

ST PAUL'S CATHEDRAL: HEARING STATEMENT
MAIN MATTER 9 – THE TEMPLE, THE THAMES POLICY AREA & THE KEY AREAS OF CHANGE

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*'.

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?

As outlined within our Regulation 19 Representations, our concerns with Policy S12 and the evidence base that accompanies it, also apply to Policy S21, concerning the City Cluster and Policy S22 regarding Fleet Street and Ludgate (principally related to the Fleet Valley Tall Buildings Area). This is outlined elsewhere (MM1, MM2, MM7, Regulation 19 Representations).

As outlined (MM1, MM7, Regulation 19 Representations) we consider the proposed tall buildings to the cluster, and to an extent to Fleet Valley, would not comply with Policy D9 of the LP.

The Blackfriars Key Area of Change is also of specific concern to the Cathedral. We note that the City are drafting a development brief for Puddle Dock, in this area. We have written to request involvement in this process as it progresses, noting that with that involvement there can be a consensual and lower-risk approach to decision making.

ARE THE POLICIES RELATING TO THE TEMPLE, THE THAMES POLICY AREA & THE KEY AREAS OF CHANGE POSITIVELY PREPARED 'IN A WAY THAT IS ASPIRATIONAL BUT DELIVERABLE'?

Given the interrelated nature of Policy S12 and its associated conflicts, and Policy S21 and S22, the same concerns regarding the policies stand. We consider that the harm that this would cause, and the conflict between policies that would resultantly arise as result of these tall buildings, mean these aspects of the plan are not positively prepared.

With regards to Blackfriars (Policy S18) and Liverpool Street (Policy S25) Key Areas of Change, our Regulation 19 Representations offer further changes that could ensure this area contributes positively to – and safeguard - the exceptional heritage significance of the Cathedral.

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

Given the interrelated nature of Policy S12 and its associated conflicts, and Policy S21 and S22, the same concerns regarding the ambiguity of the policies in terms of development proposals also apply here.

See also our Regulation 19 responses regarding positive changes to the Blackfriars and Liverpool Street Key Area of Change to avoid potential conflict / prioritisation of impacts.