

Surveyor to the  
Fabric  
ADDRESS REDACTED

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**DRAFT: SUBJECT TO CHAPTER RATIFICATION.**

9 May 2021

City Plan 2036  
ADDRESS REDACTED

Dear Sir or Madam,

## **CITY PLAN 2036 – CONSULTATION RESPONSE**

I write on behalf of the Chapter of the Cathedral Church of St Paul in London (hereafter 'Chapter') in response to the City Plan 2036. We wrote at length in 2019 in response to the Draft Local Plan and we now further respond to the 2021 consultation. Chapter is acutely aware that the world generally and specifically our City of London has been painfully impacted by the global pandemic, which has existentially threatened and harmed St Paul's as it has other institutions in our society. Our ability to fully and technically respond to the Local Plan has also been impacted.

We note that comments on the City Plan have to be categorised as follows:

- I. **Not legally compliant:**  
We are not technically competent to indicate or respond to matters of compliance and will therefore have to defer to other commentators.
- II. **Fails to meet the duty to co-operate.**  
We have one concern under this heading. Paragraph 25 of the NPPF says "*Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies*" We have only been alerted to the March 2021 evidence base Topic Paper 3 very late in the consultation process. We have not been consulted on this vital part of the plan preparation and therefore, as a key stakeholder on the matter of tall buildings and views we submit that the City has not adequately 'engaged' with Chapter on this element of the plan preparation.
- III. **Unsound**  
Chapter does not want to appear to be critically negative to the efforts of officers and the City Planning team. We have made

Surveyor to the Fabric

previous comments (only some of which have been taken into consideration) and we also make new comments that are in relation to the evidence-base for the plan, the deliverability and clarity of policy and the specificity of particular drafting to address known issues with the environs of the City. Therefore, besides the matter of tall building noted above, we submit all our feedback under the heading of 'unsound' drafting.

We confirm that, in submitting these representations, Chapter would like to be notified of the examination process and would wish to have the opportunity to make representations to the examination in person.

We make these submissions which are enclosed with all deference to other more technical responses. We would have liked to take counsel to present our proposals in more exact terms. If the opportunity arises after the 10 May 2021 deadline to do so, we would be glad to discuss our submission with City Officers, and have a chance to refine these representations so that they are correct and helpful.

Our 2019 response was framed under the following headings and these have also been the main areas of our scrutiny in this new consultation.

- A) Wellbeing, Community and Spirituality
- B) Security
- C) Tall Buildings and Protected Views
- D) The Cathedral's local environs and links

**We note that the following comments were made by St Paul's in 2019 and the responses thereto:**

3.1.8: Strategic Objective. Physical and Spiritual Wellbeing – **no change made. This is a disappointment and concern.**

3.3.6 Heritage architecture: '**backdrop and views**' of St Paul's has been included. Thank you.

Strategic Policy S1: Healthy and Inclusive city. We proposed an amendment that included '**cultural/heritage assets**'. This amendment has **not been included; we again submit that it should be.**

Policy S1 – item 5: we proposed amended wording as follows “improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5, *contribute towards bio diversity and enhancement of street level open and green spaces*”. There is now recognition of “quieter spaces and places” but there is the fuller recognition of the need that we indicated should be reflected in policy has **not been included**.

Policy CV2: Provision of Facilities Visitor Facilities now **includes** Changing Places. Thank you.

Policy S2: Security. You **did not include** our requested additional wording in relation to security, to create the possibility of an area strategy for enhanced security around St Paul’s We are very concerned as to why not the policy S2 appears to focus on new development, not active policy to progress the protection of existing critical national infrastructure, which is patently and evidently needed.

Policy SA 2: Dispersal routes. We asked that you include the wording ‘Applications for major commercial development and developments which propose night-time uses should include a Management Statement *which demonstrates prior engagement with and recognition of local occupier and stakeholder concerns and thereafter....*’. **You have not included this** request, which runs counter to other policies in relation to the protection of democratic and private concerns for residents. You have made a recommendation at 4.2.20 in relation to consultation, but that is not mandatory.

Our primary representations in 2019 were in relation to the historic environment and tall buildings, where these may impact on the historic assets of the City, including St Paul’s, the setting and environs of the Cathedral, related churches and open spaces including churchyards.

We have significant reservations about policy drafting on the grounds of:

1. The evidence base – especially on the grounds of proportionality
2. Justification – with regards to applicability, operation and clarity of policy to deliver the intended objectives, based on evidence. We have referenced known circumstances and harms which are not addressed by the plan and we have also shared a paper - which we have previously presented to officers – concerning the environs around St Paul’s

3. We are concerned about the efficacy of policies, which we have indicated in our representations.
4. Consistency with National Policy, particularly NPPF 185 and 200.

Chapter is always mindful that the historic environment is a shared, finite public resource and therefore Chapter is a stakeholder in and stewards for the general public in relation to the heritage which is in our care. It is not for Chapter to claim an entitlement to articulate concerns on behalf of the general public: we have no democratic legitimacy in that regard. It does fall to us to raise with the City officers where, from our many years experience, the aims of policy and the desirability of certain outcomes are not apparently consistent with proposed policy in the 2036 plan drafting, so that there can be expert scrutiny. Chapter does not seek to hinder the City in growth or development; we seek clarity and certainty of outcome for all participants, highlighting the qualities that our valued collectively. We always stress the importance of long term and objective decision-making against the short term and temporal, shifting goals which emerge. Harms to heritage settings, once accepted, can rarely if ever be reversed.

We made representations regarding the historic environment and tall buildings and views under the following headings in 2019. We submit that our specific concerns have not been reflected in the current consultation drafting of the 2036 Local Plan.

- Policy certainty and Precision
- Precision describing the scope of policy protection:
- The need for an agreed 'Statement of Significance' for heritage assets generally and especially of views from the Processional Way.
- Clear application of policy:
- The weighting of harms and benefits to heritage

On the basis that the plan we have reviewed (mindful of the limited opportunity to scrutinise one of the key evidence documents which was only released in March 2021) we submit that the Plan is **Unsound** in these particulars.

Chapter is deeply committed strategically to positive engagement with the City and we look forward to a fruitful and constructive working relationship on these and other matters of profound mutual interest. We wish members and officers every support in the successful development of a robust Local Plan up to 2036.

Should you wish to discuss any aspect of our response further or require any clarification please don't hesitate to contact us.

Yours sincerely,



NAME REDACTED  
Surveyor to the Fabric

Encl

cc:

The Bishop of London's office  
NAME REDACTED, Senior Cathedrals Officer and Deputy Secretary to the CFCE  
NAME REDACTED, FAC Chairman  
City of London Corporation:  
NAME REDACTED, Chief Planning Officer and Development Director

**Directors:**  
NAME REDACTED  
NAME REDACTED

**Project Director:**  
NAME REDACTED

**Associates and Designers:**  
NAME REDACTED NAME  
REDACTED NAME  
REDACTED



## City of London Local Plan

### Publication Stage Representation Form

Ref:

(for official use  
only)

**Name of the Local Plan to which this representation relates: City of London City Plan 2036**

**Please return to the City of London Corporation by 6pm on 10 May 2021**

This form is in two parts:

**Part A** Personal Details

**Part B** Your representations(s). Please fill in a separate sheet for each representation you wish to make.

#### **Privacy Notice**

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's website and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

The Planning Inspectorate has published a privacy statement for local plan examinations which is available at: [Planning Inspectorate Privacy Notice](#)

## Part A

### 1. Personal Details\*

Chapter of the Cathedral Church of St Paul in London

*\*If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: n/a

Last name: n/a

Address Line 1: The Chapter House

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

### 2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

## Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Read with attached and covering letter

Policy

Read with attached

Policies Map (A or B)

Read with attached

4. Do you consider the Local Plan is:

4.1 Legally compliant

Yes

No

4.2 Sound

Yes

No

4.3 Complies with the duty to co-operate

Yes

No

**Please add a x as appropriate**

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please to set out your comments here

**Please read with the attached documentation and commentary, with the covering letter.**

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please read with the attached documentation and commentary, with the covering letter.

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

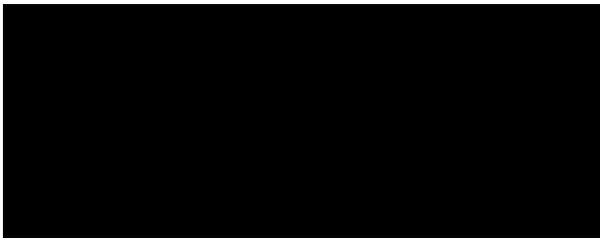
**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Chapter of St Paul's is able to elucidate the care of and concern for the City environment over many years and can therefore, we feel, assist the inspector with evidence and experience.

***Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Signature:

A large black rectangular redaction box covering the signature area.

Surveyor to the Fabric of St Paul's Cathedral

For and on behalf of the Cathedral Chapter

Date: 10 May 2021

FOR THE LONDON CITY PLAN 2036.

Attachment to St Paul's Cathedral Submission.

Page 19: Clause 3.3.5. We would urge the drafting of this clause to be changed to include the additional text highlighted: " Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline and provide for the health and wellbeing of workers **where this can be achieved without detriment to the environment, heritage and common, shared values of setting and context for the historic environment and related assets**"

Page 21 clause 3.4.5: There is lack of clarity in the drafting still about the related spaces of Ludgate Hill and Fleet street as a jointly expressed city space referred to as the Processional Way. There must be consistent definition. We take issue with the phrase "**The role of Ludgate Hill as the primary approach to St Paul's Cathedral will be enhanced.**". What is a 'role' in urban design terms? There needs to be specificity, based on an agreed statement of significance, about how urban design will preserve and enhance, and reveal significance. This seems to be unsound drafting which is not evidenced.

**NEW POLICY** Spatial Strategy The City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK:

1. Ensuring that the City is sustainable and transitions to a zero carbon and zero emission City by 2040, delivering further urban greening and improving air quality;
2. Delivering sustainable growth following the Covid-19 pandemic, including a minimum of 2 million m2 net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone;
3. Broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses;
4. Supporting the development of cultural facilities and uses **and complementing and integrating into existing cultural programming and the visitor economy** and transforming the north west of the City into a vibrant strategic cultural area of national and international status through the Culture Mile initiative;
5. Delivering at least 2,482 additional homes within the City by 2035/36 to meet housing need and continuing to deliver new housing on City Corporation estates and other appropriate sites outside of the City;
6. Focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views - **including backdrop views** - of St Paul's Cathedral and the Tower of London World Heritage Site;
7. Encouraging retail and other town centre uses that provide active frontages throughout the City, while focusing significant retail development in the four Principal Shopping Centres;
8. Identifying seven Key Areas of Change where significant change is expected in the period to 2036 and providing a policy framework to guide sustainable change in those areas;
9. Balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces; **[St Paul's does not agree with this drafting in relation to 'balancing' as the terminology is ambiguous and can be read that the City is willing to allow harm to public heritage assets and values against development. The terminology needs to be more specific, precise and evidenced, with recognition that architecture and development that harms heritage and diminishes public values cannot by definition be 'Good Growth']**

10. Ensuring that development and infrastructure provision are compatible with the radical transformation of the City's streets set out in the City's Transport Strategy;
11. Promoting greater use of the River Thames, regenerating and enhancing the City's riverside and reducing the risk of flooding.

Diagram Page 26. Spatial Strategy

We are not clear what the dotted brown north/south 'Transport Strategy route improvement' represents. We think this is a vital part of integrating the visitor journey through the City but the line is too indistinct and without policy definition. We would expect more specificity of objective and means at this juncture.

Page 28: Healthy and Inclusive City:

We suggest there remain a number of important missed opportunities in this policy as drafted as our earlier representations indicated:

1. There is no recognition that heritage and cultural offering has an important part to play in an healthy and inclusive city and mental health.
2. There is no recognition of the benefits that existing open spaces (especially the City Churchyards which are some of the unrecognised and under-developed jewels in the landscape of the City) to wellbeing
3. And there remains no recognition of the importance of spiritual wellbeing to communities and individuals. The overlap between heritage assets which are grounding and the internationally significant heritage resource of the City Churches remains without acknowledgement in this important policy arena.
4. Faith communities have a significant part to play in service delivery to the disadvantaged and those with mental health challenges. There is no recognition of these opportunities.

We suggested new wording for policy S1 in 2019 and we reiterate the need for

Policy S1 – item 5: additional wording as follows “improve local air quality, particularly nitrogen dioxide and particulates PM10 and PM2.5, *contribute towards bio diversity and enhancement of street level open and green spaces*”.

With the new drafting of S1 we also propose that, in order to deliver the policy expectations as set out in the explanation, there should be an additional policy which requires publically owned or trust property assets (including churchyards and highway spaces) to be enhanced for the common good. The policy appears to focus on the delivery of benefit through development, but that greatly limits what can be achieved.

We appreciate the inclusion of churchyards in clause 4.1.12, but note that there is no policy mechanism to actually deliver these enhancements.

At 4.1.16 – Assessment methodologies: we are concerned that the usefully specific policy drafting has been changed to a generic one, which will have less impact. Why is this change made?

At 4.1.18 We request the addition of public open space accessible to all, within the definition of this policy – **Major commercial developments are also encouraged to provide space which can be used for community needs such as *freely accessible public open spaces (at street level and within buildings)* public health facilities, community, cultural or sporting activities.**

Strategic Policy S2: We are not content with the drafting of this policy, which fails to specifically identify the security needs of existing buildings and places in the City. The following two policy paragraphs do not include the area around St Paul's (which are both Critical National Infrastructure and high risk public spaces for gatherings) for a joined up 'area strategy' for the long term. The measures recently implemented are limited in scope and short term (incomplete) solutions. This policy heading should be revised to

Implementing measures to enhance the collective security of the City against terrorist threats, applying security measures to broad areas such as the Traffic and Environmental Zone, major development schemes, or to the City as a whole; Developing area-based approaches to implementing security measures where major developments are planned or are under construction simultaneously, and in locations where occupiers have requested collective security measures;

Policy SA1 – Crowded places

This policy also does not address the changes and protections needed to existing crowded places – such as the environs of St Paul’s Cathedral. It is not just new developments that need to be the subject of policy.

Policy DE3 Public Realm:

St Paul’s supports these policies in general. We remain disappointed that there is no specific action plan or policy for defining and bringing forward a ‘world-square’ aspiration for the environs of St Paul’s. We have written many times, in different contexts and policy consultations (Area Strategies; Conservation Area; Local Plan) about the continuing shortcomings of vision for this key public node of the City. We have included with this submission by way of evidence an analysis of the context; precedents and the potential opportunities. We would ask for this policy to specifically reference the need for a ‘World-Square’ vision for the existing environs of St Paul’s Cathedral which can combine all the needs of public, visitors, workers and neighbours in a singular vision.

We specifically recommend that this policy is amended to include reference to enabling (regulated and well-placed) street trading, which acts with a social benefit, but can also generate income to assist with the sustainable management and upkeep of public open spaces.

Electric Scooters and Street Bikes are appearing more extensively on the streets since the Local Plan was first drafted. We would ask that a new policy is added to make explicit provision for these new transportation opportunities, but also to introduce suitable regulation for devices that can clutter and harm the quality of our common open spaces.

*St Paul’s submits as evidence for the need for an Area Strategy and policies for the creation of a World-Square for the environs of St Paul’s a short analysis prepared by KPF as a Neighbourly collaboration with Chapter. (see attached).*

Policy DE5: Public Roof Terraces

Because of the course of planning cases over the past years, we request that Policy DE5 is amended to include the following:

‘The public benefits from roof terraces and viewing galleries will not be allowed to be included in weighting arguments to offset harms to heritage assets or views’.

We suggest that this will clarify the current uncertainties and lack of precision about the management of harm to heritage assets which is proven to be necessary.

Policy DE9: Lighting:

We recommend, as we have in previous consultations, that this policy should be amended to include the following:

‘Lighting of buildings must respect the hierarchy of prominence of key feature buildings in the City townscape; consent for external lighting on subordinate buildings may be refused where the proposal would dilute the impact or legibility of key buildings and focal points’

Policy VT3: Vehicle Parking:

We recommend, as we have in previous consultations, that this policy should be amended to include the following:

‘The City will enable and coordinate new provisions for Disabled Parking and Pick up and Drop off in relation to key visitor attractions’.

We have long been reminding the City that the current provisions for disabled access to sites such as St Paul’s Cathedral is potentially discriminatory, following the removal of the South Cathedral parking area.

Policy HE1 – Managing Heritage Assets.

