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From: Gregory Barrett <[REDACTED]>
Sent: 06 February 2026 18:11
To: Planning Policy Consultations
Cc: Rebecca Thompson; Oliver Caroe; McNicol, Rob; Nancollas, Tom
Subject: Comment on the City Plan 2040: Main and Additional Modifications
Attachments: 260206_SPC Consultation Response_City Plan 2040 Modifications.pdf

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Dear City Plan 2040 Team,

I write on behalf of Oliver Caroe, Surveyor to the Fabric of St Paul's Cathedral. Please find attached comment regarding the City Plan 2040: Main and Additional Modifications.

Kind regards,

Greg

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&

City Plan 2040 Team
Corporation of the City of London

Sent via email only

6 February 2026

Dear Inspectors & *City Plan 2040* Team,

Consultation Response: *City Plan 2040* Main and Additional Modifications

This cover letter has been prepared to accompany representations on the *City Plan 2040* Main and Additional Modifications, on behalf of the Dean and Chapter of St Paul's Cathedral.

In line with the aspirations of this stage of consultation, our comments are only targeted at the modifications themselves. In general, they reflect the views previously outlined in our representations on the emerging plan at each stage in the process, which should be read alongside this response.

We note many of our central concerns with the emerging plan have not been addressed. First and foremost, this includes the impact of the policies (specifically the development that they would enable) upon the heritage significance and landmark value of St Paul's Cathedral. Given the present stage of the plan-making process and status of the modifications, it is not the place for this representation to provide further detail on these issues. Instead, we refer Inspectors to our previous consultation responses (in particular in relation to heritage and tall buildings).

The comments that we have provided with this consultation response, in general, focus on suggestions to the wording of the changes to sharpen clarity and consistency in policy wording relating to the protection of heritage, that would have implications for development within the setting of St Paul's. We have also included comments where we welcome the recognition for and inclusion of places of worship, and churchyards, within the plan, welcoming the acknowledgement of the multifaceted functions and benefits that these assets offer.

One area where we offer more substantive comment relates to the *St Paul's Cathedral Setting Study*. We are currently in active discussion with the City of London regarding amendments to the Study, that the City feel that they can then endorse. To that end, we have suggested that the text referencing the Study is strengthened, which is to the wider benefit of the planning process. We feel that this would give greater certainty to applicants, stakeholders, and decision-makers in the planning process, and ultimately make the plan more effective in delivering sustainable development.

In conclusion, we welcome the opportunity to provide further comment on the emerging plan at this stage. The Cathedral has invested significant time and resource into responding to the plan constructively, from the earliest plan formation stages in 2016, through Regulation 19 comments and to appearing at the Examination in Public held in 2025.

At all times, we have sought to play a constructive and positive part in the plan-making process, sharing the ultimate aims of the Corporation for a thriving, sustainable London. Our efforts have sought to shape a plan that delivers this effectively. Whilst we still have concerns regarding the impact of development the plan expects to enable, we hope that these comments assist with the shared aims of the Corporation and St Paul's Cathedral.

Yours sincerely,



*Oliver Caroe; RIBA AABC
Surveyor to the Fabric of St Paul's Cathedral*

For and on behalf of Caroe Architecture Ltd

*cc: Rebecca Thompson, Director of Property, St Paul's Cathedral
Gregory Barrett, Lead Heritage Consultant and Clerk to the Surveyor
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*Encl: Appendix 1: St Paul's Cathedral Comment on City Plan 2040 Main
Modifications
Appendix 2: St Paul's Cathedral Comment on City Plan 2040 Additional
Modifications*

Directors:

