

2024\_City Plan 2040 Response S Andrew by the Wardrobe

R0125

Fr Luke Miller [REDACTED]

Mon 6/10/2024 12:27 PM

To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>

Cc: [REDACTED]

1 attachments (213 KB)

2024 City Plan 2040 Response (0102).pdf;

You don't often get email from [REDACTED]

[Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

I attach a response to the consultation on the City Plan 2040 on behalf of the parish of S Andrew by the Wardrobe.

Fr Luke



## THE PARISH OF S ANDREW BY THE WARDROBE

Development Plans Team,  
Environment Department,  
City of London Corporation,  
Guildhall, PO Box 270  
London EC2P 2EJ

10 June 2024

### **Consultation on the City Plan 2040**

Thank you for the opportunity to comment on The City Plan 2040. The City Churches play a valuable role in all three the strategic priority areas of the Plan. The Plan as is almost entirely misses the contribution of the churches to the economic, social and environmental wellbeing of the City. The cornerstones of the Plan are the Tower of London, St Paul's Cathedral (which is a separate institution which in role and constitution does not represent, and still less comprises, the other Anglican churches in the City), Monument and Bevis Marks Synagogue. All four of these institutions contribute immensely to the history, culture and live/work-ability of the Square Mile, but the 36 mostly Grade I Listed Churches which outdate and will outlive many of the current buildings in the City, form a unique group with hugely significant contribution which is missed or minimised by the draft Plan. The Plan is therefore not sound as expected by Section 35 of the National Planning and Policy Framework.

**The following notes show the impact and intersection with the Plan of the Church of S Andrew by the Wardrobe, just one of the 36 churches.**

#### **SECTION 3: HEALTH, INCLUSION & SAFETY**

##### **POLICY S1: HEALTHY AND INCLUSIVE CITY**

The churches and churchyards should be specifically mentioned in 6(d) 'respect the City's quieter places and spaces'. The churchyards to the north and south of the church of S Andrew by the Wardrobe, and the associated churchyards of the church of S Ann Blackfriars (lost in the Great Fire) at Church Entry and Ireland Yard provide ground level community space which is free to access and available to all in a way that no Sky Garden ever can be.

The churches contribute to social cohesion with unrivalled bridging social capital as people of a huge range of ages and backgrounds gather. This is evidenced at S Andrew by the Wardrobe by the large Egyptian Coptic Orthodox Church congregation with its ministry to students, elders and City workers of all ages as well as to families and tourists, and by the activities of the Anglican congregation with its reach to many people of different ages and backgrounds.

Paragraph 12 Protecting and enhancing community facilities is helpful, but the Plan should recognise that space for community activities already exists within the churches and should be supported. The Parish Room in the church and the break out spaces are made available to the community at rates which cover costs. Any new provision should not be detrimental to this nor should it replace any Community Infrastructure Levy requirement by developers: we have benefited from a grant from this fund to refurbish and enhance the existing heavily used community facilities, and loss of this opportunity would be very bad for existing facilities.

### **POLICY HL3: NOISE POLICY SA1: PUBLICLY ACCESSIBLE LOCATIONS**

**POLICY S14: SPACES & GREEN INFRASTRUCTURE** Should specifically reference churches and churchyards which are noted as oases of quiet in the City. The City of London Noise Strategy 2016 – 2026 notes the contribution of the churchyards. S Andrew by the Wardrobe has churchyard around the church itself, and two other churchyards at Church Entry and S Ann Blackfriars. Church bells (we have three) were recognised in the document (4.4.16) as iconic City sounds.

S Andrew by the wardrobe is in the Fleet Street BID. Within the BID area there is no open space which is not churchyard. This means that if somebody is upset or depressed or just needs to breathe they can step into one of the churchyards. Under the Burials Act they are managed in partnership with the City Gardens team, but theoretically it would be possible for the churches to close the church yards and rent them exclusively which would bring in a considerable income but remove this amenity which makes a huge difference to the well-being of the City.

### **POLICY HL5: LOCATION & PROTECTION OF SOCIAL & COMMUNITY FACILITIES**

This policy should ensure that there is funding for the facilities that are already available and not dilute the offering when it is not necessary. In common with other churches S Andrew by the Wardrobe provides “sanctuary in the City” offering headspace indoors and around the church in the churchyards. Thanks to volunteers it is open most of most days of the week, it offers a warm place during the winter and a cool spaces during the increasingly hot summers. It is “third space”, neither in the office nor in the meeting room.

### **STRATEGIC PRIORITY: ECONOMIC OBJECTIVE**

#### **STRATEGIC POLICY S6: CULTURE AND VISITORS**

The church is open most of most days, and is on many of the City walking and cycling heritage tours. School visits to the City often come to the church, meaning that several hundred children





from outer London boroughs visit each year. This has recently increased with the Wren 300 programme.

The church is host to concerts, exhibitions and cultural events, such as lectures and is the repository of the music library of the Tallis Scholars, an internationally renowned choir. The church holds a significant historic organ built in the 18<sup>th</sup> Century which is in itself an important cultural contributor to the City. The church was destroyed in the Blitz, but careful collecting means that it holds several 17c pieces of significant wooden furniture, some similar to examples held in the V&A and the Royal Collection, and a medieval devotional statue of S Ann. On their own these items are contributions to the cultural heritage of the City.