We submit that the drafting of this policy is inadequate and unsound. We welcome the inclusion of ‘setting’ in the drafting but note that the wider setting of heritage assets such as St Paul’s cathedral not defined in terms of significance, evaluation tools and in the particular characteristics of context. The drafting is problematic, but we re-state the evidence base is unsatisfactory; the tools available for evaluation are not referenced – especially the CityVue model – there is no definition of or recognition of the ‘Iconic value’ of St Paul’s to the city; and finally there is a real problem in the precision of wording in relation to harms and benefits weighting, which must get more precise and be less open to interpretation – to give all participants greater certainty.

Paragraph 6.4.5 (page142), we agree the conclusion that “The City has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches, Bevis Marks Synagogue and an equally unique collection of over 60 churchyards...” The Plan needs to do more to make provision for the protection, enhancement and positive contribution these assets can make for the unique identity and character of London, to the economic health and wellbeing of the City and the people therein.

Tall Buildings and key areas of change:

(Several policies).

Our commentary on these policies is more generic as we have not had a full or reasonable opportunity to scrutinise the evidence based released in March 2021.

We have the following observations and concerns which, as noted in the covering letter, lead us to conclude that the City Plan 2036 is unsound.

**The ‘City of London digital model’.**

The model has not been included in the City Plan evidence; it is not given any weight in the plan and it is not proposed to be an expectation that public decision-making must be transparent and with reference to an agreed model, on which harms and benefits can be judged. The City want a plan-led approach but without the model as a required tool for applicants and decision-makers, we are all hampered.

Given the frequent reliance of the document on the model and references to how the City will rely on it during decisions, it seems critical that this forms part of the tested evidence base of the Plan. **This has not been satisfactorily consulted on (duty to co-operate) and stakeholders have not been able to give it due**

**consideration (insufficiently justified).**

**The 'design' shape and capacity of the tall-buildings cluster:** the policy drafting imprecise and does not provide confidence certainty to decision-makers and participants.

- There is insufficient precision on the considerations that might apply – ie heritage or views protection.
- There are no links to specific policies or an evidence base – it is too loose and open.
- There is no express 'design-led' approach.

An enormous volume of new office space is proposed for the cluster, but there is no description of where this can go – but the City has done modelling to propose this, which is not in the Plan evidence.

There is reference to the 'shape' of the cluster but this is not set out in the evidence base – how has this been arrived at and which stakeholders have inputted into it? How has the wider setting of the cathedral informed this? Again, insufficiently justified and failure of duty to co-operate.

**The evidence base for heritage protection:**

There is no evidence base. The processional way (Fleet Street and Ludgate Hill) Statement of Significance is not submitted as evidence. There is no evaluation of context and setting of the Cathedral in any objective manner. Without an agreed (and consulted upon) evidence base, policy is untested and cannot be applied rigorously.

- a. There needs to be a design led approach
- b. Heritage evidence base is essential to inform future heritage and avoid harm in plan-making.

References to the Processional Way and the cathedral backdrop are inadequately precise –eg: Strategic Policy S13: Protected Views does not identify what, where or why the backdrop to the cathedral is important. This is too vague to be enforceable and inadequate for a site of such national importance and significance. There is an issue with proportionality (ref NPPF policies).

**Area Strategy for St Paul's:**

There is no policy; we have a range of issues in relation to the local and general setting of the Cathedral.

This seems to us to be an oversight for a building and wider setting of such importance. This oversight makes the plan unsound. We suggest that the Fleet Street and Ludgate Hill Key Area of Change should be expanded to include the area all around the cathedral, because that is required to effectively achieve the objectives of the Key Area, specifically Strategic Policy S22 'The character and function of the Fleet Street and Ludgate Key Area of Change will be promoted as a centre for judicial and related business, a royal and state processional route ....' and 7 'Enhancing the public realm and open space by . . .enhancing the immediate setting of St. Paul's Cathedral through high quality development and public realm enhancements'

**Maps:**

The maps indicate potential locations for development, but there is no map defining inappropriate locations; where buildings can't go, which would be much more in keeping with and link to evidence base and policy. We are not experts in how planning policy should be defined, but we suggest that the need for precision could be improved.

**The Benefits of Heritage to the City:**

We submit that the Plan does not sufficiently recognise the power of heritage – especially St Paul's as an identifier for the City and London. Heritage can be a route for recovery from Covid; for Wellbeing; for a range of social and communal benefits and there are economic benefits too. We note that there are experts who would calculate the 'Icon Value' of a building This would be useful for St Paul's. which would be an evidence base for a respectful and long term area strategy.

- c. We can demonstrate the economic power of tourism
- d. We can show the communal and community benefits of the Cathedral as an active church
- e. We are the major cultural destination in the City.
- f. More work is needed on the benefits of churchyards and their potential.

For this reason we suggest there are grounds for St Paul's being present at examination.

**Decision-making:**

We submit that more is needed on the weighting of harms and public benefits. Design quality should not be an argument for harming heritage (good design by definition cannot be good if it does harm). Heritage is a public benefit; doing harm to heritage should not be sacrificed to other purported public benefits.

There needs to be more recognition of 'setting' and the expansive nature of setting of the Cathedral and other prominent heritage assets. There is a land-mark quality to the setting of the Cathedral and it is not just about the broad character of the environs. Juxtaposition of modernity and new buildings is not beneficial. A study of setting – ie the Canon Street views, is needed as part of the evidence base – not just local setting study. LVMF and the Heights does not cover all aspects of setting.

#### 7.8 Smithfield and Barbican Key Area of Change

##### **7.8.6 Culture Mile**

It is noted in the drafting that Culture Mile runs from Farringdon to Moorgate on its east-west axis and from St Luke's London Symphony Orchestra Centre to St Paul's Cathedral on its north-south axis. In addition to aspirations expressed above, Chapter would welcome the opportunity to be involved in the development of plans to strengthen 'routes, way finding, lighting and signage throughout the area and link with the rest of the City' set out in Strategic Policy S24: Culture Mile Implementation. We have not been afforded that opportunity and, to date, the policy continues to exclude St Paul's Cathedral

#### Policy S23 and suggested in 2018 an amendment

In this context we would repeat the aspiration expressed in our 2017 consultation responses and from 2019 for a comprehensive programme of environmental and public realm enhancement around the Cathedral and an holistic Area Strategy. The west steps of St Paul's, its precinct and churchyard are a prime part of the City's public realm and cityscape and a focal point Londoners, workers and for visitors to London from all parts of the globe. Approximately 7 million visitors per year cross the Thames and arrive in the City on the south side of St Paul's, an area that would surely be further enhanced by full pedestrianisation to create a 'World Square' around the cathedral building that is worthy of the significance of Wren's masterpiece and the public enjoyment of these spaces.

We commend the letter from the Cathedral Fabric Commission for England (CFCE) dated 22 February 2019, which elegantly exhorts a similar level of aspiration.

*We have attached a presentation prepared with our neighbours and KPF architects which speaks of the need and opportunity for policies to establish a suitable environment and setting for St Paul's.*

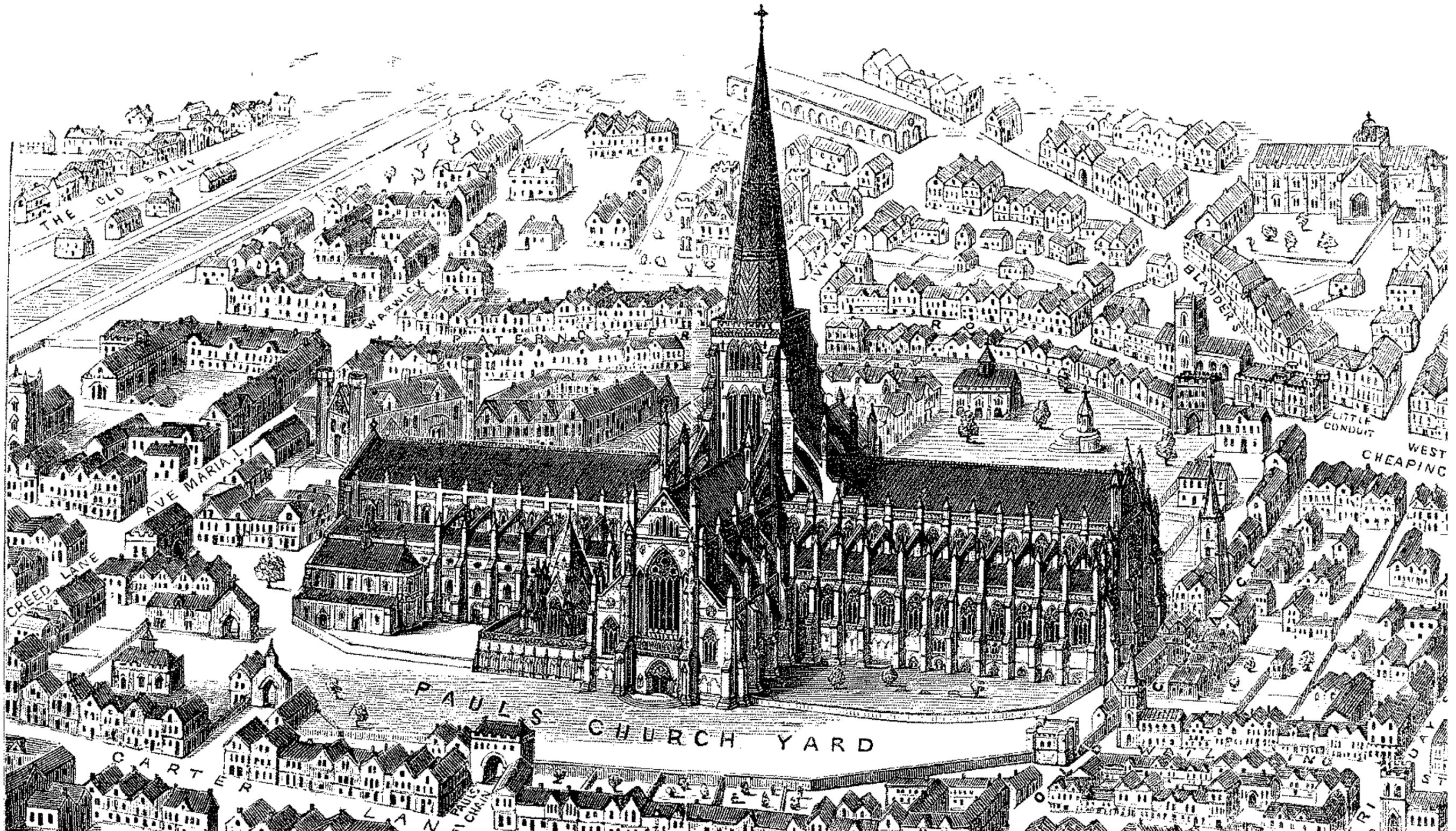
# *St. Paul's Churchyard*

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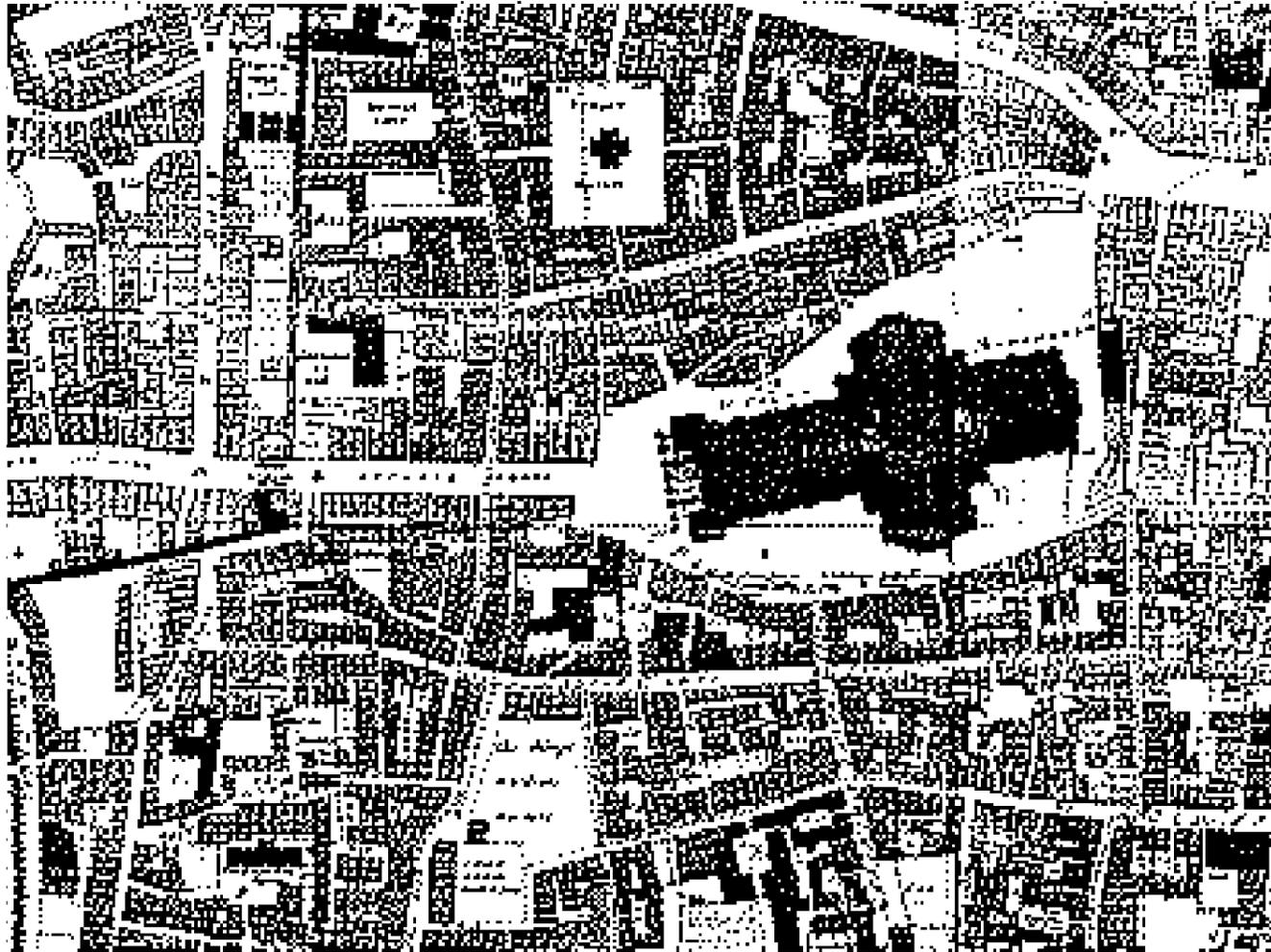
November 2020



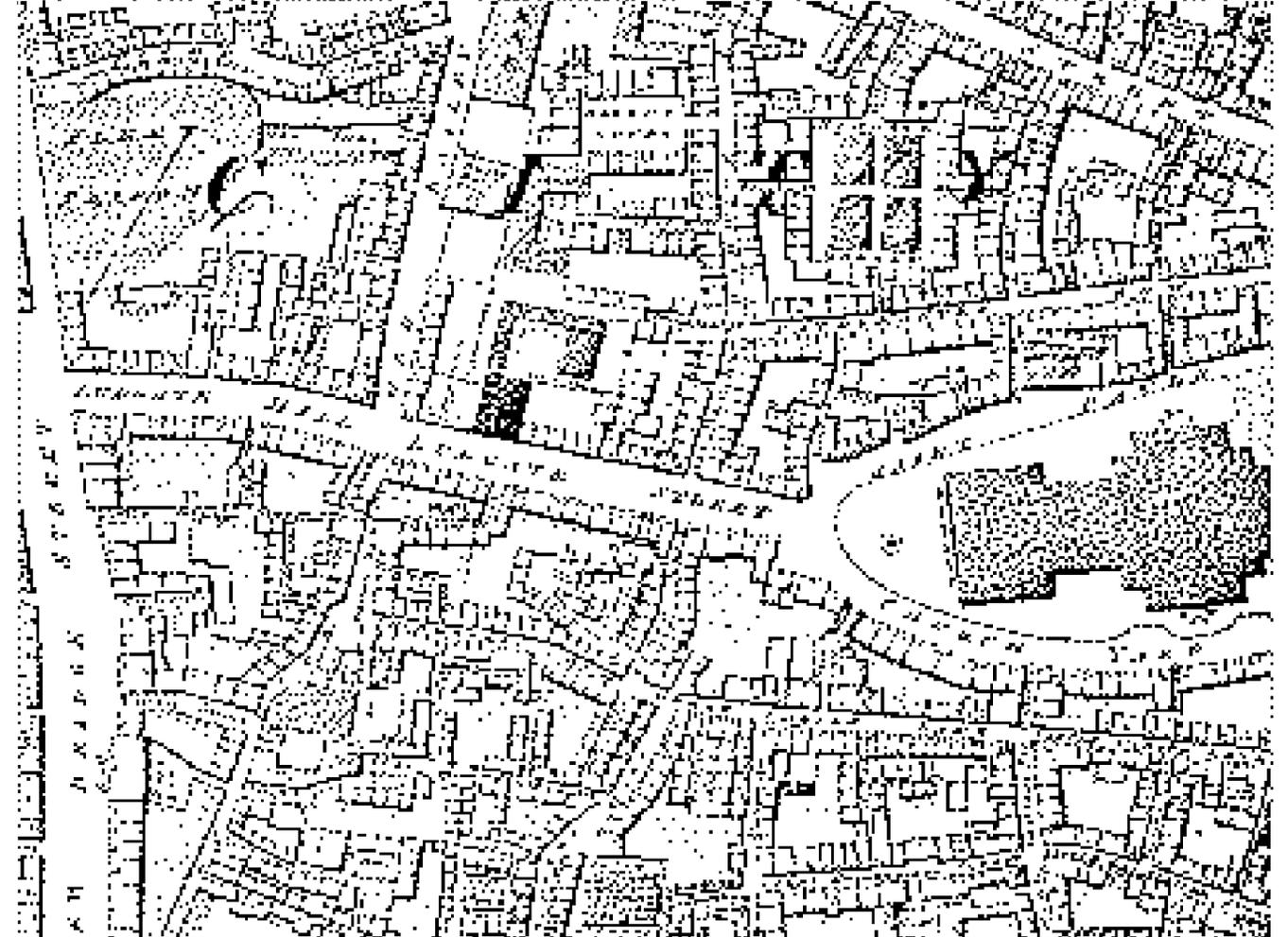
*Old St Paul's from 1314~1666*  
*Drawing by Francis Bond*