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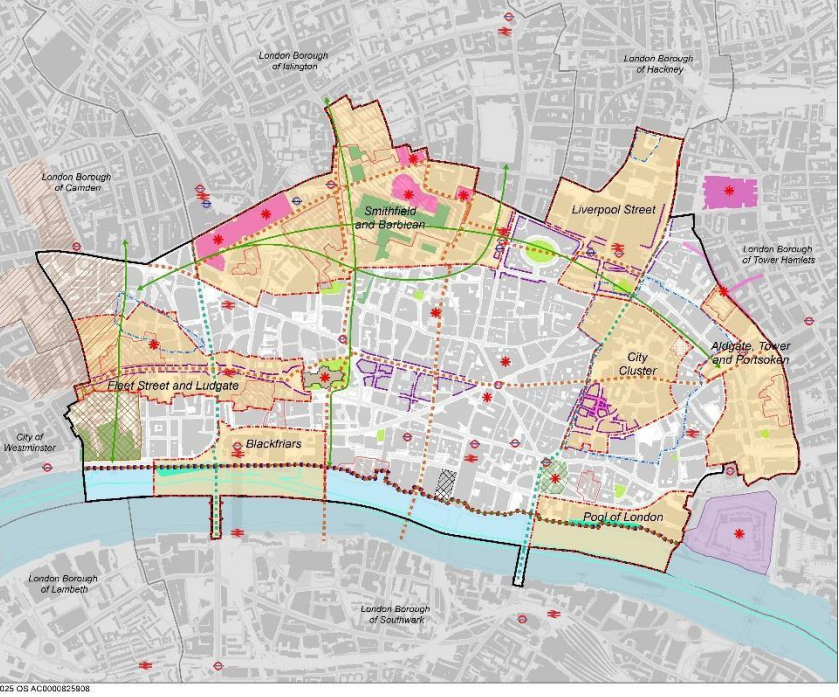
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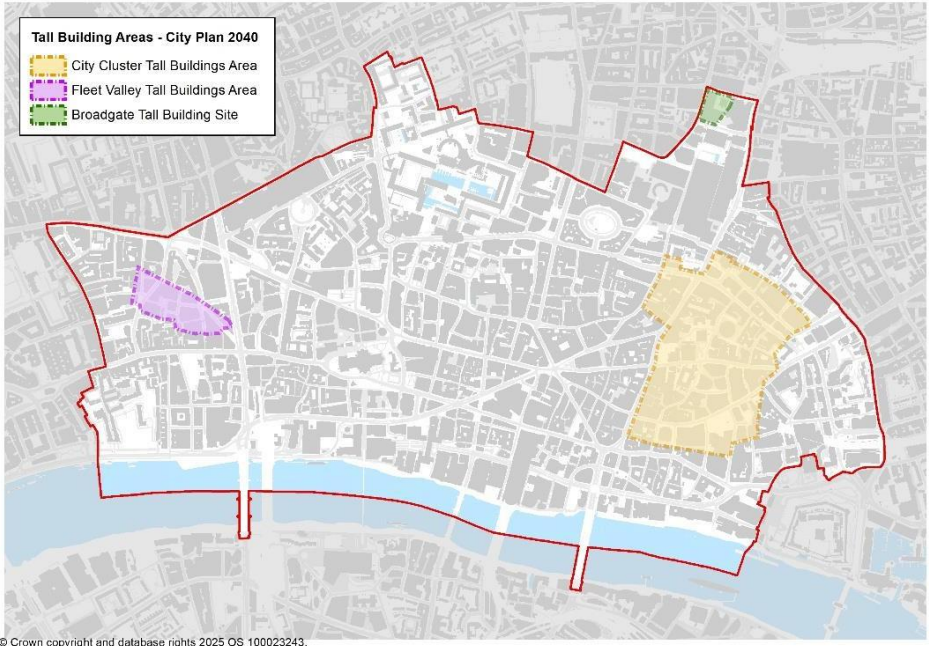
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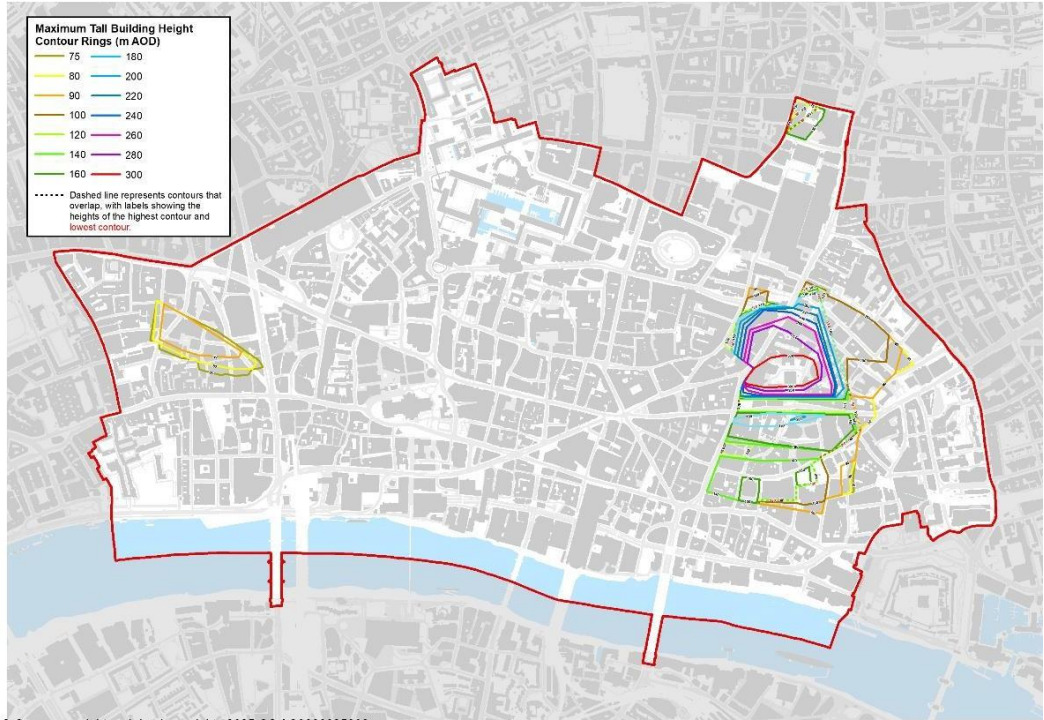
Appendix 1: St Paul’s Cathedral Comment on City Plan 2040 Main Modifications

