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The Planning Inspectorate.
London City Plan 2024 Examination in Public
Care-of: Ms. Charlotte Glancy
Programme Officer
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Sent via email only

6 March 2025 (Revision A01)

Dear Charlotte Glancy and Inspectors,

London City Plan 2024 Examination in Public

I write on behalf of the Dean and Chapter of the Cathedral Church of St Paul, regarding the Examination in Public of the *City Plan 2040*. In addition to this covering letter, please find enclosed:

1. *The Setting of St Paul's Cathedral, Its contribution to heritage significance: an analysis and evidence base (City Plan 2040 Examination in Public version)*
2. Hearing Statement: MM1 – Legal Requirements and Overarching Issues
3. Hearing Statement: MM2 – Spatial Strategy
4. Hearing Statement: MM4 – Offices
5. Hearing Statement: MM7 – Heritage and Tall Buildings
6. Hearing Statement: MM9 – The Temple, the Thames Policy Area & the Key Areas of Change
7. Hearing Statement: Collated Additional Main Matters (MM6, MM8, MM10, MM11, MM12, MM13, MM15, MM16, MM17).

Background

This letter has been prepared to accompany a number of separate Hearing Statements in response to the Main Matters and Questions raised by the Inspectorate. This covering note seeks to reflect on the huge volume of discussion that has been undertaken to date regarding the City Plan and, from that material, distil key themes which we hope will assist the Inspectors.

This letter, and the accompanying Statements, draw upon extensive previous work and submissions into the planning process, including the Statement of Common Ground (SOCG). Looking back at the content and the process of drafting the SOCG, we consider how it exemplifies the very nature of the challenges facing the Plan and how it is discussed, analysed, and communicated.

We fully acknowledge plan-making is complex. The City Plan, like every plan, is an inter-woven matrix of issues. Like a web, this is hard to disentangle. We also recognise that there is repetition in our submissions on the Main Matters. This is not an elegant way to present concise information to assist the Inspectors, but is a product of cross referencing within this matrix whilst seeking to answer the Inspectors' questions consistently.

We understand that challenge and complexity is not new to spatial planning, no less the City Plan 2040. The principle of 'communicative rationality' lies at the core of our planning processes and involves discussion based on the clear communication of ideas and methods. In turn, this should facilitate rational conclusions.

While Chapter has never been more involved or interested in the plan-making process, we do not have the resources to retain a team of expert planning advisors or specialists. Our input, at all times, has sought to be constructive, considered, and meaningful. We look to the past efforts of those involved at St Paul's, such as Surveyor to the Fabric Godfrey Allen who in the 1930s initiated and devised what later became the St Paul's Heights Policy Area. What is now striking looking back at that work was how entirely collaborative and consensual the planning process was, inextricably supported by and with the City authorities. Initiated as an informal agreement, the Heights policy was embraced by the Corporation and remains an important safeguard of the significance of the Cathedral, and its contribution to the iconic skyline of London. It is in the spirit of Godfrey Allen that we continue to engage in these processes.

Chapter agrees with the City Corporation that the sustainable, creative and dynamic development of our nations' capital city is a public good. We desire to see the City, and thus our nation, thrive.

As part of this hope and expectation, we notice and value the power of heritage and culture as positive force and vector to our society. For hundreds of years, St Paul's has been a civic, spiritual and cultural focal point within the City and wider London. The Cathedral contributes to the value of our capital in a myriad of ways and also thrives within the ecosystem of a sustainable, vibrant and developing London. Chapter seek to be a positive contributor to this change through preserving and enhancing their contribution to the overall value and especially public, communal values of the City. This is not some 'heritage lobby', preserving historic buildings for their own sake. We ask 'what is the unique image and internationally renowned character of London, without heritage and culture at its heart'? The benefits of ensuring this contribution is preserved are both active and quantifiable. St Paul's is part of a shared heritage, cultural identity and sense of place.

These factors, values and non-monetary public goods directly contribute to the social and economic fabric of our city. This contribution should not be simply a 'nice

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to have' quality, or an afterthought, only considered as part of a balance of benefit and harm. Sustaining this contribution, preserving it and enhancing it, should be the starting point. As we prepare to submit these further statements to the EIP and Inspectorate, our overarching reflection and conclusion is that The City Plan 2040 plan needs to centre a *sustainable heritage*. Planning parameters related to heritage are not simply constraints. There is a real value in observing them.

We notice that in the changes proposed for the plan, the City presents its 5-point City Plan Vision. In isolation, these are generally admirable statements of principle. However it is particularly notable that they speak of new cultural attractions and how new experiences of the City will look down on the heritage of the City. It feels important to notice that there is little expressed conceptual investment in the *existing* heritage of the City within the Plan Vision. Although the City express how they want the new city to exploit and draw on the heritage of the Square Mile, how this finite resource is preserved or enhanced feels distinctly underplayed. St Paul's and the Cathedral environs are absent, and yet this is one of the City's key cultural heritage assets and attractions. Is that not rather remarkable?

