

ST PAUL'S CATHEDRAL: HEARING STATEMENT ADDENDUM
MAIN MATTER 7 – HERITAGE AND TALL BUILDINGS

INTRODUCTION

This addendum to the Statement of MM7 has been prepared on behalf of the Dean and Chapter of St Paul's Cathedral.

This Addendum has been prepared to respond to the revised SVIA, HIA and contours map for Policy S12. It draws upon and develops themes previously identified in our earlier representations, which still stand. This further submission should be read alongside the previous statements and with the Regulation 19 Response prepared by the Cathedral, and the updated *St Paul's Cathedral Setting Study* that accompanied these responses.

WIDER CONSIDERATIONS

The revised contours include increases to height and volume of the proposed policy. We consider these further amendments may have the potential to exacerbate harm that we have previously identified evident within the contours. We seek to identify these harms further below.

Notwithstanding our specific observations, we feel that we must note that it is difficult to meaningfully comment on such policy decisions, when the exact connection between the latest proposed contours and perceived need for office space is still unclear.

Whilst additional information on office need and modelling has been uploaded to the EIP portal, we would like to know - and suggest that the Inspectors will also want to interrogate - specifically how this relates to the contours now provided and the volume now described across multiple sites. We also want to understand whether an additional tall buildings area, such as that proposed, could account for changes elsewhere to the City Cluster. In addition to being an important part of the justification for any policy, this would enable us to understand the extent of change within the contours that may be possible to minimise harms. We seek to understand whether any additional volume proposed elsewhere in appropriate locations, or in the revised contours, could be 'traded' to offset, remove or mitigate contours elsewhere that we consider harmful.

We also do not understand why there is no meaningful consideration of representations made to reduce or remove harm. It seems to be a one-way-street, where only additional volume for tall buildings is under consideration, with no balance for equally essential policy expectations for the preservation of the significance of heritage assets.

We also have concerns with the new assessment provided. The SVIA and HIA addenda focus on those changes recently proposed to the contours. However, in doing so they do not provide a holistic, full, assessment of impact of the contours as a whole (including changes). The assessment appears therefore to accept the Regulation 19 contours as a 'fait accompli' rather than understanding collective and cumulative impact of the changes. We consider that this is insufficient in terms of justification.

We also note that the HIA addendum for St Paul's does not include any updated assessment in line with our previous comments. It continues to use the same - in our view erroneous and unsatisfactory - methodology, which we consider leads to a downplaying of harms. Coupled with the

focus of the assessment (discussed above) we do not consider this gives an adequate understanding of impacts. We also consider this a missed opportunity to create and update an evidence base (and thus the contours) that truly reflects potential and actual impacts to the heritage significance of St Paul's Cathedral and its sensitive setting. We have reached out to City of London to better understand how other assessment, such as the *Setting Study*, could meaningfully feed into this process. As yet, this remains unresolved and unanswered (see appendix).

We welcome the additional views that have been prepared to assist understanding the new tall buildings area, noting that these are not strategic views. However, these demonstrate a fact we have long discussed, and have set out with great care in our representations, that heritage harm is not limited to strategic views alone. We therefore have concerns, as previously indicated, that the proposed contours as a whole have the potential for further harm than currently understood.

COMMENTARY ON REVISED CONTOURS FOR CITY CLUSTER TALL BUILDING AREA

The original policy intent for the eastern tall-buildings cluster was to propose a gradient from its peak to its edge. The construction of 20 Fenchurch Street (the walkie-talkie), working against this logic, nonetheless created a defined edge to the cluster – echoed in practice through past consents.

Upon further review, we consider that the Regulation 19 contours allow for significant increase to the height of the buildings beyond 20 Fenchurch Street. The revised contours, now proposed in addition, exacerbate this difference, creating a greater height, and 'boxy' rectilinear urban form with a hard cliff edge beyond 20 Fenchurch Street.