Chapter	Paragraph	MM number	Main modification reason	Amended Text (With Suggested Further Tracked Changes Where Relevant)	St Paul’s Cathedral Comment
Chapter 1 Strategic Priorities	City Plan Vision	MM1	Effective	<p><u>By 2040 the City of London will have become:</u></p> <ol style="list-style-type: none"> 1. <u>A stronger, more vibrant and competitive economy.</u> The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business. 2. <u>A 7-day-a-week destination.</u> The city’s world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn. 3. <u>A more sustainable city-</u> The city has achieved its net zero aspirations and continues to lead in London’s climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors. 4. <u>A more inclusive and healthier city-</u> the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all. 5. <u>A place where heritage and positive change are celebrated-</u>the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape. 	<p>The addition of this main modification provides laudable aspirations. We also warmly welcome the inclusion of ‘worship’ in the City to point 4.</p> <p>As previously discussed at the EIP, we would query the notions that historic character and modern development have been successfully ‘blended seamlessly’ in the past, and that juxtaposition is inherently always a positive thing.</p>

Chapter 2 Spatial Strategy	Key Diagram	MM2	Positively prepared	<p><i>Change to include new Broadgate Tall Building Site on Key Diagram</i></p> 	Our concerns regarding the contour map, including the changes proposed since Regulation 19 and the new Broadgate Tall Building site, were raised at the EIP and discussed within our Regulation 19 response, hearing statements, and hearing statement addenda (see also MM53 and AM103 policy map)
Chapter 2 Spatial Strategy	2.1 (10)	MM3	Positively prepared	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, and the Fleet Valley and the Broadgate tall building site, which are identified as areas suitable for tall buildings.	Our commentary and concern on the additional Tall Building site at Broadgate has been previously provided. See also MM2 and AM103.
Chapter 5 Offices	S4 (1)	MM17	Effective	<p>Increasing the City's office floorspace stock by a minimum of 1,200,000 m² NIA (1,600,000 m² GIA) net during the period 2021 to 2040, phased as follows:</p> <ul style="list-style-type: none"> • 2021 – 2026 500,000m² NIA (666,666m² GIA) • 2026 – 2031 400,000m² NIA (533,333m² GIA) • 2031 – 2036 200,000m² NIA (266,666m² GIA) • 2036 – 2040 100,000m² NIA (133,333m² GIA) 	The additional clarification is helpful. However, we have concerns as previously outlined regarding the target for office space, which is now clearly outlined as a 'minimum'. To be effective we consider that the plan should reflect a 'maximum' (see our previous representations).
Chapter 5 Offices	5.1.1	MM18	Effective	The minimum requirement of overall office floorspace target of 1,200,000m ² net internal area (or 1,600,000m ² GIA) is derived from the estimated growth in office employment between 2021 and 2040...	See MM17.
Chapter 7 Culture and Visitors	7.1.5	MM20	Effective	7.1.5 The City Corporation's Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. <u>When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</u>	We would warmly welcome the preparation of a Culture SPD and hope to be consulted as part of this process.
Chapter 9 Design	9.1.0	MM24	Effective	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished Buildings. <u>Retrofit proposals affecting heritage assets should preserve and enhance their significance, whilst realising the contributions that built heritage can make to environmental sustainability.</u>	We consider that the 'sustainable heritage' of the future embraces environmentally sustainability measures that work hand-in-hand with the heritage significance of a heritage asset. The suggested text is intended to reinforce this.
Chapter 9 Design	9.1.4	MM26	Effective	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits <u>for the site, its context and the whole City</u> before considering the many wider other design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.	Please refer to our comments on MM2.
Chapter 11 – Heritage	HE1 (6)	MM41	Effective	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area <u>and its setting</u> and its setting . The buildings and features that contribute to the character, appearance, setting or significance of a	We consider that the removal of the reference to 'setting' within this paragraph is unfortunate. Whilst the setting of a conservation area is covered by other policy, additional reference within this paragraph

