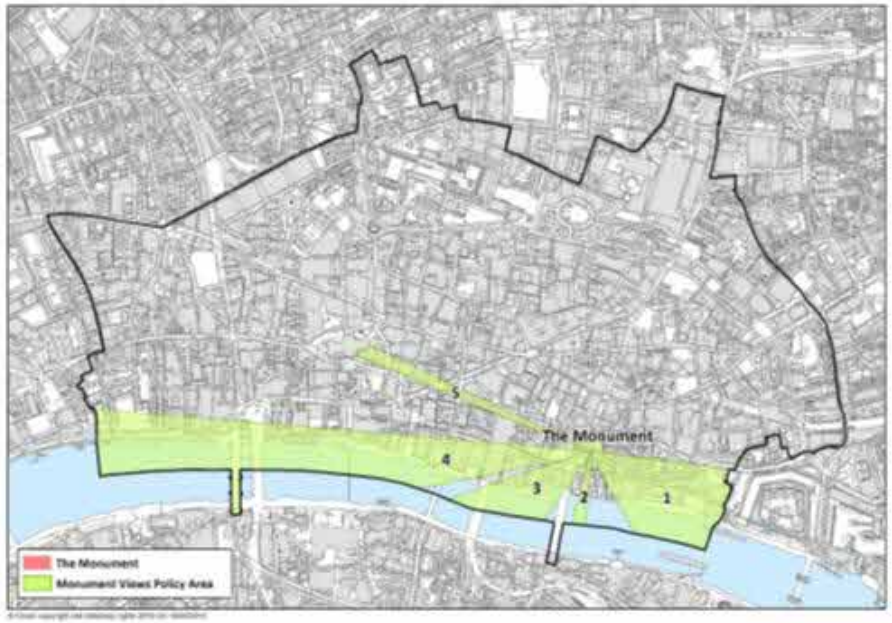
8.46 The Monument to The Great Fire was designed by Robert Hooke appointed Surveyor to the City of London and chief assistant to Christopher Wren. The Monument served a dual purpose. In addition to commemorating the disaster and celebrating the new city that rose from the ashes of the old, it was also designed to be a scientific instrument. The column was a giant Zenith telescope enabling experiments with gravity and pendulums with a small laboratory below ground. It is sited on Fish Street Hill, c200 feet from the site where the Great Fire originated in Pudding Lane and was started in 1671, taking six years to complete (1677) partly due to difficulties in obtaining Portland Stone in the required dimensions for the structure but also because safe transport of the materials was difficult because of the Anglo-Dutch War of 1672-4. The manner in which The Monument was set within the city reflected a key concept of Wren's Plan for London where important buildings were placed on main junctions and given space round them. The Monument was built on the border of an existing road which led directly from London Bridge and to the other side was a square, originally larger than the current urban space. Both St Paul's and The Monument therefore share the same significance in illustrating the approach of Wren to city planning.

8.47 In addition to sharing common materials, transported by river and landing at St Paul's wharf, both structures were decorated by the same craftsmen and sculptors. The decorative panel on the west face of the base of The Monument was carved by Danish sculptor Cauis Gabriel Cibber, who was responsible for the Phoenix on the south pediment of St Paul's Cathedral. The bas relief depicts both the past (the Great Fire on the left) and the future, the reconstruction of the City on the right.

Sitting on broken masonry in the bottom left corner, holding a sword, is a female figure, who represents the City of London. She sits above a dragon, which has been the symbol for the City of London for centuries. Standing behind her with wings is Father Time, helping her back to her feet. He also has the help of Mercury, representing Industry, who is holding a caduceus, a decorated staff that is the symbol of trade, commerce and negotiation. On the right is a group of figures, the central and most prominent is King Charles II dressed as a Roman Emperor with a baton of command in his right hand. He gestures towards the personification of Architecture, who's holding a square and compass in her left hand, and the plans for the new City of London in her right. Liberty stands behind Architecture, watching, and holding her cap bearing the word Libertas.

8.48 The Monument is a rare, pre-Georgian example of public commemoration and a rare example of a colossal colum in Britain at the time, which inspired a building typology that was subsequently adopted in following decades and centuries. Later examples include the Column of Victory monument to the Duke of Marlborough at Blenheim (1727-30); the memorial to Charles, 2nd Earl Grey in Newcastle upon Tyne (1838); Nelson's Column (1840-43); and the Elveden War Memorial column in Suffolk, dedicated to the fallen of the villages of Elveden, Eriswe and Icklingham (1921). It remains the tallest isolated column in the world.

8.49 Both St Paul's (in particular its dome) and The Monume were novel and the first structures of their type in the country and therefore a source of interest. They were both an attraction to visitors from the time of first construction and both included viewing galleries from which to survey the city. Both were designed to have a visual presence across wide sections of the Capital and that visual prominence was central to their role. This historic role and relationships have been acknowledged in specific policy guidance (*Corporation of London Monument Views Study SPD December 2020)* and the area covered by the policy incorporates and overlaps with important parts of the setting of the Cathedral.



The Monument Views Policy Area from the Views Study SPD December 2020

The history of the Cathedral following completion

8.50 St Paul's became the most talked about ecclesiastical building in England following its completion in the early 18th Century. From about 1720 maps were produced that had the Cathedral as the central point in London, and from 1676 until the 1790's St Paul's was taken to mark the meridian of the whole world before this was transferred to Greenwich. From the time of its completion the building was also a tourist attraction for foreign visitors and five parts could be viewed at a charge of 2d per person for each one. These were the Golden Gallery, the Whispering Gallery, the Library, the Great Model and the Geometric Stair. The architecture of the building was less influential in other British and European cities with the notable exception of the dome, which in 1776 was measured by a pupil of the architect J.G. Soufflot. There is, consequently, a clear relationship with the dome of St Paul's and Soufflot's subsequent design of the Pantheon in Paris of 1791.

8.51 However, for much of the 18th century the Surveyors to the Cathedral after Wren were mainly concerned with structural settlement, some of which was to be expected for such a large building that had been constructed in a comparatively short time. The interior of the Cathedral remained comparatively bare for much of this time with religious activity largely confined to the choir; this contained the pulpit with the Bishop's Throne located opposite. The Nave and transepts were used for special occasions but otherwise the main activity in these spaces was sightseeing by visitors.

8.52 It was only in the latter decades of the 18th Century and then the early years of the 19th Century that the Cathedral became identified as a suitable mausoleum for national heroes, originally those with a military or naval background. The introduction of commemorative tablets and effigies commenced in c1790 and included wall panels to those heroes who fell in the War with France from 1793. A significant turning point was the decision to choose St Paul's as the burial place for Admiral Lord Nelson, in 1809. His body was brought up the river by state barge and his coffin and bier were then theatrically lowered through the floor of the nave beath the dome into the crypt below. This arrangement was repeated for the funeral of the Duke of Wellington in 1852 whose body was brought on an enormous funeral carriage that required a wide opening in the railings to the cathedral, which was itself filled with temporary wooden galleries to accommodate the vast audience. The third notable state occasion in the 19th Century was the thanksgiving service for the Diamond Jubilee of Queen Victoria in 1897. She remained in her carriage outside the west end of the Cathedral and temporary stands were constructed in the portico and across the west end of the Cathedral for the audience. The celebration also required the temporary removal of bollards and ornamental lampposts.

8.53 Internally, the major adaptations included the opening up of the Choir, which was facilitated by the removal of the screen and dividing the organ. In 1861 a new pulpit was installed followed by the construction of a new reredos in the 1880's. Heating was also introduced into the building for the first time in the 1850's and Surveyor Penrose was also responsible for a reorganisation of the monuments. The choir vaults were decorated with mosaics designed by Sir William Blake Richmond. The Chapel of the Order of the British Empire in the crypt, instigated in 1917, was designed by John Seely, Lord Mottistone. Externally, Penrose rebuilt or altered all three entrances to the Cathedral; the steps to the west end and those to the North and South Porticos. At the west end the railings were removed (and sold by public auction) to be replaced by bollards. Penrose also designed the lamp standards, although these were subsequently replaced with the present ones designed by Edwin Lutyens in the early 20th Century.

8.54 During the 19th Century the setting of the Cathedral was altered by the purchase of a strip of land to the south by the Corporation of London in 1873. The former burial ground of St Faiths and St Gregory to the south and east of the Cathedral was then transformed into ornamental gardens. A fountain designed by Penrose and Horace Jones, Surveyor to the Corporation of London was erected in the north east churchyard in the 1880's. This was subsequently replaced by the column of St. Paul.

8.55 In the early 20th Century concerns regarding structural stability re-emerged. These included movement in the West Portico. Strengthening of the South transept had also been carried out. In 1901 the dome had been plumbed and found to be out of perpendicular, leaning towards the south-west. Subsequent measurement found the divergence had increased and that the piers to the dome had settled differentially. Grouting and strengthening works were carried out but by 1924 the situation was of such concern that a Dangerous Structure Notice was served which instigated a substantial programme of repair. This involved further grouting of the piers, removal of iron cramps and the insertion of two stainless steel girders around the dome with associated steels at its base. These were to prove their worth in the following decades when the Cathedral was under its greatest threat.

The High Altar of St Pauls showing bomb damage in 1940 The Reredos was replaced after the war by the current Baldacchino and High Altar designed by Godfrey Allen and Stephen Dykes Bower

8.56 The Second World War has a strong claim to be the m significant period in the later history of the Cathedral, at least in the national and popular imagination, when it became a symbol of resistance and, ultimately, victory against adversity. The destruction of the Cathedral by bombing was an important objective of the German Luftwaffe in the Blitz of London because destruction of the building would have significantly damaged national morale and consequently resistance to the planned invasion of the country. High explosive bombs fell very close to the south west corner of the western steps as well as to the south-east and north-east of the Choir. The building itself was struck twice, with bomb damage caused to both the north transept and the east end of Choir. Further damage through incendiary bombs was averted by the now legendary activities of the St Paul's Watch who were volunteers running across the roofs of the building removing or extinguishing the incendiary devices.

St Pauls Cathedral: taken 29 December 1940 by Herbert Mason © Associated Newspapers

8.57 One of the defining images of the Cathedral that has become iconic is that taken in December 1940 by Herbert Mason with the caption *"War's Greatest Picture; St Paul's Stands Unharmed in the Midst of the Burning City".* However, Mason's original picture was modified by the Daily Mail; it was cropped to focus more attention on the dome, and less on the ruins around it and there is evidence that brush strokes were added to the bombed-out windows of the foreground buildings to suggest flames. The Mail urged readers to 'cherish' this picture as a symbol of 'the steadiness of London's stand against the enemy: the firmness of Right against Wrong'. Mason's image was presented as nothing short of a symbol of civilisation itself. Such allusions were repeated when the photograph was reprinted in the Illustrated London News on January 4th, 1941 as, 'a symbol of the indestructible faith of the whole civilised world'. In the US (not yet at war with Germany), the photograph appeared in Life magazine that same month. But the image was also used on the front cover of German newspaper, Berliner Illustrierte Zeitung (Berlin Illustrated Times), 23 January 1941 with a caption "*The City of London burns*". It therefore illustrates the complex cultural values that can be attached to historic buildings and how they are seen.

8.58 The photograph was not simply "war's greatest picture", but also an important symbol in debates about post-war reconstruction which evoked the history of the Cathedral itself and it's resurrection after the Great Fire had decimated the city. Famous names associated with the picture include the author J B Priestley, who wrote a book called "Britain Under Fire", and American photographer Lee Miller, who took pictures for a book called "Grim Glory" and both publications featured versions of Mason's picture on the cover.[1]

8.59 In the immediate post-War period St Paul's was at the centre of both national commemorations and celebrations including Thanksgiving Services for both Victory in Europe (VE Day) and Victory in Japan (VJ Day). It would also be the location for the state Funeral in 1965 of Britain's war time Prime Minister, Sir Winston Churchill; the first state funeral for a politician in the 20th Century which was also the biggest national event since the Coronation in 1953. Churchill's cortege followed the traditional ceremonial or processional route from Westminster Hall to the west front of St Paul's and he departed the Cathedral by being taken to Tower Hill for transport by river to the Festival Pier on the South Bank. This State Funeral at St Paul's was to be followed 48 years later by a Ceremonial Funeral for Baroness Thatcher, Britain's first female Prime Minister and the longest serving of the 20th Century.

[1] Dr Tom Allbeson, Cultural Historian Swansea University

8.60 St Paul's was central to the discussions about the recovery of the country following the War and it was the location for the Launch of the Festival of Britain. Redevelopment around the Cathedral itself was hotly debated including at a national level. Several competing proposals and masterplans were developed and concepts for the creation of a new setting around the building differed; echoing the debates and conversations that flowed around the creation of the Cathedral itself following the great Fire, centuries earlier. A report by William Holford called *"The Precincts of St Paul's"* was presented to the Corporation of London in 1956 and the initial development of Paternoster Square in the 1960's was the subject of much criticism before its replacement with the much more successful development which is experienced today. The influence of St Paul's including the Heights Policy in the development of strategic views identification and management in the later decades of the 20th century and helping to define the initial consideration of the location of tall buildings at the turn of the Millennium can still be appreciated today.

8.61 Whilst the Cathedral was the centre of national celebrations in the 20th Century including the Silver Jubilee of Queen Elizabeth II in 1977; to be followed by her Golden Jubilee in 2002; Diamond Jubilee in 2012; and Platinum Jubilee in 2022, it has also been the location for demonstrations and protests. One of the most challenging for the Cathedral Authorities were the Occupy London demonstrations of 2011-12 which included encampments established immediately outside the west front of St Paul's. This resulted initially in the closure of the Cathedral to the public although the right to peaceful protest was supported. The protest was characterised as being an anti-capitalist Movement, although Occupy London defined itself as a Movement to create alternatives to what they described as an unjust and anti-democratic system and called for global democracy. The St Paul's site had been the last surviving high profile camp of the worldwide Occupy movement.

9.0
Evolution of the setting of St Paul's

9.1 *This chapter is provided to enable an understanding of how the history of change to the setting of the Cathedral has affected the contribution it makes to its significance and therefore help determine how further development is likely to affect it. By providing this assessment it is possible to understand how negative impacts from past developments have happened and how the setting may be enhanced by, for example the removal of inappropriate structures.*

9.2 The discussion in the chapter is based on the definition of setting provided in the NPPF:

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. NPPF Glossary, July 2021

9.3 The assessment is chronological and includes a short bullet summary of what happened, why it happened and the consequent impact which is framed by our understanding of the significance of the Cathedral (as set out in paragraphs 8.11-8.14 above).

SB4: Summary of setting changes from construction until c1800

- Reconstruction of the City of London largely to old street plan.
- Construction of The Monument and the City Churches.
- Demolition of the old Ludgate which blocked the view of the Cathedral as approached up Ludgate Hill.
- Development of London westwards along the Strand in Mayfair and Bloomsbury with the emergence of London squares; *(wider setting)*
- Spitalfields and silk weaving established to the north-east.
- Significant civic buildings including Somerset House, Mansion House, Bank of England; Royal Mint and Custom House to the south and west.
- The New Road created 1757 from Paddington to Islington (approximately the line of Euston Road) forming north boundary of London *(wider setting).*
- Expansion of Southwark south of the river further south for artisan houses and developments associated with industry including the leather trade *(wider setting).*
- By 1800 London extended from Hyde Park to Limehouse and from Southwark to Hoxton with further ribbon development along main routes towards Kensington, Islington, Mile End and Camberwell *(wider setting).*
- Increased use of the river for trade and traffic.

Impact on key elements of setting and how they contribute to significance

Skyspace:

- The dominance of the mass of the Cathedral on the skyline is unchallenged and complemented by the towers and spires of the City Churches.
- The extent of clear sky space enables The Monument and the Cathedral to be seen in counterpoint.
- The change results in the now iconic depictions of London by visitors and artists and is the high point in terms of the Cathedral performing its intended architectural and symbolic function.

River corridor:

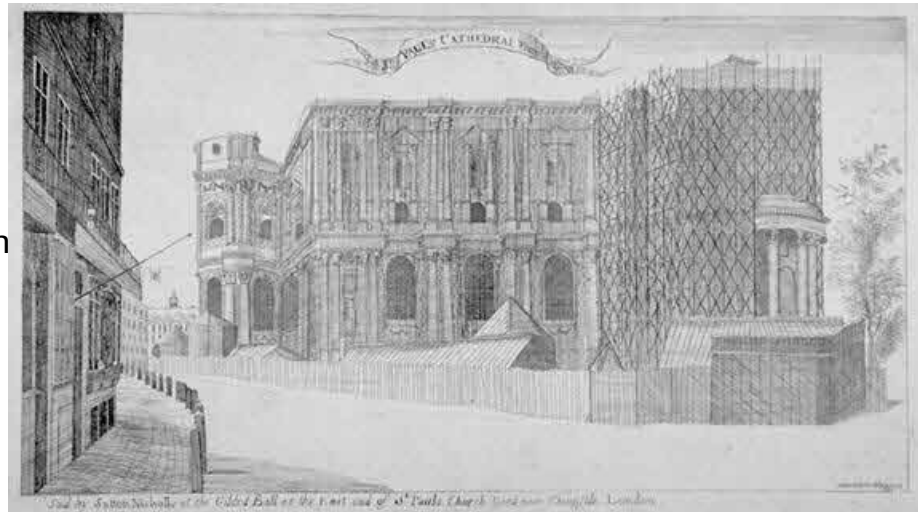
- The use of the river as a trade artery with new buildings including Custom House and warehouses encroach upon appreciation of lower sections of the cathedral.

St Paul's Churchyard or close setting:

- Removal of Old Ludgate enhances visual prominence of the Cathedral as terminus of the western approach and contributes to understanding architectural composition of the west front including the drama of the Baroque towers.

Setting at the time of construction

9.4 The great Fire of London had destroyed over 13,000 houses and laid waste to over 80% of the city within the walls. The burnt area extended from Temple and Fetter Lane in the west up to Aldersgate and Cripplegate in th North and extended east as far as Leadenhall Market and Tower Hill. The implementation of the new plan of the City prepared by Wren, amongst others, would have required combining and then redistributing all private property within the City which was regarded as impractical at a time when the nation was at war and there was an urgent need to shelter the homeless and to re-establish trade and commerce. Therefore, the city wall remained and its gates were repaired and rebuilt and, although there was some street widening, the City was to be rebuilt largely on its old plan.



Wren's Cathedral during construction, view from the north-east by Sutton Nicholls 1695 © Society of Antiquaries

9.5 At the beginning of construction some of the remains of old St Paul's were still standing, but the buildings in the immediate setting of the old precinct had been destroyed. The reconstruction of the buildings around St Paul's Churchyard had commenced by 1670 and most were in place before the new cathedral was completed in the early 18th Century. The Act of Parliament for rebuilding the City had required that all the high streets (including that which lead round the south-side of St Paul's) should be 40 Feet broad so at time of construction the relationship between the old and new cathedrals with

their respective settings was different. In the 18th and first half of the 19th Centuries St Paul's was surrounded on all four sides by largely late Stuart and early Georgian buildings, mainly of brick or render and generally three to five storeys high; with the exception of St Paul's School located to the east. The ground floors of these buildings facing onto the churchyard were frequently in commercial use. To the east, Cheapside was a major shopping centre, as it had been in medieval times and Ludgate Hill to the west also became a fashionable shopping area. Surrounded by the railings with access into the churchyard controlled, mainly from the west end and the transepts, the Cathedral would have been experienced as clearly separate but a building that totally dominated and defined its immediate setting. Engravings published by Act of Parliament such as that by Muller in 1753 emphasised this dominance by having their viewpoints elevated and exaggerating the width of the street (St Paul's Churchyard) on the northern and southern sides to create more space around the building. But the engraving provides a good impression of the silhouette of the dome and towers and the statues on the pediments which enliven the skyline.

St Pauls from the North-West in 1753 T M Muller

Evolution of setting through the 18th Century

9.6 In London, during the 18th Century, topographical depictions of views from high locations such as Richmond Hill, Greenwich Park, Hampstead and Highgate and hills to the south proliferated. Early tourists were attracted to these locations for the view afforded by the city's bowl-shaped topography. From a relatively high position at the bowl's edge, they could marvel at the status and scale of the city and its landmarks spread out before them, imbuing the viewer with an appreciation of the power of the Monarchy, the Church and the mercantile navy; all of which illustrated the growing trading and industrial power of London, England's capital. The numerous middle and long-distance views of St Paul's during the 18th century characteristically show the building in relation to the river which best illustrated its total dominance in terms of scale and height. Many views were taken from the south bank and from above the actual ground level in order to capture the distinctive and admired skyline of the city comprising the dome of the Cathedral with the counterpoint of the towers and steeples of the City Churches. An exception is Canaletto's view of the Cathedral from Richmond House further west in Westminster, which takes advantage of the bend in the river and places the Cathedral in its widest panorama and showing the spires of London's churches extending across the whole skyline. Whilst there are elements of

St Paul's from Richmond House by Giovanni Canaletto 1747
Goodwood House Collection

romance and artistic licence in the image, including what look suspiciously like gondolas and elegant barges on the Thames, the depiction of the skyline is probably reliable in terms of impression and is consistent with his other views, notably *London and the Thames from the Terrace of Somerset House.*

9.7 There was a desire to improve the setting of the new cathedral, particularly in relation to the river throughout the 18th Century. At the end of the century the redevelopment of the riverside between London Bridge and Blackfriars Bridge came under review. The congestion of boats on the river wanting to unload and store valuable merchandise as trade expanded meant that London, Britain's main port, was inundated with vessels. A parliamentary committee was set up and the City favoured the rebuilding of the quays south of Lower Thames Street. By 1800 the Clerk of City Works, George Dance the Younger, conceived a ground plan for the improvement of the City and the Surrey (south) bank. Dance's plan proposed two new bridges to replace the decaying Old London Bridge. From these bridges, wide thoroughfares radiated on both sides of the river and extended west to St Paul's. Dance proposed street improvements around St Paul's, with the Cathedral as the centrepiece. Thames Street was to be widened and straightened, and a new street created running from the south side of the Cathedral down to the river, terminating in a semi-circular open space. This was a deliberate

St Pauls as shown in an "accurate" view from the Camera Obscura in the Royal Observatory Greenwich 1804 note the undeveloped fields in the foreground, the line of the hills to the north and the view centred on the dome of St Pauls. The church of St Pauls Deptford is in the foreground and Westminster Abbey is on the extreme left in the background

attempt to provide an appropriately dignified view of St Paul's from the south bank. The House of Commons approved the scheme but the cost was prohibitive and it went no further.

9.8 Therefore, by the end of the 18th Century the wider setting of St Paul's would have remained largely as depicted by the earlier engravings and paintings, although the extent of development would have increased as London continued its expansion into the surrounding countryside.

9.9 The closer setting of St Pauls can be interpreted on Richard Horwood's Plan of the Cities of London and Westminster 1792-99. This shows that to the south, between the river and the Cathedral, there remained a dense network of alleys and narrower streets comprising Great and Little Carter Lanes, Great and Little Knightrider Streets and Upper Thames Street running broadly east-west. These were crossed by Benet's, Peter's and Lambeth Hills all leading up from the wharves and warehouses that lined the river bank. These buildings would have screened the south elevation from street level and only glimpsed views of sections of the elevations of St Paul's would have been possible framed by these buildings. The views would have expanded as the upper level of the hills were reached when, upon arriving at the churchyard, the full extent of the scale and form of the cathedral would be experienced.

9.10 In the City, to the east of St Paul's, the slightly more regular block plan between Cheapside to the north and Watling Street to the south would have framed the main approaches to the Cathedral. To the north of St Paul's, the smaller streets and lanes around Newgate Market were separated from the Cathedral by Paternoster Row which, with the development along St Pauls Churchyard, would have effectively screened much of the elevations of the Cathedral at street level. To the west, Ludgate Hill and Street containing the church of St Martin provided the main approach and the best street views of the cathedral within its immediate context. The Cathedral formed the terminus of the views up the hill. These views then opened up to the forecourt and the statue of Queen Anne by Francis Bird. The Cathedral would have been visible over large swathes of what is now central London, including from areas such as Islington, Hampstead and Highgate and as far west as Westminster; with much greater visibility in a landscape context, depending upon atmospheric conditions, from the hills to north and south of the capital a considerable distance away.

9.11 From the river, which was a major east-west route, and particularly when travelling west, the apse, dome and towers would have been clearly visible from some distance downstream and the upper section of the walls would also have been apparent. The scale and form of the Cathedral would thus have been readily understood.

The Setting of St Paul's: 1800-1900

SB5: Summary of key changes to setting 1800-1900

- Remodelling of Whitehall and new Houses of Parliament consolidating Westminster as seat of National Government (wider setting).
- Large scale rebuilding in the City of London, widening streets, with Bank junction emerging as particularly important and extension of Cannon Street westwards approaching the Cathedral.
- Reconstruction of the Royal Exchange.
- Expansion of commercial buildings around St Mary Woolnoth and specialist Victorian exchange buildings including the Stock Exchange and the Baltic Exchange some deriving inspiration from architectural style of St Paul's.
- Act of Parliament for the construction of docks outside the Jurisdiction of the City to the east (wider setting).
- Associated rebuilding of riverside shipbuilding, warehouses and commodity exchanges along with factories to refine and process imported goods and materials; textile warehouses constructed along south side of St Paul's Churchyard.
- Construction of railway termini into the capital including in the City with associated new river crossings enabling commuting for workers and allowing a greater proportion of London's working-class housing to be constructed north-east of the capital.
- Embankment of the Thames with associated transport and sewer infrastructure.
- Consolidation of financial and commercial activities in the City reducing the resident population by over two thirds.
- Emergence of "late Wren" and the English Baroque as a new "national" style represented by increasing numbers of Portland stone banking, insurance, civic and commercial building in the city.

St Pauls from the south-west by Thomas Hosmer Shepherd Early C19

Impact upon key elements of setting and how they contribute to significance

Skyspace:

- Continuing rapid change to the wider setting from expansion of London but no major challenge to the visual dominance of the Cathedral on the skyline apart from-
- Rebuilding of the Houses of Parliament introducing significant skyline features (Victoria and Elizabeth towers) appreciable with dome and towers of Cathedral across sections of the capital, however the two buildings illustrate the twin cities that form the historic morphology of Londo
- Increased height of commercial and public buildings begins to impact upon the clarity of the relationship between the Cathedral and the city churches on the skyline.
- New skyline features often in revival styles including The Old Bailey inspired by the Cathedral emphasising its architectural importance despite a reduction in the extent of clear sky.

