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This Hearing Statement has been prepared on behalf of the Dean and Chapter of St Paul's Cathedral for submission to the Examination in Public of The *City Plan 2040* (hereafter referred to as the CP).

It should be read alongside the other documents previously submitted as part of St Paul's Cathedral's representations to plan consultation, in particular those submitted in response to the Regulation 19 Draft of the *City Plan 2040*.

A cover letter has been prepared to be read alongside our Hearing Statements. The letter is included as an appendix to this Statement and others, but we recommend is read in advance of what follows below as an introduction, and summary of Chapter's overall views.

Additionally, our Hearing Statements reference *The Setting of St Paul's Cathedral, Its contribution to heritage significance: an analysis and evidence base* (City Plan 2040 Examination in Public version). This evidence report is also included as an appendix to this statement and others, and is referred to as 'the *Setting Study*'.

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We do not consider that the spatial strategy of the CP is justified by appropriate available evidence. As outlined within our Regulation 19 Representations and elsewhere (see MM1 and MM7), we consider that the methodology of the HIA for evaluating impacts on the Cathedral is deeply flawed, does not follow accepted national guidance (namely GPA3), includes townscape language and methodology in error, and leads to poorly conceived, ambiguous and incorrect conclusions. We consider the tall buildings clusters as defined in CP policies to be harmful in a way that the evidence base does not faithfully recognise.

This harm outlined by development proposals within crucial areas of the contours map that have recently been consented, such as 99 and 55 Bishopsgate. With each scheme different degrees of harm have been identified in Officers' reports to committee (see MM1).

We also note the City's comments (especially in the SOCG) regarding proportionality of assessment. The City conclude, broadly, that the assessment provided is proportionate (in-part as the plan is not 'development').

The HIA in the evidence base informs the plan. The plan sets parameters that will guide development, and effectively establish minimum, as well as maximum heights, through the contours. The plan period covers 15 years. We therefore consider that the baseline assessment of significance (and the contributions made by setting) in particular should be proportionately detailed for the HIA to be robust, given the cumulative nature of the impacts and the length of time of the plan period.

As noted, we consider the *Setting Study* (included as an appendix to this statement) appropriate to inform further plan-making endeavours; early drafting of the Setting Study was shared with the City from October 2023 and subsequently. The City did not elect to engage with or reference the emerging Setting Study within the Plan making process, despite being aware that one of the intended purposes of this expert commission was to inform the 2040 Plan process.

As noted in the SOCG and elsewhere (see MM1, MM7 and Regulation 19 Responses), we also consider that harm can be 'baked in' to a plan, especially given the spatial and three-dimensional nature of Policy S12. The City maintain this is not the case, and that a plan policy should not be assessed like development. However, their evidence base, including the HIA, does (at least purport to) assess the contour map as development, and is in turn used to justify the policy.

As noted within our previous representations, we also have fundamental issues with the outcomes reached by the SVIA. We consider that the plan would adversely affect strategic and local views of the Cathedral, harming the ability to appreciate it as an SIL.

We also consider that the City's 'bespoke methodology' is not robust, not just because it does not adequately follow established guidance (as outlined in our SOCG, Regulation 19 response, and MM7). Additionally, we would contend that national guidance pertaining to the preparation of local plans has also not been adequately followed, including *GPA1: The Historic Environment in Local Plans*, which includes guidance on the proportionality of assessment. *GPA 1* also notes the application of evidence and outlines a positive strategy for conservation and enjoyment of the historic environment in line with the NPPF, which we consider has not been fully observed. Due to the similarity of situation, we would invite the Inspectors to evaluate the usefulness of HEAN3. We also consider and submit that the evidence base used by the City also does not adequately follow the steps outlined within HEAN3 *The Historic Environment and Site Allocations in Local Plans*.

We also consider that the proposals do not have conformity, and therefore due regard to the LP (see MM1 and Regulation 19 Reps) and are also contrary to the guidance within the supporting LVMF. We also consider that the current plan would run contrary to the guidance within the City's own *Protected Views SPD*. This contrary nature is outlined by development proposals within crucial areas of the contours map that have recently been consented, such as 99 and 55 Bishopsgate, which each to different degrees demonstrate a departure from policy and guidance but were readily approved (and were recommended for approval) on the basis of a planning balance test.

We also have concerns regarding the relationship between the evidence base for the quantum of office development and the emerging policies (see MM4 and Regulation 19 Representations). Whilst this is covered elsewhere, it is also linked to concerns over ambiguity between this figure and the jelly mould described by the contours – would the contours adequately deliver this figure? Is there any scope for change? Currently, this has not been made clear through consultation. The change in the proposed modifications from 1,200,000 m<sup>2</sup> of new office space as a maximum, to being 1,200,000 m<sup>2</sup> as a minimum – as noted elsewhere (see MM1, MM4, and MM7) – has profound additional ramifications.

**IS THE PLAN PERIOD SUFFICIENTLY DEFINED I.E. CLEARLY WRITTEN AND UNAMBIGUOUS?**

No comment.

**IS THE SPATIAL STRATEGY FOR THE CITY OF LONDON EFFECTIVE AND WILL IT ENSURE THE DELIVERY OF THE IDENTIFIED ECONOMIC, SOCIAL, AND ENVIRONMENTAL OBJECTIVES WITHIN THE PLAN PERIOD?**

The spatial strategy seeks to consolidate a large quantum of development into clusters, which at the form and scale proposed, will cause heritage harm to St Paul's Cathedral, and harm to protected views. We consider that, given Policy S12 is spatial and provides, effectively, the principle of development between certain heights and massing, the policy would 'bake in' this harm (See MM1) as a starting point for development.

We have identified that this would, in our view, create a conflict between Policy S12 and the heritage policies of the Plan. However, we consider that the spatial strategy also illustrates conflict between the strategic objectives of the plan (as outlined at 'City Plan Vision'). This would harm its compliance with the NPPF, its deliverability, and its effectiveness.

As outlined within our Regulation 19 Representations, we consider that this would compromise the historic environment at the expense of a narrow definition of the economic objectives of the plan.

The spatial strategy of the plan is informed by the City Plan vision (as updated within the proposed modifications version of the plan). We consider that there is a conflict between these objectives in the City's policies – namely between the means to achieve the 'stronger, more vibrant and competitive economy' and the other statements.

The heart of this conflict is that heritage harm (and harm to protected views) that would be caused by the plan.

However, the vision for the City also does not, to us, acknowledge the positive approach that preserving and enhancing our existing, irreplaceable heritage would bring. The Cathedral and the Cluster should co-exist harmoniously, to one another's mutual, multifaceted benefit. Aside from simply environmental considerations, heritage can make a strong, positive contribution to the social and economic objectives of sustainable development. This is not adequately reflected in the wording of the 5 statements, or the spatial strategy for the plan as a whole.