Our relatively small Church would have some sort of cultural event which is not worship and is free to access to all on average once a month. Our Advanced Sunday School programme of public talks has been in abeyance but is about to get going again. Taking the City churches together, we assess that there are more free to access, non worship cultural events, mainly music, but also including art exhibitions, plays and performances, talks and lectures, than in the Barbican and the South Bank put together in any given year.

#### **STRATEGIC POLICY S1: HEALTH, INCLUSION & SAFETY**

S Andrew by the Wardrobe has a history of developing social enterprises, (for instance, Suited and Booted began in the church and the social enterprise cleaning company Clean for Good). The churches as a whole serve hidden communities specifically through the work at Holy Sepulchre Newgate and Saint Katharine Cree. There is a work of support counselling pastoral care and chaplaincy via SA Andrew by the Wardrobe and other churches to hundreds of individuals in workplaces. In addition to the partnership over the homelessness assessment centre at Snow Hill and the temporary assessment centres at S Botolph Bishopsgate, the churches host hundreds of meetings of Twelve Step Groups of all kinds and make contributions to food banks and other charitable activities

The City Churches convene and work with other faith communities in the public square working with the London Resilience Forum. The church is a cool space for the summer, and a warm space in winter, part of the GLA programme. For twelve years the Rector of S Andrew by the Wardrobe was the Faith and Belief lead for the LRF working alongside John Barradel who was LA Lead. In that role within the Covid SCG the team the Rector was part of was instrumental in the delivery of the Mortuary Hubs, the Funeral Standards for London, the multi faith chaplaincy teams to the hubs, and breaking down barriers for the vaccination programme. He was also one of the co-chairs of the Funders, Voluntary Sector, Communities and Faith sub group of the SCG, showing the contribution made by the churches.



## **STRATEGIC POLICY S4: OFFICES HERITAGE AND TALL BUILDINGS (SECTION 11)**

S Andrew by the Wardrobe, in common with most of the 38 City Churches is Grade I Listed. Only 2% of buildings in the UK are listed. Only 2.5% of *listed* buildings are Grade I. This makes this church and the group of which it is part very special indeed. It is made more significant in that such a concentration of such highly listed buildings in a central business district is unprecedented. Other than the churches in the eastern part of the City, the only surviving mediaeval building still in use in the city is the Guildhall. The extraordinary survival of this group of churches within a central business district is unique in the world, where most central business districts are not in the old town part of their city. The restoration of S Andrew by the Wardrobe after the Blitz was done in a way that retained the Grade 1 significance of the building. It has been part of the Wren 300 project, timed for the 300th anniversary of the death of Sir Christopher Wren has thrown up the specific survival of the Wren churches, but there are also buildings by Hawksmoor, Inigo Jones, and others. S Martin Ludgate, which is looked after by the parish is one of the six churches to have remarkable survivals of original woodwork and *as a group* they have been deemed worthy to apply for nomination by the World Monument Fund to be placed on the Watch list of most endangered sites in the World.

At S Andrew by the Wardrobe we have been engaging with the plans for the development of Queen Victoria Street and Puddle Dock. The threat of high rise buildings delivering significant harm to the heritage is less acute here because of the protected views of S Paul's, but these were only instigated following the building of the BT building on Queen Victoria Street, and the recent development of the roof of 101 QVS allowed a small increase of height into the protected view. It is essential that we do not find that salami slicing will destroy the unique environment of the City.

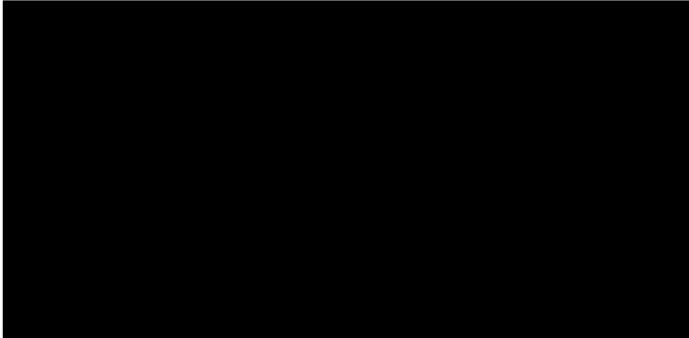
The heritage of the City churches is remarkable. It is worth noting that the churches have been here a long time and are of archaeological value as well as historic. There are Roman pavements in the crypts of All Hallows by the Tower and S Bride Fleet Street. S Peter Cornhill is on the site of the chapel which was built in the 4<sup>th</sup> century in the Roman Forum. The crypt of S Olave Hart Street contains the Saxon well where King S Olave of Norway and King Aethelred sat while planning the Battle of London 1013 (hence London Bridge is falling down, falling down...

### **FATH AND BELIEF**

The churches are of course living places of worship hosting a huge variety of services, not only for the Church of England but for the "guest churches" of other denominations many of whom are congregations worshipping in specific languages and serving specific cultural and ethnic groups. Anniversaries, endowed and livery services take place through the year, and In any given December there will be upwards of 300 carol services with an average attendance of 80 to 90 people. The City churches music in worship sustains the English choral tradition, itself an overlap with both culture and heritage.

During the pandemic government recognised that places of worship are not simply places of recreation as though religion were another discretionary activity of life: faith and belief is a protected characteristic of people, part of their identity, not a commodity but a conscience. Not only because of the huge commercial, cultural, environmental and social contribution of the churches, but also because of their core religious identity, they should be more clearly and sympathetically accounted for in the City Plan if that plan can be considered sound.

Yours faithfully,



Luke Miller  
Rector