River corridor:

- New railway infrastructure crossing the river introduces visual intrusion and activity that erodes the open corridor and clarity of its contribution to the significance of the Cathedral but it also provides new views and ways of experiencing its design and form.

St Pauls Cathedral from the south-east c1900. Note the trees marking the site of the St Paul's Deanery gardens

- Embankment of the Thames and large-scale development, including along the south side of the churchyard, erodes the visual and symbolic prominence of the Cathedral and the ability to appreciate its architecture and form from the river.
- Increasing scale of development and industrial nature of the activity along the south bank in Southwark and Lambeth introduces visual competition and erodes the ability to connect with artistic representations of the Cathedral from the west and in the approaches from the east.

St Paul's churchyard / close setting:

- Improved visibility of the Cathedral from the east by the extension to Cannon Street enhancing prominence architecturally and symbolically.
- Physical separation of the Churchyard being eroded by increasing commercial activity/buildings affecting the experience of the architectural significance and symbolic role of the Cathedral.
- Reconfiguration of the churchyard by Penrose including rebuilding steps to Wren's design enhancing architectural significance particularly when approaching from the west.
- Removal of railings and reduction in space at west end affected the ability to experience the architecture and the experience of arrival at the end of the processional route.
- Alterations to setting, including increased traffic, is evident in early photographic images of the Cathedral providing an identity that is used subsequently in films
- New spaces and steps depicted in film especially Mary Poppins, cementing the cultural value of the Cathedral in popular culture.
- Ability to appreciate the architecture and details of decoration eroded by the impact of pollution and surface encrustations from industrial activities
- New development in city to the west and north enhances the historic interest of the Cathedral by illustrating its influence on urban design and planning of new commercial and civic buildings in London including the Institute of Accountants and The Old Bailey.

9.12 There were further attempts to beautify the City's riverside in the early nineteenth century but they were not realised. Colonel Frederick Trench MP prepared drawings to depict his proposal for the Thames Quay - new quay which stretched from Westminster to London Bridge. This was subsequently curtailed to terminate at St Paul's where he proposed an avenue flanked by gran houses to form a monumental approach to the Cathedra The architect Thomas Allom similarly proposed a line of classical terraced houses en-route to the Cathedral. Non of these great schemes came to anything; the ageing wharfs and warehouses remained along the river front and were gradually rebuilt piecemeal throughout the 19th century increasing in their height and scale.

View of St Pauls from the North-West c 1870

9.13 At the middle of the 19th Century the cathedral dome was used by soldiers from which to take bearings in connection with the triangulation of the area for the first Ordnance Survey Maps of London and subsequent Ordnance Survey mapping provides a basis for identification of change to the setting of St Paul's. In the early 19th Century several commentators compared the immediate setting of the Cathedral unfavourably with the squares and terraces being built to the west in what is now central London. However, the road layout remained largely resistant to significant change until the 20th Century. Along the north bank of the Thames below the Cathedral the redevelopment of warehouses had begun to raise the height and scale of building, but it was still

possible to appreciate the upper sections of the walls, t towers and dome from the south east and the river, alo with the towers and steeples of the City Churches.

9.14 A panorama of London produced in the illustrated London News in 1845 demonstrates that the Cathedral was still the dominant building in the city and would have remained largely visible from the edges of the ther built-up areas of the capital. The ability to appreciate the Cathedral from the south bank of the Thames was now beginning to be eroded because of the developmen of the former open fields and gardens in what are now parts of Southwark and Lambeth and the construction of industrial and commercial buildings of larger scale connected with brewing and leather working, amongst other trades. Development in the suburbs included the addition of new church spires which continued an established characteristic of the London skyline and would have represented positive change in the context of the Cathedral where they were intervisible with it in the long-distance views from the north and south; but the increasing scale of development was the beginning of a process that was to start to reduce the ability to experience the Cathedral in the way originally intended by Wren.

Cannon Street Station from the new river bridge on a postcard c1901

9.15 As part of the Cannon Street extension in 1847-54 Ludgate Hill was widened along the south side at the junction with St Paul's churchyard to provide an opening sufficient to take in the façade. About this time large textile warehouses rose around the churchyard, their height almost matching the walls of the Cathedral itself. The introduction of new railway infrastructure included Hungerford Bridge, originally a footbridge 1845 but with a railway bridge in 1864; Tower Bridge 1894; London Bridge 1831, Blackfriars Railway Bridge 1864, and Blackfriars Road bridge 1869 which was remodelled in 1886. In 1864, the London Chatham and Dover Railway Company continued their route into the City with a new line over Ludgate Hill. Ludgate Hill station was carried on a viaduct on New Bridge Street and a bridge over Ludgate Hill in 1866 which obstructed views of the Cathedral on the western approaches. A notable change in the setting of the cathedral in relation to the river was the construction of Cannon Street Station in 1863-1866. The site was first proposed as a terminus by the South Eastern Railway in 1860 and in addition to providing a station for commuters from the south it was also to be a direct railway link between the city and the west end. This would greatly improve the time it took to travel between the two on the congested road network then in existence.

9.16 The station required a new crossing of the river and was also a major new structure and very visible from the Thames. This "public" elevation therefore framed the station arch between two brick towers which clearly drew their inspiration from the Wren design for the towers of the City Churches as they are simple, square in plan and contain the characteristic segmental open arches under keystones found in the bell stages of many of the city church towers and they terminate under leaded ogee roofs. They survive today.

9.17 By the end of the 19th Century and into the early years of the 20th, London was at the zenith of its importance as the capital of a global empire. The population of London and its inner suburbs, which was the area governed by the London County Council created in 1889, reached its peak according to the census in 1901 at c 4.5 million. The population for Greater London was c 6.5 million. There was a building boom in London from around 1897 to 1906 and it continued to be busy during the First World War. By 1900, the LCC was engaged in major urban improvements including housing estates and the creation of major new thoroughfares. The Victoria Embankment had been completed in stages from 1864-1870 and The Strand was widened from 1899 onwards. Queen Victoria Street was cut through between 1867-71 to link Victoria embankment and Blackfriars Bridge with the heart of the City, but the project which caught the imagination of the public was the creation of a new main street from the Strand to Holborn with an extension onto Russell Square. The new avenue, Kingsway, was opened in 1905 by King Edward VII.

9.18 In the City of London a transformation had also occurred which had changed both the character, in terms of the uses within the area, but also its appearance. At the opening of the 20th century the City was the financial capital of the British Empire and it was prospering as never before.

9.19 As part of the radical change in London architects of large buildings in particular began to look for a new "national" style fit for an imperial capital. As early as 1889 John Brydon in a lecture to the London Architectural Association on the "English Renaissance" identified the style of what was described as "late Wren" and Vanbrugh as the national style by 1720. It therefore offered a model for what they were seeking as it was regarded, ironically, as truly English, rather than an import from abroad. In addition, the style did not inhibit originality as it did not follow the rules of proportion and the strict logic of Renaissance classicism. It was also suited to architectural sculpture for those buildings where display was an important element of their function, including commercial, banking, Insurance and new civic buildings. The first notable building in this "new" style was The Institute of Chartered Accountants in the City of London (1890-1893) by John Belcher and Beresford Pite and situated in Moorgate Place. By the time of the Diamond Jubilee the style was very fashionable and countless town halls, government buildings and imposing office blocks were designed and built in this English Renaissance manner. The architectural style of Wren was now undergoing its own "resurgam" which transformed the appearance of the City of London and remains appreciable today.

9.20 St Paul's Churchyard had undergone some change in the later 19th Century, mainly to the south-west corner and at the junction of the Churchyard with Ludgate Hill which included several new commercial buildings constructed in the 1870-90's. The introduction of taller, overtly commercial buildings, including Dakins and Goodman's, which emphasised the end of Ludgate Hill, in combination with rebuilding along the north, introduced more activity and a change in the relationship with the Cathedral. The south west corner of the Churchyard was again remodelled in 1900 when the present alignment was created. The former railings that had separated St Pauls and defined the "piazza" at the west were removed and bollards were introduced which eroded the formality of the space. The space itself was reduced in area and the junction was enlarged to the east so that it was closer to the statue of Queen Anne. Traffic, mainly horse drawn at this time, was also considerable. The sense of separation between the Cathedral and its immediate setting which had been the characteristic experience from the time of its construction was now being eroded.

9.21 The changes and expansion of the capital in the 19th Century resulted primarily in an increase in height of buildings in the immediate setting of the Cathedral and along the river bank. Conversely, the creation of the Embankment and provision of a number of new crossings over the Thames provided new opportunities to appreciate the Cathedral, although this was principally the upper levels of the structure. Industrial and commercial chimneys were proliferating and the general environmental conditions around the Cathedral had deteriorated, which negatively affected the ability to appreciate its architecture.

The setting of St. Paul's: 1900-1950

SB6: Summary of key changes to setting 1900-1950

- Increasing scale of commercial development for city as financial centre in revivalist styles including the English Baroque referencing the work of Wren and regarded at the new "national" style.
- New buildings in Queen Victoria Street and south of the Cathedral of increased height.
- Construction of Bankside Power Station.
- Unilever Building and Faraday Building introducing new office buildings of unprecedented scale and height.
- Establishment of the St Paul's Heights agreement based o the work of Godfrey Allen.
- Extensive bomb damage to the north, east and south of the Cathedral.
- Bomb damage to the Cathedral North Transept and Choir.

St Paul's and the City of London from the south-east 1928 Note Canon Bridge Station which would have obscured views of the lower section of the Cathedral when approaching from the river. Note the number of City Church towers (approximately 10 in this view) that still rose above the general building heights and enlivened the skyline. These were appreciated in conjunction with the cathedral particularly from the southern area of its setting. (picture credit: Historic England)

SB6 cont.

Impact on key elements of setting and how they contribute to significance

Skyspace:

- Loss of skyspace as a result of Unilever Building and Faraday Building to south west harms the architectural and symbolic prominence of the Cathedral.
- Introduction of St Paul's Heights agreement is the first acknowledgement that the visual prominence and architectural dominance of the Cathedral required management and protection.

River Corridor:

- Harm to architectural and historic interest by the erosion of visual prominence and dominance through new development particularly to south (*wider setting and approaches to Cathedral*).
- Queen Victoria Street and associated buildings severing the connection between Cathedral and river and undermining their topographical relationship.
- Bankside Power station competing visually with the Cathedral for prominence in views along the corridor.

Churchyard/close setting:

- Loss of historic street pattern and enclosing buildings to north east and south of the Cathedral erodes the contribution made by setting to the historic interest of the cathedral.
- Enhancement of historic and architectural interest demonstrated by the influence the Cathedral in informing new commercial development in the financial area of its setting.
- Erosion of space to west end and the scale of development harms the relationship between the processional route and the sense of arrival at the Cathedral key elements of its historic, architectural and symbolic function.

9.22 The change to the wider setting of the Cathedral in the latter years of the 19th century had, in general, not raised significant objection because it was still governed by the London Building Act which restricted heights of buildings to 100 feet based in part upon fire safety requirements. In St Mary Axe, Jeffries Square was redeveloped for the Baltic Mercantile and Shipping Exchange, first established in 1744, and provided with a new headquarters buildings in 1902-3 designed by Smith and Wimble. Although the majority of commercial firms in the City were small, the number of very large firms, requiring larger premises, grew rapidly after the First World War. Although that war slowed the process of rebuilding it did not interrupt it totally and the 1920's were, in many ways, the apogee of commercial architecture for banks and headquarters buildings, particularly those for Insurance companies, often designed by leading architects of the period. The former residential character of the city diminished significantly as part of its emergence as a financial centre and the scale and architectural grandeur of buildings increased.

9.23 In the first decades of the century significant numbers of large commercial buildings many in Baroque or other revivalist styles were constructed to the north of the Cathedral. The most notable was the Old Bailey 1902 by EW Mountford as its dome, crowned by the gilded figure of Justice broke the skyline. However, by the 1930's the height of new office buildings around the approaches to the Cathedral and particularly to the south was becoming a concern. W. Godfrey Allen, appointed Surveyor to St Paul's Cathedral in 1931, produced a report in 1932 in which he drew attention to the fact that "quite recently the view from Blackfriars' Bridge has been spoilt by the hideous new Telephone Exchange building in Queen Victoria Street". He continued: "The question of the height of buildings near St Paul's is a difficult one and I intend to investigate it thoroughly".

9.24 He prepared a series of montages showing the effect that building to the limits allowed by the London Building Act of 1930 would have on views of the Cathedral. The views wereoverlaid with representations of buildings built up to the 100ft limit. These were intended to indicate the impact on the Cathedral from afar and close up, particularly from the south, and from the river and its bridges. In his notes that accompanied his survey Godfrey Allen wrote:

"At present a building may be erected to a height of 100ft to the cornice. In new Bridge Street and along Thames side, buildings carried up to the regulation height would gravely interfere with the distant views of the cathedral from the Surrey side of the river between Waterloo Bridge and Blackfriars Bridge, and practically blot out nearer views. These views are amongst the finest in London."

A photograph of the Faraday Building taken from the river in the 1950s, which illustrates the impact the building had on views and the setting o
St Paul's (picture credit: © London Metropolitan Archives, City of London).

He continued:

"It would therefore seem of urgent importance to invite the attention of the authorities concerned to the growing menace to the civic development of the City. The City authorities could do much to help and it is greatly to be hoped that they will use their special powers conferred on them by the Town and Country Planning Act of 1932 to town-plan the locality near St Paul's to endeavour to ensure that the best views of the cathedral and other buildings of beauty and historic interest in the City are preserved"

9.25 This judgement found support. In 1934 the newly formed Royal Fine Arts Commission (RFAC) commented on the effects on the skyline of the Unilever House, which at 130 feet (39.6m) obstructed views of the lower part of the dome and towers of St Paul's from the centres of Waterloo Bridge and Hungerford Bridge. Faraday Building near Blackfriars Bridge was also perceived to be uncomfortably close to the west front of St Paul's Cathedral. The Commissioners commented that both Unilever House and Faraday Building 'disastrously blocked some of the most famous and beautiful prospects in London'. Faced with encroachment upon the distinctive silhouette of St Paul's on the London skyline, the RFAC called for more controls. The result was the drawing up of the St Paul's Heights, a form of a 'gentlemen's agreement' to protect important vistas of

St Paul's Close setting from the south-west: aerial view just before 1940: note the weather-washed cleaner upper storeys and darker elevations under the middle cornice. The tight enclosure of the churchyard with largely C19 commercial (retail) development and the larger commercial (finance) and civic buildings of the city beyond to the north and west. Note the three City Church towers in close proximity to the Cathedral and experienced in conjunction with it (picture credit: Historic England archive).

the Cathedral. St Paul's Heights prescribed the maximum height for any part of any new building which lay within seven viewing cones centring on the building. It was intended to protect views of the Cathedral above the balustrade, and, crucially, of the dome. In 1938 this was adopted by the Dean and Chapter and the City of London as a basis for consultation for development within an area around the cathedral. The Heights were also extended in 1981 to protect certain northern views of the Cathedral identified in liaison with the London Borough of Islington. The agreement was not enshrined as formal policy until 1989, but has in general been highly effective in deterring tall buildings very close to St. Paul's.

9.26 In 1940-1941 large areas of the City north of the Cathedral were destroyed by aerial bombardment with much of the area around the churchyard also bombed and buildings gutted by fire. Along the north side of the churchyard the majority of buildings were either destroyed or gutted and the areas beyond around Paternoster Square were completed flattened. To the east of the Cathedral Old Change and the city blocks between Cheapside and Cannon Street were similarly largely destroyed. South of Cannon Street, extending across Queen Victoria Street and down to Upper Thames Street similar destruction occurred, and a similar fate befell the wharves and warehouses around Puddle Dock to the south-west. Along the south side of the churchyard in the closer setting of the Cathedral, damage was slightly less extensive although the shops and warehouses opposite the south transept were flattened or gutted by fire. To the west, the upper section of Ludgate hill, around Ave Maria Lane was flattened and extensive damage also occurred at Ludgate Circus at the bottom of the hill.

9.27 It was at the height of the war that the Government decided to rebuild Bankside Power Station (A), first constructed in 1891. This had provided power for the City, although it also introduced significant smoke and grit pollution. The subsequent decision to rebuild the power station in the 1940's was highly controversial. The new building designed by Sir Giles Gilbert Scott was completed in 1963. It was oil powered and caused considerably less pollution although it did discharge treated water into the Thames, hampering improvement effort to clean up the river in the 1960's.

The setting of St Paul's: 1950-2000

SB7: Summary of key changes to setting 1950-2000

Churchyard/close setting:

- The views of the Cathedral from the west re-established, enhancing architectural prominence and ability to appreciate form and scale.
- Post War Reconstruction of south and west weakens the line of original boundaries of the Churchyard and therefore an appreciation how the Cathedral was historically contained.
- Environmental impacts from traffic along the south side of the churchyard detrimental to an ability to appreciate the architecture of the Cathedral, although mitigated by improved public realm.

Intermediate setting:

- Construction of new, tall buildings including The Barbican (1960's) and the National Westminster Tower (1970's) in the city emerge as vertical elements in the sky space beginning to change the skyline. The impact is very appreciable from the south of the Cathedral along the river corridor and in views east from Waterloo. The tall buildings affect the visual prominence of the west towers in particular.

St Paul's Cathedral close setting from the South-east in 1944: Note the destruction of Old Change and the formerly defining eastern edge of the Churchyard, the damage to buildings at the junction with Cheapside (to the right) and the survival of Cook's Drapery warehouse to the left which was later demolished

SB7 cont.

- Reconstruction of the city blocks to the south, between the Cathedral and the river. These conformed to the St Paul's Heights to produce a distinctive element in the townscape, with consistent rooflines deferring to the Cathedral which remained visible from entablature level and above against the sky.

Wider setting:

- New taller buildings also emerge on the south bank including Bankside Power Station and, in particular, Guys Hospital Tower (1974), Further tall buildings emerging to the north west, including the Euston Tower (1969). In the wider setting and from elevated viewpoints these buildings obscure parts of the Cathedral and/or appear visually attached to the west towers. In a kinetic experience of the Cathedral from the north the new taller buildings intrude into the silhouette of the Cathedral.
- Development of Canary Wharf in the 1980's and 1990's included Britain's then tallest building One Canada Square in 1991 amongst other tall buildings (33 and 25 Canada Square). Visually dominating the river corridor in views from the east including those from Greenwich and distracting from the visual presence of the dome of St Paul's which then became appreciated as part of the background skyline.

9.28 The immediate problem in 1944 when the war was reaching a conclusion was the reconstruction of the City of London. The City Engineer F.J. Forty published a Reconstruction Report in 1944. More open space was to be provided south, east and west of the Cathedral, with new buildings of uniform height. Longer views were to be secured by widening Ludgate Hill and by making new vistas in line with the dome and transepts, with a number of road-widening options. The report was criticized by the RFAC. They advocated replacing height restrictions in favour of plot-ratio control (expressed by site area divided by floor area), allowing buildings to rise higher in return for leaving land clear for road widening, traffic-free precincts and public gardens.

9.29 Plot-ratio planning, a way of calculating the bulk of a building relative to the size of the plot, was duly adopted in the City's second reconstruction plan drawn up by Dr Charles Holden and Professor William Holford in 1946-7. This was adopted in essence in the County of London Development Plan of 1953. The Cathedral was to remain the City's chief building and the spirit of the agreement St Paul's Heights agreement was honoured in providing for a formal setting for St Paul's Cathedral, with no buildings allowed to be taller than Wren's masterpiece. A consistent height limit for new churchyard buildings was set at 110 feet with another eleven feet in a set-back storey.

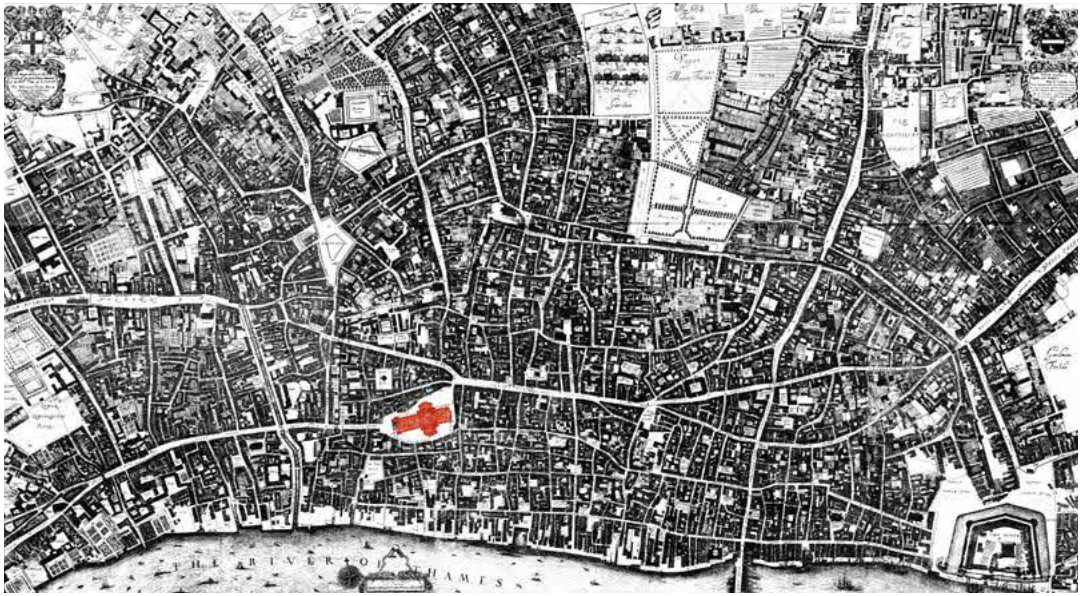
9.30 The desolation caused by bomb damage around Gresham Street enabled the construction of the Barbican Estate by Chamberlin, Powell & Bon. A concrete mega structure incorporating residential towers with educational and cultural facilities including the Guildhall School of Music and the Barbican Theatre. The three residential towers are prominent in long views and along considerable stretches of the South Bank with their distinctive silhouettes a striking contrast to the repose of the dome of the Cathedral. At the time of their construction, they were the highest residential buildings in Europe.

9.31 Reconstruction around the Cathedral itself was subject of a specific report by William Holford called "The Precincts of St Paul's" presented to the corporation in 1956. Two elements of the proposals were implemented, the first being the construction of the Paternoster development to the north of the Cathedral in 1961 (now replaced) and the movement of Ave Maria Lane at its south end to join Ludgate Hill a little to the east of its original medieval junction. To the east of the Cathedral the creation of New Change as the churchyard boundary on a new alignment opened up space. New buildings were proposed for the south-east of the cathedral precinct and for the realignment of Creed Lane along with a garden adjacent to the cathedral. A garden had in fact been laid out to the south east of the Cathedral in 1951 by Sir Albert Richardson as part of the City's contribution to the Festival of Britain but in a slightly anachronistic, in terms

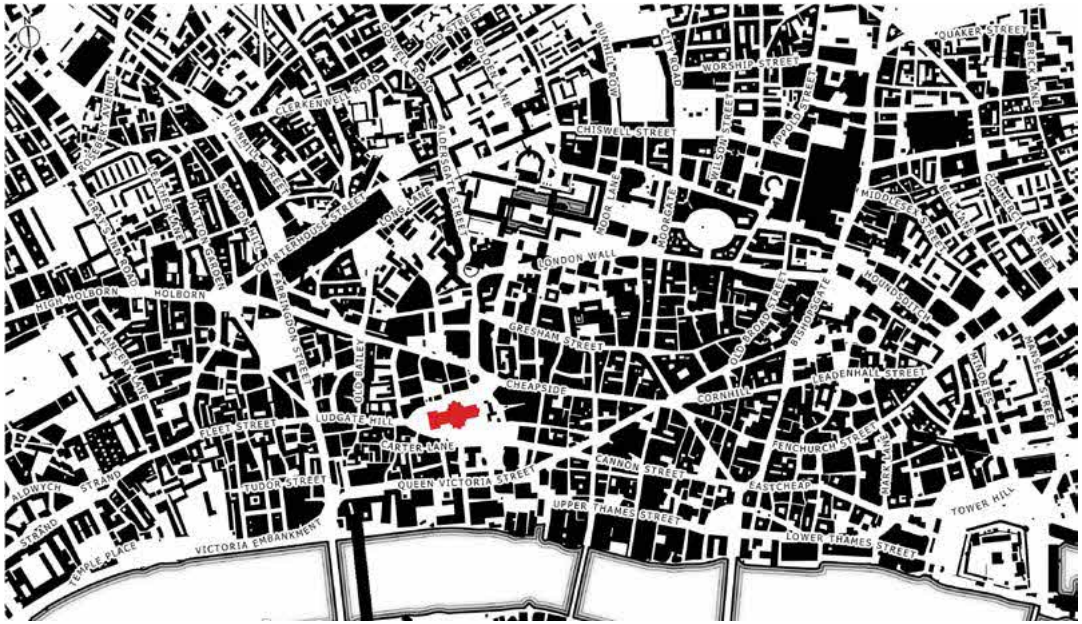
of the festival, classical style. A new choir school was constructed to the east of the cathedral, designed 1962-7 by Leo de Syllas of the Architects' Co-Partnership. The distinctive modern building incorporated the restored tower and spire of St Augustine Watling Street which formerly stood on Old Change and had the effect of screening the churchyard gardens from New Change.

9.32 A further area of large-scale planning immediately north of the Cathedral was Paternoster Square. It was conceived as a large pedestrian piazza raised over a car park with steps up from St Paul's Churchyard. The buildings were completed 1962-7 in a mix of slabs with one slim tower and the impact upon the Cathedral was unfortunate. It was demolished and rebuilt at the old ground level in 1997-2003. The Colonnade was designed by William Whitfield with other buildings designed by architects including McCormac and Eric Parry. The masterplan included important elements such a reinstating Queens Head alley and a designed alignment with the north transept of the Cathedral. (see section below).

Paternoster Square looking to the drum, dome and N transept pediment of the Cathedral (picture credit: Historic England).