What has been most difficult in our experience of discussions and seeking to contribute positively and effectively into the shaping of emerging policy has been a lack of *agreed*, defining key themes. We are interested that the City now presents the Plan Vision as a modification at this late stage. Whilst acknowledging how contingent and connected these themes are, our concerns are also contingent and connected.

In the Statement of Common Ground, we were seeking to structure a logical position statement under distinct headings which would be helpful to Inspectors. We were undertaking this drafting collaboratively with the City, under great time pressure. Inspectors will have noted the rather frustrating repetition and circularity of that document. Pulling out key strands from this complex web, we suggest the following themes are central to our submissions:

- Is the significance of St Paul's, and the contribution of its setting to this significance, sufficiently defined and understood within the evidence base of the plan?
St Paul's says No. The City says Yes.
- Is the methodology around the assessment of significance proportionate and appropriate?
St Paul's again respectfully says No. The City argue Yes.
- Are the conclusions of assessment, interpretation and analysis of harm to the heritage significance and the setting of St Paul's appropriately described; are these harms agreed and correct?
St Paul's emphatically says No. The City argues Yes.

- Therefore, can a Plan, with policies as laid out within the City Plan 2040 ‘bake in’ harm?

The City says No. St Paul’s respectfully disagrees and thus feels that the Plan is flawed and cannot be supported as it will not be effective or consistent with national policy.

It therefore must be noted (and regretted) that we are neither agreed on the means nor the outcomes of communication with the City. We see inconsistency within the Plan and within recent decisions by the City. Thus, rational and quasi-objective findings currently elude us in these discussions. We suggest this is the main challenge for the examination.

Planning processes allow us collectively to discuss, and make decisions on, aspects of our experience that are sometimes markedly subjective. If we cannot agree on how we feel about something, we can at the least agree on the language we use to discuss it. Given the scrutiny attached to the Plan and recent decisions made by the City, we can see the limits of this shared process and the unfortunate and unhelpful malleability of this shared language, which appears to vitiate long term decision-making and veers into narrow and temporal interests.

In so many ways, our built environment is a reflection of who we are, and who we aspire to be. However, our planning process is also an analogue of power and a bellwether of intent. Planning decisions are a vector too. They have direction and importantly, they have magnitude. Policies and individual development do not exist in isolation, as we well know. They are indicative of broader trends that also enable further changes.

Whilst our statements respond to each of the Inspectors’ Matters and Questions, our own questions can be summarised as follows:

1. How can the *Setting Study* form part of the examination in public process and ultimately in this plan making process?
2. How can the inspection process address and hopefully settle questions around methodology of analysis of heritage impacts and harms in regard to the evidence base of the plan?
3. How can we better clarify and acknowledge what actually happens in decision making, which we allude to in the Statement of Common Ground and develop in our submission paper, by comparison of recent cases to exemplify the issues around decision making and ‘baked in harm’. Can we learn lessons from recent decisions, and can this reality help inform what the new 2040 Plan needs to do?
4. How is it possible that the entire plan making process has been written around seeking development of a *maximum* of 1,200,000 m2 of office

space, (which in itself, we have questioned) to a process where, in the modifications, this is now stated as a *minimum* quantity? Are we alone in wondering if, in itself, this change vitiates fundamentally the plan making process – or is the modification an intentional distraction?

5. Is it agreed that heritage and tall buildings policies are in conflict, and thus there are conflicts between and within wider policies of the City Plan and other tiers of policy and guidance? And, if we are agreed on these points, how will these conflicts be resolved?
6. We question the City's reluctance to create a policy around the environs of St Paul's Cathedral and formalise the idea and possibility of a 'World Square'. They say in the SOCG they are very happy to discuss this, but seem always reticent to actually commit to policy for reasons that are obscure.

Policy provides clarity on decision making. It is also a signifier of intent. We suggest that the Examination needs to be especially interested in the wording of those policies within the Plan - and what they signify – in relation to the multifaceted importance and societal value of heritage. In the round, whilst there is much that is positive and we recognise that there is acknowledgement of core national policies in the Plan, we submit that the unresolved policy conflicts actually demonstrate that specific economic drivers are exclusively dominant in this plan, which will harm other values and shared communal sustainability goals.

This is why Chapter questions if this policy and Plan is a genuinely positive strategy to bring to the next 15 years of development in the Square Mile. We hope that the Inspectors will similarly recognise the imbalance of the Plan policies for what they actually represent and signify, and assist the City and our communities by re-centring sustainable heritage at the heart of Plan making.

Yours sincerely,



Oliver Caroe; RIBA AABC

Surveyor to the Fabric of St Paul's Cathedral

cc: *Rebecca Thompson, Director of Property, St Paul's Cathedral*
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