*St Paul Cathedral Conservation Area,  
Character Summary & Management Strategy SPD, 2013.  
City of London*



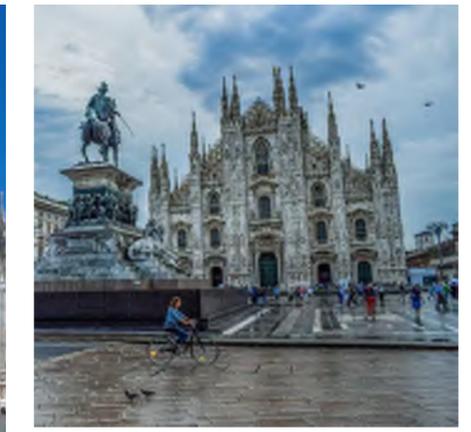
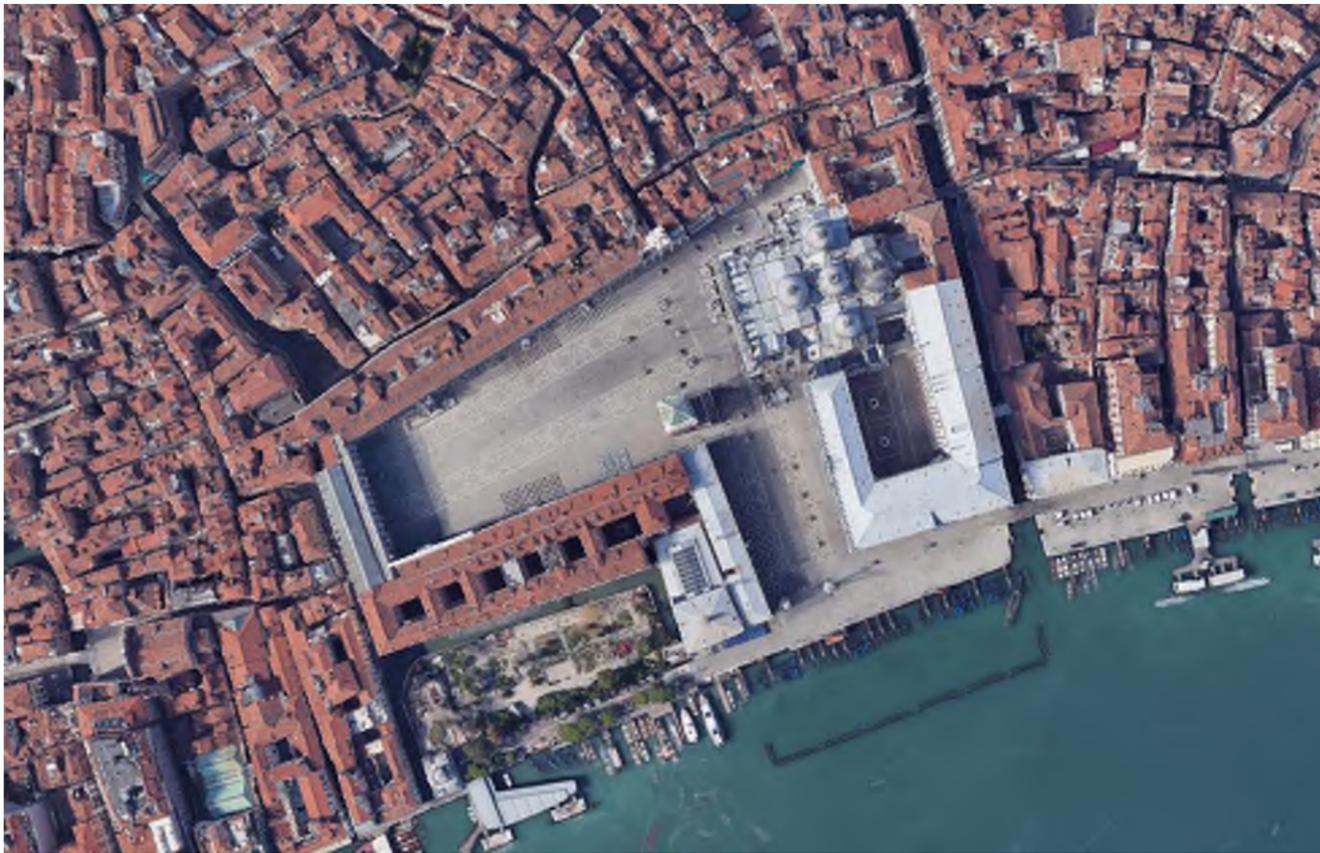
Ogilby and Morgan 1676-79



R. Harwood 1792-99

*St Paul Cathedral Conservation Area,  
Character Summary & Management Strategy SPD, 2013.  
City of London*





## Basilica di San Marco, Venice

Characters:  
Fine grained urban fabric.  
Cathedral is surrounded by hard landscape  
Squares at front

## Duomo di Milano

Characters:  
Fine grained urban fabric.  
Cathedral is surrounded by hard landscape  
Squares at front



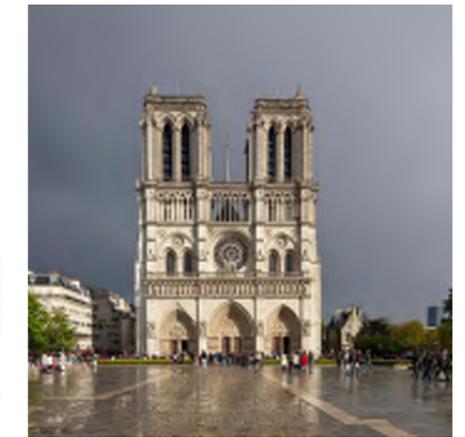
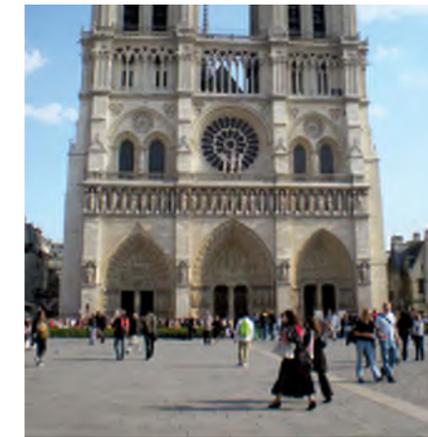
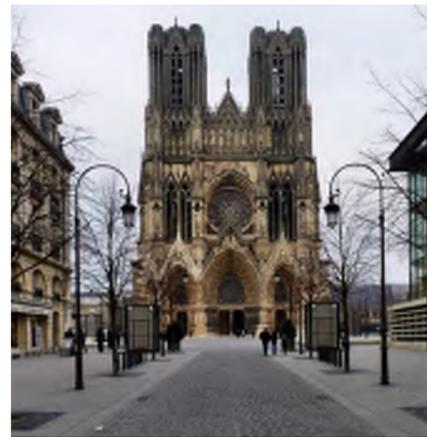
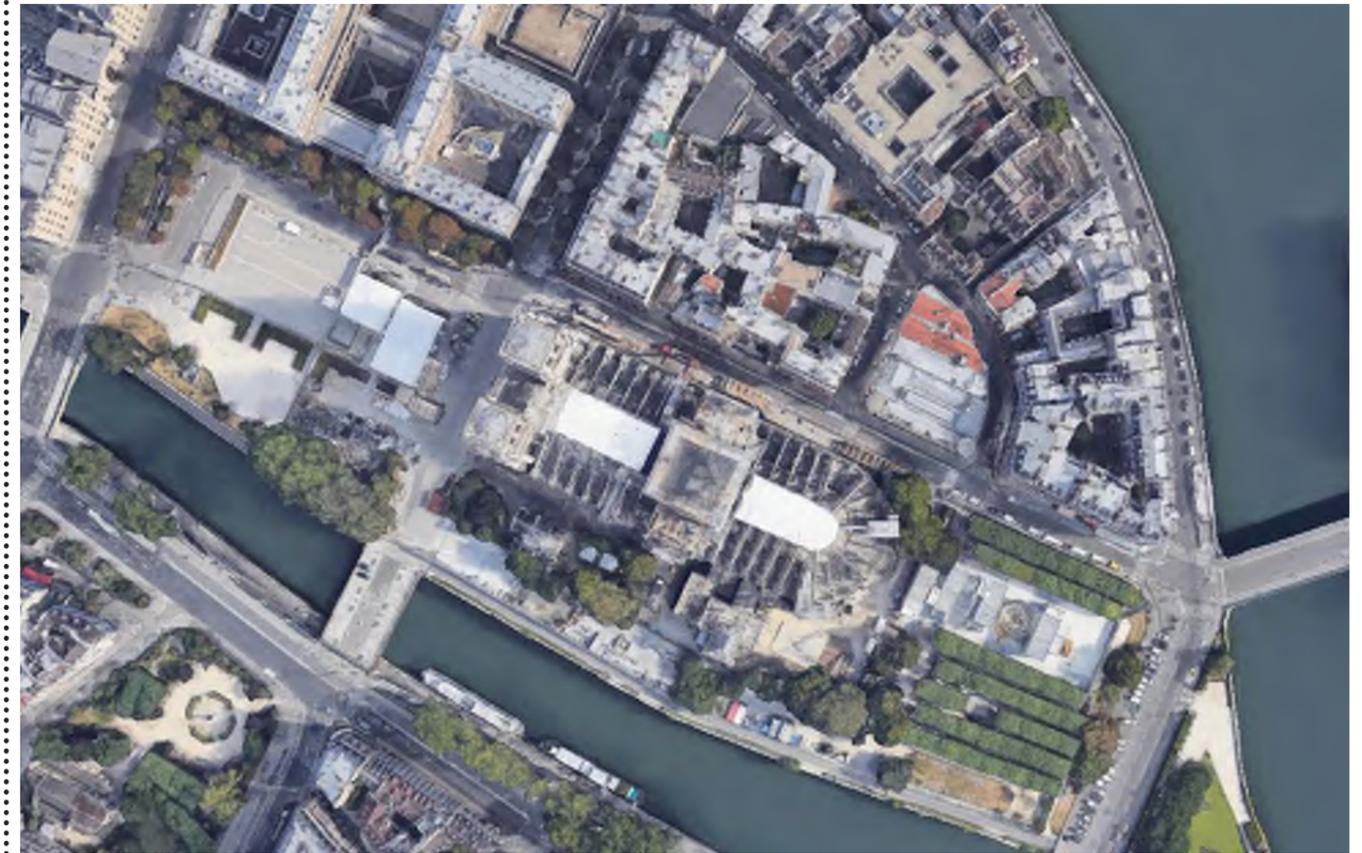
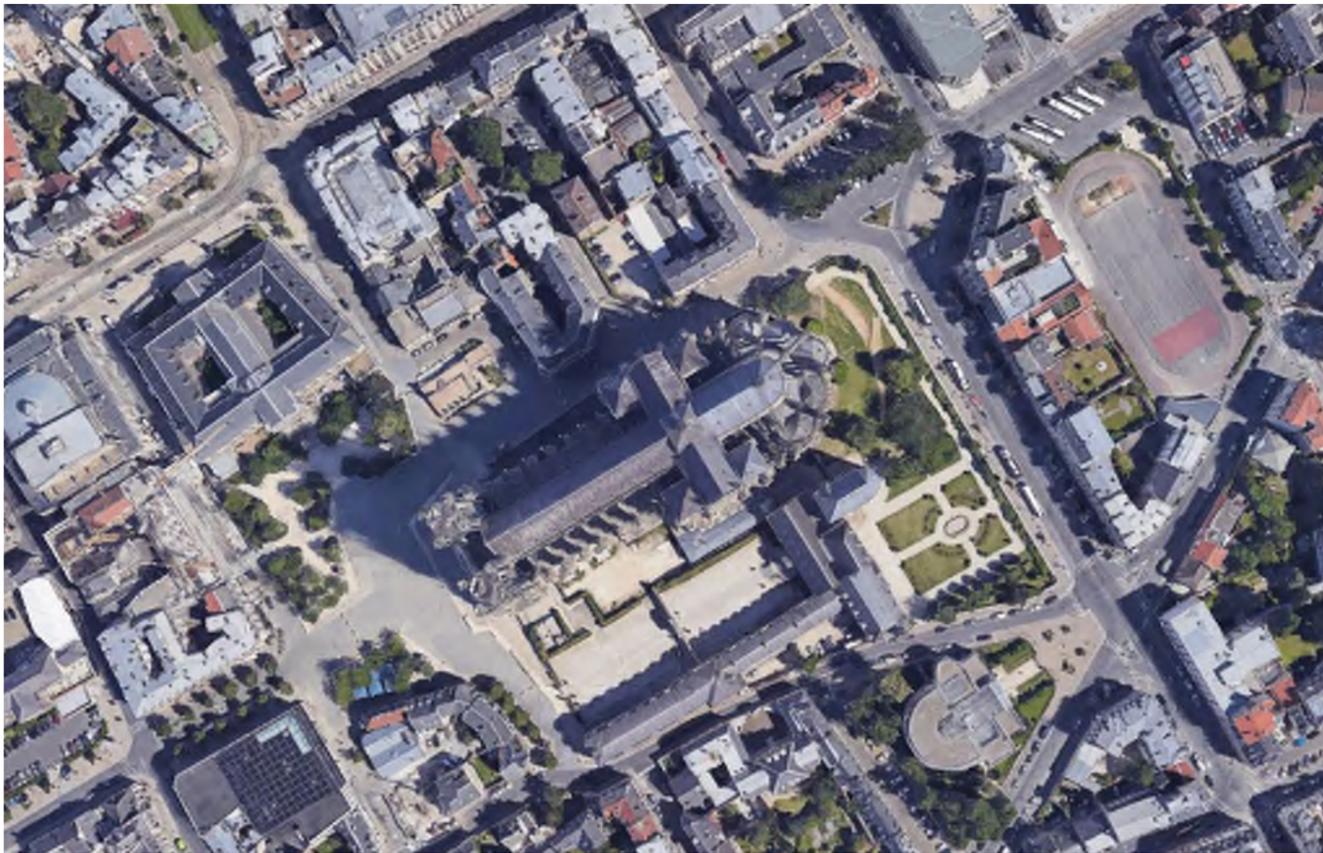
## Cattedrale di Santa Maria del Fiore square

Characters:

Fine grained urban fabric.