Street pattern and block sizes in 1676 (Survey of the City of London by John Ogilby and William Morgan)



Street pattern and block sizes in 2024

Historic England

St PAUL'S CATHEDRAL

9.33 The eastern section of St Paul's churchyard still ran along its historic line immediately following the war, but it was re-positioned further east in 1961 establishing the present east boundary of the churchyard. The railings were then extended, first to the tower of St Augustine's church and then subsequently extended on a new alignment even further to the east and following the line of New Change, which is the form of the current boundary. The south-east corner of the current Cathedral churchyard therefore lies over the former 19th Century buildings that originally stood between St Pauls churchyard and Old Change, originally outside the Wren-period precinct. Effectively, between 1900 and 1961 the churchyard has shifted eastwards in relation to Cathedral markedly increasing the public open space to the East.

9.34 In 1956 the London County Council published guidelines in May 1956, entitled 'High Buildings in London', in which there was clear encouragement to build tall buildings that were 'carefully sited and well designed' and could 'contribute to the picturesque interest of the London skyline. The 100 ft height restriction was removed the same year with the support of the RFAC. Much taller buildings could now be erected and transformation of the London skyline began in earnest. Between 1937 and 1978 eleven buildings were allowed to infringe The St Paul's Heights agreement in the range of 2-10ft (0.6m - 3.05m) including Sudbury House and Paternoster Square, very close to the Cathedral and which at 205ft (62.5m) had a severe impact of the view of the dome from the north, including from Parliament Hill, which had previously been one of the finest views outside the City.

9.35 In an article in Country Life published in 1977 Patrick McCormack MP questioned the robustness of policy regarding tall buildings then emerging in London stating:

"As long ago as 1938 the City of London laid down regulations to protect certain views of the Dome from the Thames and in 1965 views from Parliament Hill were similarly protected. Now the cathedral is hemmed in on almost every side". Cormack pointed out that although, technically, recent tall buildings (which he defined as over 150ft or 45.7m, around 18 storeys) fulfilled the requirements of the protective regulations, such buildings continued to block views of St Paul's from other viewpoints –a consistent weakness and the limitation arising from the approach of using a protected view.

9.36 Whilst the debate at this time was being conducted with regards to the skyline and the concepts of *views*, the impact was actually upon the *setting* of the cathedral. In light of Wren's intended visual dominance of St Paul's, which was to be appreciated across the whole of the capital as an ornament for the nation and conveying the unity of Church and State, the subservient scale of buildings within the setting of the Cathedral was an essential requirement in ensuring that it continued to

support and contribute to the symbolic and architectural functions of St Paul's. These new, taller and substantial buildings represented a significant erosion of that dominance and consequently 'harm' (in terms of the NPPF) the significance of the Cathedral. The buildings include Guy's Hospital tower (1974) in Southwark and Euston Tower (1969) to the north west, among several others.

9.37 In the 1970's the construction of the National Westminster Tower in the City represented a significant development in the closer setting of the Cathedral and the concept of a Cluster of tall buildings around the tower was emerging. When completed in 1980 the tower designed by Richard Seifert was the tallest building in the UK and a direct challenge to the historic role that the Cathedral had performed for over two centuries in the context of London. The Nat West Tower was overtaken as the tallest building in the country by One Canada Square in 1990, which was constructed as part of the rejuvenation of London Docklands. The emergence of tall commercial sky scrapers in this location was visually prominent in views west along the river corridor, especially from the bridges over the Thames and also had an impact upon views from elevated ground to the south-east, in Greenwich. With each increase in height, these developments continued the process of reducing the prominence of the Cathedral in its London wide role.

9.38 By the close of the 20th Century the setting of St Paul's had undergone radical change. In particular, the ability to appreciate the cathedral in the London-wide context had become significantly eroded and the impressive scale and geometrical beauty of the design of the dome were being challenged and harmed. The former clearly experienced separation of the cathedral within its churchyard had also been radically altered with the creation of gardens along the south side and relocation of barriers around the more generous space to the east. The increased areas of gardens to the south and east were created in the immediate Post War period to provide a breathing space for the Cathedral and a more open setting; but one which has proved vulnerable to the environmental impacts of increasing traffic.

9.39 Perhaps one of the transformational planning achievements of this period was the substantial rebuilding of almost the entire building stock between the Cathedral and the river Thames (besides Faraday Building). Almost all of these new buildings were constructed with strict observance to the St Paul's Heights, creating a roof landscape and built environment that realised Mervyn McCarty's vision in a manner that could not have been anticipated 50 years before. A major gain to the setting of St Paul's was delivered enabling the connections with the river corridor to be safeguarded.

The setting of St Paul's: 2000 to the present

SB8: Summary of key changes to setting 2000 to the present

- Emergence of the City Cluster and very tall buildings in th form of the Heron Tower, 22 Bishopsgate and others.
- Emergence of secondary groups of tall buildings to the ea in Broadgate and Finsbury.
- Shard completed 2012 replacing Southwark Towers.
- Reconstruction of Paternoster Square including the re-location of Temple Bar and providing axial framed views from the north.
- New accessible entrance to the north portico of the Cathedral.
- Construction of Millennium Bridge House in foreground setting of the river corridor to the south
- Construction of the Millennium Bridge opens up a formal approach to the south transept.
- New Change constructed to the east with significant new framed views of the Cathedral.

St Paul's in its setting viewed from Waterloo Bridge 2023 Note the ability to see the dome and towers against clear sky but the visually prominent form of the city cluster (picture credit: copyright Historic England)

SB8 cont.

Impact upon key elements of setting and their contribution to significance

Skyspace:

- Secondary group of tall buildings around Broadgate and Finsbury Avenue eroding clear sky space around the dome reducing visual prominence of the Cathedral and appreciation of its architectural scale and composition.
- City Cluster curating concentration of tall buildings and maintaining sky space with the cathedral sustains visual prominence of the dome.
- Construction of the Shard 2009-2012 and tall buildings to the south of the Cathedral erode the skyspace and visually compete with the dome for attention. In some views from the north the Shard emerges directly behind the dome disrupting its silhouette.

River corridor:

- Secondary group of tall buildings around Finsbury visually attached to the drum and dome of the Cathedral as experienced from the SW in the river corridor challenging both the intended visual prominence of the Cathedral but also the clarity of the geometry of the dome, integral to the intended role of the Cathedral as an "ornament" to the city.
- Construction of Millennium Bridge House exceeding the St Paul's heights limitations erodes the consistency of the townscape to the south of the Cathedral which is historically significant as a result of this policy. It also obscures key architectural elements including the south pediment and associated statues, the carved decoration as well as the entablature and balustrade of the Cathedral as experienced from the river setting along the South Bank and from the Millennium Bridge diminishing its architectural effect.
- The construction of the Shard as the tallest building in London competes with St Pauls in views from the east.

Churchyard/close setting:

- The new Accessible entrance enhances the ability to experience the architecture and understand the historic significance of the cathedral for a greater number of visitors.
- Reconfiguration of Paternoster Square provides a colonnaded elevation to the churchyard and new connections to public spaces immediately to the north, enhancing the visual dominance of the Cathedral in its immediate setting and an ability to appreciate its architecture.
- New Change constructed with roof terrace providing views to the cathedral and framed views at ground level.
- New office development to the east (25 Cannon Street) with small garden containing a pool providing reflections of the cathedral; a very popular visitor spot.

9.40 The first two decades of the 21st century has seen the most perceptible change in the setting of the Cathedral in the form of the Eastern “Cluster”. The last decades of the 20th century had witnessed the beginnings of the emergence of tall commercial development, with Tower 42 (formerly the Nat West Tower 199 metres) constructed in 1981. The replacement Lloyds Insurance building by Richard Rogers followed in 1986, before the replacement of the bomb-damaged Baltic Exchange by 30 St Mary Axe (The Gherkin) which was completed in 2004.

9.41 The conscious decision to identify a geographical area within the City of London with the potential to accommodate tall buildings led to the creation of the “cluster” and was a means of attempting to mitigate and manage the potential impact of this type of development upon the settings of highly significant heritage assets including the Tower of London and St Paul’s. The form of the cluster has been the subject of some proactive curation by the corporation of the city of London, which identified an apex at 22 Bishopsgate (249 metres) around which other individually designed tall buildings would be located. These include 122 Leadenhall Street (238 metres); 40 Leadenhall Street (170 metres) and the outlier 20 Fenchurch Street. The relatively recent consent for 1 Undershaft establishes a new apex for the cluster at 304.9 metres.

St Pauls from Waterloo Bridge S end with the new Finsbury Towers developments appearing behind the NW tower and infilling sky space between the western towers and the dome. The reflective materials draw further attention and distract from the Cathedral

9.42 The relationship between the Cluster and the Cathedral is of particular relevance between Hungerford and Blackfriars Bridges, where the CoL Protected Views SPD recognises the importance of a clear skyline gap which should be retained, with taller buildings stepping up from this point. The relationship between Cathedral and Cluster is most acute on Waterloo Bridge and Hungerford Bridge (north end). The Processional Route to the Cathedral from Westminster is of significant influence for tall building development within the cluster. For example, it aligns loosely with Leadenhall Street and the need to retain clear sky space around the dome and western towers is clearly seen to inform in the profile of 122 Leadenhall Street.

9.43 To the immediate south the most radical change in the setting of the Cathedral has been the construction of the Millennium Bridge. This has, in a short life, become an iconic London view. It is a traditional vista composition comprising a broad panorama of coherent low-lying townscape anchored on a central axis terminating on the south transept of the Cathedral. It is one of the best places to view Wren's masterpiece in its wider setting amongst his complementary 'spire-scape' of spires and steeples which punctuate and relieve the (on the whole) low contiguous horizon line. This has been diminished by ad-hoc tall buildings of less distinguished architectural form around London Wall/Broadgate.

9.44 In the very recent past a secondary group of tall buildings has begun to emerge to the north-west of the Cathedral, centred along Finsbury Avenue, including Finsbury Tower (c 109 metres). In combination with development to the south west of the Cathedral around New Bridge Street and the Unilever building the ability to appreciate and understand the relationship between the dome and towers has been significantly eroded.

One of the less discussed aspects of change to setting has been a shift in the material colours and tones in the City, from red-browns to blue-grays, especially in higher buildings. This is illustrated here in the view east from the Stone Gallery in c.2003 and 2024 (picture credit: top - copyright Chris Redgrave; bottom - copyright Historic England).

Building heights in the City in 1938 (illustrated by number of storeys). Note also plot sizes

For an illustrative comparison, building heights in 2020 using LIDAR data coloured to approximate storey heights. Note also the change in plot sizes.

10.0
Contribution of the current setting

10.1 Historic England GPA 3 (Second Edition) The Setting of Heritage Assets

All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset.

10.2 This section of the Review addresses Step Two of the Guidance which is to:

Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

10.3 As recommended, this assessment addresses the key attributes of the heritage asset itself which have been set out in Section 4 above. The assessment is then organised broadly into the categories of physical contributions: intangible contributions, environmental contributions and then visual contributions or views.

10.4 The current setting of St Pauls can be most conveniently considered in terms of its

1. *London wide setting*, where the silhouette and form of the upper features, principally the dome and towers can be appreciated.

2. *The intermediate setting* which are generally those areas to the south and west although to the north the area around Farringdon also provides opportunities to experience St Paul's. In these locations, including

the river corridor to the south, the articulation of the dome and towers can be understood in addition to their silhouette. From the south bank the overall form of the Cathedral at upper level, from apse to west front, can be appreciated as part of the kinetic experience of the river corridor and the orientation and aspect of the building is most clearly appreciated.

3. *The close setting* of the cathedral which comprises St Pauls churchyard, its western boundary at the top of Ludgate Hill, the southern boundary along Carter Lane, the eastern boundary along New Change and the north Newgate Street. In these areas the formal architectural qualities of the design can be best appreciated, including the volumes and surface articulation, the decorative carving and details in addition to the dome and towers.

4. In addition, extending across the intermediate setting and terminating at the closer setting are the approaches to the Cathedral. These comprise the “Processional” route along Fleet Street and Ludgate Hill to the west, the approach along Cannon Street and Cheapside to the East and the approach over the Millennium Bridge from the south bank. The definition of the ‘Processional way’ – the combined approach along Fleet Street and Ludgate Hill is a helpful term to capture both the historical and experiential significance of this semi-formal urban composition. Latterly there is increasing awareness of the value of the long vista and approach of Canon Street from London Bridge, in which the Southwest Tower and later the South Transept of the Cathedral play a dominant place in the composition. These approaches are a kinetic experience that reveal the Cathedral in a series of often unfolding views enabling appreciation of individual elements of its composition. These can be framed by adjacent buildings or seen in oblique glimpses, with the full composition of the building only being revealed as the close setting is reached.

1: The physical surroundings of St Paul's in its wider setting

SB9: Summary of the positive contributions of the physical surroundings in the wider setting

- The elevated topography of the London bowl which contributes to and provides opportunities to experience the Cathedral in its intended symbolic and architectural roles.
- The ability to appreciate and understand the historic functional/ ceremonial relationships with the City of Westminster.
- The ability to understand and appreciate the architectural relationships between the Cathedral and the hugely significant legacy of Wren's work at Greenwich.
- The ability to appreciate the strategic landmark role of the three sites: St Paul's, Palace of Westminster and Greenwich.
- The ability to approach the Cathedral from the east and west along the river as was usual historically.

What can be appreciated in terms of architecture of St Paul's and other assets

Skyspace:

- The silhouette and forms of the major architectural elements of the Cathedral, principally the dome and towers. These are set within a complex skyline that has evolved over centuries but the elevated topography also allows the Cathedral to be seen in relation to the Victoria and Elizabeth towers of the Palace of Westminster to the west, illustrating the twin city origins of London.
- Where the horizon comprises the wooded ridges of the London bowl and the Cathedral dome breaks the horizon, the silhouette is particularly powerful and illustrates best the intended dominance of the building as an ornament to the city.
- Elevated views from other heritage assets within the wider setting allow the dome and towers to be seen against clear sky.

River corridor:

- The sweep of the river can be appreciated from high ground to the south-east with the dome framed by or within a group of taller structures.

Churchyard or close setting:

- The churchyard cannot be appreciated and seen from the wider setting because of the scale of intervening development.

10.5 The site of the Cathedral in the heart of the capital is in a part of London which has the greatest time depth in terms of history and archaeology. Westminster to the west and Southwark to the south are, with the City of London the three historic settlements formed in the earliest phases of the history of the capital. The change to the wider setting of the Cathedral(s) has been dramatic and extensive with once separate settlements around these historic centres being subsumed by the physical growth of London. Equally dramatic in terms of experience of the wider setting of the Cathedral has been the very recent (relatively) change to the financial centre of the City of London and the creation of the Eastern Cluster. The visual presence of the cluster as experienced in large areas of the wider setting of the Cathedral has undermined a key role of St Paul's by challenging its intended dominance in a London-wide context. An additional impact has been caused by The Shard to the south, particularly with regard to visual prominence of the dome of the Cathedral and the ability to appreciate its' geometry and silhouette.

Topography

10.6 The topography of London makes a major contribution to the significance of the Cathedral and also the ability to appreciate that significance. The bowl in which London sits provides high points and elevated areas around its edge from which the design, layout and three-dimensional form of the Cathedral could be appreciated. The position

Looking ESE from the Stone Gallery towards the high ground to the SE of London around Shooter's Hill in Greenwich; note the gilded finial of The Monument to the centre left of the middle ground. The turrets of the White Tower can also be discerned further away in the background (picture credit: copyright Historic England)

of St Paul's adjacent to what was for centuries the only crossing point of the river and elevated above it, relied on that local topography in part for its dominance. The earliest wooden London Bridge was constructed from the river terrace on the north bank of the Thames to the sandbanks that offered access to the south side of the river and it also had a harbour at its northern end. On rising ground at Ludgate Hill and Cornhill, Londinium developed and this topography was central to its later development.

10.7 The physical surroundings and relative position of the Cathedral to the hills of north and south London originally provided both a green foreground and backdrop in which the capital was appreciated. Within this setting the Cathedral was the dominant structure and its relationship with the Thames, the other major topographical feature of the capital was also apparent. The perceived scale of the Cathedral and the impression of its architecture was increased where it broke the skyline formed by the hills. This contribution is integral to an understanding of the significance of the Cathedral(s) and an appreciation of what it (they) meant to convey. Elements of this contribution can still be read through the urban form today where building heights are consistent and follow the landscape. The LVMF has, for example identified a number of views from Parliament Hill and Kenwood, but if you look out from the Stone Gallery of the Cathedral the higher ground around the London basin can be clearly experienced to the south and east, including Shooter's Hill and Blackheath.

The Thames

10.8 The physical relationship between St Pauls and the river is another distinctive element within the setting of the Cathedral and one which makes a positive contribution both to significance and the ability to appreciate that significance. The prospects afforded by the river corridor have long been appreciated and enjoyed. The role of the river as a major transport link, carrying significant trade as well as private travellers also facilitated the widest views of the Cathedral from within the heart of London. The river and the wharves along its north bank were the means of transporting and delivering the Portland stone for the construction of the Cathedral itself. The opportunities for understanding the Cathedral and its intended dominance remain particularly strong along the river corridor, and the experience of the relationship between the river and the Cathedral have been enhanced by the creation of new crossings throughout its history. The river effectively forms the historic southern boundary of the City of London and is one of the reasons for the choice of viewpoints for representations of the Cathedral and the wider capital for travellers and visitors over the centuries.

The river corridor looking NE towards St Paul's from Coin Street Community Pier

The sky

10.9 The sky space and, originally, expansive sky setting of St Paul's made the strongest contribution to understanding the geometry underlying its design. Detailed analysis of Wren's writings reveals the extent to which he understood and considered both the geometry of the dome but also the optics of the building as a whole. The counterpoint of the simplified profile and detail in the Dome and the exuberant design embellishment of the Western Towers was a deliberate contrivance of what he described as 'perspectiva'. Wren was interested in and understood how the building would be experienced and how the form of his dome as opposed to a steeple or tower, would add to the visual presence and primary role of his building in the London wide context. This understanding also informed the contemporary development by Wren and others of the City Churches whose towers came to define the skyline in combination with the Cathedral. His architectural approach was based upon ensuring the Cathedral formed the dominant point of the London skyline as a symbol of the unity of Church, Crown and State, but it was also seen in combination with the towers and steeples of the City Churches and the more substantial silhouette of The Monument. The role of clear sky space is therefore central to the significance and ability to appreciate the significance of these heritage assets both individually and in their various combinations.

10.10 It is the relationship of topography and sky space that enables the geometry of the dome to be expressed across the city as Wren intended. The careful consideration of shape and the considered use of the curve is best seen against clear sky without distraction and the changing form and silhouette of the towers is also best seen against clear sky. When originally designed, the statues were intended to be seen against clear sky to emphasize their silhouette and enable their architectural function to be expressed. Clear sky makes the strongest contribution to the architectural interest of the Cathedral and therefore reduction in sky space by obstruction or distraction, or otherwise confining this element of the setting consequently erodes its contribution to significance and ability to appreciate significance.

Relationship with other heritage assets

10.11 In the wider setting the relationship of the Cathedral with other heritage assets is appreciated largely in terms of their skyline presence. The river connections from Greenwich to the east enable the dome and towers to be appreciated in the context of Wren's other great works at Greenwich Hospital. The architectural formalities shared by the two sites adds to their respective significance. Appreciation of the Cathedral from the wider setting to the north enables it to be appreciated in combination with the Palace of Westminster and therefore the relationship between the twin cities of Westminster and London to be understood. These experiences also enable a greater understanding and appreciation of the contribution made by the processional route to the significance of the Cathedral which forms part of its approaches and to which Wren's western portico and vestibule respond. Both of these latter groups of heritage assets are inscribed World Heritage Sites and it is only in the widest setting of the Cathedral that the relationship of the three sites as Strategic Landmarks can be appreciated.

2: The physical surroundings of St Paul's intermediate setting

SB10: Summary of the positive contributions of the physical surroundings in the intermediate setting

- The topography around and elevated position of the Cathedral explain the siting of St Paul's embedded in the heart of the City which is a key element of both architectural and historic interest.
- The rising ground to the west emphasises the scale and intended dominance of the Cathedral.
- The river below to the south provides an open corridor extending for considerable distances east and west enabling an appreciation of the aspect of St Paul's and illustrating its' contribution to historic interest.
- The lower topography to the south enables an understanding of the overall architectural form of the Cathedral at upper levels from apse to west front and not just discrete elements.
- The approaches along the river and over the river include significant areas of open sky space that contribute directly to the visual prominence and the intended architectural effect of the design.
- Greater use of the river has enhanced appreciation of the Cathedral.
- Intervisibility with the City Churches and The Monument enhance significance.

St Paul's from the South Bank by Tate Modern and the Millenium Bridge providing an elevated pedestrian route across the river and aligned on the south transept of the Cathedral Photograph by the author 2023.

SB10 cont.

What can be appreciated in terms of architecture

Skyspace:

- On the skyline it is principally the towers and dome of the Cathedral. The articulation and massing of the towers can be understood in greater detail, and the rhythm of solid to void in the peristyle is now particularly prominent. The statuary along the entablature of the Cathedral can be appreciated and from certain areas, when against clear sky, silhouettes can be powerful.
- In the area of the St Paul's Heights policy generally the entablature of the Cathedral can still be seen in combination with the drum, dome and towers, although this too is being eroded.
- The south-west tower of the Cathedral is the most visually prominent element of the building in large areas of the intermediate setting to the east. The dome and tower are visually dominant and form the focal point of views to the Cathedral from the east, although they have to compete with increasingly scaled commercial development.

River corridor:

- The river corridor provides the ability to appreciate in greater detail the upper sections of the Cathedral below the cornice.
- In the angled views from west the form of the Cathedral appears more compact.
- From the north it is the dome and drum which can be seen but with only limited ability to appreciate their articulation.
- In the kinetic experience walking along the South Bank of the river the three-dimensional composition of the Cathedral changes and the visual weight of the western towers also changes, in particular the pattern of the voids and ability to see through them.
- Certain aspects enable the outline of the stone to be appreciated against clear sky.
- In these areas of the intermediate setting the role of the Cathedral as an historic landmark, recognisable and an ornament to the city is most clearly appreciated and expressed.

Churchyard or close setting:

- There are segments of the churchyard or close setting that can be experienced from the intermediate setting. These are mainly along the approaches to the building.
- The eastern end of the churchyard can be seen from Cannon Street and Cheapside but is appreciated as an element of an urban landscape set within a busy road network.

SB10 cont.

- The upper section of the apse, the drum and dome can be seen in a complex skyline comprising other, taller structures.
- On the western approach along Fleet Street the upper section of the west elevation and the drum and dome are variously revealed and obscured and also framed, by modern commercial development.
- A framed view of the south transept and the open space in front is provided from the south bank across the Millennium Bridge and high-level views from Tate Modern include sections of the Churchyard.

Impact of past change on the contribution made by setting to significance

- Changes to the setting including the creation of the Thames Path and Queens Walk to the south bank and the construction of the Millennium Bridge have enhanced the ability to appreciate the Cathedral, including the south transept.
- The creation of the Millennium bridge has provided a popular and exciting approach that links the Cathedral with the historic highway of the river, the realisation of an ambition that had been set out in the early years of the 19th century.
- Commercial development along Cannon Street is generally consistent in height and scale, although pressure to increase scale in recent years has increased visual distraction and reduced the prominence of the Cathedral.
- Developments in the sky space behind the Cathedral from the southern, river setting has eroded its visual prominence. Recent development to the north-west competes with the dome of the Cathedral, and in some parts of the setting appear to be visually eroding the geometric clarity of its form and intended effect.

Topography

10.12 The main topographical feature of the intermediate setting and approaches to the Cathedral is its' elevation. The approach from the west ascending Ludgate Hill which curves as it rises and gradually reveals the Cathedral, emphasises its scale and mass. The elevation in relation to the river is less pronounced and appreciate not least because of the elevated route taken by many visitors across the Millenium Bridge. The river corridor and generally flat south bank provides an open aspect i which the form of the Cathedral is instantly recognisable The later embankment of the river to the north side provides a consistent baseline above which the land rises, with development broadly appreciated as a series of "steps" obscuring the body of the Cathedral and above which the steeples and towers of the City Churches can sometimes be appreciated. This topography is particularly evident immediately to the south of the Cathedral in the area governed by the St Paul's Heights policy although the stepped arrangement of development is not as apparent in views directly opposite from the South Bank because of the redevelopment to that height limitation in buildings fronting the river.

St Paul's from Queen's Walk looking north and revealing the impact of the St Paul's Heights policy in preserving the ability to see the extent of the body of the Cathedral below the peristyle, dome and towers. Photograph by the author 2023

The river

10.13 The river itself makes a major contribution to the setting of St Paul's both in terms of providing a corridor which emphasises its visual prominence but also one which allows the Cathedral to be appreciated in combinations with other heritage assets. The river is now once again a major transport route after a significant period in which it was not used as a recreational resource because of environmental conditions. The network of river piers facilitates commuting and also the numerous leisure craft providing river tours for visitors. St Paul's is a major attraction on this route which extends downstream as far as the Greenwich barrier.

10.14 The Cathedral has always been separated from the river by development. That development was always subservient, although increasing in scale and height through the 18th and 19th centuries. Unilever House and the Faraday building in the early 20th centuries demonstrated the significant impact that increased height could have upon the visual prominence of the Cathedral, which was exacerbated by the monolithic massing of both buildings. The development along the north side of the Thames between Somerset House and Blackfriars is still generally subservient and integrated into substantial tree cover that provides a significant soft green foreground in river prospects from the west.

The Dome and towers of St Pauls in the river prospects looking east (downstream) from Waterloo Bridge with the substantial soft green foreground providing a foil to the city beyond. Photograph by the author 2023

10.15 This area of the intermediate setting provides the best experience of the Cathedral embedded in the capital which is why the overwhelming majority of the artistic representations of the building were located along its banks. The dome and towers of the Cathedral are experienced against clear sky at the northern end of Waterloo Bridge with the Eastern cluster in the City of London a distinct entity to the right in its setting. Moving south across the bridge the sky space around the cathedral expands and the visual prominence of the dome increases in response. Additional skyline features such as the steeple of St Brides, St Mary- le-Bow, St Magnus and the dome of the Old Bailey also become visible in an echo of the historic relationship depicted in the many historic views of London's skyline. The visual presence of the Cathedral on the skyline changes as one progresses along the south bank and its prominence is dependent upon the perceived extent of clear sky space around the towers, the dome and peristyle. Its impact as a building rather than isolated architectural elements is at its greatest between Blackfriars and London bridges.

