


Representations on the City Plan 2040

Hywel Davies [REDACTED]

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

 1 attachments (221 KB)

St Benet response to City Plan 2040.pdf;

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Please find attached the representations from St Benet's Welsh Church to the draft City Plan 2040. We are willing to give further evidence if requested.
Regards

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I am writing on behalf of the Metropolitan Welsh Church of St Benet, which is located on Bennet's Hill, in response to the Corporation's 'City Plan 2040' document currently out for consultation. There has been a church building on the site dating back into the 15th century and the church has been associated with the nearby College of Arms for around five hundred years.

The current Grade I-listed structure is of Christopher Wren's design, although the detail is widely attributed to Robert Hooke. It replaced the medieval church destroyed in the Great Fire of 1666, which started on Pudding Lane just a few hundred yards away. St Benet's survived the Blitz almost unscathed, save for its glazing, and is one of only thirteen unspoiled Wren churches and of those one of the least altered, marking it out as a building of exceptional historical significance in the City of London. We therefore welcome what is already included in the draft Plan about heritage buildings in general and the Grade I listed church buildings in particular.

But as well as the heritage building aspect, there is a significant distinction between church buildings, which are heritage assets, and churches, which are communities of Christian people. The City of London is home to a number of churches which are living communities of people who make a contemporary and essential contribution to the daily life of the City, bringing the Christian message of saving faith to the hundreds of thousands who work in and visit the City! As well as providing a range of other "services" to the City community and those who visit it.. This ministry is an extra dimension which is quite different and distinct from the "heritage assets" themselves. It is the ministry that happens within our building that is the most significant contribution to the City.

Commented [HD1]: I'd be inclined to say "contemporary importance" to distinguish from the heritage aspect.

As well as our weekly service in the building we work in partnership with the 'Friends of the City Churches' to open the building more to visitors. Unfortunately one consequence of past planning decisions is that St Benet's is tucked away down stairs from Queen Victoria St with virtually no realistic access provision for the disabled or those with particular mobility needs, reducing our ability to cater for casual visitors. We also continue to be the church of the College of Arms and the associated White Lion Society.

We consider ourselves to be committed members of the City community, and our mission to serve that community continues to drive us. In particular, we anticipate that the Blackriars Masterplan offers a real opportunity to reconnect St Benet's with the area and for us to serve the proposed new office and retail destination in the Puddledock area.

We, like other churches, note with concern the lack of attention given to us, and other City Churches, in the current City Plan 2040 document, which considers the heritage church buildings but not the faith communities which meet in them or their contribution to the life, health, wellbeing and culture of the City.

We propose that the City Plan 2040 should give recognition to the role of faith communities in the Strategic priorities at the start of the Plan.

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".

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.

Further more particular concerns, include, but are 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. For example, the City streets are regularly taken over by events and filming activity, which generate revenues for the City but cause access problems for the churches. Some event organisers are helpful, but others appear to take the view that their commercial arrangements should take priority over the regular weekly activity of the churches. That is discriminatory and has an impact on faith based groups.

- 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 a church in close proximity to tall buildings and with more planned for our vicinity. 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, operate and maintain those heritage assets, should be served by their own separate section of the document, giving the churches 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**

Commented [HD2]: Now this is controversial! You might want to add: 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.

Grade I-listed Bevis Marks Synagogue has been identified as one of the four heritage pillars within the plan, yet the many Grade I-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.

That church buildings and their churchyards are not specifically mentioned in **Section 3; Policy S1; 6(d) Page 16**. The 'hidden-away' nature of some churchyards makes them havens for people looking to escape the noise and rush of the City around them. We request that the report be enhanced to reflect the contribution the church buildings make to this aspect of the city.

That churches and their churchyards are not specifically mentioned in **HL 3: Noise; Page 24**. Some church buildings and the ministries that happen within them, are incredibly sensitive to noise of all kinds. The churches 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 plan as drafted is likely to 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. But there was no recognition of the ministry and community contribution delivered by the churches that meet in those heritage assets. 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.

As mentioned, we welcome developments that will give us more people to serve as a church community but, at the same time, we wish to be treated appropriately as equal and integral members of the City community and as crucial contributors to both its social and built environment. We trust that our suggestions will enable the current draft of the City Plan 2040 to be improved to achieve that.

We look forward to productive discussions with the City going forward. We are willing to give evidence in support of our proposals.

Yours sincerely,



Dr Hywel Davies, CChem CSci MRSC HonFCIBSE MASHRAE

Church Treasurer and Buildings Manager