Cathedral is surrounded by hard landscape

Squares at front

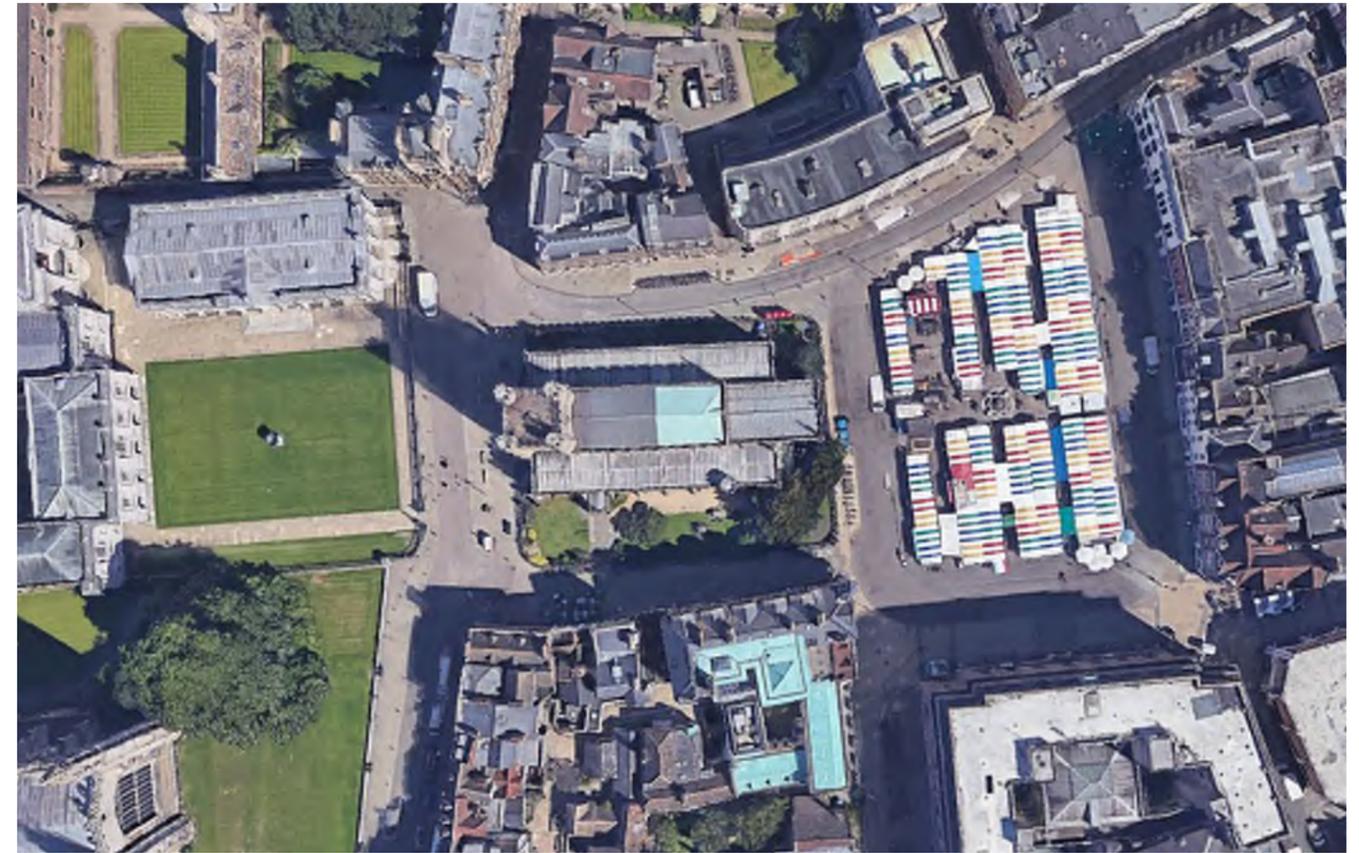


## Reims Cathedral

Characters:  
 Cathedral has formal gardens at side and back  
 Hard landscape squar at front

## Notre Dame de Paris

Characters:  
 Cathedral has formal gardens at side and back  
 Hard landscape squar at front



## York Minster, York

Characters:

Small hard scaped squares west and south with areas of lawn.

A paved court to the north east.

Dean's Park to the north with mature trees

## Great St Mary's Church, Cambridge

Characters:

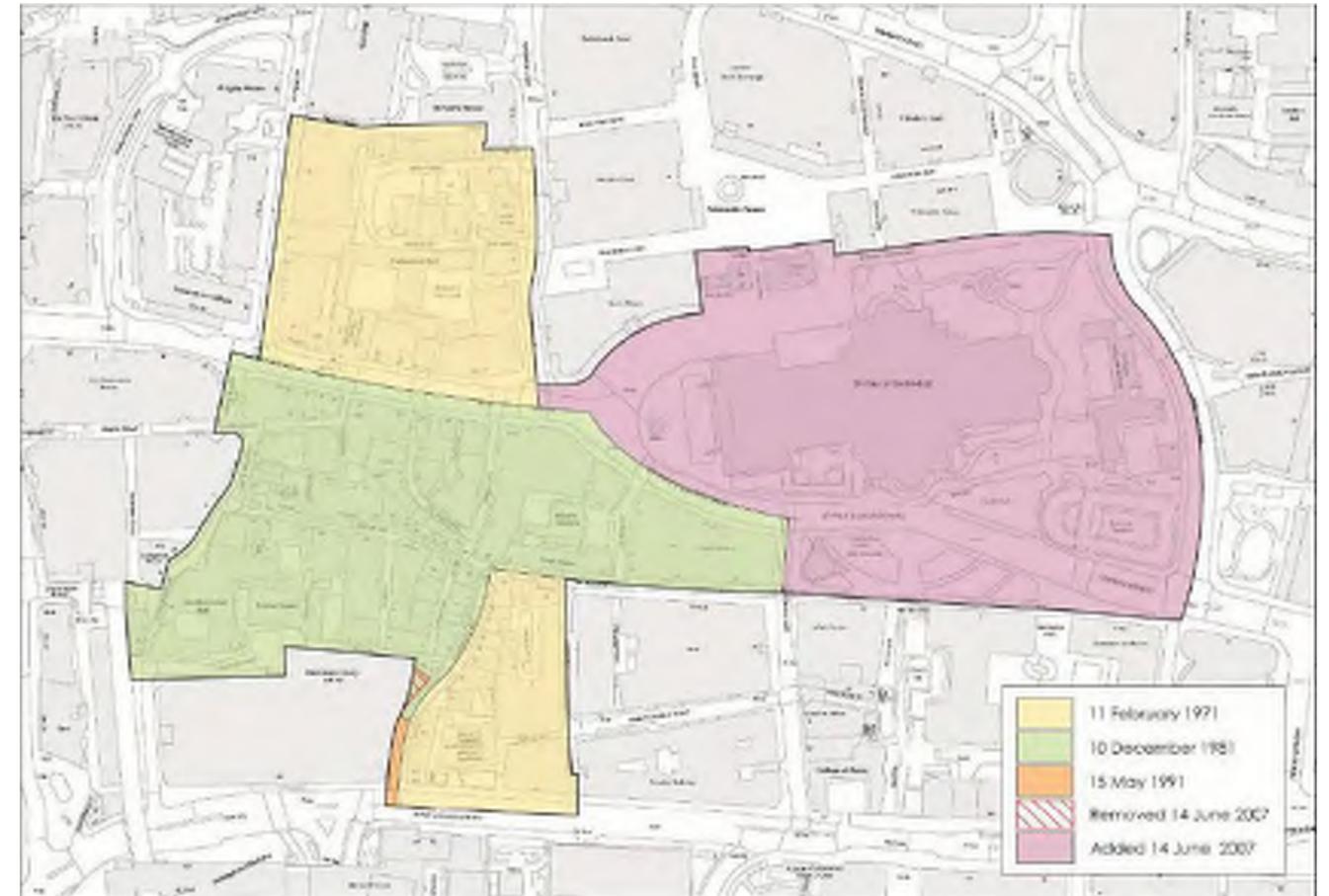
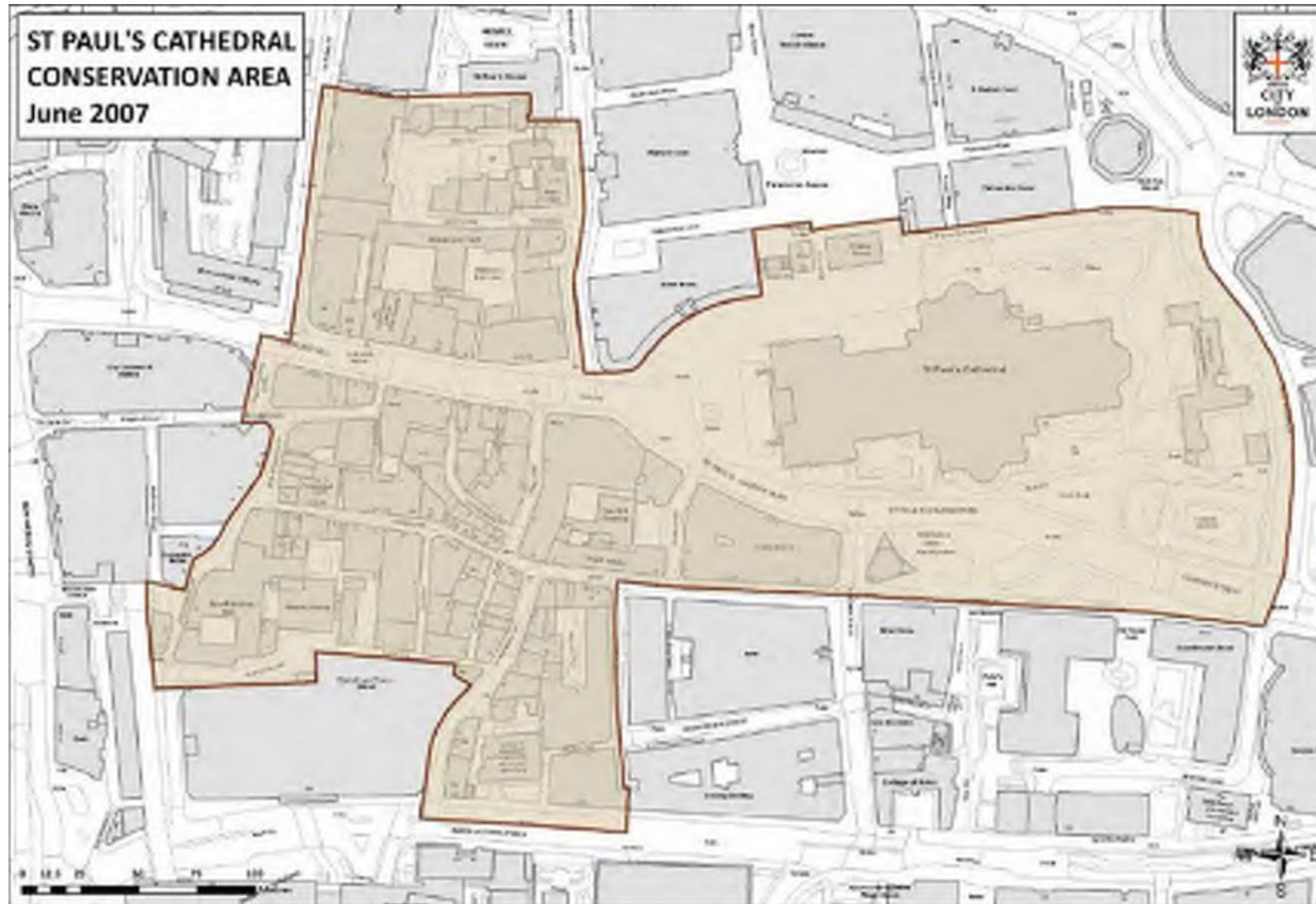
Dynamic town fabric.

Cathedral is surrounded by hard landscape on three sides and green landscape on one side.

Squares and formal gardens at front

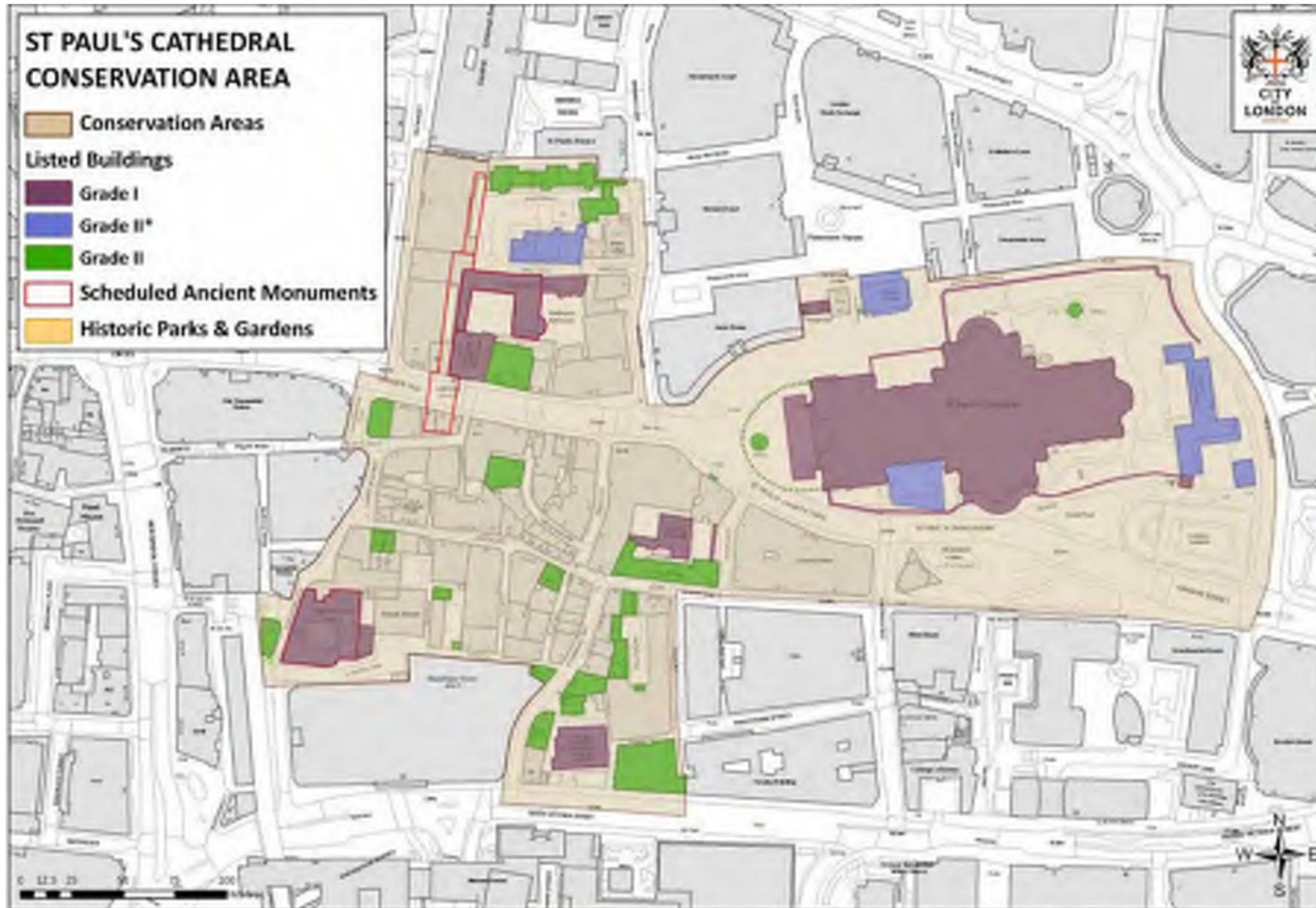


# St. Paul's Cathedral Conservation Area



*St Paul Cathedral Conservation Area, Character Summary & Management Strategy SPD, 2013. City of London*