10.16 Between Waterloo and London Bridges is the policy area for the St Paul's Heights which has had a noticeable impact on the form, definition and grain of foreground development in the setting of the Cathedral when viewed from the south. In the views from the Thames bridges, south bank and points to the west and east, the Heights protect views of the dome, western towers

St Paul's from the south bank looking north to Millennium House under construction and now obscuring the view of the entablature or main body of the Cathedral. Photograph by the author 2023

and, in order to retain a sense of the entire length of the Cathedral, the main entablature. The area of the Heights also extends laterally beyond the Cathedral to ensure that buildings do not crowd its setting on the skyline. In recent years the limitations of the policy have come under sustained pressure with some, limited, breaches of the height. Although limited in extent the impact is more significant which is demonstrated by the recently constructed Millennium Bridge House development that will, when completed obstruct the view of the entablature of the Cathedral and thus causes harm to an ability to appreciate its architectural significance.

10.17 A particularly strong contribution made by the setting in the river corridor are the fortuitous combinations of the Cathedral with later development. These combinations illustrate the historic significance of St Pauls and its influence on subsequent change in the City of London. Examples include the Cathedral in relation to Blackfriars Bridge, Tate Modern and Cannon Street Station, which both provide new places from which to experience the Cathedral and frame St Paul's in certain views.

The dome of St Paul's framed by the towers of Cannon Bridge Station from London Bridge. The towers of the station were inspired and influenced by Wren's City Church towers including those at St Benet and St Mary Abchurch both of which are located nearby. Photograph by the author 2023.

10.18 In the intermediate setting to the east the general consistency of modern commercial development along Cannon Street leads the eye to the Cathedral. An unfortunate consequence of departing from the consistency of height along the north side of Cannon Street is that development then obstructs the dome of the Cathedral as can be seen by the addition of the penthouse space at 31 Cannon Street at its junction with Bread Street and from further east.

St Paul's from Cannon Street to the east at the junction with Queen Victoria Street. The bronze clad penthouse element on 31 Cannon Street in the foreground collides with and obscures part of the important silhouette and form of the dome of the Cathedral. Photograph by the author 2023 (picture credit: copyright Historic England).

10.19 From the north part of the intermediate setting the Cathedral is largely obscured in terms of skyline becaus of the grain of development and topography. The notabl exception is within the London Borough of Islington. On Turnmill Street the dome and peristyle can be appreciate against clear sky and further west on Farringdon Lane the western towers of the Cathedral can be appreciated. The clearest skyline presence of St Paul's is that gained from Vine Bridge where the dome, drum and peristyle a seen against clear sky above the arches of Farringdon Station. The skyline presence of the dome and ability to appreciate its geometry is affected by the intrusions into the sky space including The Shard. The visual prominence and dominance of the Cathedral is reduced as the Shard has supplanted St Paul's as the focal point of the skyline.

The dome of St Paul's framed by the towers of Cannon Bridge Station from London Bridge. The towers of the station were inspired and influenced by Wren's City Church towers including those at St Benet and St Mary Abchurch both of which are located nearby. Photograph by the author 2023.

Relationship with other heritage assets

Architectural and historic: the City Churches

10.20 The relationship with the city churches is experienced very differently from ground level within the setting of the Cathedral, as opposed to being in the Stone Gallery of the Cathedral itself. At ground level the dome and towers of St Paul's either individually or collectively are appreciated with only glimpsed views of the towers and steeples of adjacent churches which are generally set against the busy skyline. The experience of the relationship between the assets is, as a consequence, often only partial.

3: The physical contributions to St Paul's significance in the close or immediate setting

SB11: Summary of the positive contribution of the physical surroundings in the close setting

- An area of great historic significance which has been a centre of Christian worship for over a Millennium and encompasses streets, buildings and spaces spanning a similar period enhancing an understanding of the historic significance of St Paul's.
- An area of great architectural significance, including one of the largest concentrations in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous non-designated buildings of high architectural quality from different periods enhancing an understanding of the architectural and historic significance of St Paul's and its enduring influence.
- An area of internationally important archaeology relating to the adoption of Christianity in Britain, and including the City's largest intact area and depth of archaeological deposits remaining of the medieval and Roman city.
- An area which attracts community events and public gatherings, particularly at the Cathedral and its churchyard.
- Green spaces to the south and east including the Festival Gardens.
- Spaces immediately to the south and east of the Cathedral within the railings providing areas to sit and rest.
- The western area adjacent to the steps allows for congregation/ meeting point and photography by visitors.

What can be appreciated in terms of architecture

Skyspace:

- The sky space within St Pauls Churchyard is generally clear of distraction providing the optimum conditions for appreciation of the dome, towers and statuary of the Cathedral. From the narrow medieval lanes to the south and newer routes created from the north the sky is framed by development.

River corridor:

- There are opportunities to appreciate the topography sloping down towards the river from the south side of the setting with views to St Benet's Paul's wharf enabling an understanding of how the Cathedral was constructed. The northern end of the approach from the river across the bridge reveals the topography and provides good opportunities to appreciate the south portico, transept and dome.

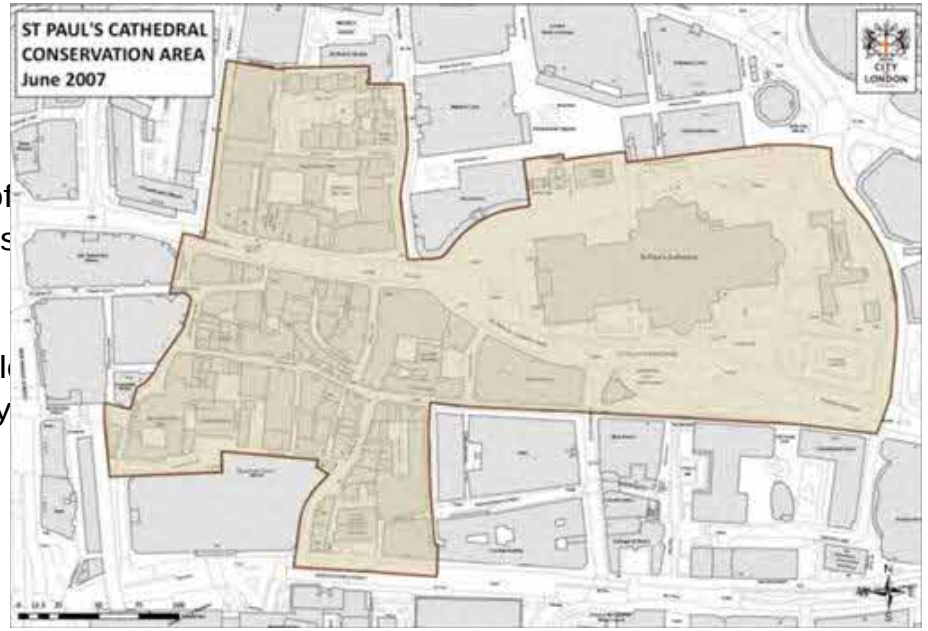
Close setting:

- The open southern section of the churchyard provides some of the best opportunities to experience and understand the design of the Cathedral, both the surface decoration, classical articulation and the bold massing. The towers and statues can be seen in close detail.
- The western porticoes can be experienced as the architectural arrival point of the Cathedral elevated and approached up the great stair. The churchyard allows a complete circuit of the Cathedral which can be experienced in combination with buildings of all periods and their details and architectural cross references can be appreciated and understood.
- The sheer scale and mass of Cathedral dominates and is appreciated as towering above.
- The smaller details of sculptural and carved decoration can be appreciated and the craftsmanship understood because of the ability to approach the Cathedral in close proximity along the south and eastern elevations.
- The sense of separation from the busyness of the setting particularly that to the south when in the churchyard spaces to the east of the Cathedral.
- The close setting allows the bells of the Cathedral to be heard, sometimes in combination with those of the contemporary City Churches.
- Moving around the close setting amplifies the understanding and appreciation of those buildings which have important functional and historical relationships with the Cathedral including The Deanery, Chapter House, St Augustine's Tower and St Paul's School.

Impact of past change to setting and its contribution to significance

- The Paternoster Square development has created positive new routes through to the Cathedral creating framed views and glimpses of the Cathedral, enhancing an appreciation and ability to understand its architecture.
- The relocation of Temple Bar providing a new connection between Paternoster Square and the churchyard enhances an ability to understand the architecture of the Cathedral but also its history.
- Paternoster Square is a successful urban space, used and enjoyed with a program of events providing good views of the dome, drum and towers of the Cathedral.
- The new entrance ramp at the north transept provides greater accessibility to both the architecture and history of the Cathedral.

10.21 The basic topography of the immediate setting of St Paul's is of land sloping away to the west and south, which can still be experienced, and the Cathedral and its close setting are physically as well as symbolically at its summit. The natural slope of the ground south of Ludgate Hill towards the Thames significantly contributes to the character of many streets, particularly south of Carter Lane, with buildings stepping down along each street. Where streets such as St Andrew's Hill and Addl Hill slope to the south, the roofline becomes particularly visible when viewed from the north, adjacent to the location of the churchyard, with dormers chimneys and roof extensions taking an additional prominence. The intricate grain and skyline contrasts with the scale and space of the Cathedral in close proximity.



Conservation Area boundary Map taken from the Conservation Area Character Summary and Management SPD © Corporation of the City of London

10.22 The most recent previous formal assessment of the close setting of the Cathedral is contained in the St Paul's Cathedral Conservation Area Character Summary and Management SPD produced by the Corporation of the City of London in March 2013. The summary characteristics of the area identified in the appraisal includes its great historic significance as a centre of Christian worship for almost 1400 years and an area with a large concentration of listed buildings in addition to many non-designated heritage assets. The archaeological importance of the area is also identified as being of international significance in relation to the adoption of Christianity in Britain as well as containing, in terms of extent and

depth, the largest area of deposits within the Corporatio of the City of London relating to its medieval and Roma predecessors.

10.23 The setting described in 2012 was an area where the urban grain varied from tightly knit historic streets and alleys to open spaces around St Paul's Cathedral and churchyard; it is also one that was characterised by predominantly masonry buildings with traditional proportions and materials and which has a public realm which is enriched by a wealth of materials, features, monuments, public sculpture, signs, plaques, statuary, and other structures. The current setting has retained many of these characteristics.

The current experience of the churchyard progressing west along the south and east along the north side

10.24 To the south-west of the Cathedral two buildings of c.1900 follow the gentle curve of the street, with Portland stone facades embellished by features that subtly reference some of Wren's architectural motifs. No. 4 is well-proportioned and richly ornamented with a corner dome and classical detailing, while Nos. 5-14 (Condor House), the former Pawson and Leafs warehouse, has a wealth of surface detail to its imposing façade. The general form and scale of the buildings are echoed by the Paternoster Square development to the north which similarly curves so that the west end of the close setting is embraced within the two "arms" of later development.

Juxon House, part of the Paternoster Square development that frames the northern side of the western end of the churchyard. The road has been pedestrianised and covered with setts and trees planted in a formal arrangement. The scale, materiality and height of the building responds well to the earlier, 19th century commercial buildings that enclose the south side of the churchyard opposite. (see below)

10.25 These also frame the space at the western end of the churchyard which is a busy pedestrian area used as a through route but also a gathering place for visitors. The visitors mingle often forming queues up the western steps to the ticket pavilion and checkpoint controlling access to the Cathedral. In summer the steps are also used as seating. The atmosphere is bustling and often lively.

Condor House opposite defining the south side of the churchyard with the historic lane leading to the Deanery behind the Statue of Queen Anne and enclosing an area of pedestrian activity (picture credit: copyright Historic England)

10.26 At the south-west corner of the close setting St Paul's Churchyard extends south as a narrow lane connecting to Carter Lane. On the west side just south of a kink in the lane stands the Deanery, set back behind a rebuilt boundary wall. The Deanery was one of the first buildings to be rebuilt after the Fire of London and its proximity to the Cathedral facilitated its important historic functional role with St Paul's. Although located close to the Cathedral the street is quiet, with a sense of enclosure but enabling an oblique view of the west end of St Paul's to be appreciated when revealed as the lane kinks towards the north-east. This visual connection emphasises the historic connections between the buildings and amplifies their significance. The scale of the portico of the Cathedral can be appreciated including its relationship with the steps and the open area to the west, whilst the North-west tower can also be seen. The dome is largely invisible. The portico, tower and sculptures on the west elevation at cornice level can all be appreciated against a clear backdrop in parts of the journey north along the lane but with commercial development to the north visually attached to its north-west tower. This dilutes the silhouette and appreciation of the architectural form of this important element of the west end of St Paul's.

10.27 As more of the Cathedral is revealed upon reaching the northern end of the lane, the architectural scale and articulation of the western portico and north-west tower become visually dominant and the relative scale of the

View looking NE towards the west front and NW tower of the Cathedral from outside the Deanery which extends down to the steps with the statue of Queen Anne (picture credit: copyright Historic England)

commercial development beyond appears diminished. The expanse of the steps seen beyond the road serve to physically and visually elevate the structure above the surrounding site and the street furniture, including the listed lamp standards and granite bollards become visually prominent. On emerging from the end of the land the listed Statue of Queen Anne is revealed and the bustle and activity in the western and northern areas of the Churchyard can be appreciated.

10.28 To the east, south of the Cathedral the setting has been opened up with the creation of Carter Lane Gardens which provide an important area of green space to the south of the Cathedral, arranged with formal curved lawns and borders that reflect the form of the south transept. They incorporate the St Lawrence Jewry drinking fountain which is a substantial Victorian Portland stone structure in an elaborate Gothic Revival style. The green quality of the space is important, offering some respite to the otherwise hard urban public realm elsewhere, but the gardens are incoherent and do not offer places to linger. The road severs the south transept from the arrival point of the important southern approach over the Millenium Bridge and visitors cannot connect easily with it. However, despite the severance, the South Portico with the carved Phoenix is visually prominent and the scale and mass of the Cathedral dominates.

The West end of the Cathedral seen obliquely from the north end of St Paul's Churchyard Lane; note the visual prominence of the steps, lamp standards and bollards and the urban public realm; the canopy on the steps is the first access point for visitors affects the experience of the steps and west porticos (picture credit: copyright Historic England).

10.29 In the south-west churchyard of the Cathedral and partly hidden behind the railings is a representation of the pre-fire cloister and chapter house completed in 2008, with new landscaping and reinstated railings enclosing the space (designed by Martin Stancliffe, former Surveyor to the Fabric). The space is one of the few where the history of the earlier building and the immensely important historic continuum of Christian worship represented by this place can be appreciated. At present it is somewhat disconnected although it is used by people as a space in which to eat their lunch.

10.30 The southern edge of the green space along Carter Lane is defined by modern commercial development, mainly of brick and of similar scale to the more historic commercial buildings to the west. The consistency of height and urban block is striking. The space in front of the buildings is very busy, cross crossed with paths and a considerable number of visitors approaching from the south having climbed St Paul's Hill. The open nature of the northern edge of this space provides a good opportunity to appreciate the scale and decorative detail of the body of the Cathedral, albeit screened in part by the railings.

10.31 The landscaped spaces to the south of the Cathedral are varied in design and character. Those spaces of note for their design and/or heritage value include the 1951 Festival of Britain Memorial Gardens which are partly enclosed by walls and terraces at different levels that separate them from the main paths running along the churchyard and Cannon Street to the south and those immediately adjacent to the St Paul's Cathedral School to the north. The historic line of Old Change is commemorated but generally the character and experience of this area is a little unresolved. A new public garden containing a mirror pool has been created outside of 25 Cannon Street. This pool enables a reflective view of the Cathedral, which is a popular new visitor attraction and this image of the Cathedral is one of the most widely shared across social media.

10.32 Heritage buildings within this area include various listed memorials, K2 telephone boxes, the modernist Grade II* listed St Paul's Cathedral Choir School and the attached Grade I listed tower of the former church of St Augustine by Wren. Many of these buildings appear alongside or in the foreground of views of the Cathedral. Without doubt the most significant of those relationships are between St Augustine's tower and the Cathedral particularly where the two are seen directly side by side where both have distinctive skyline elements. Similarly important relationships exist to the west with the spire of St Martin's Ludgate and the western towers of the Cathedral.

10.33 The east and north-east section of the setting of the Cathedral provides two distinct experiences, inside and outside the railings. This area has changed over time because originally the eastern boundary was very

St Pauls Cathedral seen from the east end of the mirror pool outside 25 Cannon Street. The oblique view of the south and east elevations of the cathedral are against clear sky which allows the statues over the south transept to be particularly prominent. The experience within the garden is one of enclosure with the cathedral set against a green foreground. Traffic noise does detract from what would otherwise be a relatively tranquil space. The Cathedral's drum and dome are seen in conjunction with the tower and spire of the former church of St Augustine also designed by Wren (picture credit: copyright Historic England).

closely adjacent to the east end of the cathedral when first constructed and remained in that position until the mid-20th century. The present relationship was created as part of the Post War reconstruction which incorporated parts of Old Change into the green space east of the Cathedral building.[2] Within the railings that now enclose the green spaces immediately to the east of the cathedral there is a sense of partial separation from the busy traffic dominated areas outside, although the space contains a busy route for pedestrians and those wishing to take advantage of the seating as well visitors and tourists exploring the space. The proximity t the Cathedral enables close inspection of the decorative carved elements around the lower elements of the façad but also enables the powerful scale and mass to be appreciated from below. The eastern churchyard has several monuments memorials and sculptures, some of which relate to the past history of the churchyard, for example the original location of Paul's Cross and its modern counterpart. Others with less direct relationships to the site of the Cathedral include statues of John Wesley and Thomas Becket.

St Paul's Drum and dome oblique view from the Junction of St Martin Le Grand and the A40 (picture credit: copyright Historic England).

[2] A detailed assessment of the eastern area of St Paul's can be found in the Eastern Churchyard heritage Statement January 2017 by Oliver Caroe, Surveyor to the Fabric for St Pauls: Map regression on P 55

10.34 The north-east area of the churchyard contains several large trees and more abundant mid-level planting. Within this area is the St Paul's Cross memorial designed in early 20th Century, with the gilded figure facing east. Th memorial is separately listed.

10.35 Outside the railings the experience of the setting east a north-east of the Cathedral is quite different. The conte is traffic dominated and the east end of the Cathedral is obscured at lower level by the St Paul's Choir School and the railings and planting within the churchyard. The overarching character of this area is of a modern commercial city. The setting is otherwise dominated by the road network and the junction of Cheapside with New Change, Newgate Street and St Martins Le Grand, the route from the north. Views through to the ruins of Christchurch Greyfriars now a garden illustrates the severe damage inflicted in the Second World War and is a tangible reminder of what could have happened to the Cathedral.

10.36 From the north along Newgate (A40) the character of the setting is generally commercial with office blocks of masonry construction forming the south side of the stre and obscuring most views of the Cathedral. The area immediately adjacent to the Cathedral and extending to Newgate Street was largely laid out in the late 1990's and early 2000's as a new urban quarter. It is evident from the design of the buildings and spaces that the role of the site as part of the setting of the Cathedral was influential in

The North transept and portico with drum and dome above framed in an axial view by new development along Queen's Head Alley (picture credit: copyright Historic England).

the design. Glimpsed views of the Cathedral are availabl from the north side of Newgate Street and generally the drum and dome are the visible elements. As an importa part of the commercial regeneration to the north of the Cathedral, new narrow connections, reminiscent of the historic alleys characteristic of the medieval city have been recreated providing framed views of elements of the Cathedral. These also provide pedestrian links to the churchyard along the north side of the precinct and the most significant of these connections are those along Queen's Head Passage, which is aligned on the north portico of the Cathedral and Rose Street, which curves south from Newgate Street before revealing the north-west tower of the Cathedral rising above Temple Bar as the focal point in the view.

Eastern section of the north side of the Cathedral Churchyard from above. The gilded figure on Pauls Cross stands within the landscaped area of the churchyard and the brick buildings (3-5) close the space down forming a through route towards the west.

10.37 The north side of St Paul's Churchyard is a space of two different characters. The eastern section is a pedestrian route between the railings of the Cathedral Churchyard and the brick buildings comprising numbers 3-5. The route is well used and opens up a little as the north transept is approached. To the north side is the flat roof above the Cathedral works yard which is used for storage and is a slightly uninviting space, although alternative sites for essential storage are not readily available.

10.38 To the west side of the north transept of St Paul's Cathedral, the space widens and activity becomes more varied. Pedestrians crossing from N-S mix with visitors milling around the area and those using cafés or using the new accessible ramped entrance into the Cathedral within the churchyard adjacent to the north portico. Immediately to the north and aligned with the north west tower the space expands further to form an entrance to Paternoster Square through the Temple Bar which was reconstructed on this site in 2004 after being moved to Theobolds Park in Hertfordshire from its original position in Fleet Street in the 1880s. The Bar was reinstated between two new buildings, Juxon House and Paternoster Lodge, the latter being a compact red brick building the design of which references the adjacent Cathedral Chapter House. The Chapter House (Grade II* listed) was built 1712-14 to the designs of Wren and in a familiar idiom with a domestic character using red brick with rubbed brick and stone dressings. It has been subject to various alterations, including post-War restoration in 1957 by Godfrey Allen.

10.39 The Paternoster Square development provides a mix of close and narrow pedestrianised routes linking from Newgate Street the paved area at the western end of the Cathedral that merges with the plaza at the front of the Cathedral. A colonnade forms a distinctive NW corner and whilst some have criticized the architectural style, in terms of scale and the definition provided to the churchyard it is a successful building. A particularly important component of the success of the development are the new views of the north elevation and dome of the Cathedral that were created and the sensitive relationship with the retained historic Deanery and the re-introduced Temple Bar.

10.40 Paternoster Square itself is a successful urban space, similar in character to urban squares found in other European cities and therefore reflecting the inspiration and ambitions of Wren in terms of the role of his cathedral in the rebuilt city. The space is well used both as a through route, but also for social gatherings including - Christmas markets, watching Wimbledon and other sports tournaments; or using the square for table tennis. It is the most successful urban space within the close setting of the Cathedral in many ways.

The close setting or Churchyard at night

10.41 Within the churchyard at night, St Paul's is appreciated in a still generally busy and active, artificially illuminated setting. The strongly directional lighting focussing on the crossing contrasts with the more even light wash of the south and west elevations of the Cathedral. The combination makes the building appear calm and coherent in contrast to the scattered lighting of adjacent buildings. The colour, or heat of the lighting als distinguishes the building from its setting, reinforcing the identity of the Cathedral as distinct from the largely commercial urban context.

10.42 In the intermediate setting, the lighting of the Dome and peristyle is of particular importance enabling these features to remain visually prominent against the sky in the context of many more tall buildings adjacent to the Cathedral in the cluster.

St Paul's at night from Ludgate Hill at the junction with Ludgate Circus, note the strong contrasts of the illuminated peristyle and dome against the night sky and the even wash of light over the west portico below (picture credit: copyright James Newton).

St Paul's at night from the south-east with the lighting of the public realm, including the road contrasting with the light above on the Cathedral (picture credit: copyright James Newton).

The approaches to the Cathedral

10.43 The approaches to the Cathedral, provide the strongest contribution to understanding and enjoyment of the architecture and history interest for many visitors to the building. The approach to the St Paul's was historically part of its ceremonial and liturgical significance. The east-west alignment was important for liturgical practice but also related to the historic morphology of the early medieval city with the royal settlement of Westminster to the west allowing the monarch to be greeted at the west end of the Cathedral and formally admitted into the City of London. The alignment also presented the greatest opportunities for the form of the cathedral(s) to be appreciated by those approaching from north and south and across, originally, the only bridge over the Thames.

10.44 Today the approaches can be broadly divided into character areas.

1. The approach from the north is through the financial and civic areas of the city. The Cathedral is largely invisible until the A 40 is reached, because of the grain of the setting; with the notable exception of mid-range views from the London Borough of Islington. These have been identified for management through the St Paul's Heights policy (see *paragraphs* 6.23-6.24 above).

2. The approach from the east is along Cheapside, Cannon Street and the associated commercial retail areas. The experience is dominated by the width of the roads, traffic and the major junctions just east of the Cathedral.

3. The approach from the west is along Fleet Street and the Processional Route and is a bustling urban context, dominated by commercial and retail activity and heavily affected by traffic.

4. The approach from the south and primarily along the river corridor is mainly via the Thames Path and Queens Walks which is more open. It is still a busy urban context but one characterised by pedestrian movement and recreational activity. It is a kinetic experience that involves a journey from Waterloo and Hungerford Bridges to the west and extending to London Bridge to the east. In making this journey the Cathedral is an almost continual presence, its precise relationship to the river changing in response to its bends. The Cathedral disappears behind the bridges over the river and occasionally is framed by them in an almost picturesque manner.

The approach from the North

10.45 The Cathedral is a skyline presence in mid distance fro the area around Farringdon, but otherwise is generally not appreciated in the northern areas of its setting. Upon reaching the A40 which runs along Newgate, glimpsed views of the dome set within a largely moder commercial context are available. It is not until the ne routes that have been created as part of the Paternoste Square development are reached that there is a positive urban relationship between St Paul's and its setting to t north. Overall, the northern approach to the Cathedral i the most fragmented.

The approach from the East

10.46 From the east the approach is along Cheapside and Cannon Street with the Cathedral at an angle closing the view. The dome, south transept pediment with its statues and the south-west tower of the Cathedral are all seen as the dominant skyline elements, with the mos visually prominent, because of the urban grain, being the south-western tower. Further north the approach along Cheapside is much wider, and dominated by retail activit New Change is a positive addition at the east end of th street which provides new framed views of the Cathedra at ground level and elevated views of the Cathedral and particularly the drum and dome from its roof.

East end of St Paul's Cathedral seen from within New Change (picture credit: copyright Historic England).

The approach from the West

10.47 The ability to first experience St Paul's as the terminus of the Processional route from Westminster along Fleet Street is just east of the junction with Fetter Lane at Crane Court. At this point Fleet Street curves towards the south-east and the Dome and peristyle of the Cathedral begins to emerge on the skyline. The spire of St Martin's Ludgate Hill is in front and just to the side of the north-west tower. To the north (left) the Eastern or City cluster is a significant element in the skyline, its' southern edge formed by the incline of the "Cheesegrater" building on Leadenhall Street. This softens the otherwise abrupt juxtaposition of development on the skyline and provides a greater area of sky space around the dome.