and Tall Buildings				conservation area should be conserved and opportunities to enhance conservation areas should be considered sought <u>where appropriate</u> ;	would helpfully reinforce this contribution to those shaping development. This is especially important in the City, given the density of conservation areas and the urban form of the Square mile. We would also recommend the removal of 'where appropriate' from the end of this paragraph, for similar reasons.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	Effective	<u>All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area.</u> In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.	We welcome this addition.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	Effective	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. <u>Such assessment should ensure that appropriate, differing, and distinct methodologies are clearly adopted for heritage, townscape, and visual impact assessments.</u> Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment, townscape and skyline, including their cumulative effects.</u>	We have suggested the addition of the accompanying text to ensure the methodology used for such assessment is sound and reflects the differing and distinct methods of heritage, townscape, and visual impact assessments. As outlined at the EIP, we are concerned with conflation within assessments for development leading to misleading impacts on heritage as opposed to townscape.
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	Effective	The City Corporation's Character Areas Study provides an overview of the City's overall significance including a Statement of Significance for key strategic assets, like St Paul's Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <u>any aspects of the</u> The St Paul's Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the <u>setting of the Cathedral can should be considered and managed in relation to development proposals in order to conserve and enhance its role in contributing to significance.</u> Applicants should draw reference to the Character Areas Study and the Setting Study (where appropriate) to understand their site's significance and the key attributes of significance they should consider	As outlined at the EIP, we welcome the inclusion of the St Paul's Setting Study within the Plan as a Main Modification. Ideally, we would like to see this wording repeated / relocated into the policy itself. However, it is very welcome in the supporting text. Given recent and still developing conversations with the City of London regarding the Setting Study, we have suggested the following re-wording. We feel that this would give greater certainty to applicants, stakeholders, and decision-makers in the planning process, and ultimately make the plan more effective in delivering sustainable development.
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	Effective	2. The tall building areas identified on the Policies Map and Figure 14 (<u>City Cluster, Fleet Valley and Broadgate site</u>) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	Our commentary and concern on the additional Tall Building site at Broadgate has been previously provided. See also MM2 and AM103
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	Effective	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <u>respects, preserves and enhances both heritage significance and townscape character,</u> creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	We have previously provided commentary on the wording of this policy, which still stands (see our previous representations). Notwithstanding our concerns regarding the policy, we offer the following additional changes, which we feel would strengthen the policy in response to heritage.
Chapter 11 Heritage	S12 (8) (c)	MM50	Effective	8c. the significance of heritage assets and the <u>contribution their</u> immediate and wider settings <u>make to their significance.</u>	We have provided the following suggested clarification to further clarify the link to appropriate assessment methodology.

e and Tall Buildings					
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	Effective	<p>For the purposes of Policy D9 of the London Plan, the The tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster, and Fleet Valley and Broadgate Tall Building Site areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to new tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, new tall buildings, particularly especially on sites where there is no tall building currently, would be very likely to have significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.</p>	<p>We have suggested the following amendments to more easily acknowledge that some existing tall buildings are in locations of heritage sensitivity, and are actively detracting elements that caused a degree of 'harm' upon their construction.</p> <p>The additional edits are to reinforce our view of the sensitivity of these parts of the City to this development.</p>
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	Effective	<p>11.5.6 The heights of the buildings in the City Cluster, and Fleet Valley and Broadgate Tall Building site areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. Both These areas were assessed based on specific criteria, including the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views, and local strategic views.</p>	<p>Please refer to our comments on MM43.</p>
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	Positively prepared	<p><i>Change to show new Broadgate Tall Building Site as an area suitable for tall buildings</i></p> 	<p>Our concerns regarding the location of areas for tall buildings, and the new Broadgate tall building site were raised at the EIP and discussed within our hearing statements (see also MM2 and AM103 policy map).</p>
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	Effective	<p>11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment, townscape and skyline, including their cumulative effects.</u></p>	<p>Please refer to our comments on MM43</p>

Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	Effective	<p><i>New paragraph after 11.5.12 (and renumber after)</i></p> <p><u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies. Such proposals should preserve, and where possible, enhance the significance of any heritage assets that would be affected by any such development.</u></p>	<p>As outlined in our previous responses, we are concerned that opportunities to enhance the significance of the Cathedral, and the way in which it can be appreciated, could be missed. Moreover, we are also concerned that any such retrofit or redevelopment of an existing detracting element does not increase, exacerbate, or entrench harm to the significance of heritage assets.</p> <p>The proposed text seeks to emphasise the preservation of heritage significance, to respond to this concern.</p>
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	Positively prepared	<p><i>Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours</i></p>  <p>© Crown copyright and database rights 2025 OS AC0000825908</p>	<p>Our concerns regarding the contour map, including the changes proposed since Regulation 19 and the new Broadgate Tall Building site, were raised at the EIP and discussed within our Regulation 19 response, hearing statements, and hearing statement addenda (see also MM2, AM103 policy map).</p>
Chapter 11 – Heritage and Tall Buildings	S13	MM57	Effective	<p>2. Protecting and enhancing significant local views of St. Paul's Cathedral, through the City Corporation's St. Paul's Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views <u>and the settings</u> of historic City landmarks and skyline features;</p>	<p>We support the addition of 'the setting'. We would ask whether other key views (Canon Street, or views from the North and South) are sufficiently identified to capture the entirety of the viewing experience of the Cathedral.</p>
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	Effective	<p>12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible <u>and appropriate, including through the design of public realm and sustainable drainage systems. This can</u> Can take many forms and require careful design, installation and regular maintenance <u>(which should be secured through the planning system).</u></p>	<p>We have added the additional text to ensure such regular maintenance and management is controlled through the planning system.</p>

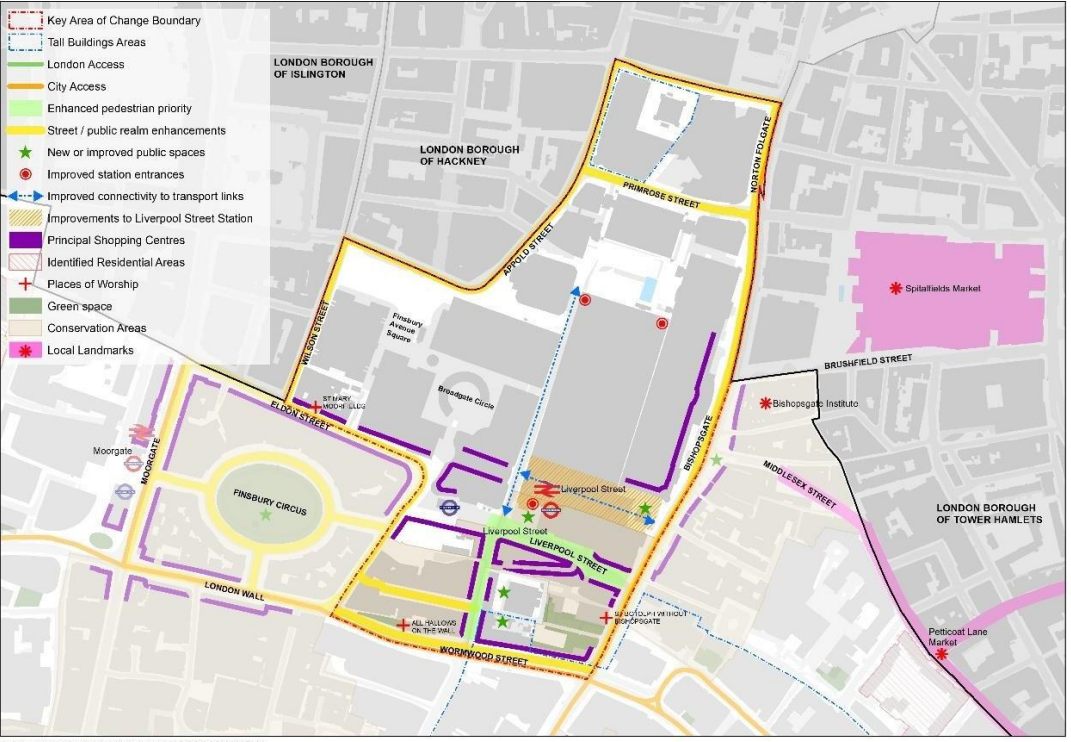
Appendix 2: St Paul's Cathedral Comment on City Plan 2040 Additional Modifications

