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**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

Mr Rob Chipperfield  
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Department of Planning & Transportation  
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8 August 2016

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Your ref: 16/00627/LBC  
Our ref: 2016/07/016

Dear Mr Chipperfield

**Re: Royal Exchange (Grade I, *Sir William Tite*, 1841-4); application to replace mezzanine in courtyard ambulatory and associated works**

Thank you for consulting the Victorian Society on this application. The replacement of the mezzanine would in several important respects exacerbate the damage that the existing mezzanine does to the significance of the building. The justification for this damage is inadequate, and therefore the Victorian Society **objects** to the application.

It was an unhappy mistake for the City of London to allow a mezzanine to be constructed in the major internal space of this Grade-I listed building. While the design of the existing mezzanine was reasonably sympathetic, any mezzanine in this space is intrinsically seriously harmful to the spatial qualities of the ambulatory and courtyard, and seriously harmful to the appreciation and visibility of the important cycle of mural paintings in the ambulatory. The argument has been made that such an intervention is necessary to provide the building with a long term sustainable use. This argument is flawed; the building as a whole, with shops and office space in a prestigious site in the centre of the City of London, is clearly sustainable. The courtyard and ambulatory are one of the most important internal spaces of the City of London, and should be sustained by the revenue-generating spaces elsewhere in the building; the issue of sustainability has only arisen due to the unwise division of the building and the construction of a mezzanine intended for commercial use in an internal courtyard that receives little footfall.

The current mezzanine is somewhat heavier in its construction than a well-designed one occupying the equivalent space would be today; there is no objection in principle to its replacement. We note that the floorplate of the proposed new mezzanine would be more slender in section, that the materials of the new mezzanine would be of high quality and the detailing elegant; these are all good things but they make only a marginal difference to the impact of the mezzanine on the Royal Exchange. Much more significant are the changes proposed to the plan and layout of the mezzanine.

There is one unambiguous improvement proposed. The double-height vaulted entrances to the courtyard on west, south and north sides, which are currently cut

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through by the mezzanine, would be restored to their original volumes. This would clearly be a benefit, albeit that these are spaces are relatively minor in extent and significance compared to the ambulatory and courtyard.

The current shopfronts extend outwards between each column in canted bays that extend beyond the fronts of the attached columns. In the proposed new arrangement, there would be flat-fronted shopfronts, flush with the fronts of the arch reveals and behind the columns. In the western half, these shopfronts would extend up to the soffit of the arches, as the first floor would be fully enclosed, unlike today where it is merely a balcony. On balance we consider this change harmful, with the benefit of removing the canted bays more than outweighed by the harm caused by reducing the articulation of the arcades, particularly at first floor level where the soffits of the arcades are currently completely open. Instead the shopfronts should be set back level with the rear of the arch reveals.

The eastern half of the new mezzanine would have a balcony that would extend well forward of the arcade columns, visually slicing them in half. It would also include a new stairway which would extend well into the courtyard. These changes would cause significant harm to the building, destroying the symmetry between the two halves of the courtyard and damaging its character, which is all about the unencumbered and harmonious display of the classical orders. A lot of harm would be caused for the addition of a relatively small amount of extra space. We agree with Historic England that the design of the balcony 'is sensitive and mitigates the harm as far as possible'; however, the idea of a projecting balcony in such a place is intrinsically harmful and insensitive in principle.

The current floor of the courtyard dates from the late C20 alterations, and consists of two colours of stone setts, with decoration in a diapered pattern. This is a replica at higher level of the previous floor, described in the Buildings of England as 'a diapered C16 floor reinstated by Tite'; the original floor survives at a lower level, though this is not mentioned in the application documents. Information must be provided about whether or not there would be any physical impact on it by the works proposed in the courtyard (such as the service trench and the footings for the new stair). Regardless of this, the proposed new floor, of diamond shaped pale limestone in two tones and a randomised pattern, lacks the character and historical continuity of pattern of the current floor, and would be bland and anaemic by comparison; an unnecessary and harmful change.

I turn now to the murals, which Historic England's Roger Bowdler has described as "a far too little-known representation of London's past that has no equal in the capital." This is one of the most extensive and important mural cycles in London; while the quality of the murals varies, a number are of considerable artistic merit, by prominent artists of the day such as Lord Leighton and Brangwyn. As an attempt to depict the history of the City in murals it is without parallel. The murals are currently not visible at all at ground floor level, as the shop units have rear walls; they are visible only from a first floor walkway which runs around the rear of the mezzanine, allowing them to be appreciated as a cycle but not from the angle intended. Much has been made in the application documents and in Historic England's response of the 'improvement' that will apparently result from being able to see the murals from the courtyard, due to the more slender floor thickness of the new mezzanine and the fact that there would be no blocking rear wall to the ground floor shopping units.