10.48 Proceeding further east along Fleet Street the perceived distance between the cluster and the Cathedral increases as the full extent of the drum, peristyle and dome of St Paul's is revealed to become the dominant feature of the skyline. The relationship between the cluster, the Dome and North West tower of the Cathedral and the spire of St Martin's Ludgate Hill is a dynamic one with all four elements changing position as one progresses east.
As Fleet Street drops down to reach Ludgate Circus the cluster recedes, its lower elements increasingly screened by development in the foreground whilst, conversely, St Paul's becomes the dominating skyline presence.

10.49 The foreground of the final stage of the route from the west to the Cathedral is dominated by the topography rising up Ludgate Hill which underpins its significance and enhances its architectural effect. Commercial buildings of masonry construction rising to a common height of five storeys provide a consistency of grain that is subservient to the Cathedral. The effects of perspective result in the development flanking Ludgate Hill appear to be consistent with the level of the entablature of the Cathedral, particularly along the south side. The spire of St Martin's Ludgate is a conspicuous feature in the setting that breaks the skyline alongside the dome and the south-west tower of the Cathedral at the foot of Ludgate Hill. Progressing up the hill the dome of St Paul's recedes from view and the south-west tower and spire of St Martins become the dominant elements until the curve of Ludgate Hill once again takes effect and the dome re-emerges to be appreciated in combination with the tower and the lantern and spire of the church. At the crest of the hill in the close setting, the tower of St Martins recedes and the west front of the Cathedral dominates and is framed by masonry buildings; early 20th Century to the south, early 21st Century to the north.

St Paul's from the west and the skyline from about half way up Ludgate Hill (picture credit: Historic England).

The approach from the South

10.50 These are described in paragraphs 7.14-7.17 above, but in addition a fulcrum for many visitors is the Millennium Bridge which provides an elevated pedestrian approach to the south side of the Cathedral and echoes the tradition of pilgrimage to great ecclesiastical sites. It is a busy and active route, continually photographed and is a positive intervention into the setting of the Cathedral that enhances its significance and the ability to appreciate the building. The bridge is a realisation in a more modest form of earlier, grander, urban planning that sought to establish a direct link between St Paul's and the river immediately to the south.

The Millennium Bridge and St Paul's Hill from the Stone Gallery linking with Tate Modern and The Globe on the South Bank; the most popular pedestrian visitor route to the Cathedral

Environmental contributions of the setting of St Paul's

10.51 The wider setting provides opportunities to appreciate and experience the Cathedral as part of the panorama of London, almost as an object. In locations including Parliament Hill, Primrose Hill and Kenwood the green space adds to the sense of separation from the intense urban activity which is characteristic of the intermediate approaches and close setting of the St Paul's. These spaces are not always tranquil but do enable contemplation of the building in a manner that is not possible elsewhere within the setting. Additional locations in the south London boroughs including Lambeth, Southwark, Greenwich and Lewisham also afford similar experiences.

10.52 The intermediate setting and in particular the river corridor provide the most popular route for visitors. The cultural attractions along the South bank including the Hayward Gallery, the National Theatre, Tate Modern and The Globe all provide an exciting and intellectually stimulating context within which to experience St Paul's which is generally visible across the river. The recreational experience of walking alongside the river and then crossing over on the Millennium Bridge make positive contributions to understanding both the architectural interest of the Cathedral but also its enduring cultural and symbolic values.

10.53 Although the approach and processional route from the west is of immense historic significance, environmentally it is less satisfying. The busy urban environment with significant impact from traffic does not allow spaces to linger and appreciate the Cathedral until the churchyard or immediate setting is reached. The Paternoster Square development provides a calmer urban environment whilst the western area in front of the steps and porticoes of the Cathedral are usually very busy with excited visitors.

Views enabling appreciation of St Paul's

10.54 Where views from the elevated topography within the setting remain, they represent a strong positive contribution to the significance of the Cathedral. There are examples where this has been recognised in the context of formally designated views both strategic and local, for example in the Southwark Local Plan or the views from Blackheath. But in terms of the contribution of these views in experiencing the asset, these locations and any others like them are the closest one can get to the original setting in topographical terms. They make the strongest contribution to understanding the impact that the Cathedral must have had when originally completed and are the echoes of the earlier experience in terms of the relationship of both the current St Paul's (and its predecessor) with the wider city.

10.55 The formally designated views, both strategic and local that have already been identified in development plan policy are: LVMF Views 1-6 (Strategic Panoramas) and View 9 Strategic Linear. "Local" views include those identified by the boroughs of Islington, Lambeth, Southwark, the City of Westminster; and of course, the Corporation of the City of London (*Appendix NPBM 4*) In all of these it is primarily the skyline presence of the Cathedral and in particular the drum and dome that are identified as the key landmark in the views. The policies accompanying these views all seek to ensure that the visual prominence of the Cathedral is sustained and protected. It is probable that there are other places where similar views are available although they have not yet been formally identified; including from Forest Hill and area to the South-East across the river.

10.56 The series of kinetic views experienced in the journey from the north bank of the Thames by Somerset House in the west and arriving at London Bridge to the east provide the best opportunities to appreciate the Cathedral and understand its relationship to the topography of the city but also its central location. This area of the setting also provides good opportunities to appreciate the Cathedral in relation to other buildings, including the City Churches which amplify an understanding of its architectural and historic significance. Elevated views from sites such Tate Modern, Tower Bridge and The Monument provide opportunities to experience the combinations of these heritage assets from a different perspective.

10.57 Two new views of particular importance have also been created in the 21st Century. The Millennium Bridge has provided an approach and view that is directly informed by the plan form and orientation of the Cathedral and represents the fulfilment of a long-held ambition to link the building with the river. It does so in a highly successful manner. Of the east within the close setting of the Cathedral, the view from within and on top of One New Change both frame and also rise above the traffic dominated setting around the apse of the Cathedral. The views from the roof reveal the power and grace of the cathedral and are unique in being approximately aligned with the entablature of St Paul's so that the drum, Peristyle and dome of the Cathedral are seen against a clear sky in all their majesty. New positive interventions into the setting of the Cathedral to the north have also introduced new, framed views of the north transept along Queens Head Passage/Canon Alley and through Paternoster Square.

New views of St Paul's from New Change

Views of St Paul's at night

10.58 The views of St Paul's at night are the result of a combination of illumination from surrounding buildings, the public realm and lighting of the Cathedral itself. In the close setting of the churchyard the illumination of the cathedral, in particular the peristyle and dome above is seen in strong contrast to the night or dark sky.

St Paul's at night from the Festival Gardens to the South-East. The dome and peristyle are seen contrasted against the sky, whilst the even light washing over the elevations below make the building appear calm and coherent in contrast to the scattered lighting of adjacent buildings (picture credit: copyright James Newton).

Experience of the setting from St Pauls: Stone Gallery

10.59 Part of the historic significance of St Paul's has been its role as a visitor attraction from the time of its completion. An important element of the experience was the ability to access the Stone Gallery and enjoy what were originally expansive views across London. The Gallery remains accessible today and provides extensive views across London, reaching as far as the wooded ridges that frame the London Basin.

10.60 The elevated viewpoint also enables direct visual connections to be made with other important heritage assets including the City Churches, The Monument and The Old Bailey. This enables an appreciation of the architectural influence of the Cathedral upon later buildings which amplifies their significance. The ability to see the dome of the Old Bailey from the dome of St Pauls is one example, but there are many others. The most significant historically are those between The Monument and the Cathedral, followed by those where the towers and spires of the Wren City Churches can be seen as a group. These include: St. Bride's, St Dunstan in the West and St Martin Ludgate to the west; St Mary-le-Bow, St Olave, and St Michael Cornhill to the east-north-east; and St Augustine, St Mary Aldermary, St James Garlickhythe and St Michael Paternoster to the east-south-east.

Views North and east from the Stone Gallery looking over Paternoster Square towards the wooded ridges of the northern heights. The Dome of the Old Bailey is prominent in the view which also includes the tower of Holy Sepulchre Church (picture credit: copyright Historic England)

Looking West: The west towers of the Cathedral with St Martin's Ludgate Hill with St Brides; but also, the tower of St Dunstan in the West; and the turrets and spires of the Royal Courts of Justice (picture credit: copyright Historic England).

Looking East-North-East: New Change and Cheapside with the towers and spires of Church of St Mary Le Bow; St Olave and St Michael Cornhill (picture credit: copyright Historic England).

Looking East-South-East: With the Tower of St Augustine; Tower of St Mary, Aldermary; Tower of St Michael Paternoster; Tower of St James Garlickhythe; The Monument; and the corner turrets of the White Tower (picture credit: copyright Historic England).

PART THREE:
Case Studies

Note for version v10:

The case studies will follow in the final version of the report. They will be selected to illustrate how the contribution of close, intermediate, and distant setting to the Cathedral's heritage significance, and to the ability to appreciate significance, can be assessed using the four step process recommended by Historic England in *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017).

It is hoped that this will provide a useful toolkit for practitioners engaged in preparing and assessing development proposals within the setting of the Cathedral.

PART FOUR:
Appendices


TO LET

Appendix 1: Distinction between setting and views

The distinction between setting and views is explained in two Historic England advice notes: *The Setting of Heritage Assets Historic Environment; Good Practice Advice in Planning Note 3* **(2017) and** *Tall Buildings; Historic England Advice Note 4* **(2022).**

Setting is more comprehensive and can include contextual elements which deal with the relationship of an asset to its surroundings both in the present and in the past. This includes the way a heritage asset or place is experienced and perceived today. The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

Views are a more defined element of setting, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to appreciating the setting of heritage assets and constitute part of an asset's significance.

Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether designed to be seen as a unity or as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration or do not make a significant contribution. The methodology in this report therefore includes reference to such designated views, but they are only used to illustrate a particular contribution made by an aspect of the setting. The identification of a positive contribution made by an aspect of setting does not rely on it being part of a designated view, either strategic or local.

Not all of the current views of St Paul's have been identified as part of the assessment of the contribution of setting both past and present and it is acknowledged that not all views make the same contribution to the significance of the asset, or indeed the ability to appreciate that significance. The views that are referenced in the report are generally those where the composition within the view was a fundamental aspect of the design or function of St Paul's; those with historical associations, including their viewing points; those with cultural associations and those where relationships between St Paul's and other heritage assets were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons.

Evolution of setting: the Historic England advice states:

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.

Appendix 2:
Legislation and policy for the management of heritage assets

Legislation

The legal context for the management of listed buildings and conservation areas is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended):

Section 66(1) provides that in 'considering whether to grant planning permission for development which affects a listed building or its setting, the Secretary of State (or decision taker) shall have special regard to the desirability of preserving the building or it setting or any features of special architectural or historic interest which it possesses.'

Section 72(1) provides that in 'the exercise, with respect to any buildings or other land in a conservation area . . ., special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

Case law concerning the duties in the Act is conveniently summarised in Appendix 1 to the Judgment of Holgate J in the *Save Stonehenge* case at paragraphs 4 to 9. The *Barnwell* judgement makes clear that "*preserving*" means "*doing no harm*" and that decision makers should give "*considerable importance and weight*" to the desirability of preserving listed buildings and their setting of listed buildings, and the character and appearance of conservation areas. A finding of harm to the setting of a listed building, or to the character or appearance of a conservation area gives rise to a strong statutory presumption against planning permission being granted.

Policy

The purpose of the planning system is to contribute to the achievement of sustainable development and the National Planning Policy Framework (NPPF) (*December 2023*). There are three dimensions to sustainable development and the planning system has an economic role supporting growth; a social role supporting strong, vibrant and healthy communities by creating high-quality built environment; and an environmental role by contributing to protecting and enhancing the natural, built and historic environment.

A decision-maker should identify and assess the particular significance of the heritage assets that are affected by a proposal. They should take account of this assessment

[3] R (Save Stonehenge World Heritage Site Ltd.) v. Secretary of State for Transport [2021] EWHC 2161 (Admin)

to avoid or minimise conflict between the heritage assets' conservation and any aspect of the proposal. Great weight should be given to the conservation of designated heritage assets. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

Appendix 3:
Current policy framework for the management of views

Planning Authority	View type	Number and Location
Greater London Authority LVMF	Strategic Panorama	View 1 Alexandra Palace
	Strategic Panorama	View 2 Parliament Hill
	Strategic Panorama	View 3 Kenwood
	Strategic Panorama	View 4 Primrose Hill
	Strategic Panorama	View 5 Greenwich Park
	Strategic Panorama	View 6 Blackheath Point
	Strategic Linear	View 8 Westminster Pier
	Strategic Linear	View 9 King Henry VIII Mound
	Strategic River Prospects	View 10 Tower Bridge upstream
	Strategic River Prospects	View 11 London Bridge
	Strategic River Prospects	View 12 Southwark Bridge
	Strategic River Prospects	View 13 Millennium Bridge
	Strategic River Prospects	View 14 Blackfriars Bridge
	Strategic River Prospects	View 15 Waterloo Bridge
	Strategic River Prospects	View 16 Southbank
	Strategic River Prospects	View 17 Golden Jubilee Hungerford Bridges
LB Lambeth	Local Panorama	C (i) Brockwell Park N and NE
	Local Panorama	C (ii) NNE Norwood Park
	Local Panorama	C (iii) N Gipsy Hill

Planning Authority	View type	Number and Location
	Local Panorama	C (viii) N and E National Theatre terraces
	Landmark Silhouette	D (xviii) NE from Queens Walk
LB Southwark	Local Panorama	View 1 One Tree Hill
	Local linear	View 2 Nunhead Cemetery
	Local linear	View 3 Camberwell Road
	Local River Prospect	View 4 Kings Stairs Gardens
LB Greenwich	Local	View 1 Shooters Hill
	Local	View 5 Eltham Park North
	Local	View 9 Docklands Panorama
	Local	View 10 Kingston Walk
LB Islington	Local	LV1 Farringdon Lane Clerkenwell Road
	Local	LV2 St John's Street
	Local	LV3 Angel
	Local	LV4 Archway Road

Planning Authority	View type	Number and Location
	Local	LV5 Archway Bridge
	Local	LV6 Amwell Street
	Local	LV7 Dartmouth Park Hill
Corporation of the City of London	The Monument Views Study December 2020	
Corporation of the City of London	St Paul's Heights Study Parts 1-7 published 2015	
Corporation of the City of London	Protected views SPD published 2012	

Greater London Authority: London View Management Framework (LVMF, 2012)

Relevant Panoramas

View 1 Alexandra Palace (2 viewing places). St Pauls is the Strategic Landmark in the view ad with a protected vista Relationship to the wooded hills and flatter land to the east is referenced.

View 2 Parliament Hill the summit. (2 viewing places) St Paul's and Palace of Westminster are the two LSIs in the view. In relation to view 2a it states *St Paul's Cathedral is set within a miscellany of buildings, in both its foreground and background. The dome and peristyle are visible, but some development in the background diminishes the viewer's ability to recognise and appreciate the landmark, particularly in poor weather conditions.*

View 3 Kenwood The Viewing Gazebo - view 3A it St Paul's and Palace of Westminster are the 2 LSIs in the view. States: *St Paul's Cathedral, to the west of the City of London, is seen in front of a cluster of taller buildings at London Bridge, including Guy's Hospital tower and the Shard. The views of the Cathedral dome benefit from an absence of development in the foreground but development behind the dome compromises the viewer's ability to appreciate the landmark.*

View 4: Primrose Hill St Paul's is one of 2 LSIs in view. (2 viewing places)

4A1 is the relevant protected vista *The cluster of tall buildings in the City of London is partially obscured by towers at Euston. St Paul's Cathedral is framed by two of these towers but a third, lower tower, reduces the viewer's appreciation of the dome and drum.*

Background p 134 St Paul's Cathedral and its Western Towers are recognisable in this view largely because it is seen clearly against the sky and it is not dominated by development in its backdrop.

View 5 Greenwich Park (2 viewing places) 5A2 with the relevant protected vista-

St Paul's Cathedral and Tower Bridge are visible in the panorama. Adjacent to Tower Bridge, and to its right in the view, is The Monument to the Great Fire. The background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers. The sight line to the Tower Bridge and St Paul's Cathedral is unimpeded in the foreground, ensuring the two elements are seen as a composition. The ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama.

View 6 Blackheath Point *6A1 The dome and western towers of the Cathedral are visible, the former silhouetted against the sky, enabling clear recognition and appreciation of the landmark. Few buildings are visible immediately behind the landmark, such that the rising line of hills to the north are the dominant backdrop feature. The western towers of St Paul's Cathedral are integral to the viewer's ability to recognise and appreciate the landmark. Therefore, the Landmark Viewing Corridor of the Protected Vista from Assessment Point 6A.1 incorporates these features.*

The Tower of St Paul's Deptford is available in the view in combination with St Paul's.

Relevant Linear Views

View 8 Westminster Pier to St Paul's viewing place 8A *The two buildings that frame St Paul's Cathedral allow an unimpeded view of the peristyle, upper drum and dome, silhouetted against the sky. This is a key attribute of this view. The most southerly of the western towers of the Cathedral partially obscures the peristyle, while the northern tower is largely hidden behind the Royal Festival Hall.*

View 9 King Henry VIII's Mound Richmond

Relevant River Prospects

View 10 Tower Bridge Upstream – St Pauls and TL are the two SL. There are visual relationships with The Monument, Churches of St Dunstan in the East, St Margaret Pattens and the Church of All Hallows

View 11 London Bridge (3 viewing points). Viewing point 11A upstream is the relevant one focussed on St Pauls- and with St Bride's church spire in setting.

View 12 Southwark Bridge (2 viewing places) the relevant viewing place is 12A1 upstream. The view is the result of the St Paul's Heights and effective control particularly in the foreground and middle ground. *The St Paul's Heights Limitations have played an important role in the development of the townscape setting around St Paul's Cathedral during the 20th Century. While respecting the Limitations, new development should also improve this townscape environment where possible.*

View 13 Millennium Bridge and Thameside at Tate Modern (2 viewing places both relevant)

The foreground of the view is dominated by the bridge and its structure, with buildings in front of St Paul's forming the middle ground. The south transept can be clearly recognised and appreciated, beyond the steps leading to the Cathedral. On the north bank

the dominance of the Cathedral in the townscape can be attributed to the effects on development of the St Paul's Heights Limitations, which ensure that the cornice line of the cathedral remains visible. The backdrop of the Cathedral is compromised by taller buildings including the Barbican towers.

226 The St Paul's Heights Limitations have also led to an unrelenting horizontal emphasis to the buildings in the middle ground, although this is relieved by the spires and towers of the City's churches, which can also be seen in the view.

View 14 **Blackfriars bridge** - Blackfriars Thameslink Station-

View 15 **Waterloo Bridge** (4 viewing places 2 upstream and 2 downstream –but kinetic more appropriate) 15B 1 and 2 relevant viewing points *The location provides important views east towards St Paul's Cathedral and the City of London. The river frontage buildings on the Westminster and Southwark sides of the Thames frame the middle ground views and the river dominates the foreground. The viewer's eye is drawn towards Temple Gardens, St Paul's Cathedral and the City's financial district. Both river banks are softened by trees in the foreground of the view. From the north end of the bridge, St Paul's Cathedral appears above the trees on the Embankment, with only the river and tethered boats also in the foreground. While the principal cluster of tall buildings in the City remains to the right of the Cathedral in views from Waterloo Bridge, recent developments close to the north-east edge of the City, have begun to create a second cluster on the left side of the Cathedral.* Dome and towers seen against clear sky

View 16 **South Bank** (2 viewing places) Most relevant is 16B 1 and 2 looking upstream from Gabriel's wharf St Paul's is centre of the view with clear sky *The three-dimensional form of St Paul's Cathedral can be fully appreciated in this view, with the main cornice and western towers both prominent. The dominance of St Paul's Cathedral and the visibility of its principal features are safeguarded by the St Paul's Heights Limitations, which prevent inappropriately high developments close to the Cathedral. Some existing tall buildings in the backdrop have started to damage the clarity of the Cathedral's overall form, and reduce the viewer's ability to appreciate it.*

View 17 Golden Jubilee/Hungerford footbridges. (4 viewing places 2 up and 2 downstream) More relevant ones are 17B 1 and 2 towards Westminster end of bridges. *St Paul's Cathedral and its western towers rise above the general townscape, although recent development reduces the quality of its setting in the view from the south-east side of the bridge. Either side of the Cathedral are the east and northern clusters of tall*

buildings in the City of London. The spire of St Brides and the dome of the Old Bailey are distinctive vertical elements seen against the sky.

Townscape Views

None

Local Plans

LB Lambeth 2020-35. Adopted 2021

10.125 Lambeth's topography plays an important role in dictating local views. The elevated land of the Norwood Ridge to the south of the borough and the relatively flat topography to the north means that most distant views are northerly; a number looking out across low-lying Southwark to the city beyond.

Policy Q25 A LVMF Views

The council will resist harm to the significance of strategic views (Panoramas, Linear Views, River Prospects and Townscape Views defined in the LVMF and listed in Annex 6) and secure improvements within them in accordance with London Plan policy HC4.

and

Policy Q25 B Views of local Interest including (C) Panoramas and (D) Landmark silhouettes

The council's views of local interest are set out in part's c and d below. In assessing proposals, the council will seek to protect their general composition and character from harm. Particular regard has been paid to the identification of views of the Westminster World Heritage Site. The following views are considered to be of local interest:

Q25 A views of relevance:

- See LVMF above

Q25 B views of relevance:

C Panoramas: The objective in identifying these views is to ensure that no foreground or middle- ground development is intrusive, unsightly or prominent in relation to the panoramic view as a whole, or landmark buildings within:

- C i. (c) views from Brockwell Park N and NE to the City- St Paul's identified as a landmark of note
- C ii. View NNE from Norwood Park (across LB Southwark) to the city- ability to appreciate the dome of St Paul's should be maintained
- C iii. View N from Gipsy Hill (across LB Southwark) to the city –St Paul's identified as an asset of high value and requirement is to maintain the ability to "fully appreciate" it
- C viii. View N and E from National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral- St Paul's is identified as a landmark alongside St Clement's Danes. Value of the view comes in part from the background of clear sky that forms (sic) their silhouette

D Landmark Silhouettes: The objective in identifying these views is to ensure that no development obscures or is intrusive, unsightly, visually dominates or competes with, and no background development harms, the silhouette of the assets in:

- xviii. View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark. The dome and towers are identified in the description and the building as described as having a "true landmark quality"

Details of the views are in a Draft SPD consultation closed (January 2021) check status

LB Southwark: the Southwark Plan: Fairer Future 2019-2036. Adopted February 2022

Policy P22 Borough Views

Borough views are significant views and panoramas that make a positive contribution to experiencing Southwark's environment within London, informing how we are located in an historic and important world city

Development should: 1. Preserve and where possible enhance the borough views of significant landmarks and townscape; and 2. Ensure the viewing locations for each view are accessible and well managed; and 3. Enhance the composition of the panorama across the borough and central London as a whole.

P22 Views of relevance:

- View 1: The London panorama of St Paul's Cathedral from One Tree Hill

1. Maintain the view of St Paul's Cathedral from the viewing place on One Tree Hill and not exceed the threshold height of the view's Landmark Viewing Corridor; and
2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;

- View 2: The linear view of St Paul's Cathedral from Nunhead Cemetery

1. Maintain the view of St Paul's Cathedral from the viewing place within Nunhead Cemetery and not exceed the threshold height of the view's Landmark Viewing Corridor; and
2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;

- View 3: The linear view of St Paul's Cathedral along Camberwell Road

1. Maintain the view of St Paul's Cathedral from the viewing place on Camberwell Road and not exceed the threshold height of the view's Landmark Viewing Corridor; and
2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;

- View 4: The river prospect of River Thames and its frontage, Tower Bridge and St Paul's Cathedral from Kings Stairs Gardens

1. Ensure that the River Thames and its frontage, and the key landmarks of Tower Bridge and St Paul's Cathedral are maintained within the view;

LB Camden: Camden Local Plan 2016-2031. Adopted July 2017 under review from 2022

Chapter 7 Design and Heritage

Views 7.26 A number of London's most famous and valued views originate in, or extend into, Camden. These are:

- views of St Paul's Cathedral from Kenwood, Parliament Hill and Primrose Hill;
- views of the Palace of Westminster from Primrose and Parliament Hills; and
- background views of St Paul's from Greenwich and Blackheath. –all LVMF

Para 7.28 The Council will also consider the impact of a scheme, in terms of the townscape, landscape and skyline, on the whole extent of a view ('panorama'), not just the area in the view corridor. Developments should not detract from the panorama as a whole and should fit in with the prevailing pattern of buildings and spaces. They should seek to avoid buildings that tightly define the edges of the viewing corridors and not create a crowding effect around the landmark.

LB Greenwich: new Local Plan 2021 to 2036.

Regulation 18 consultation currently in progress until September 2023. Design and Heritage topic Paper out for consultation July 2023

LB Greenwich: current Local Plan Core Strategy. Adopted 2014

4.4.5 The Royal Borough will seek to preserve and enhance areas of recognised and valued character for Royal Greenwich and London as a whole, including historic landscapes, general landscapes, fine local and strategic views, open land, and wildlife habitats.

Policy DH4 Maritime Greenwich World Heritage Site: The Royal Borough will protect and enhance the Outstanding Universal Values (the 'Values') of the inscribed Maritime Greenwich World Heritage Site (the 'Site'). Development within it should protect and enhance these Values. Development within the buffer zone (as defined on the Proposals Map) and setting should not adversely impact on those Values, including views to and from the Site. [added emphasis- explore relationship to St Pauls and LVMF viewpoint)

Policy DH(g) Local views

Planning permission will only be given for development which would not have a materially adverse effect on the overall perspective and essential quality of the Local Views as listed below:

Relevant views

- View 1 Shooters Hill to central London? Shooter's Hill highest point – in the borough and one of highest in London
- View 5 Eltham Park N to central London?
- View 9 Docklands Panorama from the Wolfe Monument – reliance upon LVMF policy (under para 4.4.57)
- View 10 King John's walk to central London?

LB Tower Hamlets: Local Plan 2031 Managing Growth and Sharing Benefits. Adopted January 2020

Policy D.DH4 Shaping and Managing Views

Development is required to positively contribute to views and skylines that are components of the character of the 24 places in Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted.

8.43 Views are important elements of townscape and local character, and provide a good test of the contribution that a development makes to a place. Townscape views can be valued for a variety of reasons, but often the most valued views will feature a prominent building that terminates a vista, acts a focal point or establishes some other form of spatial prominence. Such landmarks help to define and identify places and are considered to be a key component of high-quality urban design. The policy identifies: a. A skyline of strategic importance which is observed from multiple locations within and outside the borough, and b. A series of views and landmarks of a borough-wide importance: borough-designated views and borough-designated landmarks.