Chapter	Paragraph	AM Number	Amended Text (With Suggested Further Tracked Changes Where Relevant)	St Paul's Cathedral Comment
Chapter 1 Strategic Priorities	1.1.2	AM3	1.1.2- As set out in paragraph 8 of the National Planning Policy Framework (NPPF)..... <i>Insert additional diagram showing the relationships between the Vision, the Strategic Priorities, the Spatial Strategy, the Strategic and other policies</i>	We welcome the inclusion of the diagram to set out the relationships between these elements of policy, to assist the reader in understanding how the plan will operate.
Chapter 1 Strategic Priorities	1.2 Economic Objective	AM4	Delivering sustainable economic growth, including a minimum of 1.2 million sqm <u>NIA (1.6 million GIA)</u> net additional office floorspace by 2040	See comment for MM17.
Chapter 3 Health, Inclusion and Safety	HL3 (1)	AM10	HL3 (1) - A noise assessment will be required where noise sensitive uses may be impacted there may be an impact on noise sensitive uses . The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses such as housing, hospitals, schools, nurseries, <u>places of worship</u> , and quiet open spaces, <u>including churchyards</u> .	We welcome the inclusion of places of worship and churchyards within this section, given the contribution they make to the character, social fabric, and often tranquility of the City.
Chapter 3 Health, Inclusion and Safety	<u>New paragraph 3.1.5</u>	AM12	<u>3.1.5a The City's many churches other faith communities and their buildings, including Bevis Marks Synagogue, make a highly significant contribution to the life of the City and its built environment. The churches and places of worship play an important social, faith, community and civic role, throughout the week. The church buildings and synagogue are a significant part of the architectural and historic character of the Square Mile, are visitor destinations that provide cultural experiences, as well as providing many of the City's open spaces.</u>	See response to AM10.
Chapter 3 Health, Inclusion and Safety	3.1.6	AM13	3.1.6 Outdoor spaces and the public realm, <u>including churchyards</u> , provide places for relaxation, amenity, <u>well-being</u> and leisure.....	See response to AM10.
Chapter 3 Health, Inclusion and Safety	3.4.2	AM14	3.4.2 Noise sensitive uses and developments in the City include residential developments, hotels and serviced apartments, health facilities, schools and childcare provision, <u>places of worship</u> , and certain open spaces, <u>including churchyards</u> .	See response to AM10.
Chapter 3 Health, Inclusion and Safety	HL9	AM17	HL9 - An HIA may also be required for developments considered to have particular health impacts, including those involving . The impact on sensitive uses such as education, health, leisure or community facilities, <u>places of worship</u> , publicly accessible open space <u>including churchyards</u> , hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent <u>should be taken into consideration</u> .	See response to AM10.
Chapter 3 Health, Inclusion and Safety	SA2	AM18	SA2 - Applications for major commercial development and developments which propose night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of all people, minimise the potential for over-crowding and reduce the instances of noise nuisance and antisocial behaviour, particularly in residential areas and near noise sensitive uses and developments such as health facilities, and schools, <u>places of worship and churchyards</u> .	See response to AM10.
Chapter 7 Culture and Visitors	S6	AM30	S6 ...enhance the City of London's cultural <u>infrastructure</u> ... S6 (2)a wide range of cultural <u>infrastructure</u> , and leisure, and recreation and visitor... S6 (3)...areas of cultural <u>infrastructure</u> significance including cultural buildings and leisure, and recreation and visitor facilities... S6 (5)...seeking opportunities to embed heritage in the cultural <u>infrastructure</u> offer... S6 (7)... supports the <u>City's cultural infrastructure or businesses</u> primary business or cultural role of the City ... S6 (8)... especially in areas of night-time activity and around cultural <u>infrastructure</u> , <u>including and</u> tourist... S6 (9)...Maintaining the City's <u>cultural infrastructure</u> , <u>including existing artworks</u> ...	We welcome these edits, As we have noted in the consultation on Culture SPD, it is important that the definition of 'cultural infrastructure' includes the human and curatorial expertise and infrastructure. We are also interested in how this overlaps with social value.
Chapter 7 Culture	7.1.4	AM32	7.1.4...and changes of use to protect existing <u>cultural infrastructure</u> , and leisure, recreation and <u>visitor</u> , arts and cultural facilities...	See response to AM30.