Let us examine these arguments. The murals were, of course, designed to be viewed at ground level from the ambulatory. They were not designed to be viewed from the central courtyard, which is too great a distance away for their details to be appreciated. For this reason alone, an increased ability to view them from the courtyard is pretty meaningless. But then it must be remembered that they would be being seen through glass (never wholly transparent and in some light conditions very hard to see through). The protruding balconies and balcony balustrades would block many views of the upper eastern half of the murals. There are seven staircases at

different places in the shop units which would block further views. The glass balustrade between the rear of the mezzanine and the murals would obscure further views. The eastern mezzanine restaurant would have a bar zone, a finishing kitchen and a toilet block, shown only indicatively on the plans, which would block further views. There are two lifts shown which would block further views. Yet Units 3, 11, 10 and 1 are shown drawn without lifts, and therefore no disabled access to their upper floors. Surely such an arrangement would be both unlikely to find favour with occupiers and be incompatible with the Disability Discrimination Act. Should further lifts be necessary more views will be blocked. And this is considering only the elements that could be controlled by planning. In reality the eastern mezzanine would be filled with chairs and people blocking the view of the murals. The shop units would inevitably contain many display cabinets for merchandise, signage etc, blocking a large proportion of the rear walls from view. Realistically such things are almost impossible to manage effectively in the long term. It is highly unlikely that any meaningful view of the murals could ever be obtained from the courtyard. Any glimpse would be of a meaningless fragment, at too great a distance to be able to appreciate the painting concerned. Furthermore, the ability to walk round the murals in a cycle, building up cumulatively key events in the history of the City of London, would be lost. Anybody wanting to see all the paintings at a reasonable distance would have to enter twelve separate commercial units in order to do so, even if all obstructions magically vanished.

This is before one considers the single worst aspect of this scheme. In order to get acoustic separation between ground and first floors of the eastern half of the mezzanine, it is proposed that there will be a complete separation by means of a silicone strip that will butt up to the murals, touching their surfaces. This will visually sever the murals, inevitably destroying the ability to appreciate what are narrative paintings. Even more importantly, no information has been provided on what physical impact such a silicone strip might have in the long term on the surface of the paintings. There is clearly a risk of damage to these important paintings, and such a risk should be comprehensively evaluated by specialists before any decision is made.

While we agree with Historic England's assessment that in their current state the murals' contribution to the significance of the Royal Exchange has been 'compromised', the current proposals would make this far worse. Views of many of them would be permanently blocked and it would be impossible to see any of the murals whole in one view. Access to the retail units for art lovers would be extremely limited, unsatisfactory and fragmentary. The physical butting up of the silicon strip to some of the murals would sever them visually and threatens damage to them. This would cause significant harm both to the murals and the building. Historic England's suggestion that an App be provided for virtual viewing of the murals would be cold comfort for the loss of the ability to see the real things.

It is proposed that the curved incised tablets in two of the corners of the ambulatory are covered-over out of sight. Donald Insall Associates' historic building report describes them as follows:

*"In the remaining two corners are curved incised tablets recording details of the founding of the Royal Exchange by Tresham and details of the opening of the current Royal Exchange in 1844. Their provenance is not clear: they have been overpainted with modern paint and so the material is obscured as is some of the lettering. From the script used, they appear to be broadly contemporary with the later murals, i.e. 1920s although they could be as late as the 1940s. Both the statues and the tablets can only now be seen from the mezzanine. The statues have no significance; the tablets have some limited historic significance."*

In fact the wording and the style of the lettering indicate strongly that the inscriptions are likely to date from soon after the opening of the Royal Exchange in 1844. Given how well-documented this building is it should be possible to determine this with some precision, but the working assumption should be that the tablets date from soon after

construction and that they are of illustrative importance to the history of the building and the Exchange. Covering them up would be inappropriate and harmful.

Finally we turn to the statues that it is proposed are removed from the NE and SE corners of the ambulatory. Donald Insall Associates' historic building report describes them as follows (p. 32):

*"In two of the corners of the ambulatory there are niches for statues, although the statues which are currently in situ (of Elizabeth I and Charles II ludicrously dressed as a Roman Emperor) are of very limited artistic merit and appear to be mid-20th century in date. They are clearly different from the busts which were originally in these niches and which can be seen in the historic photographs (Plates 11-13)."*

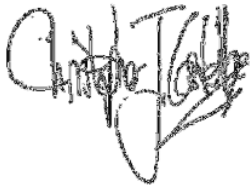
No sources are given for this assessment, and it is not consistent with the list description (appended at p. 52 of the same report), which states that the Royal Exchange contains "Statues of Queen Elizabeth 1844, by M L Watson, Charles II by Gibbons (?)". One could also turn to the Buildings of England entry for the Royal Exchange, which mentions "In the SE corner a dramatic statue of Charles II, a copy of 1792 by John Spiller after Grinling Gibbons's statue in the centre of the C17 courtyard.... In the NE corner, Queen Elizabeth I by M.L. Watson, 1844." The Public Sculpture of the City of London, by Philip Ward-Jackson, gives a full history of the statues at pp. 324-326, backed up by extensive sources which demonstrate that both the statues were in situ in 1844, and that they are in the niches which were designed specifically to accommodate them.

The Charles II statue has particular historical significance, having survived the fire of 1838 that destroyed the previous Exchange. The Elizabeth I statue was commissioned as she was the monarch who had conferred the status 'Royal' on the Exchange. Their removal from these niches, designed to hold these statues which are of particular symbolic importance to the history of the building, would be damaging and unnecessary.

For all these reasons we **object** to this application, which would cause significant harm to a Grade I-listed building, and urge the City of London to refuse listed building consent for a proposal which would do considerable harm to one of the City's most important buildings and one of London's most important series of mural paintings.

The Royal Exchange is one of the great set-piece buildings of the City, a municipal temple filled with important sculpture and murals that demonstrate the history and pomp of the City. It should be a key destination for the City and a source of great pride. Its potential will never be realised while there is a mezzanine in the ambulatory, and we strongly suggest that its removal should be a strategic heritage priority for the Corporation of London.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Christopher Costelloe". The signature is stylized and somewhat cursive, with the first name being the most prominent.

Christopher Costelloe  
**Director**