

Department of the Built Environment

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Your ref PA/19/00205

Date 3 December 2019

Dear Ms Crosby,

RE: New City Court, St. Thomas Street, SE 1 (ref: PA/19/00205)

Thank you for consulting the City of London Corporation. This letter contains our formal response to the planning application.

We consider the proposal would result in demonstrable significant harm, failing to preserve the setting of strategic London landmarks – the Monument to the Great Fire of London, St Paul’s Cathedral and St Magnus the Martyr Church.

We respectfully request you afford this harm due weight in your balancing exercise.

The Monument to the Great Fire of London (Grade I and Scheduled Ancient Monument) and St Magnus the Martyr (grade I)

The Monument to the Great Fire (“The Monument”), by seminal architect Sir Christopher Wren, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It was symbolically sited on near axis with the Old London Bridge, the site of the original Roman bridge from which London originated. Since the Medieval period, the Church of St Magnus the Martyr welcomed the visitor to London and was re-built, also by Wren, near the origin of the Great Fire, to be seen in conjunction with the Monument as part of an arrival experience from London Bridge of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

In recent years the City’s Protected Views SPD has protected the immediate setting of the Monument, including in kinetic views on approach from Gracechurch Street from as far back as Bishopsgate, near the junction with Threadneedle Street. The applicant has isolated the moment at the junction with Lombard Street so the full and true impact on this approach is not made apparent.

If the applicant is willing to share an FBX file format three-dimensional model, then we can give a fuller response.

Bishopsgate and Gracechurch Street form an ancient spine, and are two of the oldest thoroughfares in London, comprising the main north-south route through the City for hundreds of years. Buildings, more recently via the planning system, have preserved and curated the observers ability to appreciate the Monument and its distinctive sky-etched silhouette. The Monument, when seen in sequence with the tower of St Magnus the Martyr, is of clear group value and an important heritage view.

The proposal in view 23 would crash into and engulf the pristine sky-etched silhouette of the Church and Wren's distinctive dome and spire, the scale of the proposal overwhelming it. It is unclear on the wider approach as to whether the proposal would also affect the silhouette of the Monument. If it did, this would cause further harm to the setting of both, undermining the group value of the two on this seminal character-defining approach.

The proposal would fail to preserve the setting of the Monument and St Magnus the Martyr. This harm would be significant to the Church, and could also be significant to the Monument, depending on further analysis of the approach.

St Paul's Cathedral (grade I)

St Paul's Cathedral is a grade I listed building of outstanding national and international significance, to London, the Nation and as a seminal piece of UK and European architecture. It is the source of protected views deemed integral to preserving London's character and identity at a strategic level – identified as a Strategic Landmark in the London View Management Framework (LVMF), and at a local borough-wide level via a series of identified local views. CoL have an adopted Protected Views Supplementary Planning Document (the SPD) which provides geometric protection to preserve the local townscape setting of St Paul's via the 'St Paul's Heights', originally conceived in the 1930s to protect and enhance local views of the Cathedral, including from Farringdon Road (Figure 3 in the SPD).

The most impressive approach to the Cathedral from the north is from Farringdon Road – where the drum, peristyle, dome and lantern are prominent, largely uncluttered, and with a sky-etched silhouette. The foreground of this view has been carefully curated for over half a century by CoL and the London Borough of Islington to protect and enhance the ability of the observer to appreciate the Cathedral. The SPD is clear that it is important to consider the backdrop and skyline setting of the views protected by the Heights. The SPD identifies where existing tall buildings compromise the skyline presence and detract from the pre-eminence of the Cathedral in these local views with the aim for new tall buildings not to worsen, and where possible improve this backdrop. It is considered that, in principle, a diminishment of the sky-backed silhouette would fail to preserve the setting of the Cathedral and therefore would fail the statutory test to preserve, causing harm to the setting of the Cathedral.

Images available online are unclear as to the extent of the visual impact. However, it is stated that the proposal would, in views 58, 59 and 60, from the vicinity of Farringdon Road, diminish the

sky-backed silhouette and thus the pre-eminence of St Paul's Cathedral, on an important London-wide approach.

We consider that the change would fail to preserve the setting of St Paul's Cathedral, causing harm to its special architectural and historic interest and heritage significance.

Conclusion

Our strong position is that the proposal would cause harm to the setting of strategic London landmarks deemed to be of outstanding national interest – The Monument, St Magnus the Martyr and St Paul's Cathedral. We would respectfully ask that, in accordance with the law, considerable importance and weight is attributed to this harm in your planning balance exercise.

Thank you for consulting with the City of London. Should you wish to discuss, please feel free to get in touch with myself or Ben Eley.

Yours sincerely

A handwritten signature in black ink, reading "Annie Hampson". The signature is written in a cursive style with a large initial 'A' and a long horizontal stroke at the end.

Mrs Annie Hampson
Chief Planning Officer and Development Director
Department of the Built Environment