

Felgate, Gavin

From: Paul Conolly [REDACTED]
Sent: 14 June 2024 16:51
To: Planning Policy Consultations
Subject: Church of St Helen's Bishopsgate and St Andrew's Undershaft response to the CityPlan 2040
Attachments: SAU, SHB response to CityPlan 2040 final.docx
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THIS IS AN EXTERNAL EMAIL

Dear sir/madam

Please find attached to this email a written response to the current draft CityPlan 2040 that is out for consultation. We have also sent a physical copy of this letter. This note is concerning the churches of St Andrew Undershaft and St Helen's Bishopsgate

Please could you acknowledge receipt of the note when you can.

Kind regards,
Paul Conolly

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I am writing on behalf of the churches of St Helens Bishopsgate (SHB) and St Andrew Undershaft (SAU) in response to the Corporation's City Plan 2040 document currently out for consultation. As two of only a few churches to have survived both the Great Fire of 1666 and the Blitz during the Second World War, St Helens and St Andrews are two of the most historically significant buildings within the Square Mile. Their modern-day setting among the glittering high-rise City Cluster gives them a unique standing not seen anywhere else in the world, attracting visitors from all over the globe. We are grateful for the recognition of the importance of Heritage Assets in the current draft.

However, it is the ministry that happens within these buildings that makes them of irreplaceable contemporary importance to the City Cluster and surrounding areas. SHB and SAU are in constant use for services, training, and other bespoke ministry every day of the week.

SHB hosts two midweek talks geared towards reaching city workers—these talks are attended by hundreds of people on a weekly basis. There are small group Bible studies across both buildings nearly every night of the week, providing crucial spaces for community interaction, meeting people outside of work settings, and making friends beyond the rush of the office scene. On the nights when small groups are not taking place, there are youth group meetings.

Finally, on Sundays, the churches are a hive of activity with four services taking place over the course of the day, as well as church family lunches and dinners following those services. On Sundays, SHB hosts four services with nearly 1000 people in attendance. SAU then acts as a place for these people to gather after services and share life over a meal.

One of those Sunday services is an exclusively Mandarin-speaking service, providing a critical space for the ever-growing number of Chinese workers and students who now work and live in London.

We consider ourselves to be committed members of the City community, and our mission to serve that community continues to drive us.

So it is with concern that we note the lack of attention given to us, and other City Churches, in the current City Plan 2040 document.

Paragraph 196 of the NPPF states that plans should conserve and enhance the historic environment and consider "the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation... [and] the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring".

Commented [JA 1]: Is this figure correct (I assume ye. if Partnership groups are included but wasn't sure of midweek numbers etc.)

Commented [PC2R 1]: G iulio informs that midweek talks hover at around 100 people (excl. staff) so along de Partnership groups I think we can justify '100's'

The Strategic Priorities of the Plan in Chapter 1 need to address these considerations much more explicitly. For example, section 1.2 talks about enhancing weekend and evening economies. That should extend to supporting the work of churches as faith-based entities. Perhaps more specifically, as well as “creating new and enhanced culture, leisure and visitor attractions” the plan might enhance the faith-based communities within the square mile? We suggest “creating new and enhanced cultural, leisure and visitor attractions and supporting faith-based communities.”

It is essential for the Plan to support the current activities of faith-based communities within the City as it is the sustainability of these current activities that will enable the heritage assets to be maintained and conserved. Churches can only look after the heritage church buildings in which we operate if our contemporary ministry is recognised, valued, and fully supported within the Plan.

Of particular concern is, but not limited to:

- Policy HL1.2 lists all protected characteristics under the 2010 Equality Act. The reason for the policy and explanation of how it works in practice are then very focussed on physical access and inclusion, with no mention of inclusion of faith-based groups in the detail. An inclusive built environment needs to cater for the physical aspects of inclusion, but also to be inclusive of faith groups by not adopting policies that prioritise commercial activities unduly at the expense of community faith organisations.
- The fact that ‘Heritage Assets and Tall Buildings’ (**Section 11; page 178**) have been grouped together under one chapter. This is of particular concern for us as churches surrounded by tall buildings and on the brink of welcoming more to our doorstep. We are particularly sensitive to changes in Tall Building policy. It is our feeling that heritage assets and, more specifically, the City churches which occupy and maintain those assets, would be far better served in their own separate section of the document, at the same time giving them the attention due to them as integral members of the communities that have been built up around them. Currently, the churches are hardly mentioned. The Grade 1 listed Bevis Marks synagogue has been identified as one of the four heritage pillars within the plan, yet the many Grade 1 listed churches are minimally acknowledged, if acknowledged at all. **Strategic Policy SL1.5** talks about requiring inclusive design and management of buildings. Inclusion is not just about certain protected characteristics that may have particular physical access needs. Inclusion also needs to include the protected characteristic of religious belief, and including the buildings in which faith-based communities gather and from which they serve the wider City community.
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- That churches and their churchyards are not specifically mentioned in **Section 3; Policy S1; 6(d) Page 16**. Our two churches and churchyards provide much-needed public realm space within the Cluster and will become even more important quiet/open spaces in the coming years if planned developments go ahead. We request that the report is enhanced to reflect the contribution the churches make to this aspect of the city.
- That churches and their churchyards are not specifically mentioned in **HL 3: Noise; Page 24**. Our church building, and specifically the ministry that happens within them, are incredibly sensitive to noise of all kinds. Their being mentioned in public planning policy would see them given more adequate protections against the noise of development and general City

life. This would also help maintain their standing as quiet and meditative spaces for City workers to access and escape from the rigors of office life. It would also mean that our thriving ministry could continue to serve the surrounding communities effectively.

- The City churches also offer a unique contribution to health and wellbeing in the City which might merit an explicit item in S1, such as “Protecting and enhancing the provision of health and wellbeing opportunities through faith-based communities within the City”.
- The City Cluster is identified as one of the **‘Key Areas of Change’** in the current document. We consider ourselves to be ‘City positive’ and try to welcome new developments in our vicinity. The Cluster is also our home, yet very little mention of our churches is made in discussing the changes that will be made to the Cluster and the effects they will have on us. We have had very little, if any, contact with the City with regards to our needs, hopes, and desires for this unique part of the Square Mile. We ask that our churches be given more of a voice, especially with regards to policy governing development within the Cluster.
- The plan would cause fundamental change to the historic environment/character of the City and London as a whole, particularly in its expansion of the zones of tall buildings and in designing policies that would harm the historic environment. During one of the recent consultation meetings for the City Plan 2040, the importance of juxtaposing heritage assets with new developments was emphasized as a central theme. It strikes us that the new developments need these juxtapositions far more than the already existing heritage assets do, and that this approach is a way of justifying increased modern development. Additionally, the figure claiming that the City needs an extra 1.2 million square metres of office space is given very little context in the document. We ask that the report be enhanced to give more insight into how this number was reached and why it is so crucial that that such vast amounts of space is provided.

As mentioned, we welcome developments that will give us more people to serve but, at the same time, we wish to be treated appropriately as integral members of the City community and crucial contributors to both its social and built environment. We fear the current draft of the City Plan 2040 doesn’t achieve that.

We look forward to productive discussions with the City going forward.

**Yours sincerely,
Jason Barrington**

(Operations Manager, St Helen’s Bishopsgate)