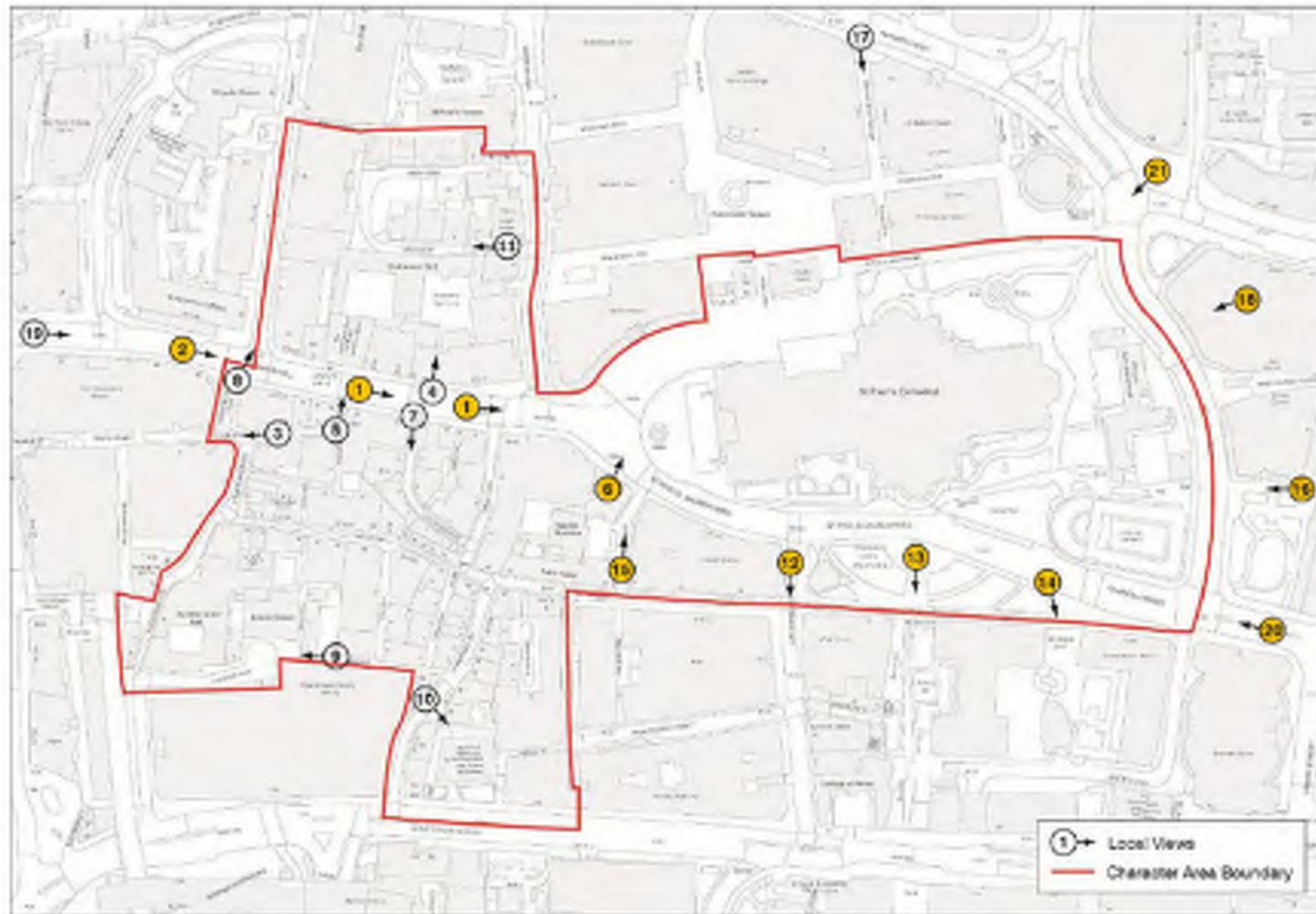
# St. Paul's Cathedral Conservation Area Listed Buildings



STREET	NUMBER /NAME	GRADE
Amen Court	1-3	II*
	4-9, 8A and 8B	II
	Pair of gate piers attached to number 1	II*
Ave Maria Lane	Stationers' Hall	I
Blackfriars Lane	Apothecaries' Hall, 10-18	I
	15-17	II
Carter Lane	Rising Sun public house, 61	II
	79 Carter Lane	II
	81 Carter Lane	II
Church Entry	St Ann's Vestry Hall	II
Dean's Court	St Paul's Deanery	I
	Screen walls and gateways to forecourt of St Paul's Deanery	I
Ludgate Hill	34-40	II
	Midland Bank, 45 and 47	II
	Church of St Martin	I
Ludgate Square	1-3	II
New Change	St Paul's Cathedral Choir School	II*
Playhouse Yard	Magnesia House, 6	II
	Church of St Andrew by the Wardrobe	I
	146	II
St Andrew's Hill	31-32	II
	35, St Andrew's Rectory	II
	36	II
	The Cockpit Public House, 7	II
St Paul's Alley	Pump on west side of Chapter House	II
St Paul's Churchyard	Tower of former Church of St Augustine	I
	Cathedral Church of St Paul	I
	Statue of St Anne in forecourt of St Paul's Cathedral	II
	40 stone posts to forecourt of Cathedral Church of St Paul	II
	Footings of destroyed cloister and chapter house	II*
	Three K6 telephone kiosks in the vicinity of St Paul's Cathedral	II
	Chapter House of St Paul's Cathedral	II*
	St Paul's Cross	II
	Railings to the churchyard of the Cathedral Church of St Paul	I
Wardrobe Place	1	II
	2	II
	3-5	II
	Wardrobe House and adjoining archway, 5B Wardrobe Place	II

St Paul Cathedral Conservation Area,  
Character Summary & Management Strategy SPD, 2013.  
City of London

# St. Paul's Cathedral Conservation Area Selected Views



## Local views from within the conservation area boundary:

1. A series of views east to St Paul's Cathedral from Ludgate Hill.
2. View east of St Martin Ludgate and St Paul's Cathedral from Ludgate Hill, with the narrow spire acting as an important foil to the dome.
6. View north to Temple Bar from St Paul's Churchyard.
12. View south along Godliman Street to St Benet Welsh Church, Paul's Wharf.
13. View south from Peter's Hill to the Millennium Bridge and Tate Modern.

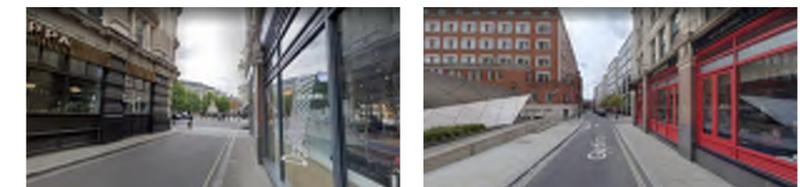
## Local views from outside the conservation area boundary:

14. View south-east from Cannon street /Old Change Court to the Church of St. Nicholas Cole Abbey.
15. View north-east to St Paul's Cathedral from Dean's Court.
16. View to St Paul's Cathedral and the tower of St Augustine Watling Street from Watling Street.
18. View over the St Paul's Cathedral and churchyard from the public roof terrace of One New Change.
20. Views north-west to St Paul's Cathedral from Cannon Street.
21. View west from Cheapside to the Conservation Area



1

2



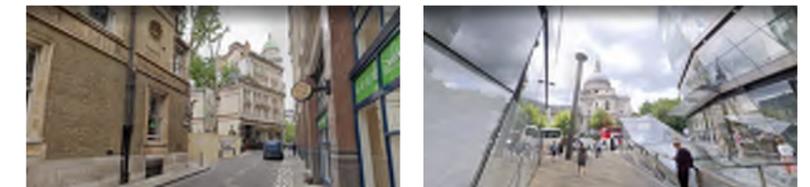
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12



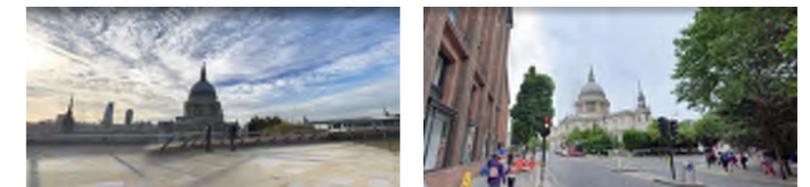
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14



15

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18

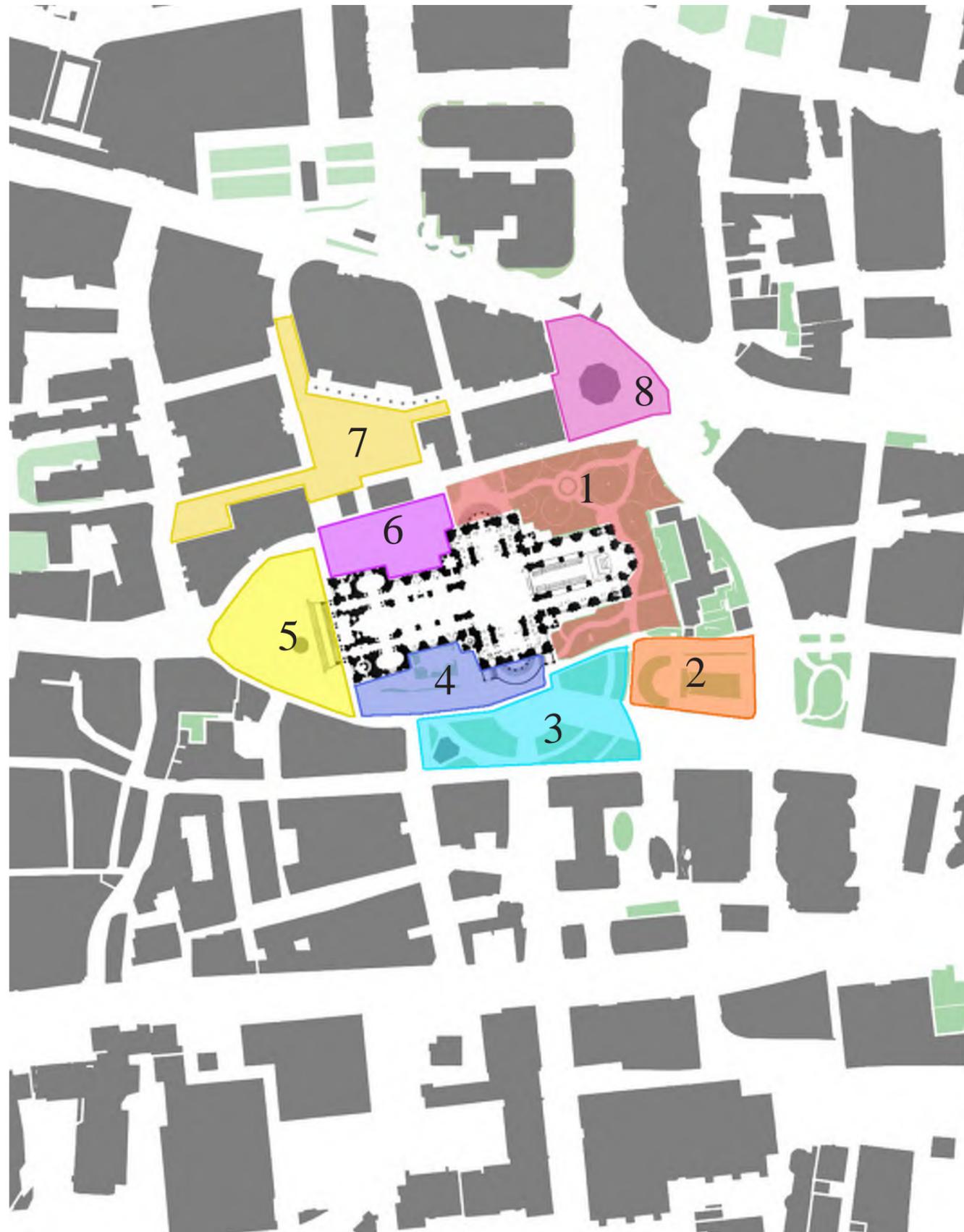
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21

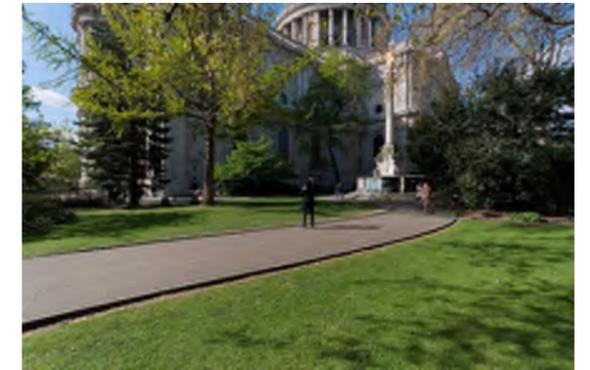
St Paul Cathedral Conservation Area,  
Character Summary & Management Strategy SPD, 2013.  
City of London

# St. Paul's Cathedral Character Areas



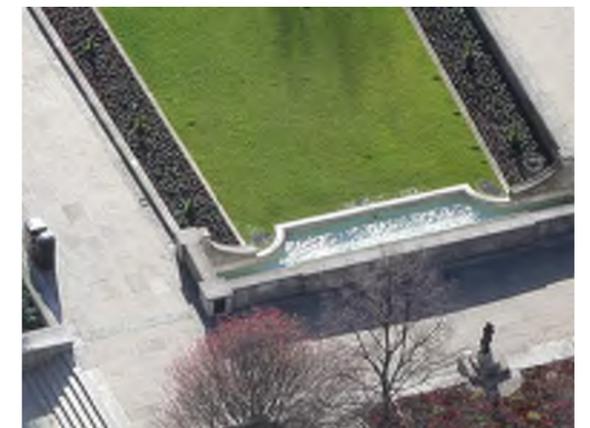
## 1. North East Churchyard

In the Cathedral's north-east churchyard, a plaque marks the location of St Paul's Cross, The column mounted with a gilded statue of St Paul also commemorates the public preaching of the Christian faith in this location. This garden has the most trees and greenery



## 2. Festival Garden

Festival Gardens was created as part of the City of London Corporation's contribution to the Festival of Britain. The formal layout of the garden features a sunken lawn with wall fountain, The west of the garden features the sculpture 'The Young Lovers' by Georg Ehrlich. Squared and fan-shaped Gardens, less trees.



## 3. Carterlane Garden

A landscaped area in front of the City Information Centre, near the north entrance to Millennium Bridge, and with a ring-side view of the majestic St Paul's Cathedral. Regular sector-shaped.



## 4. South West Corner

Radial, stellated square with benches and surrounded by small squared lawns. Next to the Cathedral and relatively away from road.



(City of London, 2019)

# St. Paul's Cathedral Character Areas

## 5. West Courtyard

Facing Ludgate hill and busy retails, the crescent west courtyard has the statue of Queen Anne and huge, long stairs next to the Cathedral.



## 6. North Courtyard

Rather than a Courtyard, it's more like a transition space between the Cathedral and Paternoster Square by its arches, people will not stop and relax here.



## 7. Paternoster Square

The Square is near the top of a modest rise known as Ludgate Hill, the highest part of the City of London. It is characterised by its pedestrianisation, colonnades and retails.

