

ST PAUL'S CATHEDRAL: HEARING STATEMENT
 MAIN MATTER 4 - OFFICES

INTRODUCTION

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*'.

DO THE STRATEGY AND POLICIES RELATING TO THE PROVISION OF OFFICES MAKE ADEQUATE PROVISION TO MEET THE CITY'S NEEDS FOR THE WHOLE PLAN PERIOD (15 YEARS)?

We do not profess to be urban economists, nor specialists in the financial aspects of the planning system and evidence base. In our representations we defer to other specialists and the Inspectors to test the City's assertion of an evidenced need for 1,200,000m² of new development. We also trust that your examination will unpick the ambiguities in the needs assessment between new and refurbished space. The requirement must be appropriately scrutinised by those with the appropriate skills.

We query the proposed 'change' that the 1,200,000m² figure now represents a 'minimum requirement' rather than an 'overall requirement' (PC30) as has always been previously communicated to consultees. Does the inspectorate have a view as to whether this 'change' is not in fact a 'main modification'. This change has obvious and profound implications regarding the evidence base, the plan making process and how a 'minimum' office space requirement is accommodated within the current parameters. A change of this nature at this late stage deeply undermines confidence that the appropriate figure for office space requirement in the plan period has been established. The Inspectors will be better able to test whether this modification is an intended distortion of due process to distract from suitable scrutiny of the figures within the consultation drafts of the plan.

Whatever the tactic at play in the proposed change, we submit a) there is no clearly communicated transparent evidence that the contours have been tested to show what development volumes can be achieved b) that adequate options were tested to explore how harm could be removed or mitigated by alternative configurations of the contours and c) overall the volume and contours being harmful, as evidenced in our representations, how this harm can be reconciled with heritage policies. The

Inspectors may have powers, which we do not have, to seek unpublished technical research, modelling and early feasibility work which underlay the proposed contours to discover if there is unpublished 3D or similar modelling that would be useful in a transparent process of examination.

ARE THE POLICIES RELATING TO OFFICES JUSTIFIED BY APPROPRIATE AVAILABLE EVIDENCE, HAVING REGARD TO NATIONAL GUIDANCE AND LOCAL CONTEXT; AND ARE THEY IN 'GENERAL CONFORMITY' WITH THE LP?

As noted above, we trust that the evidence base supporting this figure to be interrogated by those with the appropriate expertise and experience. However, as noted above, the change from 'overall' to 'minimum' requirement outlined in the proposed changes raises important questions regarding the reliability and soundness of the evidence base.

Importantly, this also raises further concerns regarding the tall buildings policy and contour map, which we were told throughout consultation was developed in response to this figure. If this is now a minimum figure, what is the maximum? Does the contours map provide for this, and would this cause even further harm to the heritage significance of the cathedral through even more extensive development? The previous unanswered questions regarding the relationship of the contours map to this figure (see MM2) are therefore also of relevance in this instance.

We also have queries over the relationship of this figure to consented schemes, schemes within the 'development pipeline' and to possibly retrofitting of existing buildings. Are these within the 1,200,000 m²?

Ultimately, these concerns are related to the justification of the policy, the robustness of the evidence base, particularly in light of the harm that would be caused to the Cathedral.

ARE THE POLICIES RELATING TO OFFICES POSITIVELY PREPARED 'IN A WAY THAT IS ASPIRATIONAL BUT DELIVERABLE'?

Our concerns with the quantum of office space apparently needed stem from the quantum of development that is projected in the CP to deliver this figure. Given the harm to St Paul's Cathedral – a building of exceptional heritage significance, and its role in protected views – we would question whether this is 'aspirational'. Given the concerns outlined previously (see MM1, MM2, and our Regulation 19 Representation), and those queries outlined above, we would query whether this is effectively deliverable. Where does the social value aspirations and benefit sit within the plan for a wider recognition of sustainability?

ARE THE POLICIES CLEARLY DEFINED AND UNAMBIGUOUS SO THAT IT IS EVIDENT HOW A DECISION MAKER SHOULD REACT TO DEVELOPMENT PROPOSALS?

We have discussed ambiguity with regards to the evidence base, as noted above. The conflict we consider is inherent to the plan (see MM1, MM2, MM7 and Regulation 19 Representations) would also affect the deliverability of development related to office space, and how decision makers react to such schemes.