LB Islington: new local plan has been examined in public, major modifications consulted upon and minor modifications still to be completed (as of May 2024).

Relevant parts of the current local plan are therefore Core Strategy 2011 and updated DM policies adopted 2013.

DM 2.4 Protected Views

Within Islington there are local views of St. Paul's Cathedral and of St. Pancras Chambers and Station, which the council will protect and enhance.

2.4 D. Redevelopment of buildings that currently adversely impact on the local or strategic view are required to enhance the view and the ability to appreciate the landmark within the views, and not infringe on any part of the defined view.

These views are shown on the Policies Map. The local views protected are:

- LV1: View from Farringdon Lane/Farringdon Road / Clerkenwell Road - provides an opportunity for views of St Paul's Cathedral from a large space and can therefore not be considered in terms of separate viewpoints but as a viewing area. Views to St Paul's cathedral will be protected from all parts of this viewing area.
- LV2: View from St. John Street
- LV3: View from the Angel
- LV4: View from Archway Road
- LV5: View from Archway Bridge
- LV6: View from Amwell Street
- LV7: View from Dartmouth Park Hill

The views from Farringdon, St. John Street and Amwell Street of St. Paul's Cathedral form part of the original views protected in the 1930s by the City of London's St. Paul's Heights. Islington has maintained these original views and added to them over time. Protection across the whole of the local view needs to be maintained, requiring policy coordination between the City of London and Islington. It should be noted that there is a slight difference in height between the view the City protects and that Islington's policy protects for these three views. The height difference is to enable greater control of the development in the foreground of these views, allowing a larger viewing area and enhancing the appreciation of this important and attractive landmark. However, consistent with the City of London's St Paul's Heights, these three views terminate at 58.1m AOD (the height of the base of the cathedral's peristyle). The remaining local protected views terminate at 52.1m (the height of the base of the cathedral's drum), as per the mayor's strategic protected views of the cathedral)

City of Westminster: City Plan 2019-2040. Adopted April 2021 (*Under partial review for site allocations, affordable housing and retrofit policies – regulation 19 consultation due to finish 2023)*

40.15 / Westminster's unique townscape gives rise to some of the most familiar and cherished views of London. These include views of the River Thames and its frontages, the Royal Parks, as well as many other 'picture postcard' views of famous London landmarks.

40.17 / Local views are valued for their contribution to Westminster's distinctive character areas. These may contribute to the appreciation of important listed and other landmark buildings or distinctive skylines or groupings of buildings, historic parks and gardens, and views along or across the River Thames and Westminster's canals. Recognising the national importance of Westminster's heritage and townscape, we have also identified certain 'metropolitan views' of major landmarks and the most significant river views and areas of townscape in the city**We will publish a list of views of metropolitan importance and prepare guidance on their management.**

40.18 / New development should make a positive contribution to the characteristics and composition of significant views, both strategic and local, and improvement to significant views will be encouraged. This may include a proactive approach to view enhancement by repairing past damaging development. For example, opportunities should be taken to reduce the scale and impact of existing harmful buildings in the foreground or middle ground of protected vistas. Careful consideration of building materials and finishes can make proposals more sympathetic in long distance views. A proportionate approach to view protection will be taken, taking into account the significance of the view and magnitude of impact of proposals.

Policy 40 F Westminster views:
New development affecting strategic and local views (including local views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible

Protected vistas of relevance (LVMF):

- 4A1 Primrose hill Summit to St Paul's
- 8A1 Westminster Pier to St Paul's Cathedral
- 9A.1 King Henry's Mound to St Pauls

Westminster viewpoints (LVMF):

- 8 Westminster Pier to St Paul's Cathedral
- 14 Blackfriars Bridge
- 15A Waterloo Bridge
- 17 Hungerford foot bridges

Corporation of London: City Plan 2040

In preparation (previously City Plan 2036) planned consultation on revised draft December 2023- February 2024 Current Plan: City Plan 2015.

Draft 2036 plan

"Shape outstanding Environments" it states: The City's rich architectural and archaeological heritage will continue to be conserved and enhanced. Historic buildings will be sympathetically adapted to new uses where this is appropriate, enabling them to play their part in meeting the needs of the future City. New development will enhance the City's character and add value to the wider character and quality of London, whilst respecting the setting, backdrop and views of St Paul's Cathedral and the Tower of London.

Under Key Areas of change (vision) *3.4.5 Fleet Street and Ludgate: The role of Ludgate Hill as the primary approach to St Paul's Cathedral will be enhanced. Existing office accommodation will be retained and improved to provide flexible floorspace and spaces to meet changing business needs. Public realm and transportation improvements will deliver a high-quality environment which enhances the Principal Shopping Centre, the retail link and the historic lanes, alleyways, churchyards and spaces that lead off the processional route of Fleet Street and Ludgate Hill.*

Detail assessment: 7.7.2. The St Paul's Conservation Area extends up much of Ludgate Hill and surrounding streets and frames the approach to the Cathedral. Protecting and enhancing this heritage and views of St Paul's Cathedral will be a key consideration guiding future change. Fleet Street, Ludgate Circus and Ludgate Hill form part of the ancient processional route between Westminster and the City of London, providing iconic views of St Paul's Cathedral. Fleet Street, Ludgate Circus and Ludgate Hill are heavily trafficked, with narrow, often congested, footways but there is a strong sense of place resulting from the spaces and the architecture.

Proposed Strategic Policy S22: Fleet Street and Ludgate. The character and function of the Fleet Street and Ludgate Key Area of Change as a centre for judicial and related business, a royal and state processional route and a Principal Shopping Centre (PSC) will be promoted by: Protecting and enhancing the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route.

7.7.14. The Key Area of Change extends up to St Paul's Cathedral, an internationally recognised landmark on the London skyline which is sited at one of the highest points in the City and was London's tallest building between the early eighteenth century and the 1960s.

The local setting of St Paul's remains relatively low-rise, allowing the scale and significance of the building to be appreciated and preserving its status as the defining focal point of the processional route and a key element of the area's character. While the approach to St Paul's from Fleet Street and Ludgate Hill is of historic importance, the setting of the Cathedral and the visitor experience is diminished by heavy traffic and associated highways clutter. There is potential for significant townscape enhancements and decluttering along the processional route and for further public realm and transportation improvements in the immediate vicinity of the Cathedral to enhance the setting of this iconic building.

Spatial Strategy objective 6: Focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site;

Policy HE1 Managing change to Heritage Assets supporting para 6.4.18. The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from **high level locations is a material consideration**.

Proposed Strategic Policy S12

6. New tall buildings will be refused in inappropriate areas, comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; the protected vista and White Tower protected silhouette of the Tower of London; and Monument views and setting; all as defined on the Policies Map.

Proposed Strategic Policy S13: Protected Views

The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

- Implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views;
- Protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features;

6.5.12. The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St. Paul's Cathedral have been protected successfully by the City Corporation's 'St. Paul's Heights' code since the 1930s. The London Plan sets out the overall view protection requirements which apply to Strategically Important Landmarks. Landmarks such as St. Paul's Cathedral, the Monument and the Tower of London are internationally renowned and add to the City's world class status.

6.5.18. The City Corporation will protect local views of St Paul's Cathedral when approaching along Fleet Street, Ludgate Circus and Ludgate Hill which forms part of the long established royal and state processional route between Westminster and the City. The views of St Paul's are kinetic, changing as the viewer moves along the length of this route, depending on the topography and alignment of buildings. Development proposals that could be visible from places along this route should ensure that they do not impinge on the ability of the viewer to recognise and appreciate the silhouette of St Paul's Cathedral, and that they maintain the current clear sky background profile. An indicative view background centre line is shown on Figure 22 to highlight this issue. Further details will be set out in an update to the Protected Views SPD, which will include a ***Statement of Significance*** *and 3D digital modelling information to inform the future conservation and enhancement of this approach.*

Protected Views SPD adopted 31st January 2012

Operation of the Heights

2.12 The City Corporation has successfully protected views of St. Paul's Cathedral through the St. Paul's Heights policy for over 70 years. The successful protection and restoration of the views depends on the long-term, application of the Heights limitations to all sites within the area of control. The views protected by the Heights are sensitive to even small infringements. Consistent application of the limitations is therefore crucial to their successful protection of the views.

2.13 Development proposals within the Heights policy area must comply with the Heights limitations. The Department of the Built Environment can provide details of the relevant Heights limitations and can advise on their implications. Applicants will be expected to submit drawings showing the relationship between the Heights limitations and the proposed development to ensure compliance with the Heights. [my emphasis]

2.14 Some existing buildings exceed the Heights limitations and thereby partially obstruct the protected views of St Paul's. Upon alteration or redevelopment such buildings will be required to comply with the Heights limitations so that views obstructed at present will eventually be restored. Several infringing buildings have been redeveloped in compliance with the Heights, successfully restoring lost views. Examples include Vintry House (built in 1930 and demolished in the 1980s), and Sudbury House (built 1964 and demolished in 2003 as part of the Paternoster Square redevelopment).

2.18 In some of the views protected by St Paul's Heights tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases, tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge; and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. Within these views, new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views.

2.19 From other heights viewpoints where no tall buildings appear in the backdrop and the Cathedral is seen against clear sky, new development should maintain this situation

Appendix 4:
Select bibliography and sources

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Appendix 5:
Nigel Barker-Mills

Education/Professional Qualifications:

Nigel Barker BA(Hons) PhD. Dip Bldng. Cons IHBC, FSA

BA honours Degree (2:1) in History of Art and Architecture Reading University 1976-1979

1978: Courtauld Institute Scholarship to attend the Summer School in Venice and the Veneto led by (then) Anthony Blunt.
1979-1982 Awarded a State Scholarship to carry out research for a Doctoral Thesis on "*The Architecture of the English Board of Ordnance 1660-1750*" supervised by Prof Kerry Downes

1990: Post Graduate Diploma in Building Conservation awarded by the Architectural Association- dissertation subject *The Repair of Traditional buildings- a Question of Education?* -which examined the level of skills and knowledge available to contractors and owners of historic buildings in the SE of England.

1997: Elected, founding, Member of Institute of Historic Building Conservation (Membership Number 0004)

2014: Elected Fellow of the Society of Antiquaries of London

Professional Career/Experience:

1982-1986: Fieldworker for the Accelerated Resurvey of Lists of Buildings of special Architectural or Historic Interest – responsible for Surrey

1987-2000: Employed as Historic Buildings Adviser Surrey County Council providing specialist advice on the conservation and repair of historic buildings, areas and landscapes in Surrey. Key achievements include establishing Conservation Officers Group for Surrey (Chairman for 11 Years), establishing and publishing the first Buildings at Risk register for the County in collaboration with the 11 local planning authorities, providing expert witness advice for several major public inquiries including Wotton House restoration of Grade II* country house and Grade I Registered Landscape, and one of the first successful prosecutions of an owner for unauthorised works to a listed building in the county. Providing training for the Surrey Planning Officers Society and Building Control officers on the management of historic buildings and providing expert advice for the Surrey Historic Buildings Trust Repairs Grant Scheme.

2000-2001: Historic Buildings Adviser for Waverley Borough Council

2001-2009: Historic Areas Adviser/Team Leader in English Heritage SE Region with responsibility for new development in historic areas and area grant schemes across Kent, E and W Sussex, Buckinghamshire, Oxfordshire and Berkshire. Key achievements include establishment of community-based conservation area appraisal projects in Surrey which became a national exemplar; community-based characterisation projects in Oxford working with the Oxford Preservation Trust and developing a model conservation area appraisal and management plan strategy in collaboration with Aylesbury Vale DC. During this time, I was identified as the EH National lead on Building in Context developing and publishing the BiC Toolkit in partnership with CABE and the Kent Architecture Centre and rolling the training programme out across the country. The Toolkit received a Planning Award from the RTPI in 2007/8. Other key achievements included supporting the development of Townscape Heritage Projects in Rochester and Hastings, monitoring HLF grant projects and commissioning a conservation plan for RAF Upper Heyford which led to its designation as a conservation area subsequently successfully appearing as an expert witness to oppose the local council's proposals to demolish nationally significant Cold War Structures and securing new uses for the former aircraft hangers. Supporting the regeneration of former railway workshops at Wolverton and the repair and regeneration of Bletchley Park with the Bletchley Park Trust

2009-2011: English Heritage London Head of Partnerships – taking the lead on Heritage at Risk for London and strategic partnerships with the Greater London Authority and the London Boroughs.

2012-2016: Planning Director for the London office (team of 44) responsible for the provision of specialist advice and grants, maintenance of the Historic Environment Record for London and the Greater London Archaeological Advisory Service. In 2010 appointed Historic Environment representative on the London Mayor's Cultural Strategy Group.

2016-to date- Established *Barker-Mills Conservation* specialist expert (heritage) consultancy with clients in the public and private sectors including Gascoyne Cecil Estates, Historic England NW and SE offices; Greater London Authority; Ryde School; Horsham District Council and various private developers.

Other roles:

1984-2000: Member, and for part of the time Secretary, of the Surrey Archaeological Society Buildings Committee

Elected Honorary member of the Arts and Crafts Movement Surrey- Chairman (2016-2018)

1987-2000: Trustee of the Watts Chapel. Involved in the successful campaign to repair the roof of the internationally significant Grade I listed Funerary Chapel in Compton, Surrey

Registered lecturer with the Department for Continuing Education Surrey University

Registered lecturer with Workers Education Association, NADFAS (now the Arts Society) and U3A teaching courses on architectural history and conservation

Chairman, Vice Chair and Treasurer of the SE Branch of IHBC at various times, serving continuously on the Committee from 1997- 2009

Editor and then Chairman of the Editorial Board for *Context* the journal of the IHBC and serving on Council from 2000-2006

Member of the New London Architecture Sounding Board 2010-2016

Member of Oxford West End Design Review Panel

Expert Assessor for Hackney Design Awards 2013 &2014

Appointed Chairman of the Heritage Advisory Committee of the Canals and Rivers Trust 2017

Member of the Advisory Board for Glasgow University- School of Urban Studies research project on *"Why Does the Past Matter? Emotional attachments to the Historic Environment"* 2017

Publications:

Contributed to "English Architecture Public and Private: Essays for Kerry Downes Ed Bold & Chaney

Contributed to "Nature and Tradition: Arts and Crafts Houses and Gardens in and Around Guildford" published GBC 1993

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Articles in *Context* including a review of the conservation legislation in first Decade of the 21st Century

Paper on: *Setting of Heritage Assets- A Practitioner's View for the Joint Planning Law conference Oxford 2015 (published proceeding Sweet& Maxwell).*

Historic England 2020 Conserving Georgian and Victorian Terraced Housing. Swindon. Historic England.

LONDON
REVIEW PANEL

Simon Gunasekara
Associate
DP9

14th October 2024

Dear Simon,

London Review Panel: 99 Bishopsgate

Please find enclosed the London Review Panel report following the design review of 99 Bishopsgate on the 14th June 2024. I would like to thank you for your participation in the review and offer ongoing Mayor's Design Advocate support as the scheme's design develops.

Yours sincerely,

Tom Holbrook
Mayor's Design Advocate

cc.
All meeting attendees
Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills
Philip Graham, Executive Director of Good Growth, GLA
Louise Duggan, Head of Regeneration, GLA

LONDON
REVIEW PANEL

Report of London Review Panel meeting for 99 Bishopsgate

Friday 14th June 2024

A site visit took place ahead of the review with a tour and briefings given by the client team and the Design Team.

London Review Panel

Tom Holbrook	MDA (Chair)
Farshid Moussavi	MDA
Julian Lewis	MDA

Attendees

Maurice Brenann	RSHP
Graham Stirk	RSHP
David Ravencroft	Andy Surgeon
Gerry O'Brien	AKT II
Ben Brodie	Atelier Ten
Richard Ward	DP9
Simon Gunasekara	DP9
Dan Scanlon	Brookfield Properties
Matthew White	Brookfield Properties
Juan Jose Sarralde	Townscape Consultancy
Joanna Park	City of London
Thomas Roberts	City of London
Amy Williams	City of London
Amrith Sehmi	City of London
Grace Jack	GLA Planning –Case Officer
Shamiso Oneka	GLA Design Unit
Kerry Branford	GLA Design Unit
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Overview

The applicant team is proposing a mixed-use commercial development in the Bishopsgate area. Their plan includes a developed public realm on the ground floor alongside commercial space across all levels. The project aims to enhance Bishopsgate and enrich the public realm within the City of London.

London Review Panel's Views

Summary

The panel does not support the complete demolition and rebuild of a building of this type which is less than 50 years old and urges that this approach is reconsidered. Notwithstanding this fundamental aspect, the panel gives its views on the merit of the proposed design in its own right.

The panel acknowledges the evolving nature of city views and, based on the views presented, finds no issues with how the building sits within the cluster, though they recommend further evaluation from Waterloo Bridge for coherence.

The panel urges a flexible strategy for public realm and site routes, safeguarding the building for future uses. The panel cites IBM Madison Plaza in New York as a precedent for good public spaces. The ground floors should be designed to benefit surrounding and wider communities, accommodating various activities beyond commercial interests. Nighttime safety considerations, flexibility of use, and programming space to enhance cultural production are also highlighted.

The panel proposes integrating reclaimed materials to reduce carbon footprint. and refining circulation in the cultural hub for better cohesion. They advocate for enhancing the cultural space's presence.

The panel recommends exploring a lighter structural solution to improve the street-level experience and clearly communicating the space's openness. They stress aligning with local guidelines and evolving the management strategy to better cater to diverse audiences. Enhancing landscaping beyond site boundaries and integrating existing building elements to enhance uniqueness are also suggested.

Overall, the panel provides insights to refine future stages, emphasising community-centric design, safety, flexibility, and contextual integration as key considerations.

Height and form in relation to the immediate and city cluster context

The panel recognises that the cluster curve for city views is always changing, so there is a collective consensus that there are no problems with the current cluster. However, further investigation should be considered for views from Waterloo Bridge to ensure there is coherence with the city cluster.

The sustainability and embodied carbon approach should reconsider the fact that this building is 30 years old, exploring better options to preserve the existing building to enhance the sustainability approach.

Public realm and routes through the site

The panel recommends that the team develop a comprehensive strategy for adapting the building for future use, emphasising the need for flexibility. As an exemplar case study, the panel suggests looking at IBM Madison Plaza at 519 Avenue in New York, which features an abundance of trees and open spaces that create a welcoming public realm. In contrast to the proposed ground floor, which could benefit from a more holistic and open design approach, the panel underscores that the public realm should serve the community rather than focus solely on commercial gain; it should provide spaces for users to sit, chat, rest, and wander.

The panel also highlights the importance of considering the safety of women, girls, and gender-diverse people at nighttime. Conducting a nighttime study would be beneficial in establishing the necessary features to ensure safety. The current design of the food court space is overly specific, whereas public spaces should be non-specific and flexible, allowing people to use them as they wish. The panel suggests to the applicant team to consider all methods and spatial organisation options for public realm management. This area is consumption-driven, but it would benefit from incorporating more informal workspaces and public realm areas rather than retail.

Public realm spaces should focus on cultural production, prompting a reevaluation of the ground floor design. The panel suggests diversifying the commercial uses on the ground floor, as limiting it to food and drink units restricts its potential. Additionally, introducing flexibility in the space and its uses would greatly enhance its appeal.

Public realm connections, and integration with surroundings

The panel suggests further exploration of materiality, drawing inspiration from architectural elements such as those found in the nearby church, could enhance the project's aesthetic and contextual integration. The panel critiques the current design of the cultural hub, noting that its circulation patterns feel disjointed and could benefit from redesign to create a more unified and amenity-rich environment. They recommend conducting additional investigation and design refinement specifically for the facade of the cultural hall space, highlighting its significant potential and its relationship with the main tower.

Additionally, the panel proposes transforming the cultural space into a more substantial, less transparent structure to imbue it with a stronger presence and character. They also suggest repurposing materials from the existing building to add historical depth and reduce the project's carbon footprint, thereby integrating sustainability into the cultural building's development.

Lastly, establishing a dedicated project team is proposed to oversee the public realm, focusing on both its design and management aspects to ensure its effectiveness and integration within the urban fabric.

Street level experience

The panel comments on the current appearance of the structure, noting its heavy and formal aesthetic. They suggest exploring alternative forms for the structural elements to create a lighter visual impact and a more inviting atmosphere for the public. Emphasising the need to clearly communicate that the space is open and welcoming to all, they underscore the importance of aligning with local authority guidelines and goals for public spaces during the design process.

Furthermore, the panel recommends enhancing the management strategy of the public realm, advocating for a deeper understanding of the target audience to ensure broad appeal. They stress the importance of ongoing development of the public realm, suggesting that lessons from the city's urban experience should inform its design.

The panel also addresses the landscaping strategy, noting its current confinement within the site boundary. They propose exploring options to extend landscaping into adjacent pavement and public areas, thereby creating a more inviting environment. Additionally, they encourage integrating the ground floor more uniquely and contextually with the site, suggesting investigations into incorporating elements from the existing building—whether through materiality, scale, texture, or other means—to enhance its distinctiveness and relevance to the surroundings.

Summary

The panel acknowledges their review arrives late in the application process but offers valuable insights intended to shape future refinements. Active participation in improving streetscape and public realms is emphasised over passive support for TFL and the city. The original building, dating back to 1776, is noted for its generous public space concept, which remains a collective asset to the city. There's a call for creating a public space that explicitly recognises its role and contributions to the community.

GREATER**LONDON**AUTHORITY

Planning report GLA/0480/S1

21 October 2024

99 Bishopsgate

Local Planning Authority: City of London Corporation

Local Planning Authority reference: 24/00836/FULEIA

Strategic planning application stage 1 referral
Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal
Demolition of the existing building and construction of a new 54-storey building (253.5m AOD) to provide commercial office floorspace (Class E) with a public market hall on the ground floor for flexible retail, food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); construction of a standalone 6-storey building (52.5m AOD) for flexible exhibition, performance, learning, community, and/or creative workspace (Class F1, Class (E(g)(i), Sui Generis); and construction of a 2-storey public cycle hub building (Sui Generis).

The applicant
The applicant is **Brookfield Properties,** and the architect is **RSHP.**

Strategic issues summary
Land use principles: The proposed high density office development would support the function of the Central Activities Zone and London's position as a World City. Provision of a standalone pavilion for cultural and creative uses is also strongly supported subject to public access and affordable workspace being secured.
Urban design: The City of London's Eastern Cluster is identified as a suitable location for tall buildings and the proposed building height falls within the relevant maximums for this site. The proposal represents high quality architecture and urban design. The ground level public realm would benefit from greater integration with adjacent developments.
Heritage: Less than substantial harm at a low level is identified to heritage assets, through harm caused to their setting. The harm is to be weighed against the public benefits of the scheme at the Mayor's decision-making stage.
Transport: The proposal would be considered acceptable subject to all the necessary highway and transport conditions and planning obligations being secured, including £1.29m towards improvements on Bishopsgate. Further work is required on the cycle parking quantum.
Energy and sustainable development: The energy strategy, circular economy statement, and whole life carbon assessment require refinements.

Recommendation
That the City of London Corporation be advised that the application does not yet fully comply with the London Plan for the reasons set out in paragraph 80. The applicant should address the outstanding matters addressed in this report.

Context

1. On 10 September 2024, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in issuing his response.

2. The application is referable under the following categories of the Schedule to the Order 2008:

   • *Category 1(B): Development (other than development which only comprise the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings in the City of London and with a total floorspace of more than 100,000 square metres; and*

   • *Category 1(C): Development which comprises or includes the erection of a building in the City of London and more than 150 metres high.*

3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Corporation to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk

Site description

6. The site is located on the corner of Bishopsgate (A10) and Wormwood Street. The City of London is entirely within the Central Activities Zone. The site benefits from excellent access to public transport with a PTAL of 6B, which is the highest.

7. The existing office building on the site is from 1976 (with significant recladding of the façade in 1993) and consists of a 4-storey podium with a 24-storey tower above. There is no public access to any part of the building. A public route through the building formerly existed as part of the City of London's pedway network, via a pedestrian bridge over Wormwood Street. However, the pedestrian walkway has been closed to the public for over 10 years and is now only used in case of emergency.

Details of this proposal

8. The proposal is to demolish the existing building above ground level, retaining the substructure, and construct a new 54-storey building (AOD 253.5m) comprised of commercial office floorspace with a public 'market hall' on the ground floor for retail and food and beverage.

9. A separate 6-storey building (AOD 52.5m) is proposed fronting Wormwood Street, to be called Open Gate, which would be a cultural pavilion providing exhibition and performance space, learning, community uses, and creative workspace. The application also proposes public realm improvement works, hard and soft landscaping, and highways works. The existing and proposed floorspace GIA is shown in Table 1.

Proposed Use and Use Class	Existing (GIA) sqm	Proposed (GIA) sqm
Office (Class E)	44,605	99,005
Plant, BMU, and ancillary space associated with the commercial floorspace including bike storage, parking, lockers, and showers (Class E)	9,257	40,840
Retail/Food and beverage (Class E(a)-(b))	482	1,237
Pavilion Building (Class F1, Sui Generis and Class (E(g)(i))	0	2,410
Public Cycle Hub (Sui Generis)	0	648
Total	**54,344 sqm**	**144,140 sqm**

Table 1: Existing and proposed floorspace (GIA)

Strategic case history

10. GLA officers held a pre-application meeting with the applicant team, also attended by the LPA, in January 2024 with respect to proposals to redevelop this site for a tall building of approximately AOD 240m. Written advice was provided on 22 January 2024.

Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015), the City of London Local Plan Proposals Map (2015) and the London Plan 2021.

12. The City of London Corporation is in the process of producing a new Local Plan ('City Plan 2040'). On 29 August 2024 the City of London submitted the proposed submission draft City Plan 2040 (Regulation 22 version) to the Secretary of State, and the draft Local Plan will now be subject to an independent examination.

13. The following are also relevant material considerations:

    The National Planning Policy Framework and National Planning Practice Guidance; and,

    A Written Ministerial Statement, for the ongoing consultation on the revised NPPF, was issued on the 30 July 2024 by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. The weight to be given to this, is a matter for the decision-maker having regard to the means by which it is proposed to effect a change in policy. The draft National Planning Policy Framework was also published on 30 July 2024. However, given it is still in draft and subject to consultation and change, the weight to attach to it is limited.

    Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including those on economic development, urban design, transport and sustainable development, can be found on the GLA's website here.[1]

14. The relevant strategic planning issues for this development are land use; the provision of flexible and affordable workspace, including cultural space; tall building impacts; transport impacts and mitigation; and climate change and sustainable development.

Land use principles

Office use

15. The proposed high density office development within the City of London's Eastern Cluster is acceptable in land use terms, in accordance with London Plan Policy SD5. Use of land for strategic functions (such as offices) is prioritised within the CAZ to meet demand for office space and facilitate London's continuing role as a World City. The draft City Plan 2040 identifies continuing need for office space and aims to increase the City's office floorspace stock by a minimum of 1.2 million square metres during the period 2021-2040.

16. The proposed building would deliver Grade A office space with a range of floorplate sizes ranging from 1,600 square metres to 2,000 square metres, all of which could be divided into multiple tenancies as required for different types and sizes of occupiers. A significant amount of office amenity space is provided throughout, including access to private winter gardens or outdoor terraces at upper levels. The requirement for flexible business accommodation, as per London Plan Policy E2, is met.

17. The development does not propose any of the office floorspace within the main tower to be let at affordable rates. Instead, the applicants are proposing to provide subsidised creative workspaces within the standalone cultural pavilion building on Wormwood Street. This approach is acceptable, as discussed below.

[1] https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507

The proposed building would also not have a high-level viewing gallery. However, in this instance officers consider that the unique and substantial public benefit provided by the cultural pavilion building stands to compensate for this.

Cultural pavilion building

18. The 6-storey standalone cultural pavilion building, Open Gate, will provide 2,400 square metres of floorspace including cultural facilities and affordable workspace. The following are proposed: (i) a gallery at ground floor level with public access and free exhibitions, (ii) a hall space for hire offering a mixed programme of free or affordable curated events, and (iii) studios offering subsidised and affordable creative workspaces.

19. London Plan Policy E3 and the draft City Plan 2040 encourage developers to provide affordable workspaces to meet demand, particularly from new and emerging sectors of the economy such as creative industries. As such, the proposal for affordable cultural workspaces is welcomed in lieu of affordable office space within the main tower and complies with Policy E3. Public access arrangements and affordability thresholds will need to be agreed with the LPA and secured in the S106 agreement.

Retail/ food and beverage use

20. The development proposes a public 'market hall' at ground floor level, offering retail, food and beverage and drinking establishments. This offer would contribute towards the City of London's ambitions to make the City an attractive place to visit all week long ('Destination City').

Affordable housing

21. Although not a London Plan requirement, the City of London's Local Plan and Planning Obligations SPD require office developments to make a financial contribution towards affordable housing-off site (which is usually invested in the Corporation's affordable housing programmes beyond the CoL boundary). The final contribution will be confirmed by the City Corporation and would ultimately be secured by way of a Section 106 agreement.

Urban design

Design review

22. The proposal has undergone a rigorous process of local borough design scrutiny and has also been presented to the London Review Panel, satisfying the requirements of London Plan Policy D4.

23. A CGI of the proposed building is shown below marked (1) with the consented development at 55 Bishopsgate marked (2) for context.

Tall buildings policy

24. The current City of London Local Plan Policy CS7 states that new tall buildings are expected to be located within the Eastern Cluster, and the site does not lie within an area identified as being inappropriate for tall buildings in current Policy CS14. Within the draft City Plan 2040, the site falls within the area identified as being suitable for tall buildings, as per Strategic Policy S12 and Figure 14. The proposed tower element also sits within the tall building '240 metre' height contour in Figure 15 (also known as the 'jelly mould'). For these reasons, the principle of a tall building on this site is supported in accordance with the locational principles of London Plan Policy D9 Part B.

25. Detailed information submitted relevant to the tall building impacts will be reviewed by the Corporation in accordance with London Plan Policy D9 Part C. Any necessary local mitigation must be secured as part of any planning permission. GLA officers' initial comments regarding the strategic visual, functional, environmental, and cumulative impacts are provided below.

Visual impacts: Strategic views

26. The submitted documents demonstrate that the proposed massing, architectural expression, and external treatments would result in a high-quality skyscraper that would be a distinctive addition to the City's skyline. The proposed building height appears to sit comfortably in the context of the Eastern Cluster and responds appropriately to its position at the northern edge of the cluster by virtue of its lower height relative to taller buildings emerging towards the centre, and its chamfered western elevation. Nevertheless, given its height, the proposed tower would be visible in many of the strategic views as identified in the London View Management Framework SPD, namely:

    1A.2 Alexandra Palace terrace

    2A.1 Parliament Hill

    3A.1 Kenwood

    4A.1 Primrose Hill

    5A.2 Greenwich

    6A.1 Blackheath

    10A.1 Tower Bridge

    15B.1 Waterloo Bridge, north and south

    16B.2 Gabriel's Wharf

    17B.1 Golden Jubilee Footbridge

    25A.3 Queen's Walk

    26A.1 St James's Park

27. In most of the above LVMF views, particularly the London panoramas, the new building will be viewed as a composite part of the Eastern Cluster and the cumulative effect will be insignificant.

28. In nearer views of the cluster from the south side of the Thames (for example 25A Queen's Walk and 10A Tower Bridge) the development would be mostly or completely obscured by the taller buildings in front, resulting in either none or a very minor impact to the view. GLA officers consider that the most sensitive LVMF views are 15B Waterloo Bridge and 26A St James's Park, and these are discussed below.

LVMF 15B Waterloo Bridge:

29. Regarding LVMF View 15B, the 'downstream' view from Waterloo Bridge provides an important vista towards St Paul's Cathedral, and the Eastern Cluster sits to the right-hand side of the Cathedral in this view. The LVMF view management guidance states that new tall buildings should seek to complement the City's Eastern Cluster with buildings of a height appropriate to their site, and of high architectural quality. New development which draws the cluster closer to St Paul's should preserve the Cathedral's relationship with its clear sky background and should not dominate the dome or the western towers.

30. Officers consider that the proposed development largely accords with the aims of the view management guidance for this view. The proposed development would edge closer to the Cathedral, but its clear sky backdrop would be maintained and the sloping design to the top of the building helps maintain the visual separation. The new development also has the benefit of obscuring a more complex group of buildings in the farther distance behind it, providing a 'cleaner' form to the edge of the Eastern Cluster that has a more positive relationship with the Cathedral.

31. LVMF View 17B.1 from Golden Jubilee Footbridge offers a similar but more distant view, and the impact is similar to the impact on the Waterloo Bridge view albeit to a lesser extent.

LVMF 26A St James's Park:

32. Regarding LVMF View 26A, this view looks east from the Blue Bridge in the centre of St James's Park. The important civic buildings in the middle ground either side of Duck Island enable the view to appreciate that this is an historic parkland in an important city location. Its value also lies in the picturesque nature of the view, and the skyline of spires and pinnacles (Horse Guards and Whitehall Court). The view management guidance states that development should not dominate or compete with either group of buildings and that any which are visible in the background should relate well to one or other of the groups and be of exceptional design quality.

33. The proposed development would be visible above the spires and pinnacles of Horse Guards and Whitehall Court and would not be obscured by trees at any time of year. The building appears to the left of the consented future development at 55 Bishopsgate, encroaching further upon the distinctive historic rooflines. Nevertheless, GLA officers acknowledge that these impacts are relatively minor in the overall context of LVMF View 26A, and the historic skyline and overall composition of the view would remain dominant. Any conflict with the view management guidance would be limited.

Functional and environmental impacts

34. Strategic functional impacts of the proposed tall building mainly comprise impacts to the road network, particularly the SRN and TLRN, and to public transport. See Transport section of this report. Functional impacts on telecommunications and aviation should also be robustly assessed by the LPA and avoided or mitigated. There should be no conflict with any airport safeguarding criteria, concerning either radar operations or physical height limitations.

35. The environmental impacts of the tall building are liable to be predominantly local. The surrounding tall buildings within the Eastern Cluster have the potential to cause wind tunnelling effects with adverse impacts for pedestrian comfort; the LPA should be satisfied that any instances of exceedances of safety thresholds are appropriately mitigated.

Cumulative impacts

36. Strategic cumulative impacts on LVMF views and heritage assets are considered in the relevant sections of this report. Strategic transport impacts have also been considered in conjunction with other major tall building developments taking place in the City and are discussed in paragraphs 48-66 of this report.

Layout, landscaping, and public realm

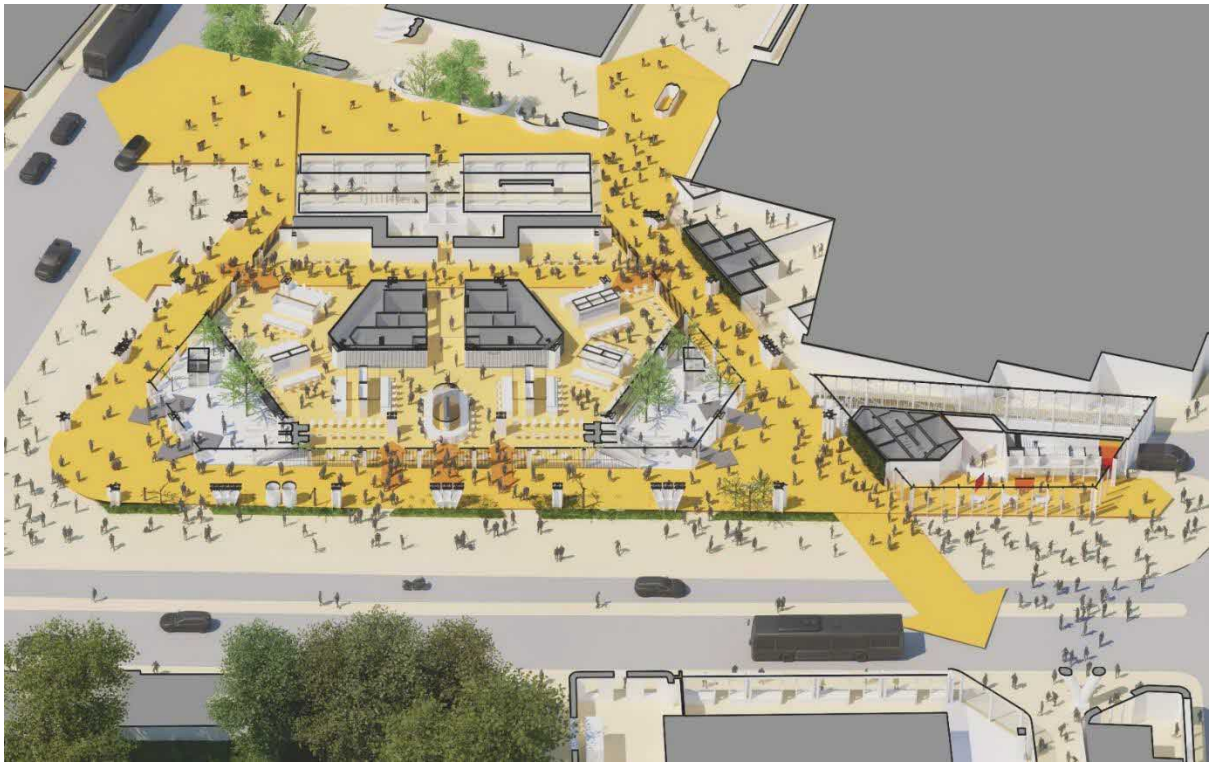


Figure 2: Proposed ground plane and associated spaces

37. On Bishopsgate and Wormwood Street, the ground floor building line is recessed beneath a colonnade, allowing the development to significantly increase pavement widths. The pedestrian environment would be further enhanced by soft planting which is supported.

38. The site layout also includes opening a new pedestrian route around the rear of the building, providing welcome permeability between Bishopsgate and Wormwood Street and, possibly, the public realm underneath the consented development at 55 Bishopsgate. This route requires carefully designed signage, lighting, and artwork to signify its presence and draw people in. If the street access points to this route are not obvious (particularly from Bishopsgate) then reduced legibility will impact on its desirability and inclusiveness. It is noted that further work may be required by both developers to better integrate the public realm proposals for this site and 55 Bishopsgate, which have been designed independent of one another.

39. Internally, the ground floor of the building is dominated by the public market hall which will provide welcome week-long activation where none exists in the current

building. There are two small office lobbies at ground floor level, with escalators leading up to a mezzanine level which accommodates the reception areas and lift cores.

Fire safety

40. In line with Policy D12 of the London Plan, the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

41. The proposal also meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with London Plan Policies D12 and D5 and all proposed measures should be secured by appropriate conditions.

Heritage

42. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local authorities to have special regard and attention to preserving listed buildings, including their settings, and to preserving or enhancing the character and appearance of Conservation Areas. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. London Plan Policy HC2 states that development proposals either in World Heritage Sites or their settings should conserve, promote, and enhance their Outstanding Universal Value (OUV). They should not compromise the ability to appreciate their OUV or authenticity and integrity of their attributes.

Heritage impacts

43. GLA officers consider that the following levels of indirect harm are caused by the proposed development. In all cases the assessment is based on the cumulative scenario and the scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high, and very high. Table 2 below focuses on World Heritage Sites and Grade I listed assets of particular strategic importance. A significant number of other heritage assets stand to be affected and will be assessed in full by the LPA.

Designated heritage asset	Category of harm identified by GLA	Extent of harm (on scale)
Tower of London World Heritage Site and associated assets	No harm	No harm
Tower Bridge (Grade I)	No harm	No harm
St Paul's Cathedral (Grade I) and associated Conservation Area	Less than substantial	Low
Southwark Cathedral (Grade I)	Less than substantial	Low
Group of assets associated with views from St James's Park including Whitehall Court, Ministry of Defence and Horse Guards (all Grade I)	Less than substantial	Low
The Monument (Grade I)	No harm	No harm

Table 2: Impacts to selected designated heritage assets

Discussion of impacts

44. In many views in the setting of the Tower of London, the proposed development is tucked into the cluster and mostly obscured by existing tall buildings. GLA officers consider there will be no harm to the World Heritage Site.

45. In many views of St Paul's Cathedral (Grade I), the proposed development, despite the design amendments including introducing a chamfered element at a high level, appears closer to the cathedral and taller than it. This is very noticeable, for example, in View 28 (LVMF View 15B.1). This tends to detract from the primacy of the cathedral in the view. Less than substantial harm at a low level is identified.

46. In Views 23, 24 and 25 (LVMF View 26A.1) the proposals appear to the left of the consented 55 Bishopsgate scheme. In these views the irregular crown of the building appears in the context of the roofline of Whitehall Court and the Ministry of Defence (Grade I) resulting in less than substantial harm at a low level.

Conclusions

47. NPPF Paragraph 208 states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal'. The proposed development is assessed to cause less than substantial harm to heritage assets as identified above, and in all cases is either low or low-to-middle on the range. However, these harms could be outweighed by the public benefits

of the scheme if secured and this will be assessed at Mayor's decision-making stage. Nevertheless, the development remains contrary to London Plan Policy HC1, which requires development proposals to conserve the significance of heritage assets and mitigate harm.

Transport

Public access

48. The proposal will provide multiple pedestrian access points from Bishopsgate to the east and Wormwood Street to the north. It is proposed that pedestrians access the main building via one of two main entrances on Wormwood Street. Through-site connections are proposed to the west and south of the main building. It is expected that access rights for members of the public through these routes shall be secured by planning obligation.

Cycle access and parking

49. Cyclist access to the long-stay cycle parking at the first basement level will primarily be via the stair-with-gulley from Bishopsgate. Secondary access is provided via the two lifts within the cycle hub. An additional access point is proposed via the vehicle ramp from Old Broad Street through the loading bay into the cycle store. It is noted that deliveries would not be permitted within the loading bay from 07:00-10:00, 12:00-14:00, and 16:00-19:00, meaning conflicts between cyclists and vehicles would be minimal. Officers are satisfied that the access points are acceptable.

50. Officers also support that cycle lift and ramp access will be designed to be in line with London Cycle Design Standards, which should be secured by condition or obligation.

51. The quantum of long-stay cycle parking spaces (1,600) falls short of the London Plan requirement for 2,000 spaces. While physical site constraints are acknowledged, the applicant should review the arrangements to make up the shortfall.

52. The proposal includes 144 short-stay cycle parking spaces within the Cycle Hub at Level 1 in line with London Plan standards. The Cycle Hub building is publicly accessible at ground floor level, with a concierge service for visitors' (to the development) cycles on the first and second floors.

Car parking

53. As expected, the proposal would be car free except for the provision of one Blue Badge parking space located at the first basement level, accessed via the vehicle ramp on Old Broad Street. The applicant should clarify how further provision of Blue Badge spaces could be made, should there be an increased demand in future.

Healthy Streets

54. An Active Travel Zone (ATZ) assessment has been undertaken, and nine routes have been reviewed, in line with London Plan Policy T2. The study has identified improvement opportunities on some routes, which include ensuring footways are well-maintained, providing additional seating and minor crossing improvements etc.

55. The Pedestrian Level of Services (PCL) study shows that Wormwood Street (south) adjacent to the site would become highly congested with Level of Service 'F' if no improvement is delivered. It is welcomed that a number of scenarios for improvement have been assessed by the applicant, which see footway improvements that would enable better level of service and accommodate future rise of footfall in the area. The City of London should therefore secure appropriate improvements by planning obligations accordingly.

56. The proposed footway improvements on Bishopsgate should be delivered with the applicant entering a S278 agreement with TfL for the following works:

    Widening of the Bishopsgate eastern footway along the Site frontage.

    Widening of the Bishopsgate western footway in line with the Site frontage

57. In addition, TfL is developing a safety improvement proposal for the A10 Bishopsgate. A contribution of £1.29m is therefore sought from this proposal toward the project.

Legible London

58. The new permeability between Bishopsgate and Wormwood Street will require carefully designed signage. The Council should seek to secure a contribution of £35,000 towards new Legible London wayfinding signage on the public highway.

Cycle hire

59. It is anticipated that the proposed development would generate an increased demand for cycle hire. A contribution of £220,000 towards a new docking station is requested, payable to TfL. If a site is not feasible within the application site, then TfL is open to working with the City Corporation and the applicant to find an alternative location within the vicinity. This should be addressed before the application is determined, so that it can be secured in the S106 agreement.

Trip Generation

60. The proposals would generate a net increase of approx. 2,530 two-way persons trips during the peaks compare with the existing use. It is accepted that the TA considers that most trips related to the retail/ performance and exhibition spaces would be linked trips; therefore, the trip generation impact would not be significant.

Public transport service impact

61. Due to large availability of London Underground, buses, National Rail, and DLR services available within walking distance of site, it is not expected that the proposal would have a significant impact to local public transport services.

Delivery and Servicing

62. In line with London Plan Policy T7, a framework Delivery and Servicing Plan (DSP) has been provided which states that service access would be via the ramp off Old Broad Street, however the width of the ramp will be reduced to only allow one way operation. The applicant should therefore clarify measures to eliminate the risk of service vehicles queueing back onto the public highway and put forward a back-up plan for the loading bays in the basement being out of use due to unforeseeable circumstances. Alternative arrangements should also be provided to facilitate quick delivery of small courier items.

63. The final submission of DSP shall be secured by planning condition/ obligation.

Construction

64. A detailed Construction Logistics Plan (CLP), produced fully in accordance with TfL's CLP guidance, should be secured by pre-commencement condition. It is also advised that TfL will seek compensation against loss of revenue/cost of relocation should the existing Cycle Hire docking station on Wormwood Street be temporarily relocated/ suspended during the construction phase. As noted above, the applicant should work with TfL to identify alternative provision during any temporary relocation of the cycle hire facilities.

Infrastructure Protection

65. The site is near London Underground tunnels/ infrastructure. Planning conditions concerning LU assets/ infrastructure protection should be secured accordingly.

Travel Planning

66. A Framework Cycle Promotion Plan has been submitted which is welcomed. Subject to previous comments regarding cycle parking provision being satisfactorily addressed, the finalised Plan should be secured by s106 planning obligation.

Transport Summary

67. In summary, the proposal would be considered acceptable in strategic transport terms provided all the necessary highway and transport conditions and planning obligations requested here, as well as local Healthy Streets and Vision Zero/ safety improvements, are secured. Further work is needed on the cycle parking quantum considering the comments made, as well as financial contribution toward A10 safety improvements and increasing capacity for local cycle hire docking station.

Environment and sustainable infrastructure

Energy strategy

68. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 should be met on site in the first instance; only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site may a contribution to a carbon offset fund be made. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or a local borough price where one has been set.

69. An Energy Statement has been submitted with the application. This shows that the development as currently proposed would see a cumulative reduction in regulated CO2 emissions of 17% beyond Part L 2021. Of this, 9% would be from passive design /energy efficiency measures alone (Be Lean savings). These savings fall well below the requirements of London Plan Policy SI2, which is for a minimum on-site saving of 35% including 15% Be Lean savings. The energy strategy should be revised to bring an improvement to the on-site savings.

70. Full details have been provided to the Corporation and the applicant in a technical memo that should be responded to in full, however outstanding policy requirements include:

    Be Lean: Further exploration of energy efficiency measures;

    Be Clean: Demonstration that the number of energy centres has been minimised;

    Be Green: Demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed ASHP;

    Be Seen: Compliance with this element of policy, with compliance to be secured in the S106 agreement;

    Energy Infrastructure: It is understood that there are no existing district heating networks in the vicinity of the development that are available to link to. However, there is a proposed heat work that would run adjacent to the site and could allow a future connection. The development must be designed in such a way as to allow for a future connection to the network should it come forward in future;

    Managing heat risk: Further details to demonstrate that the GLA cooling hierarchy has been followed.

Whole life-cycle carbon

71. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions. The applicant has

submitted whole life-cycle carbon assessment. The WLC assessment does not yet fully comply with London Plan Policy SI2. A detailed memo has been provided to the Corporation and the applicant for a response.

72. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website[2].

Circular economy

73. The London Plan requires development proposals to integrate circular economy principles as part of the design process, and referable applications must submit a Circular Economy Statement. The applicant has submitted a Circular Economy Statement, including the GLA CES template and supporting information which is welcomed. Some updates are required to achieve satisfactory compliance with the GLA CES guidance, and a detailed memo has been provided to the Corporation and the applicant for a response.

74. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[3].

Urban greening and biodiversity

75. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.271 according to the GLA methodology which falls slightly beneath the target score of 0.3 for non-residential developments. The applicant should explore additional opportunities to increase the urban greening and the Corporation should secure all greening measures to ensure the target is met.

76. The applicant has set out that there would be a biodiversity net gain of 248.29% which complies with the London Plan requirement to secure a net gain. Measures to secure the biodiversity net gain should be secured by the Corporation.

Air quality

77. The site falls within an Air Quality Management Area. The applicant has provided an air quality assessment which concludes that the scheme would be air quality positive through being car-free, with provision of significant public cycle infrastructure, access to public transport and the proposal to deliver consolidated servicing and deliveries. The day-to-day operation of the building itself will be air quality neutral. Mitigation measures are recommended to be implemented during construction to minimise the risk of dust. These should be secured as part of the

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
[3] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

future planning permission. Accordingly, the development is compliant with Policy SI1.

Local planning authority's position

78. City of London planning officers are currently assessing the application. In due course the Corporation will formally consider the application at a planning committee meeting.

Legal considerations

79. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the City of London Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

80. There are no financial considerations at this stage.

Conclusion

81. London Plan policies on land use; the provision of flexible and affordable workspace, including cultural space; tall building impacts; transport impacts and mitigation; and climate change and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

Land use principles: The proposed high density office development would support the function of the Central Activities Zone and London's position as a World City. Provision of a standalone pavilion for cultural and creative uses is also strongly supported subject to public access and affordable workspace being secured.

Urban design: The City of London's Eastern Cluster is identified as a suitable location for tall buildings and the proposed building height falls within the relevant maximums for this site. The proposal represents high quality

architecture and urban design. The ground level public realm would benefit from greater integration with adjacent developments.

Heritage: Less than substantial harm at a low level is identified to heritage assets, through harm caused to their setting. The harm is to be weighed against the public benefits of the scheme at the Mayor's decision-making stage.

Transport: The proposal would be considered acceptable subject to all the necessary highway and transport conditions and planning obligations being secured, including £1.29m towards improvements on Bishopsgate. Further work is required on the cycle parking quantum.

Energy and sustainable development: The energy strategy, circular economy statement, and whole life carbon assessment require refinements.

For further information, contact GLA Planning Unit (Development Management Team):
Grace Jack, Principal Strategic Planner (case officer)
email: [redacted]
Connaire OSullivan, Team Leader – Development Management
email: [redacted]
Allison Flight, Deputy Head of Development Management
email: [redacted]
John Finlayson, Head of Development Management
email: [redacted]
Lucinda Turner, Assistant Director of Planning
email: [redacted]

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Westminster City Council

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/06288/OBS

Please reply to: Jennie Humphrey
Tel No: [redacted]
Email:

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

21 October 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/06288/OBS **Application Date:**

Date Received: 10.09.2024 **Date Amended:** 10.09.2024

Plan Nos: Consultation letter from City of London dated 9 September 2024.

Address: 99 Bishopsgate, City Of London, London, EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.

Transport for London

Our ref: CITY 24/46
Your ref: 24/00836/FULEIA

Transport for London
Borough Planning

5 Endeavour Square
Westfield Avenue,
Stratford, London
E20 1JN
Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

Amy Williams
City of London Corporation

29 October 2024

Dear Amy

99 Bishopsgate, City of London E1W 2BX– TfL's Detailed comments

Thank you for consulting TfL about this referable planning application. It is understood that the proposal includes the Demolition of the existing building and construction of a new 54-storey building (253.5m AOD) to provide commercial office floorspace (Class E) with a public market hall on the ground floor for flexible retail, food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); construction of a standalone 6-storey building (52.5m AOD) for flexible exhibition, performance, learning, community, and/or creative workspace (Class F1, Class (E(g)(i), Sui Generis); and construction of a 2-storey public cycle hub building (Sui Generis).

These comments follow the Mayor's recent consideration of the case at stage 1. TfL is in receipt of the Transport Assessment, dated May 2024, Planning Statement, dated May 2024; and other associated document. These form the basis of the response below.

Site location
The site is located on the corner of Bishopsgate (A10) and Wormwood Street. The City of London is entirely within the Central Activities Zone.