and Visitors				
Chapter 7 Culture and Visitors	CV1	AM33	CV1 (Title) Protection of Existing <u>Cultural Infrastructure, and Leisure, Recreation and Visitor-Arts- and Cultural Facilities.</u> CV1 (1).... loss of existing <u>cultural infrastructure, and leisure, recreation and visitor, arts, and cultural facilities...</u> CV1 (2).... Proposals resulting in the loss of <u>cultural infrastructure, and leisure, recreation and visitor arts and cultural facilities....</u> ...Loss of facilities will only be permitted where this would facilitate the overall enhancement of <u>cultural, leisure, recreation or visitor, arts or cultural provision.....an alternative cultural, leisure, recreation or visitor, arts or cultural use at reasonable terms for such a use....</u>	See response to AM30.
Chapter 7 Culture and Visitors	7.2.0	AM34	7.2.0....accommodate these uses. <u>In a cultural ecosystem approach, these arts and cultural organisations and facilities are also known as sites of cultural production and/or cultural consumption.....</u>	See response to AM30.
Chapter 7 Culture and Visitors	7.2.2	AM35	7.2.2....applicants will be required to demonstrate that an existing <u>cultural infrastructure, and leisure, recreation and visitor, arts or cultural facility has facilities have been marketed....</u>	See response to AM30.
Chapter 7 Culture and Visitors	CV2	AM36	CV2 (Title) Policy CV2: Provision of <u>Cultural Infrastructure, Arts, Culture and Leisure, Recreation and Visitor Facilities</u> CV2 ...provide new <u>cultural infrastructure, leisure, recreation and visitor arts, cultural and leisure-facilities...</u> CV2 (2)....on-site for <u>cultural infrastructure, arts, culture or leisure, recreation or visitor facilities;</u> CV2 (3)....make provision for <u>cultural infrastructure, arts, culture or leisure, recreation or visitor facilities of a scale commensurate with the size of the development, or to provide off-site provision or contributions towards cultural infrastructure, arts, culture and leisure, recreation or visitor facilities-and infrastructure.</u> CV2 (4)....provision of <u>cultural infrastructure, arts, culture and leisure, recreation or visitor facilities...</u>	See response to AM30.
Chapter 7 Culture and Visitors	New paragraph 7.4.1	AM43	<i>New paragraph 7.3.4</i> <u>Churches and other places of worship are a key component of the overall visitor experience and help create the distinctive look and feel of the City. They provide many of the facilities that visitors require such as: calm green spaces to stop and rest; shelter that is free to access; cafes and toilets; and activities for school groups. They also attract visitors with a diverse cultural, historical and religious offer, and many are important landmarks within the City.</u>	We have suggested the following addition to capture the importance of many of these places of worship, including St Paul's Cathedral, to the way the character, history, and identity of the City is communicated, read, and understood.
Chapter 9 Design	DE7 (1)	AM57	DE7(1) Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces <u>including churchyards,</u> is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.	See response to AM10.
Chapter 9 Design	DE8 (1)	A58	DE8(1) Development should be designed in ways that consider the impacts of internal and external lighting and should include measures to reduce energy consumption, avoid spillage beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals, <u>places of worship,</u> relevant open spaces <u>including churchyards</u> and community uses. The design of lighting should be informed by the potential impacts on biodiversity and should seek to make the City a safer and more welcoming place to be for all its communities after dark.	See response to AM10.

			<p>Proposed street hierarchy</p> <ul style="list-style-type: none"> London Access - through traffic (previously Strategic/London Distributor) City Access (previously Borough/Local Distributor) City of London boundary All other streets are local access <p>Figure 7: Proposed Street Hierarchy</p>	<p>We are disappointed that St Paul's Churchyard is not being down-graded to local access only, which will frustrate future efforts to control or reduce traffic around the cathedral and the preparation for a 'World Square' environs or precinct.</p>
<p>Chapter 10 Transport</p>	<p>10.7.4</p>	<p>AM64</p>	<p>10.7.4 Healthy Streets Plans will be developed by the City Corporation, <u>working jointly with neighbouring boroughs where appropriate</u>, to cover the following areas: City Cluster; Fleet Street; <u>St Paul's and St Paul's Churchyard</u>, Liverpool Street; Aldgate, Tower and Portsoken; Bunhill, Barbican and Golden Lane; Fenchurch Street; Bank and Cheapside; and Riverside.'</p>	<p>City Officers have suggested that a 'world square' environs to the Cathedral which be achieved, planned and delivered via a Healthy Streets Initiative. Can St Paul's Churchyard be included in this list to this end?</p>
			<p>Proposed walking improvements 2019-2030</p> <ul style="list-style-type: none"> East-west route improvements North-south route improvements Proposed improvements to the TfL road network City of London boundary <p>Figure 10: Proposed walking improvements (2019-2030)</p>	<p>We note the desire to route pedestrian traffic North/South and East West through St Paul's Churchyard – which is land in the ownership of Chapter. We welcome this in principle, but continue to observe that, without investment and the establishment of improved management approaches these benefits will not be delivered. We ask what policy within the plan (besides this policy map) will reinforce and create the opportunity for achieving this aim?</p>