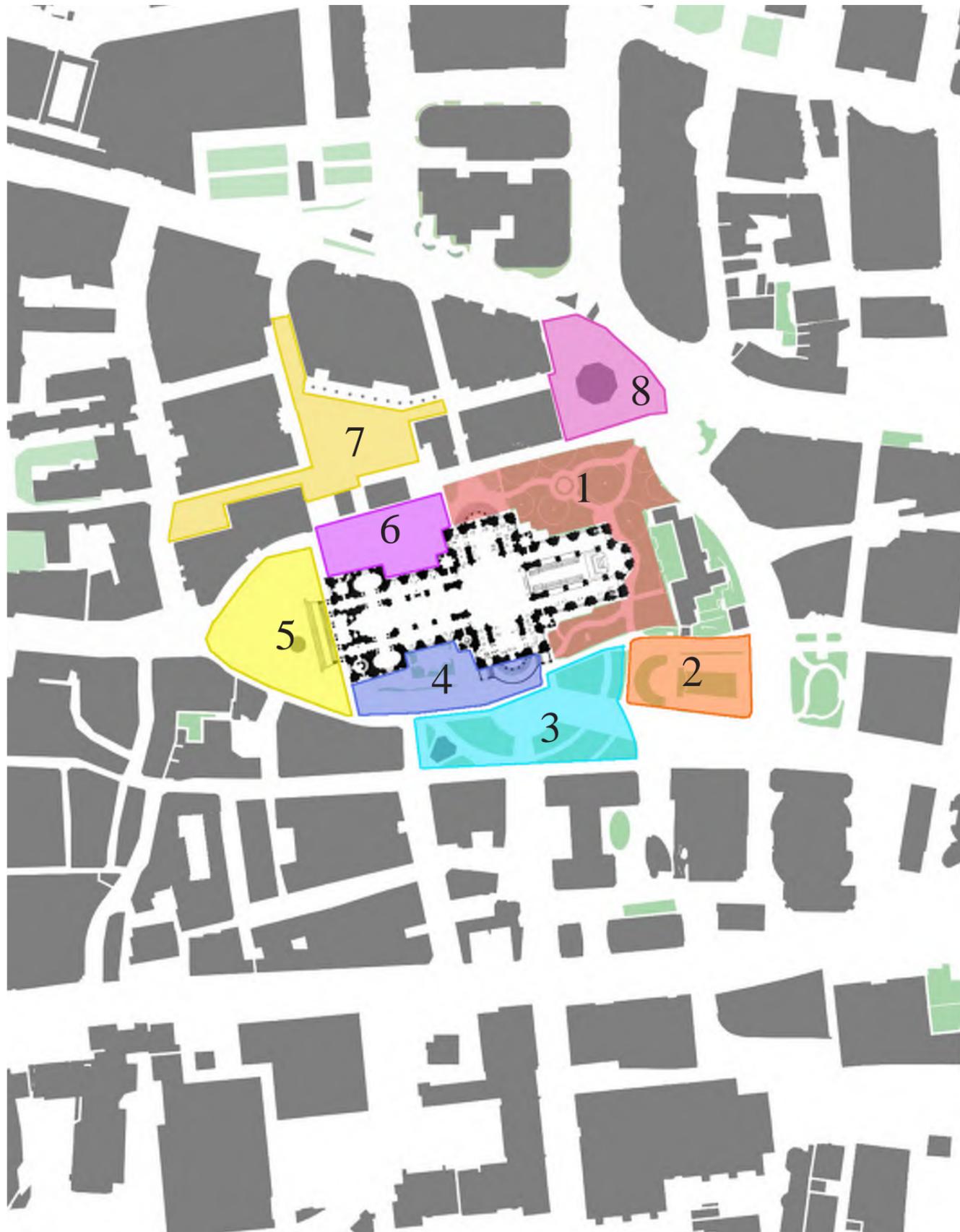


## 8. St. Paul's station

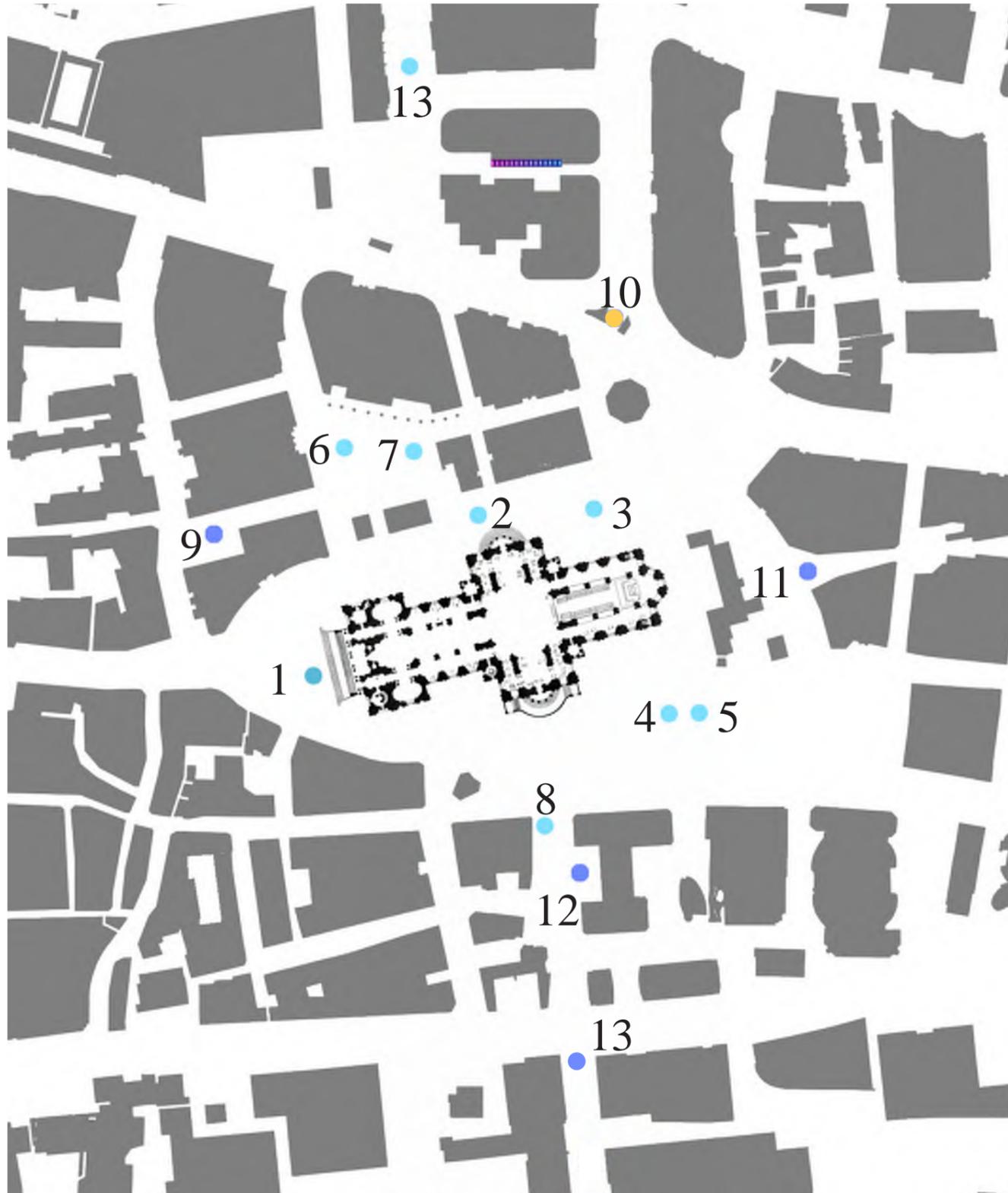
The tube station is located next to Cheapside Rd. People can get access to Paternoster Square from the station through Paternoster Row.



(City of London, 2019)



# St. Paul's Cathedral Public Art



1. Queen Anne



2. John Wesley



3. North Golden Statue



4. John Donne



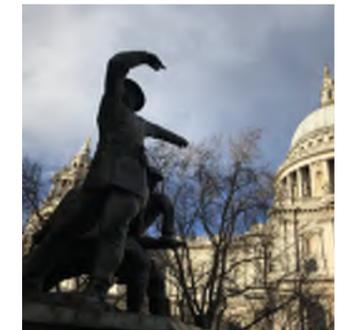
5. Festival Garden



6. Paternoster Column



7. Paternoster Sheep



8. National Firefighters Memorial



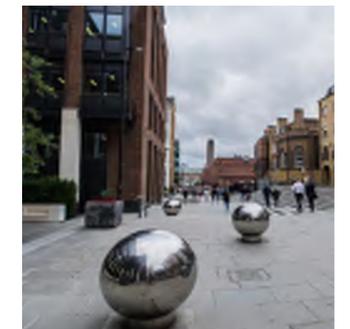
9. Angel's Wings



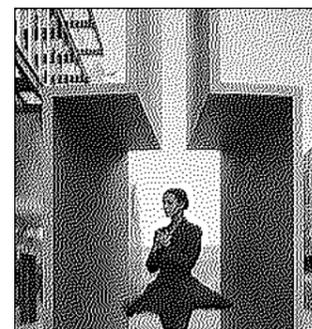
10. St Paul's Station's Installation



11. Gavin Turk's Nail



12. Peter's Hill's Installation



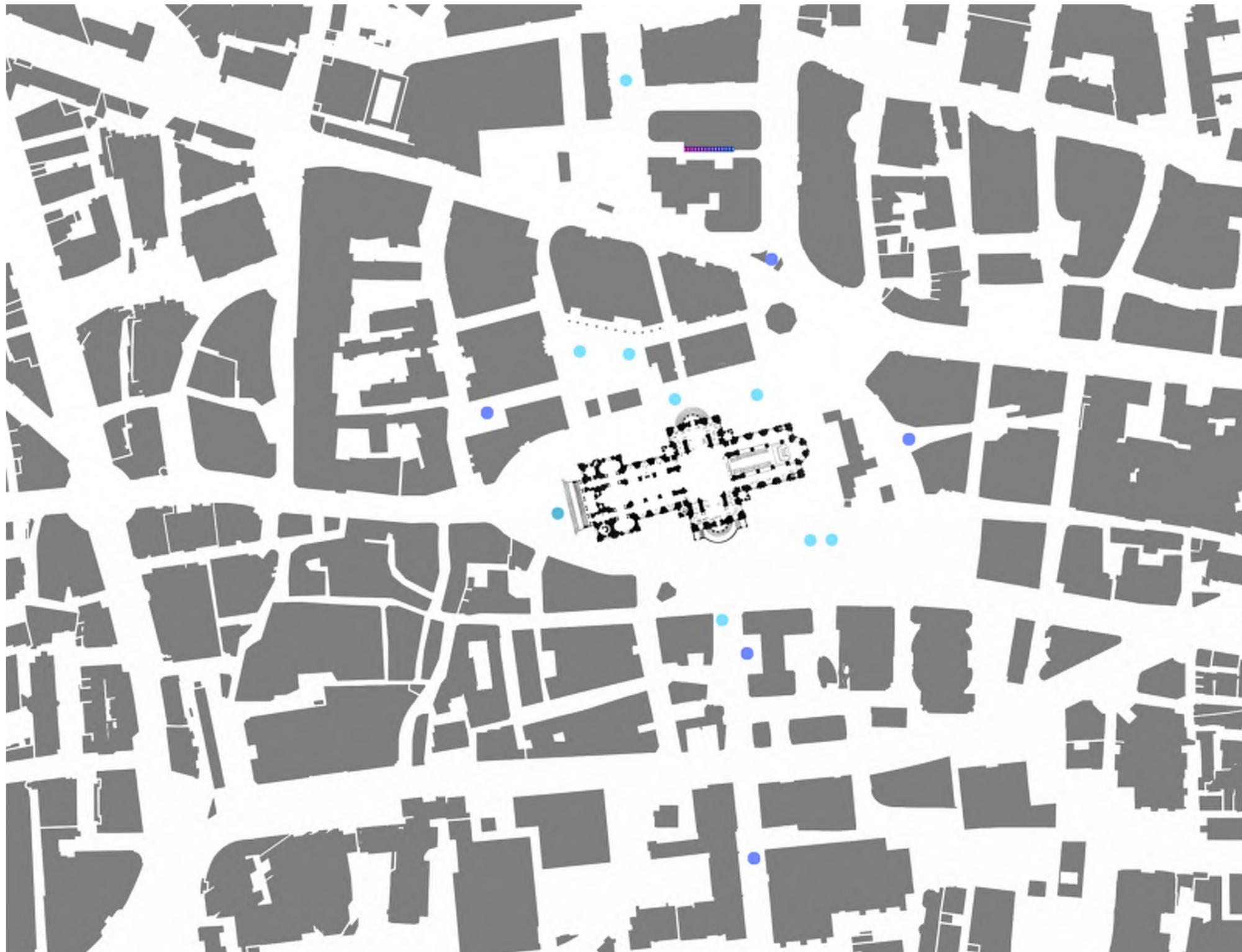
13. Peter's Hill's Gate



14. Roland Hill Statue

- Key
- Statue
  - Installation
  - Temporary Installation
  - Curated art wall

# St. Paul's Cathedral Public Art



## Architectural Sculpture

St Paul's Cathedral Conservation Area contains an array of significant architectural sculpture, some of which is of exceptionally high quality, and generally takes the form of a carved stone relief or statuary. A number of buildings are enriched by sculpture, most notably St Paul's Cathedral. (City of London, 2019)

St Paul's Cathedral incorporates numerous sculptural adornments to its exterior, the majority of which were designed by Sir Christopher Wren incorporated into the Cathedral by Wren and visible on his 1685 drawings of the building, and later sculpted executed by exemplary and still renowned sculptors including Gibbons and Cibber or Francis Bird between c.1697 and c.1705. When completed it would have been some of the finest sculpture in Europe, and remains of the highest significance.

(City of London, 2019)



*St. Paul's Cathedral  
Figure Ground*



*St. Paul's Cathedral  
and emerging green spaces*



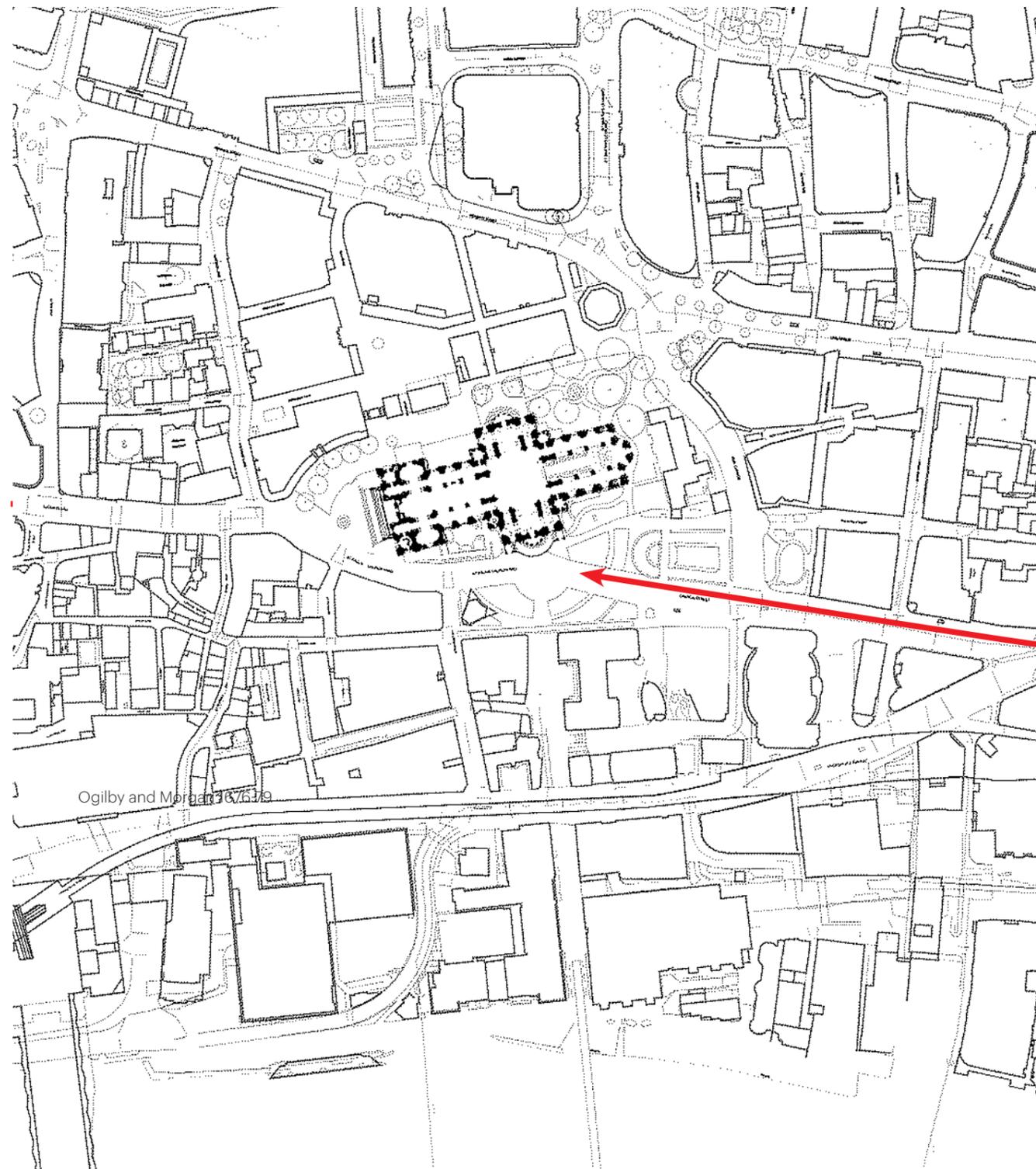
*St. Paul's Cathedral  
and emerging tress*