The site has a PTAL of 6b, indicating excellent access and connectivity to public transport. The nearest London Underground stations within walking distance are Liverpool Street (200m), Bank (500m), Moorgate (600m), Monument (600m), Fenchurch Street (800m), Cannon Street (800m) and Tower Gateway (900m). Together these stations are served by the Elizabeth line, Central line, Hammersmith and City line, Circle and Metropolitan line, Northern line, Waterloo & City lines, District line, and the DLR. There are National Rail services from Liverpool Street, Fenchurch Street and Cannon Street station providing connections to the East Anglia and the south-east. There are numerous bus stops on A10 Bishopsgate, East Cheapside, Houndsditch, Old Broad Street, Wormwood Street, Prince's Street and Cornhill providing access to 23 routes.

Cycleway 1 (C1) to the northwest of the site between Sun Street and Wilson Street, is the nearest part of the current strategic cycle network. The nearest

cycle hire docking station is on Wormwood Street, directly in front of the northern frontage of the site.

In addition, there are three TfL Cycle hire docking stations locating within 200m of site which are St Mary's Axe, Houndsditch, and Jewry Street cycle hire docking stations.

Access and parking

Access
The proposal will provide multiple pedestrian access points from Bishopsgate to the east and Wormwood Street to the north. It is proposed that pedestrians access the main building via one of the two main entrances on Wormwood Street. Those accessing the office floors above would then use escalators to travel to lift banks on the first and second floors. Through site connections are proposed to the west and south of the main building.

It is welcomed access routes through the site would be opened, which would improve permeability of the site, the access right to members of public shall be secured by planning obligations.

Cyclists access the long stay cycle parking at the first basement level primarily will be via the stair with gulley from Bishopsgate. Secondary access to the long stay cycle parking is provided via the two lifts within the cycle hub to the south-west of the site. In addition, tertiary access to the cycle store is also proposed via the vehicle ramp from Old Broad Street via the ramp and through the loading bay into the cycle store.

The applicant has confirmed deliveries would not be permitted within the loading bay from 07:00-10:00, 12:00-14:00, and 16:00-19:00, minimizing risk of conflicts between cyclists and vehicles, which is welcomed.

It is also supported that cycle lift and ramp access will be designed to be in line with London Cycle Design Standards, which is welcomed and be in line with London Plan Policy T5 Cycling. All of these should be secured by conditions/ obligation accordingly.

Cycle Parking
It is welcomed that the proposal includes 144 short-stay cycle parking spaces, in line with London Plan (2021) cycle parking standards and London Plan policy T5 Cycling, within the Cycle Hub at Level 1.

This building would be accessed via the publicly accessible ground floors of the Cycle Hub, with a concierge service for parking visitors' cycles on the first and second floors.

However, it is not acceptable that the proposed long-stay cycle parking provision of 1600 long-stay spaces would fall well short of the London Plan requirement of 2000 spaces. While the factor of site constraint is acknowledged, the applicant should make up the shortfall by reviewing the current proposed cycle parking arrangement following London Plan cycle parking standards. Since London Plan cycle parking standards are future proof, the phased approach of provision is not accepted.

TfL requests that All cycle parking shall be designed in line with the London Cycle Design Standards. Shower and changing facilities should also be provided for the office element in line with London Plan policy T5 Cycling and London Plan cycle parking standards.

Car Parking

TfL welcomes that the proposal would be 'car free' except for provision of a blue badge parking space located at the first basement level. This space would be accessed via the vehicle ramp on Old Broad Street. The applicant shall clarify how further disabled provision can be made should there be an increased in demand in the future, in line with London Plan policy T6.5 Non-residential disabled persons parking.

Healthy Street & Vision Zero

An Active Travel Zone assessment (ATZ) has been undertaken and nine routes have been reviewed, in line with London Plan policy T2 Healthy Street.

The study has identified improvement opportunities on some routes, which include ensuring footways are well maintained, providing additional seating and minor crossing improvements etc.

The Pedestrian Level of Services (PCL) study shows that Wormwood Street (south) adjacent to the site would become highly congested with Level of service (LOS) F if no improvement is delivered alongside of the proposal as less extent for Bishopsgate (west) of LOS C. TfL welcomes that several scenarios for improvement have been assessed which sees footway improvements would enable better level of service and accommodate future rise of footfall in the area, the City of London should therefore secure appropriate improvements by planning obligations accordingly.

The improvement on Bishopsgate shall however be delivered with the applicant enters a s278 agreement with TfL for the following works:

Widening of the Bishopsgate eastern footway along the Site frontage.

Widening of the Bishopsgate western footway in line with the Site frontage

In addition, TfL is developing a safety improvement proposal for the A10 Bishopsgate. A partial contribution of £1.29m is therefore sought from this proposal toward the project. This is considered reasonable as it is in line with that recently secured at the adjacent development at 55 Bishopsgate.

<u>Legible London</u>

TfL considers that new permeable routes between Bishopsgate and Wormwood Street will require carefully designed signage. A contribution of £35,000 towards new Legible London wayfinding on the public highway is therefore requested, payable to the City Corporation, in addition to any wayfinding, art and lighting requirements within the site.

<u>Trip Generation & Mode Share</u>

In line with London Plan Policy T4 Assessing and mitigating transport impacts, trip generation and mode share assessments have been undertaken in the TA. It is forecasted that the overall proposal is expected to generate a total of 4247 office two-way trips in the AM Peak (08:00-09:00) and 3923 two-way trips in the PM Peak (17:00-18:00), with a net increase of approx. 2530 two-way persons trips during the peaks compared with the existing use. This assessment is considered robust and acceptable.

TfL accepts that the TA defines most trips related to the retail/ performance and exhibition spaces as likely to be linked trips; so that their trip generation impact would not be significant.

The TA predicts most trips to/from the development will be by sustainable and active modes. Of those, 14% of trips will be by bike or on foot; 8.5% by bus, and 74% by London Underground (LU), rail, or DLR. The number of expected car and taxi trips is negligible.

Public transport service impact

TfL welcomed that a directional assessment on public transport services impact has been provided. Due to the many of LU, Bus, National Rail, and DLR services within walking distance of site, it is not expected that the proposal would have a significant impact on local public transport services.

London Cycle Hire

It is considered that the proposal would generate additional demand for local cycle hire services; to mitigate this TfL would generally seek a financial contribution toward provision of new cycle hire docking station in the City if feasible location has been identified for provision of new docking station. Failing this, a financial contribution toward enhancing level of service for existing cycle hire docking station may however be sought instead. Further advice would be given after further discussion on this matter with the Corporation of London.

TfL will also seek compensation against the loss of revenue if the construction of the proposal leads to the temporary closure of the Wormwood Street Cycle hire docking station locating at the northern frontage of the application site.

Delivery & Servicing

In line with London Plan Policy T7 Deliveries, servicing and construction, a framework Delivery and Servicing Plan (DSP) has been provided which states that service access would be via the ramp off Old Broad Street, however the width of the ramp will be reduced to only allow one way operation.

It also stated that servicing time would be restricted to outside peak hours to minimise traffic impact.

TfL therefore requires that applicant to clarify measures to eliminate the risk of service vehicles queuing back onto the public highway and a put forward a back-up plan for the loading bays in the basement being out of use due to unforeseeable circumstances. Alternative arrangements should also be provided to facilitate quick delivery of small courier items.

TfL also encourage the use of cycle servicing to minimise vehicle servicing and consolidated servicing should be included as part of the servicing strategy.

The final submission of the DSP should be secured by pre-occupation planning condition/ obligation.

Construction Logistics
A Detailed Construction Logistics Plan (CLP), produced fully in according with TfL's CLP guidance, should be secured by pre-commencement condition in consultation with TfL. Special consideration should be given to ensure safety of vulnerable road users in the surrounding area and construction vehicle movements should be carefully planned and routed to avoid congested area and outside the peak hours.

To minimise highway impact, construction vehicle holding area should be provided outside Central London to minimise un-wanted construction movements.

Infrastructure Protection
The site is near TfL/ LU tunnels/ infrastructure. The applicant would be required to seek Structural Approval from both TfL Roads and London Underground prior to commencement. Planning conditions concerning TfL/ LU assets/infrastructure protection should be secured accordingly.

Travel Planning
A framework Cycle Promotion Plan has been submitted which is welcomed. Considering previous comments regarding cycle parking provision being satisfactorily addressed, the finalized Plan should be secured by s106 planning obligation.

Community Infrastructure Levy
The MCIL2 rate for City of London is £80 per square metre.

Summary
The following matters should be resolved before the application can be considered in line with the transport policies of London Plan.

1. Secure the delivery of all highways, walking/ cycling and public realm improvement work by legal agreements (S106/s278s)
2. Secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements in line with ATZ findings and carried out Night-time ATZ.
3. Review of the proposed service access design and clarify measure to minimise risk of queue back by servicing vehicles and arrangements for express deliveries.
4. Secure the submission and approval of cycle parking details by condition.
5. Secure £1.29m (index linked) financial contribution toward TfL's A10 Bishopsgate Safety/ walking/ cycling improvement project.

6. Secure £35,000 (index linked) financial contribution toward Legible London Way-finding improvement.

7. Secure contribution toward cycle hire improvement (either for new cycle hire docking station or service improvement to existing docking station).

8. Revise the DSP considering comments, and secure approval of both DSP and CLP by conditions, including TfL/ LU infrastructure protection.

9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.

I trust that these comments are of assistance. If you have any further queries, please let me know.

Yours sincerely,

PakLim Wong
Area Planner
[redacted]

Application ref: 2024/3852/P
Contact: Miriam Baptist
Tel: [redacted]
Email: [redacted]
Date: 5 November 2024

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: [redacted]

planning@camden.gov.uk
www.camden.gov.uk/planning

Amy Williams
Environment Department
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
99 Bishopsgate
London
EC2M 3XD

Proposal:
Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys(plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Drawing Nos: See City of London planning application ref 24/00836/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Informative:

1 Reasons for no objection -

The site is not adjacent to any conservation area, listed building or notable site within the borough of Camden. The proposal is not considered to cause any material harm on design, heritage or transport grounds to the adjacent borough of Camden, neither is any material harm considered to the amenity of Camden residents.

It is advised that London Borough of Camden raises no objections and the application should be determined under The City of London's planning policies.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully

Daniel Pope
Chief Planning Officer

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 14/11/2024
Our Ref DS/SUDS24/0052
Your Ref PT_AW/24/00836/FULEIA
Subject 99 Bishopsgate London EC2M 3XD

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the information provided for the above application and would recommend the following conditions should the application be approved:

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including green-blue roofs), rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.61l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 380m^3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

APPLICATION COMMENT FORM

From: Ella Brown, Environmental Resilience Officer

Application No: 24/00836/FULEIA

Development Management Case Officer: Amy Williams

Site Address: 99 Bishopsgate London EC2M 3XD

Proposal: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

Application Received: No memo provided

Request for Comment Received: 6 November 2024 (email from AW)

Response issued: 26 November 2024

Comment:

Date & Initials

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Sustainability Statement, prepared by Atelier Ten
- Sustainable Urban Drainage strategy, prepared by AKT II
- Outdoor Thermal Comfort Assessment, prepared by gia
- Biodiversity Net Gain Assessment, prepared by assystem
- Health Impact Assessment, prepared by Trium

Section 12 of the Sustainability Statement considers climate change resilience and assesses the City of London's six climate risks. A BREEAM Wst05 climate change risk assessment is also included in Appendix B of the Sustainability Statement.

Overheating

- Urban Heat Island (UHI) effect is included in the risk assessment under 'impacts on building contents and business continuity'. UHI will be mitigated by vegetation on terraces and building mass providing shading to public realm which will minimise pedestrian discomfort.
- Building facade optimised to control solar gain, with elements replaceable from building interior to allow for future adaptability such as natural ventilation. Building core is located south which helps to minimise excessive solar gain.
- Facade materials selected for future climate resilience

Flooding

- Surface water discharge will be restricted to 0.61 l/s which provides a 99% betterment on existing 1 in 100 year rate.
- Attenuation provided in the form of blue roofing and attenuation tanks.

APPLICATION COMMENT FORM	
• Combined smart stormwater / rainwater attenuation tank will be installed to reduce potable water consumption • Deep-pile foundations and retention of existing basement helps mitigate against subsidence. **Water stress** • Targeting 60% water demand reduction against BREEAM baseline. • Low flow rate fittings specified. • Water monitoring, shut off and leak detection. • Rainwater harvesting and greywater to be used for non potable uses. • Planting specific includes drought toleration plant species with low irrigation requirements. • Irrigation system will use non-potable water and have demand control based on soil conditions and weather predictions. **Biodiversity** • Green roof and green wall provided on cycle hub, terraces and and winter gardens included in tower. • Existing Ginkgo tree adjacent to site to be retained. • 9 trees installed at ground flood public realm • Urban greening factor will exceed COL target (0.305). • Predicted that the scheme will achieve 0.83 habitat units/ha for BNG. • Planting selection to ensure species diversity and nectar-rich planting to encourage a range of biodiversity. • Bird and insect shelter infrastructure to be investigated. **Pests and Diseases** • Interior design to minimise touch points and prevent the spread of contact-based diseases. • Cleaning protocols to prevent spread of bacteria. • Decentralised ventilation systems makes it possible to isolate individual floors • Elevated ventilation rates • Waste management strategy to be communicated to future tenants • Disease-resistance planting selected to discourage disease carrying fauna with plant maintenance and management strategy to prevent spready of pests and diseases **Food, trade and infrastructure** • Diverse incoming power supply from different substations. • Sizing with 10-15% additional electrical capacity. • Demand management system will allow building to modify energy consumption in real time • Cycle parking and end-of-trip facilities (lockers, showers) • Close to existing transport options **Recommendation:**	
The proposed development **is** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate	**EB**

APPLICATION COMMENT FORM	
Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.	**26/11/24**

Memo

To Assistant Director (Development Ma
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Kate Alexander-Newton
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [redacted]
Email [redacted]

Date 26 November 2024
Our Ref 24/05286/NPLN
Your Ref PT_AW/24/00836/FULEIA

DETAILS: 99 Bishopsgate London EC2M 3XD

An application has been received for: Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions are attached to any consent :

1. The roof terraces on hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

2. No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

3. There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

4. There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

5. Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

6. The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

7. Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

8 No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

9. All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

10. a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. Emergency plant will be expected to meet this criterion.

    (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.

    (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

Reason: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

11. Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

12. Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):
a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this

condition are incorporated into the development before the design is too advanced to make changes.

13. Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

REASON: 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: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

14. No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

Regards

Kate Alexander-Newton

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ Mob: [redacted]

From: Daniel Barker <[redacted]
Sent: 18 December 2024 09:42
To: Williams, Amy <[redacted]>
Cc: Sehmi, Amrith <[redacted]; Tab Omar
<[redacted] ; Philip Barber <[redacted]
Subject: RE: Consultation response - 99 Bishopsgate - 24/00836/FULEIA

THIS IS AN EXTERNAL EMAIL

OFFICIAL

Dear Amy,

Thank you for your email. I acknowledge that we received your original email relating to the above application.

I confirm that we have no comments to make on the related environmental statement.

I hope this is helpful.

Kind regards,

Daniel

Daniel Barker
Planning Casework Support Officer
Planning Casework Unit
Ministry of Housing, Communities & Local Government
pcu@communities.gov.uk
gov.uk/mhclg | @mhclg

From: Williams, Amy <[redacted]
Sent: 17 December 2024 18:59
To: PCU <[redacted]
Cc: Sehmi, Amrith <[redacted]>; Daniel Barker
[redacted]>; Tab Omar <[redacted];
Philip Barber <[redacted]
Subject: Consultation response - 99 Bishopsgate - 24/00836/FULEIA
Importance: High

Dear PCU,

The MHCLG were consulted on a planning application for the redevelopment of 99 Bishopsgate in September 2024 under LPA reference 24/00836/FULEIA.

I cannot recall receiving a response –please can you advise on whether the SoS will be providing comment on this application.

I understand the GLA have forwarded their Stage 1 response on to PCU, attached here again for ease.

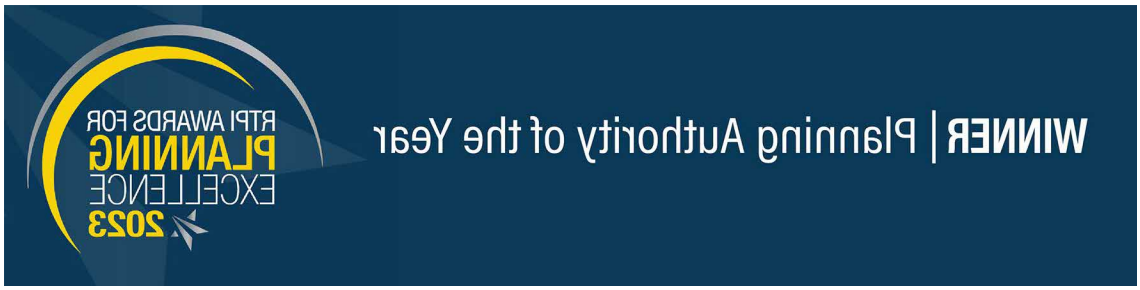
I look forward to hearing from you.

Kind regards,
Amy

Amy Williams | she/her
Senior Planning Officer (Design and Development Management)
Development Division
Environment Department
Tel: [redacted]

Environment Department
City of London Corporation

City of London Corporation| PO Box 270|London EC2P 2EJ|
www.cityoflondon.gov.uk



Tel: [redacted]

Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
24/2960/K

Directorate of Regeneration, Enterprise & Skills
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

23 December 2024

DECISION NOTICE – RAISE NO OBJECTION

Dear Sir/Madam,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site:	**99 Bishopsgate London EC2M 3XD**
Applicant:	Amy Williams City of London
Proposal:	**Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.** **This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**
Drawings	Consultation Letter.

I refer to your letter dated 09 September 2024 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully

Assistant Director

From: Gavin McLaughlin <[redacted]>
Sent: 12 January 2025 18:33
To: Williams, Amy <[redacted]>
Cc: Barnaby Sheppard <[redacted]>; Roy McGowan [redacted] ; Paklim Wong <[redacted]> ; Nushrat Chowdhury <[redacted]>
Subject: Fw: 99 Bishopsgate - TfL Feedback

THIS IS AN EXTERNAL EMAIL

Dear Amy

The attached note is acceptable in principle to TfL and fairly and accurate reflects the outcome of our final strategic transport negotiations with the applicant in this case.

Please include in any Committee summary and bear in mind 2 final related additional points alongside it:

At paragraph 2.7 the wording about the contribution where it says ‘placing the works contract’ to ‘tendering out for the…’.

And we’ll seek specific legal wording during S106 negotiation so that if we can’t extend the docking station outside the site as planned with the £100k due to the emerging London Wall corridor scheme, that funding transfers to the A10, into the other contribution.

Thank you
Gav

Sent from Outlook for iOS

From: Barnaby Hill <[redacted]>
Sent: Wednesday, January 8, 2025 5:53 pm
To: Gavin McLaughlin <[redacted]>
Cc: Roy McGowan [redacted]>
Subject: RE: 99 Bishopsgate - TfL Feedback

Hi Gavin,

Please find our TfL Comment Response note attached for your review. This note reflects the discussion at our meeting on 19th December.

Kind regards,
Barnaby

Barnaby Hill (He/him)
Principal Consultant

momentum
transport consultancy

Clerkenwell House
23-27 Hatton Wall
London
EC1N 8JJ

t [redacted]
m
w **www.momentum-transport.com**

Memo

To Assistant Director (Development Management)
Environment Department
Email plncomments@cityoflondon.gov.uk

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 14/01/2025
Your Ref: 24/00836/FULEIA

Subject: 99 Bishopsgate, London, EC2M 3XD

Partial demolition of the existing building, retention and partial extension of existing basement and the construction of a ground plus 53-storeys (plus plant) (253.5m AOD) building to provide commercial floorspace (Class E); with market hall space on the ground floor for the following: flexible display of goods or retail/food and beverage (Class E(a)-(b)) and/or drinking establishments (Sui Generis); erection of a multi-purpose ground plus 5-storeys (plus plant) pavilion building (52.5m AOD) for the following: exhibition and/or performance space, learning, community use, creative workspace (Class F1, Sui Generis and Class (E(g)(i)); public cycle hub satellite building (26m AOD) (Sui Generis), public realm improvement works, hard and soft landscaping, provision of basement cycle parking and means of access, highway works and other works associated with the development of the Site.

An ES has been submitted as part of the EIA, with an Air Quality Chapter included. Due to being an EIA and Air Quality Positive Statement has also been submitted as part of the application.

The development has proposed the installation of four backup diesel generators, with the potential of an additional two to be installed at a later date. The four would be for life-safety emergency operation, and the further two would be operated by the future tenant. All generators should be fitted with mitigation, such as SCR, to reduce NO_x emissions to comply with the City of London Air Quality SPD, and only tested in-line with manufacture guidance. Alternatives for backup generators have been assessed, and in the event future generators are installed this process would need to be repeated. If any future generators are utilised for a level of business continuity, they would need to be included in the Air Quality Neutral Assessment.

The development is air quality neutral, as per GLA guidance, with a single blue-badge car parking space and the heating demand provided by heat pump technology. It should be noted that emissions from emergency life-safety backup plant and service and delivery vehicles are exempt from Air Quality Neutral.

The initial Air Quality Positive Statement submitted was generic and did not include any measures, that were not already required through local or London Plan policy, to ensure the development pushed beyond compliance. A revised document was submitted that took service and delivery vehicles into account.

Should the development be approved please attach the following conditions:

Condition M28C amended

Prior to the installation of any generator, full details of the proposed generator, including the testing schedule, shall be submitted for approval. Any diesel generator must be shown to comply with the emission requirements of the City of London Air Quality Supplementary Planning Document. Any generator shall be used solely on emergency occasions and for necessary testing, as per manufacture requirements, and shall not be used at any other time.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2025 and the London Plan Policies SI1 and SD4 D.

Condition M26F

Prior to the installation of any generator in the Pavillion Building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the proposed generators will minimise emissions and exposure to air pollution during operation and will comply with the City of London Air Quality Supplementary Planning Document. The measures detailed in the assessment shall thereafter be maintained in accordance with the approved assessment(s) for the life of the operation of the building.

Reason

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

Air Quality Neutral Assessment
Prior to the installation of any generator to be used for any purpose outside of emergency life-safety, a revised Air Quality Neutral Assessment that considers the building emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

Reason
In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

Condition M29

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum

dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2025, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason
To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.
In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from

here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)

From: Lucy Dale <[redacted]>
Sent: 15 January 2025 13:57
To: Williams, Amy <[redacted]>
Cc: Simon Vince <[redacted]>; GIBBON, Simon R <[redacted]>
Subject: Re: Follow up consultation - 99 Bishopsgate - London City Airport Consultation response

Good afternoon,

We have looked into this further and have the following comments to make regarding the wording of the IFP Condition.

We accept the first statement of "no construction works above 155m AOD shall be carried out until an IFP assessment has been completed"

However, we cannot accept the second statement as it only refers to the construction of this building and not the building itself. We acknowledge the points raised in your email regarding the building and the surrounding environment. However, we have consulted an approved procedure design organisation (NATS) on this matter and they have confirmed that with the proposed height of the building at 253.5m AOD, there would be an impact to the Air Traffic Control Surveillance Minimum Altitude Chart (ATCSMAC).

Therefore, this building needs a full IFP assessment completing before the building can exceed 155m AOD.

Therefore, we propose the condition wording to read as follows:

Instrument Flight Procedures (IFPs) Impact Condition

No construction works above 155 m AOD shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. The IFP assessment must consider the proposed building and any subsequent cranes used for construction.

Reason: *To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.*

Please let me know if you have any further comments.

Kind regards,

Lucy Dale
External consultant with access to Safeguarding mailbox (WO0000020670382)

[redacted]

www.londoncityairport.com

From: Williams, Amy <[redacted]>
Sent: 09 January 2025 1:02 PM
To: Lucy Dale <[redacted]>
Subject: Follow up consultation - 99 Bishopsgate - London City Airport Consultation response

Dear Lucy,

I hope all is well and Happy New Year.

Apologies for the delay in sending the below to you – I am just getting around to drafting conditions for this scheme.

Please see the agents request below regarding LCY's proposed conditions on 99 Bishopsgate, ref. 24/00836/FULEIA.

Please can you let me know if these amendments would be acceptable to LCY?

I am happy to chat if need be.

Kind regards,

Amy

Amy Williams | she/her
Senior Planning Officer (Design and Development Management)
Development Division
Environment Department
Tel: [redacted]

Environment Department
City of London Corporation

City of London Corporation| PO Box 270|London EC2P 2EJ|
www.cityoflondon.gov.uk

From: Simon Gunasekara <[redacted]>
Sent: 27 September 2024 15:36
To: Williams, Amy <[redacted]>
Cc: Sehmi, Amrith <[redacted]>; richard.ward <[redacted]>
Subject: 99BG - London City Airport Consultation response

THIS IS AN EXTERNAL EMAIL

Hi Amy,

We have received the NATS and LCY consultation responses, and I have also had these reviewed by our aviation consultant who has advised the following and has proposed the below suggested wording change to one of the LCY proposed conditions.

We kindly request that the condition we reworded as suggested below:

Instrument Flight Procedures (IFPs) Impact Condition *No construction works above ~~ground level~~ 155 m AOD shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment of proposed construction craneage above this height has been commissioned and completed by Airport's Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport.* ~~*The IFP assessment must consider all tall buildings and proposed construction*~~

~~cranage.~~ *Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP's associated to London City Airport.*

This amendment is suggested as we do not consider that an IFP check of the building is justified at this location given the building is adjacent to an existing tall building cluster and is significantly lower than 22 BG and the consented scheme at 55 BG. I attach the conditions for 55BG for comparison. It is noted that since the 55BG conditions were imposed, there has been more emphasis on the need for IFP checks by APDO (NATS), however, it is considered unreasonable to ask for these checks when the obstacles clearly don't infringe the OLS (in this case the approach surface) and are effectively shielded by other tall building development in the vicinity. Furthermore, it is a well-established constraint of 309.6 m AOD for cranes in this area when LCY is operational.

Could you kindly raise the above with LCY?

Kind regards,

Simon
Simon Gunasekara
Associate
direct: [redacted]
mobile: [redacted]
e-mail: [redacted]
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: [redacted] website: www.dp9.co.uk