

BY EMAIL

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Further Statement for the Examination in Public of the City of London Plan 2040, on behalf of the Archdeacon of London, the Ven Luke Miller KHC SCC

Main Matter 7 – Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3)

Main Matter 9 – The Temple, the Thames Policy Area & the Key Areas of Change (Policies TP1 and S17 to S25)

1. We are responding to the Main Matters, Issues and Questions for the City of London's draft Local Plan 2040, on behalf of the Ven Luke Miller, Archdeacon of London. Our comments concern the Anglican churches in the City of London ('the City Churches'). A Regulation 19 Consultation Response was submitted on this matter on behalf of the Archdeacon by Donald Insall Associates (ref R0127, appended for reference). Alan Baxter has since taken on this instruction, under the framework of the Diocese's Square Mile Churches Project.
2. The Archdeacon's Office would like to register its interest in participating in the hearings. It would be represented by myself and others, depending on and relevant to specific Main Matters and Questions.
3. This is a further statement with regard to Main Matter 7 and Main Matter 9. The questions to which it responds are set out below. These are relevant to the Regulation 19 representation submitted on behalf of the Archdeacon (ref R0127). Although I did not prepare that representation, I have read it and I agree with its contents.

Main Matter 7 – Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3)

Q: Are the Heritage and Tall Buildings policies justified by appropriate available evidence, having regard to national policy and guidance and local context; and are they in 'general conformity' with the LP?

Heritage

Q: Are the Heritage policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

Tall buildings

Q: Is Policy S12 (Tall Buildings) consistent with Policy D9 of the London Plan and is it informed by a proportionate evidence base?

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4. In answering these questions, we contend that the evidence base is partial, that the impacts are underplayed and that the policies do not reflect the evidence.
5. ED-HTB1 *City of London Tall Buildings Topic Paper* is a detailed document and in section 11, paras 16-22, describes many of the elements that make the City Churches highly significant. This is reflected in designation: the City Churches constitute approximately one third of all the Grade 1 listed buildings in the City. That 32 of the 34 churches in the City Deanery are listed at Grade 1 is exceptional nationally, and possibly unique.
6. Since the Archdeacon's Regulation 19 submission, further research has been undertaken that demonstrates that the evidence base (ED-HTB1) and by extension the assessed impacts do not take account of the full heritage significance of the City Churches. As part of a Framework Conservation Plan for the City Churches subsequently commissioned by the Diocese of London, Alan Baxter has consulted a wide range of historians and experts. This exercise has shown that, in addition to the elements of high national significance identified in ED-HTB1 (11.16-11.22), the City Churches form a group of international heritage significance because there is no parallel in the world for a single architect (here, Wren) to oversee and direct the design and construction of such a large number of churches and a cathedral in a single campaign, in a single location, as part of a single coordinated architectural and townscape vision. The significance of the City Churches is therefore elevated above all but a select few historic buildings in London.
7. Further, ED-HTB1 (11.16-11.22) underplays the significance of the City Churches as landmarks, both because it does not recognise the exceptional international group significance set out above and because it underplays the fundamental functional, spiritual and architectural importance of their landmark and skyline presence – both locally and on a wider and City scale. By no means were all historic buildings, including those of the highest grade, designed or intended to be prominent. But churches were, and this is fundamental to their heritage significance, which is therefore particularly susceptible to harm due to changes to setting. Because of these gaps in evidence, the assessment of impact does not fully consider the contribution setting makes to the significance of the City Churches or their sensitivity to setting impacts (ED-HTB1 11.16-22, 9.32-9.34, 12.9) and resultant Policies give insufficient regard to this.
8. For these reasons, we also agree with and support Historic England in their Statement of Common Ground concerning deficiencies in the evidence base and impact assessment (SOCG9, paras 7.4, 7.6, 10.4, 10.5).

Q: Is Policy HE1 (8) clearly defined and unambiguous in regard to the setting of heritage assets so that it is evident how a decision-maker should react to development proposals in a manner consistent with the statutory requirements in the Planning (Listed Buildings and Conservation Areas) Act 1990 and which gives sufficient protection to heritage assets?

9. The Monument and Bevis Marks Synagogue are listed buildings of very high significance and a reasonable case based on evidence can be made that they 'require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of elements of setting to that significance' (City Plan 2040 11.2.1). However, 'the critical contribution of setting to . . . significance' is not limited to these two buildings. We believe that the evidence demonstrates, for example, that the City Churches, as a group of international heritage significance that was designed explicitly as landmarks, both collectively and individually, are no less deserving of the Policy protection afforded under HE8.1. In this regard it should be noted that the *Protected Views Supplementary Planning Document* (2012) identifies 28 City Churches and Towers as Historic City Landmarks and Skyline Features but not Bevis Marks Synagogue. The evidence base (ED-HTB1 11.16-22, 9.32-9.34, 12.9) acknowledges the significance of this aspect of the City Churches but Policy H1.8 (and

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by extension S21.6) does not reflect this evidence and should be revised, for example to include other Historic City Landmarks and Skyline Features of equal significance, or struck.

10. We also agree with and support Historic England in its Statement of Common Ground that the concept of 'immediate setting' has no formal meaning in statute or policy and would appear to place lesser weight on wider setting matters that may equally cause harm to significance (SOCC9, 10.3-10.6).

Protected Views

Q: Is Policy S13 justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

11. For reasons articulated above, we believe Policy S13 places insufficient weight on the significance of the setting of the City Churches, locally and on a wider scale.

Main Matter 9 – The Temple, the Thames Policy Area & the Key Areas of Change (Policies TP1 and S17 to S25)

Q: Are the policies relating to The Temple, the Thames Policy Area & the Key Areas of Change justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

12. For reasons articulated above, we believe Policies for Key Areas of Change place in sufficient weight on the significance of the setting of the City Churches, locally and on a wider scale.
13. We also note and question why some churches are mentioned in the Key Areas of Change and others are not. All the churches within these Areas can contribute towards Policy objectives of the Plan (Health, Inclusion & Safety, Culture & Visitors, OPEN Spaces & Green Infrastructure) and therefore they should all be included under the Key Areas of Change Policies.

Yours sincerely



Richard Pollard
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