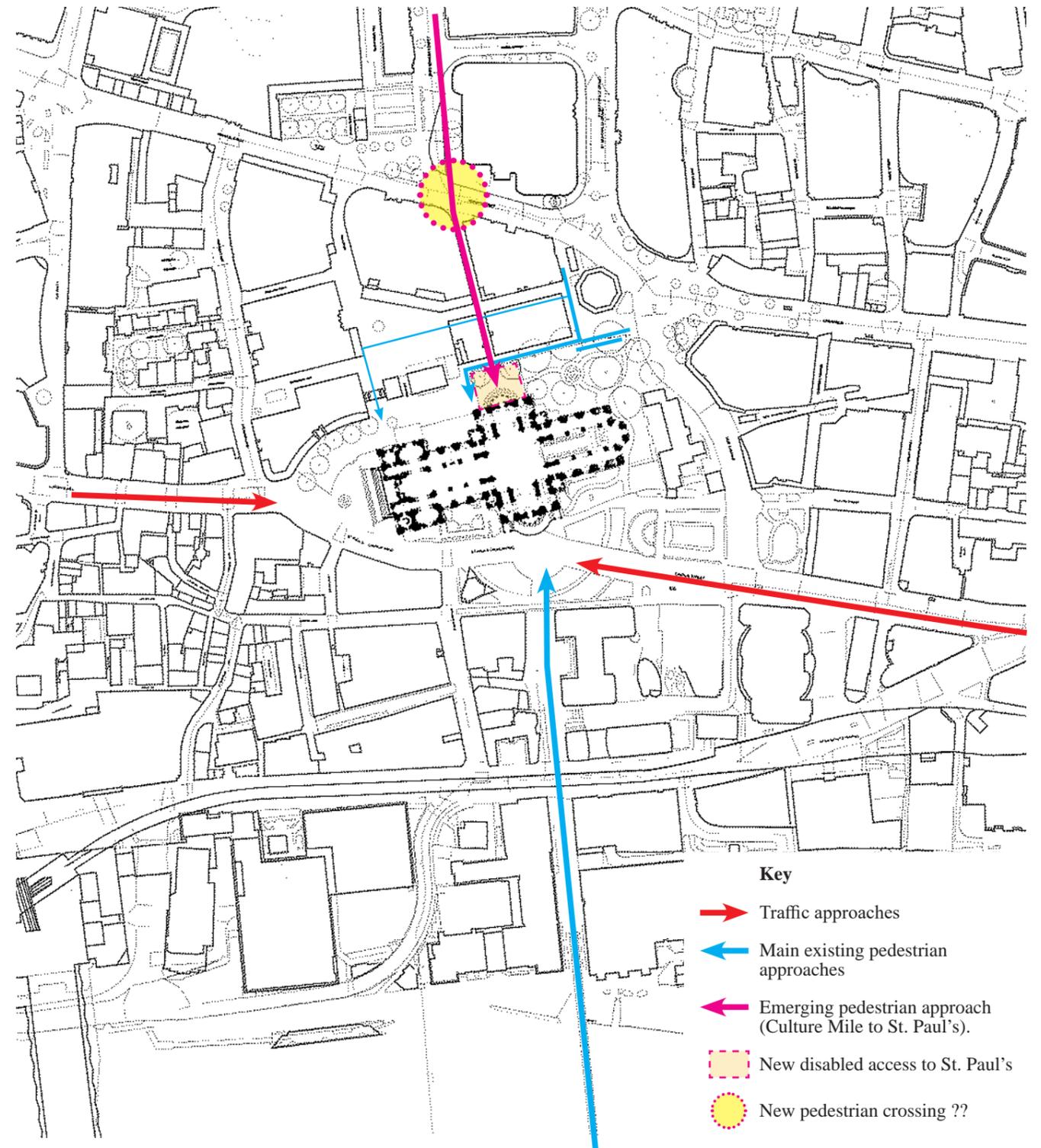


# St. Paul's Cathedral approaches

Existing



Emerging

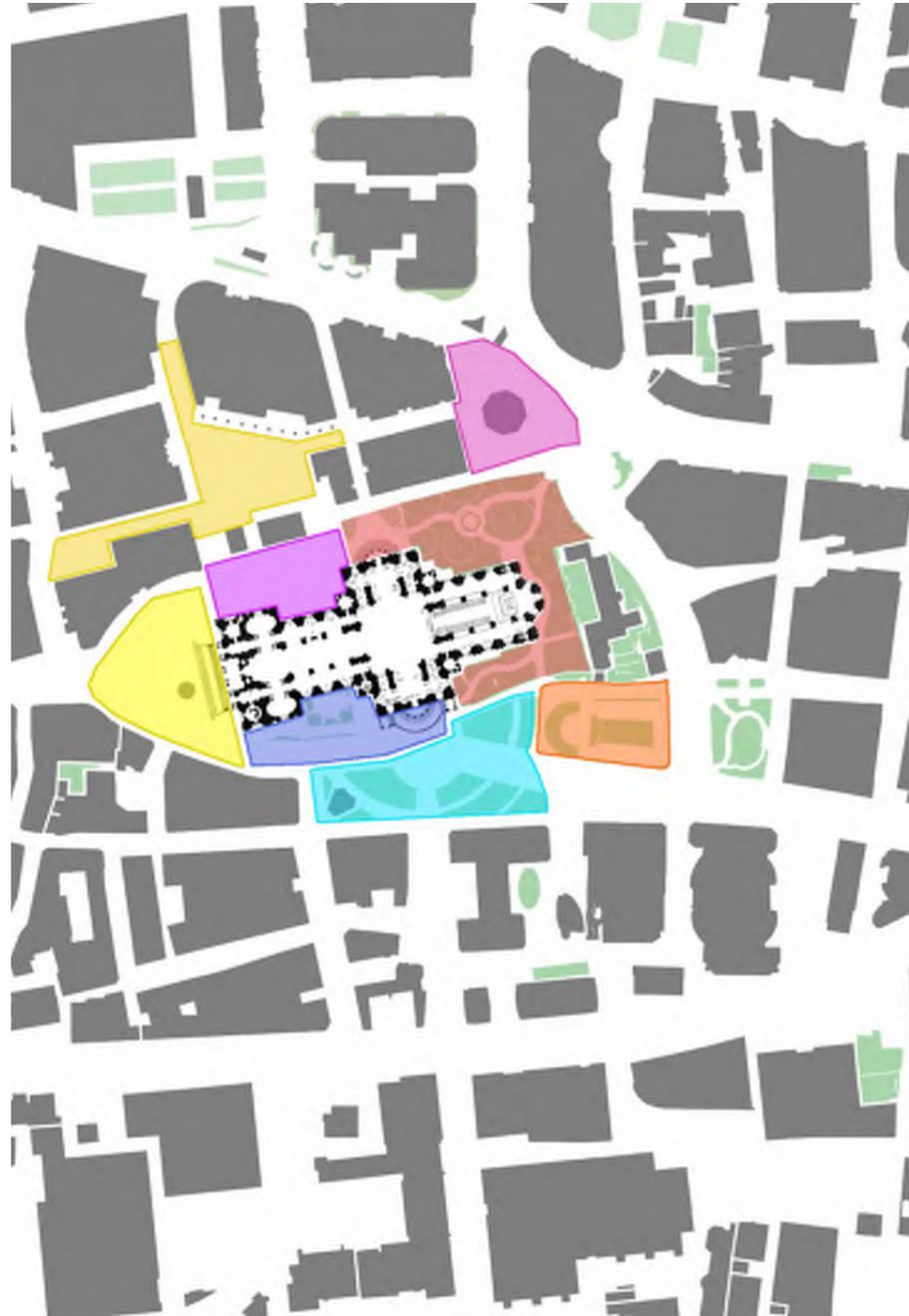


**Key**

-  Traffic approaches
-  Main existing pedestrian approaches
-  Emerging pedestrian approach (Culture Mile to St. Paul's).
-  New disabled access to St. Paul's
-  New pedestrian crossing ??



Existing character areas



Proposed character areas



*Proposed Character Area A*

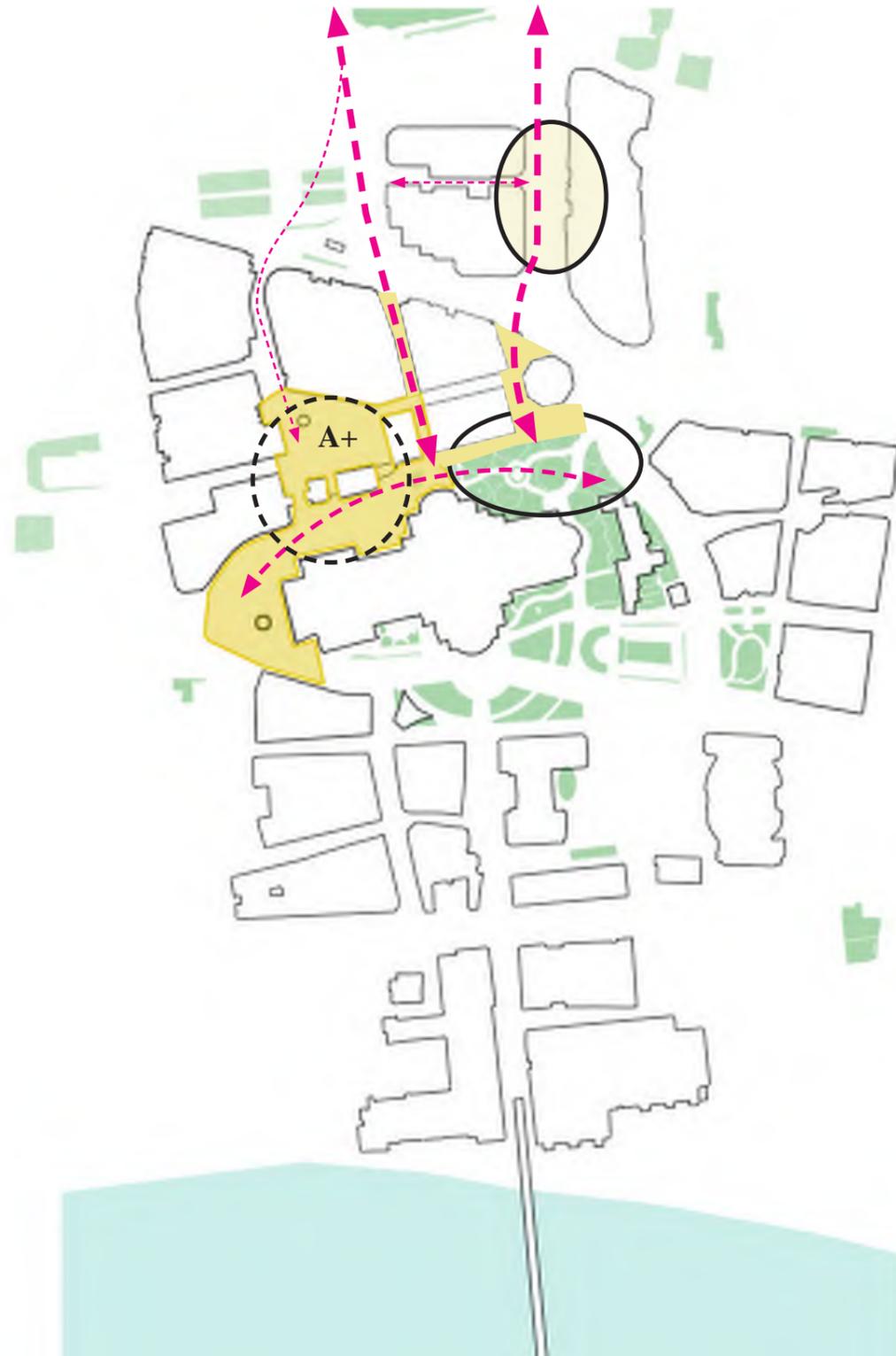
Combine area north of Cathedral with Paternoster Square



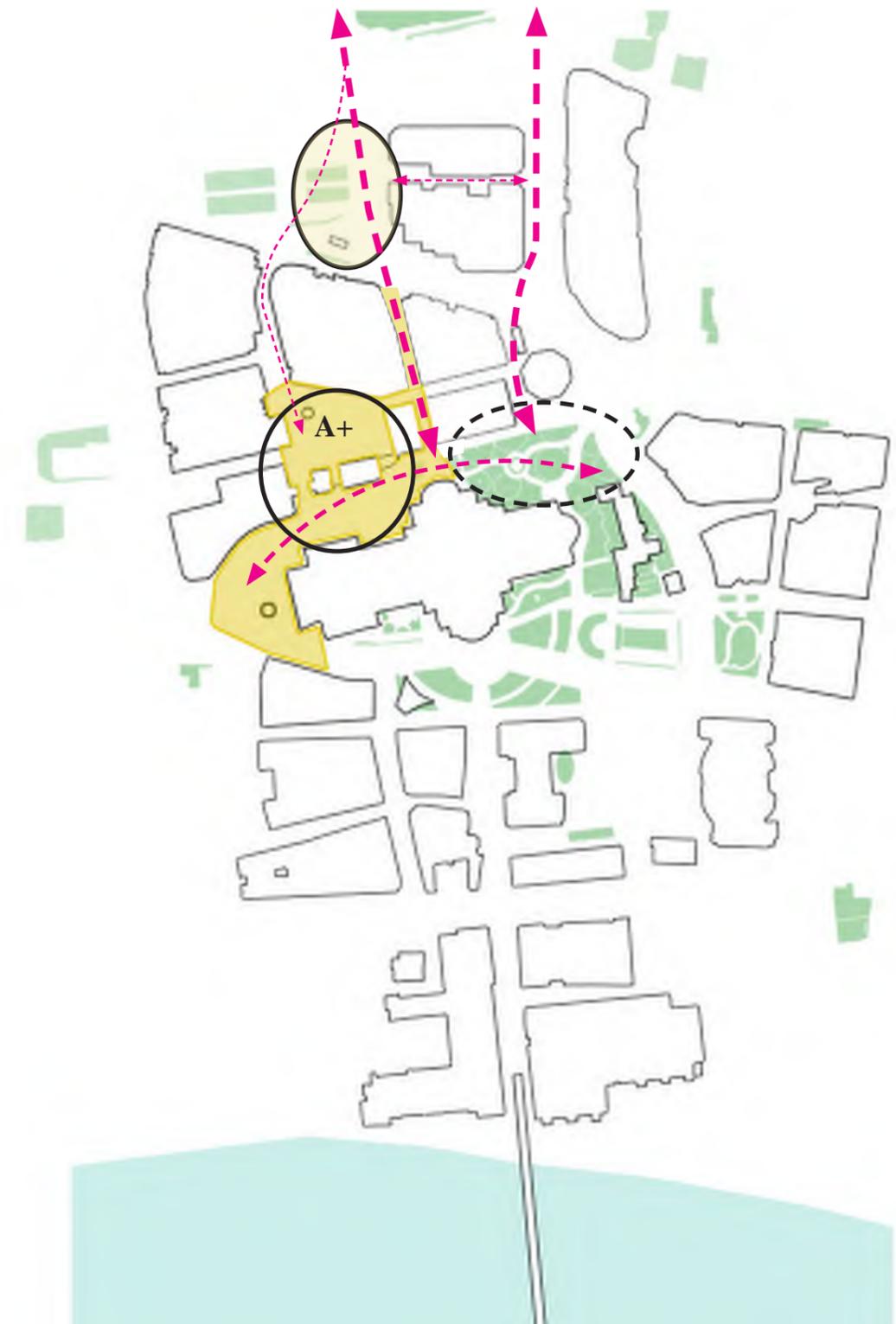
Increased connection to Paternoster Square

*Proposed Character Area A*

**Stronger links to public spaces and the Culture Mile**



Pedestrianisation of St. Martin's le Grande



Pedestrianisation of King Edward Street

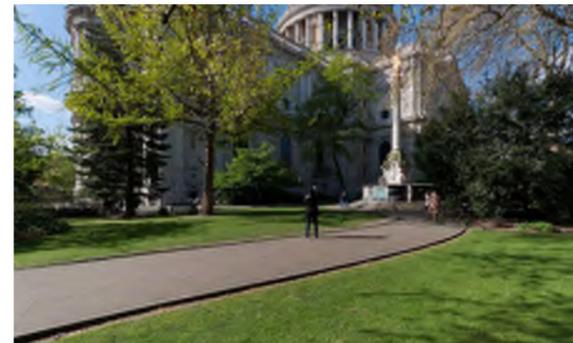
# Proposed Character Area B

Improve coherence of 'green space'

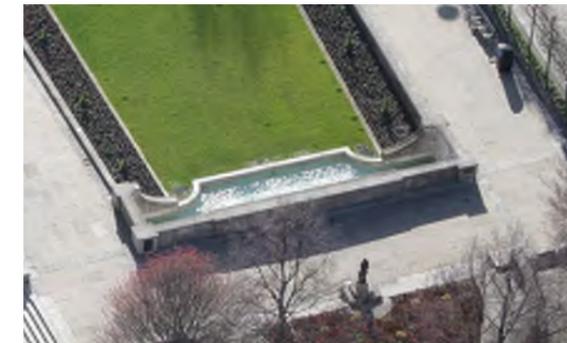
Proposed character areas



Existign character of Area B



Existign character of Area B+?

