

Cathedrals Fabric Commission for England Response

I write on behalf of the Cathedrals Fabric Commission for England ("the Commission"). The Commission has a statutory national planning role under the Care of Cathedrals Measure 2011, and this role extends to the setting of cathedrals. The quality of Southwark Cathedral's relationship with its wider setting in the city demands continued protection and it is on this aspect of the application the Commission wishes to focus.

Though the Commission is supportive of the principle of good economic development, several elements of this proposal cause concern. Having discussed this application, the Commission wishes to object to the scheme on the grounds of its negative impact on: (1) views of the cathedral and its tower, particularly from London Bridge, and its setting in the wider Conservation Area; and (2) potential wind damage to the Cathedral.

(1) The Commission wished to echo the concerns raised by the Cathedral Chapter about the visual impact of the proposed new building on views of the cathedral and its tower, particularly from London Bridge, and on the wider Conservation Area in which the cathedral is a major landmark. The Commission endorsed Chapter's assertions that the proposed tower would "destroy the principal views of the unbroken silhouette of the cathedral roofline, its tower and pinnacles in views from the west and north ... uncompromised for over 1000 years" and "undermine the legibility of a route which has characterised the relationship of Southwark with the City of London for over 2000 years." Allowing the construction of a new tower of such height in the location proposed would inevitably increase pressure on the local authority to allow further development of comparable scale in the area around the cathedral, resulting in the steady erosion of the cathedral's setting.

(2) The Commission also shares the concerns raised by the Cathedral Chapter about the risk posed to the cathedral fabric by proposed new building's effect on wind conditions. The Commission noted that whilst computer modelling of the project's impact on wind conditions had been interpreted to find that "no significant noticeable impact on cathedral surface pressures can be seen", this modelling had failed to include the pinnacles to the choir and tower - the very elements of the fabric likely to be most vulnerable to increased wind pressure - and had not considered the risk that increased wind pressure would accelerate the general deterioration of the cathedral fabric through erosion by wind and water.

Under paragraph 132 of the National Planning Policy Framework the impact of a proposed development on the setting of a heritage asset should be given "great weight" in decision making. The Commission does not believe that the current plans give suitable weight to, or offer sufficient mitigation of, this impact.

We would therefore like to see the current plans refused permission and a new development proposed on a more suitable scale.

Deputy Secretary of the Cathedrals Fabric Commission for England