The Regulation 19 contours (left) and the revised contours (right), both wide and zoomed versions

The tall buildings cluster is now an established component of the setting of the Cathedral. There is therefore a strong requirement that the urban design (in form, mass, location as well as design and materiality) of this ever-growing development is of commensurate, appropriate quality. We consider that the Plan policies must deliver urban form of exceptional quality, not just in its own terms, but as part of the setting of St Paul's. We consider that, in general urban design terms, the contours would lead to poorly considered development. In addition to creating a visually prominent 'cliff edge', it increases the overall presence of the cluster within key strategic riparian views that also contain St Paul's (see Gabriels Wharf and Hungerford and Waterloo Bridges). We consider that this 'foothill' negatively affects the character and composition of these strategic views when considered cumulatively and holistically. We also consider that, through increasing the overall presence of the cluster, the revised contours would further exacerbate the shift in the 'gravity' of the view further away from St Paul's previously discussed. Cumulatively, this would affect its potency as a Strategically Important Landmark.

In heritage terms, this would cause harm to the significance of St Paul's, and the way this significance is appreciated. It would further challenge the legibility of St Paul's as the historically pre-eminent building in the City of London, especially as understood from the river corridor. This affects how its historic interest is understood. These points of concern ((both methodological and as applied) are laid out in greater detail in our previous responses.

We suggest that this multifaceted impact needs to be understood holistically with the contours as a whole, and should be avoided. Please note, our review and commentary is informed by a high-level appraisal of the views that concern St Paul's, as provided. We leave it to other parties to interrogate impacts to other heritage assets, or impacts as experienced in the local streetscape.

COMMENTARY ON NEW BROADGATE TALL BUILDINGS AREA

We also offer comment on the new Tall Buildings Site proposed to Broadgate. The impact of this new site is communicated mainly through 'new views' prepared to assess the site.

The City's Tall Buildings Topic Paper previously identified this site as 'very sensitive'. Our dealings with development in this part of the setting of the Cathedral, and the harm that has been wrought by such schemes, mean we agree with this statement. The City's own assessment shows very clearly that development in this area (whether consented or constructed) has radically changed and harmed the appreciation of the cathedral as experienced from the river. Several buildings have been permitted which appear directly against and behind the Dome, resulting in an imbalance which is clearly harmful in terms of heritage significance and view management.

The City's Addendum gives the following reasons for the departure from the City's own conclusions about the high sensitivity of this location:

- i. it would be framed by extant tall buildings either side and above, such that it would not consume any more clear sky around the Cathedral.*
- ii. being at the heart of the informal Cluster, it would not draw it closer to the Cathedral*
- iii. as per (i), it would not lead to fresh encroachment on the Cathedral's silhouette at any point*
- iv. per (ii), it would not lead to a 'merging' of the informal Cluster with tall buildings in the adjacent Character Area.*

The documentation therefore effectively uses the future baseline, both existing and under construction, as justification for this new site. We have a number of concerns with this approach.

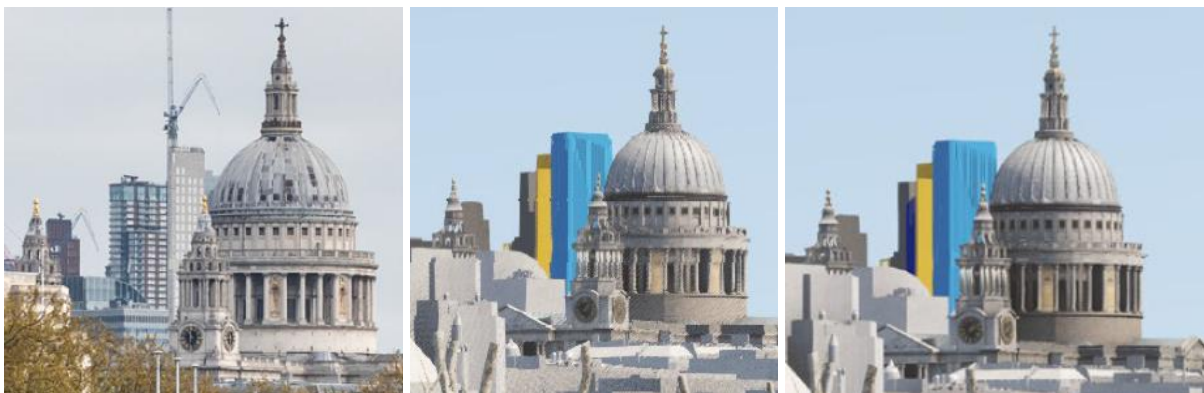
We first note that the buildings within this baseline are harmful to the heritage significance of the Cathedral, both individually and collectively. They erode the Cathedral's silhouette and also visually compete with the Drum, Peristyle, and Dome. Some of these buildings lie beyond the boundary of the City. This heritage harm is most apparent outside of strategic views, though this does not undermine the level of heritage impact. We hope the Inspectors will agree that the existing situation is harmful and detracting, as this is unambiguous.