Chapter 11 Heritage and Tall Buildings	S12 (5)	AM71	5. The suitability of sites for tall buildings within the identified areas <u>will depend on the sensitivity of the relevant context to such proposals. Their and their design, height, scale and massing should ensure that they take into consideration local preserve and enhance the significance of heritage assets and take into consideration other localised factors relating to townscape character and microclimate.</u>	We welcome the inclusion of 'preserve and enhance' and seek this is also applied to MM49.
Chapter 11 Heritage and Tall Buildings	11.5.2	AM73	The City contains many tall buildings; <u>some are located in clusters or as standalone features, and unusually some are also heritage assets.</u> In particular, the eastern part of the City has a concentration of tall buildings including iconic skyscrapers such as the Gherkin, 22 Bishopsgate, and the Leadenhall building. Tall buildings impart the City of London's World City status to compete globally and to be a place where businesses seek to locate. Strategically planning for tall buildings in clusters can bring economic as well as townscape benefits. Clusters of tall buildings allow for concentration and agglomerations of businesses and related economic activity while they also provide higher densities and contribute towards creating a more defined impact on the overall City skyline. The eastern cluster forms a distinctive skyline with the highest density of commercial activity within the City and is required to accommodate a significant proportion of the City's future growth in office floorspace. Capacity modelling demonstrates that the two clusters of tall buildings are required if the City is to meet objectively assessed need for office capacity over the lifetime of this Plan. <u>Taking into account the policies of the plan as a whole, in particular the imperative to preserve and enhance the significance of heritage assets, there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs.</u>	We have suggested the additional text as we feel it would reinforce the purpose and benefits of heritage protection within the plan.
Chapter 11 Heritage and Tall Buildings	11.5.13	AM74	Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings <u>including a number of conservation areas partially within the Cluster itself.</u> The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on <u>all</u> heritage assets, while recognising the juxtaposition of old and new architecture that already exists and that, in many instances, makes a positive contribution to the character of the Square Mile.	We have suggested that the text regarding juxtaposition is removed. As we previously set out within our previous representations, not all juxtaposition can be considered a positive especially in terms of heritage significance. We continue to feel that the inclusion of this sentence is extraneous and misleading. There was no evidence taken in the plan making process or EIP to support this unsupported concept of juxtaposition being intrinsically and universally beneficial. We have provided comment on this in our previous representations.
Chapter 11 Heritage and Tall Buildings	11.6.6 (a)	AM76	<u>A revised and updated Protected Views Supplementary Planning Document (SPD) will be produced by the City Corporation, and will be informed by both public consultation and the evidence and views gathered as part of the plan making process.</u>	We welcome the inclusion of this text, and would be pleased to assist the City of London in the preparation of this SPD.

<p>Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change</p>	<p>Figure 34</p>	<p>AM103</p>	<p>Add the Broadgate Tall Building Site</p>  <p>The map displays the Broadgate Tall Building Site in the City of London, bounded by Primrose Street to the north, Bishopsgate to the east, Liverpool Street to the south, and Moorgate to the west. The site is highlighted with a yellow outline. A legend in the top-left corner identifies various planning features: Key Area of Change Boundary (dashed red line), Tall Buildings Areas (dotted blue line), London Access (green line), City Access (orange line), Enhanced pedestrian priority (yellow line), Street/public realm enhancements (light green line), New or improved public spaces (green star), Improved station entrances (red circle), Improved connectivity to transport links (blue dashed line with arrows), Improvements to Liverpool Street Station (purple shaded area), Principal Shopping Centres (purple shaded area), Identified Residential Areas (pink shaded area), Places of Worship (red cross), Green space (green area), Conservation Areas (grey shaded area), and Local Landmarks (pink star). Landmarks such as Spitalfields Market, Bishopsgate Institute, and Petticoat Lane Market are marked. The map also shows surrounding streets like Finsbury Circus, Moorgate, and various streets in the London Boroughs of Islington, Hackney, and Tower Hamlets.</p> <p>© Crown copyright and database rights 2025 OS AC000025908</p>	<p>See our previous representations on this proposal, at EIP, entrenching and exacerbating existing harms.</p>
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