The new site effectively 'shadows' these tall buildings and would consolidate this group. We agree with the City's statements that the proposed site does not add additional overall height or overall width to this grouping of harmful buildings.

However, we consider that any future building constructed within the parameters of the contours, and thus supported by planning policy, has the potential to entrench and perhaps deepen the existing harm in the short and long term. We seek to know more about how this harm would be absolutely prevented through policy.



New View 2 (existing, future baseline, proposed)



New View 3 (existing, future baseline, proposed)

As appreciable in New View 2, any proposal within these contours would appear in front of the Broadgate Tower. Such a proposal would be closer to the viewer, more resolved or more distinct in

the view, and thus potentially worsening the current harm evident from this building (as found from our experiences of previous consents such as 55 Old Broad Street). Overall, the principle of new buildings in this location therefore have the potential to increase the presence of this harmful group within the view, exacerbating harm. There would be a similar, although lesser, compounding impact in New View 3.

As this is assessment of policy, the actual architectural expression of any future building compliant with the contours is unknown. However, such buildings may have the potential to be more visually distracting and detracting in the view due to their design, further exacerbating the existing harm. We would query to what extent potential harm in this area could be explicitly avoided through specific policy wording regarding design and heritage.

We also note the City's use of the term 'informal cluster'. The existing group of tall buildings are not part of any unified policy initiative or vision, but a result of cumulative harmful development due to the case-by-case system of development control. It is noted that this harm has also been caused by cumulative change consented across different local authorities. As a group, we would today consider them harmful and detracting. Whilst we acknowledge these are now part of the Cathedral's setting, (and screen some of the proposed new tall buildings area) we would query whether using these clearly detracting buildings as a basis for future development policy presents a positive, long-term strategy for the historic environment.

We acknowledge the merit of planning policy that supports considered clusters of buildings where appropriate. However, using these particular piecemeal, harmful, unplanned previous changes to underpin a new tall buildings policy area needs thorough consideration to ensure further harms are avoided *entirely* in future, rather than entrenching those that already exist, or making them worse. We consider that this could run contrary to the 'backdrop of the Cathedral' section of the City's own Protected Views SPD.

Ideally, we should all wish to see future planning decisions in this area seeking to remediate the existing harmful nature of the 'informal cluster'. The principal of an explicit policy stating that tall buildings are appropriate as part of this group therefore has the potential to make this as an agreed aim very difficult – and could even perpetuate this harm in the longer term. Such policy would therefore need to be very carefully considered to avoid long-term harm entirely, and avoid potentially unanticipated harms.

Whilst we welcome that the proposed tall buildings site would not cause it to merge with any tall buildings in adjacent character areas, we seek to note that consolidating an existing sporadic, unplanned development of tall buildings, as above, would be harmful and set a worrying precedent for the future if further spread was to occur in time. As we note above, is it right to compound past harmful decisions? We would also query if further cross-boundary impacts to the Cathedral could be enabled through this policy, and how this too could be countered by the City of London in the wording of your policy, and in your cross-boundary co-ordination.

CONCLUSIONS

We therefore have concerns that the revised SVIA and HIA continues to use inappropriate assessment methodology which downplays heritage impacts. This means that the City continue to promote and rely upon an evidence base is not robust and thus are proposing assessment and decisions which we are suggesting are not justified, in line with the NPPF.

We are concerned that the changes to the contours to create yet more developable area are poorly understood in terms of explicit links to the quantum of development required, and how this is distributed across the contours. We also consider they may entrench harm to the Cathedral. In the case of the new tall buildings site at Broadgate, we seek assurances that any formal cluster (whether explicitly named or otherwise) would actively avoid future harm to St Paul's entirely, and would not hinder the possibility of potential further heritage enhancements.