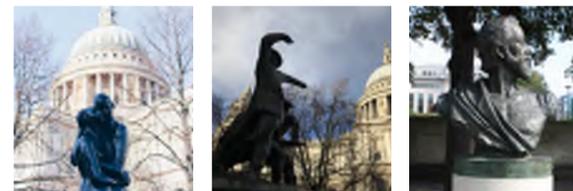
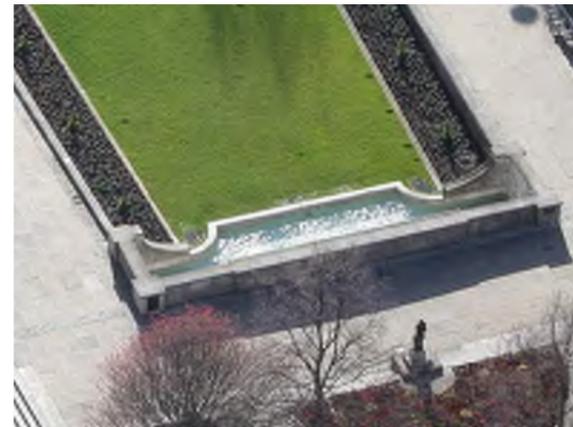


# Proposed Character Area C Ludgate Hill to Cannon Street

Existing character area C

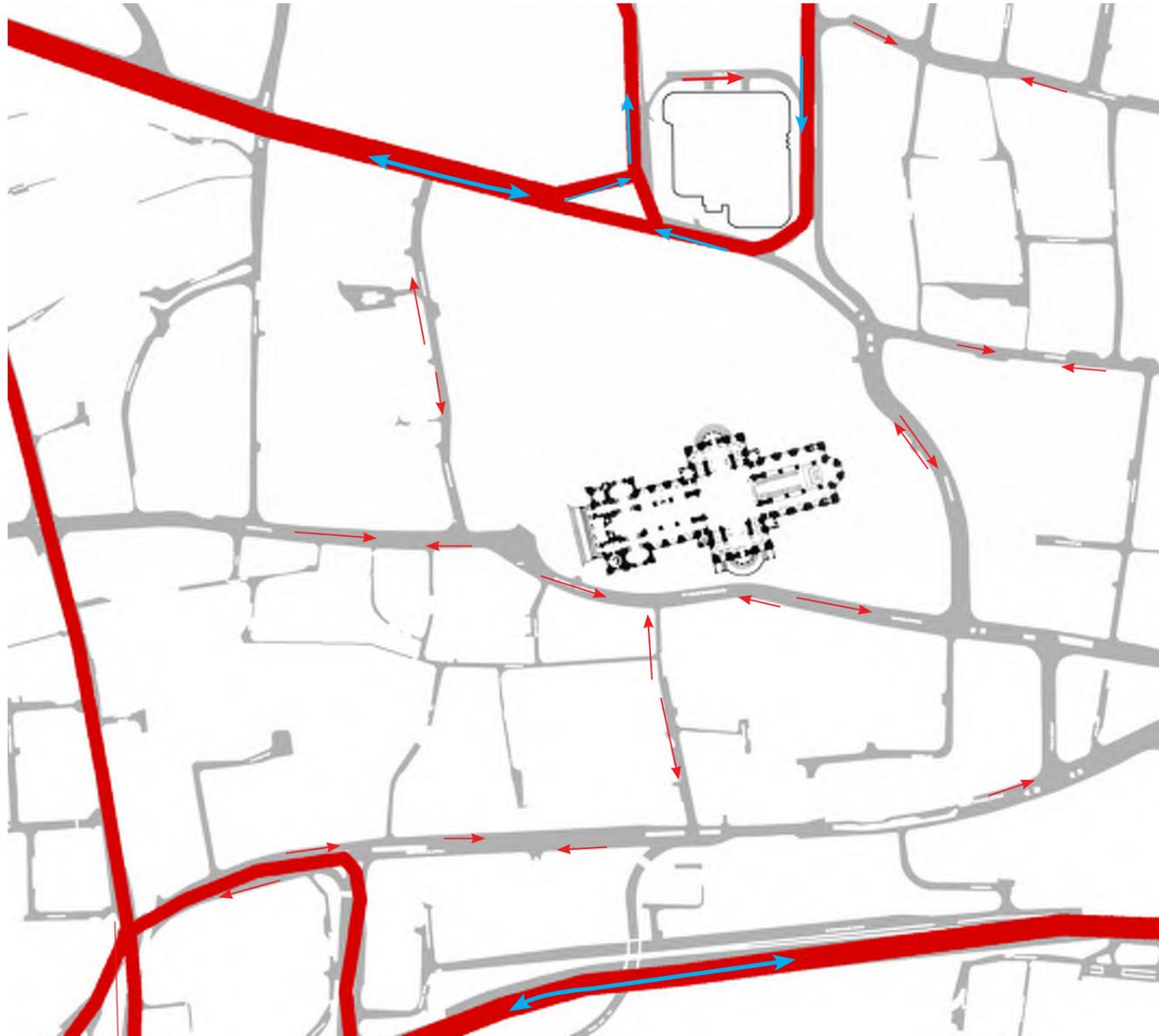


Existing character of Area C



# Proposed Character Area C Ludgate Hill to Cannon Street

Existing



Proposed



Controlled or no traffic on St. Paul's Churchyard.  
Shared surface for continuity of space around the  
Cathedral

**Key**

- A Roads
- Direction of traffic
- Controlled or no traffic and shared surface

## Trafalgar Square Transformation



1908



2009

A major 18-month redevelopment of the square led by W.S. Atkins with Foster and Partners as sub-consultants was completed in 2003. The work involved closing the eastbound road along the north side and diverting traffic around the other three sides of the square, demolishing the central section of the northern retaining wall and inserting a wide set of steps to the pedestrianised terrace in front of the National Gallery. The construction includes two lifts for disabled access, public toilets and a café. Access between the square and the gallery had been by two crossings at the northeast and northwest corners.

## *Exhibition Road Transformation*



2003

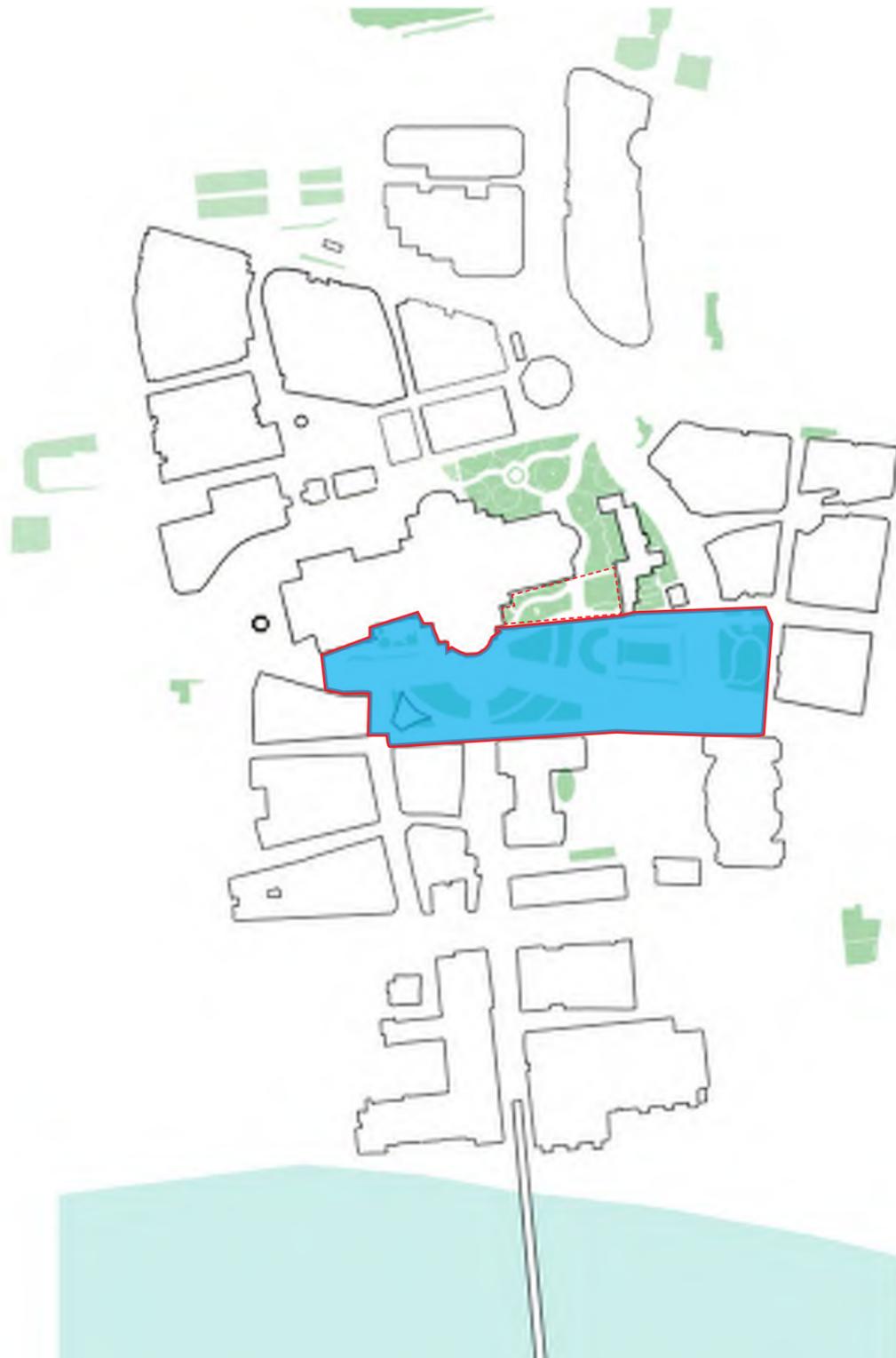


2012

Since the 1960s, the road had been divided into two lanes for vehicular traffic, two rather narrow footpaths, and three rows of parked vehicles, one on either side and one in the centre. It was difficult to cross owing to a scarcity of pedestrian crossings and, in general, its appearance was cluttered, unattractive and not very worthy of its prestigious institutions.

# Proposed Character Area C Ludgate Hill to Cannon Street

Proposed character area C



Shared surface and controlled traffic for improved public realm

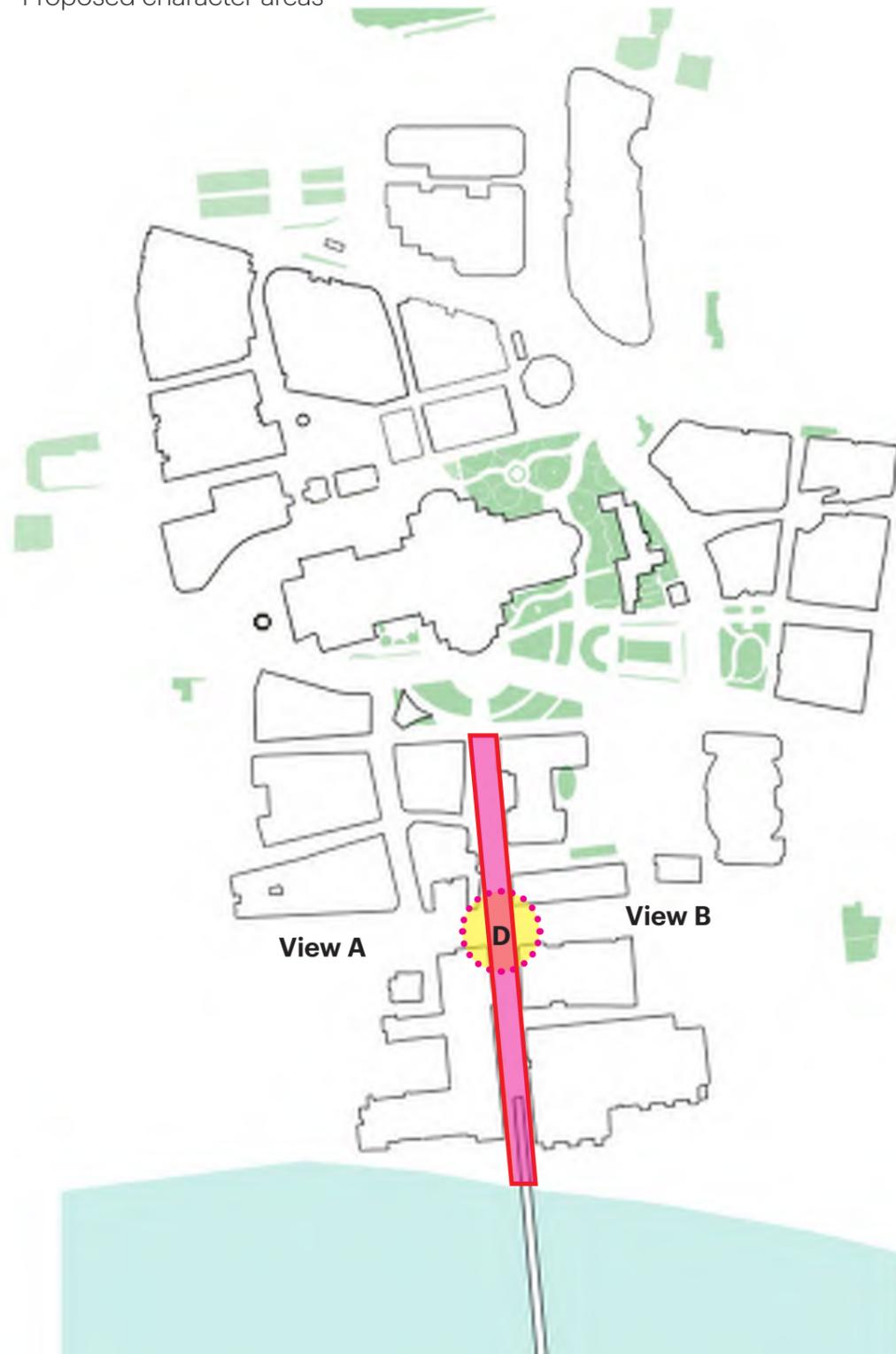


Exhibition Road



Trafalgar Square

Proposed character areas



Existign character of Area D



View A



View B

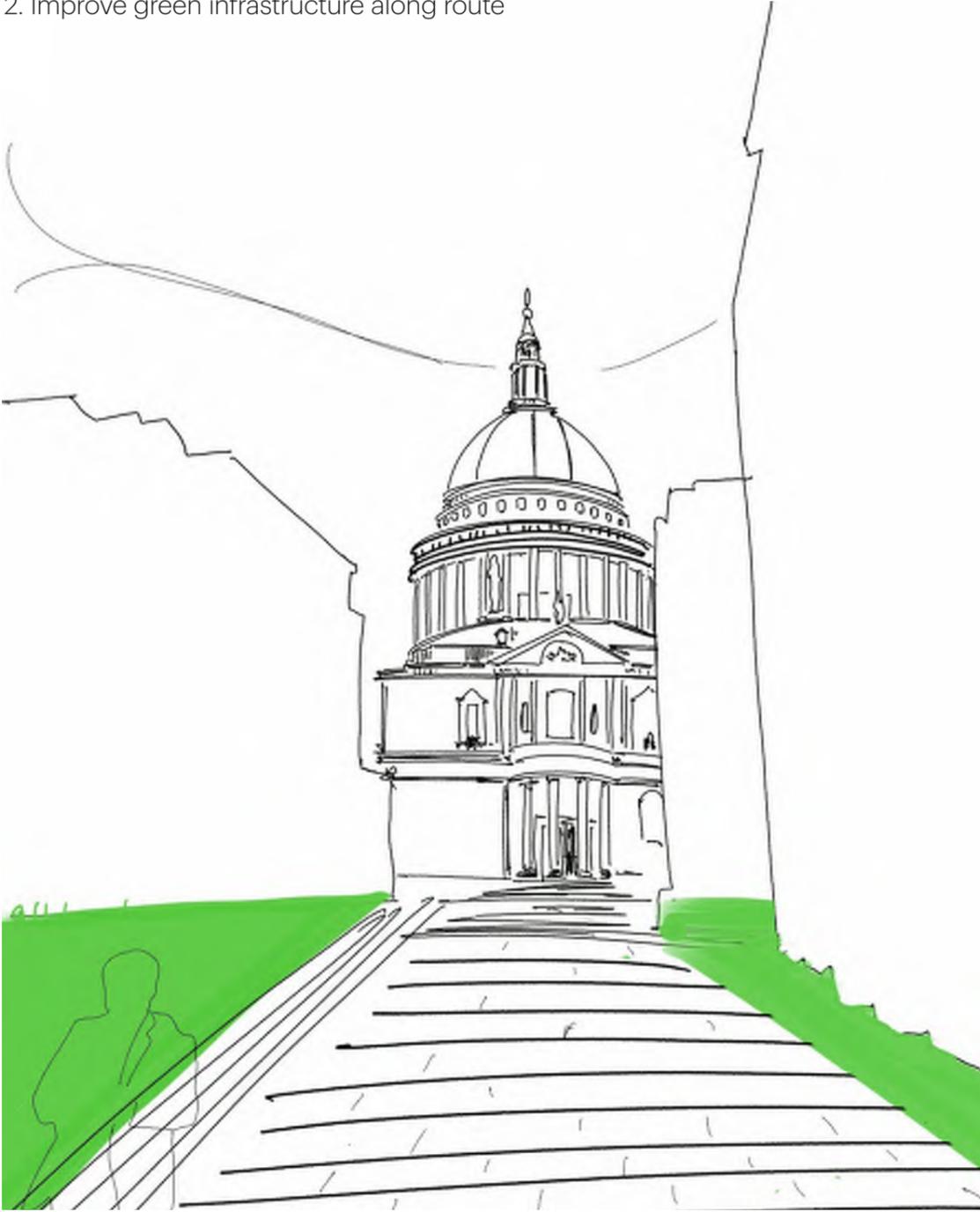
*Proposed Character Area D*  
*Extend soft landscape influence of St. Paul's*

Challenge of character Area D



Proposed

- 1. Improve Upper Thames Street pedestrian crossing with a raised top / shared surface
- 2. Improve green infrastructure along route



*Proposed Character Areas  
Combined strategy*



Combined Strategy



## REPRESENTATION TO THE CITY OF LONDON CORPORATION DRAFT LOCAL PLAN 2036

10.05.2021

### **Vision, Strategic Objectives and Spatial Strategy**

Publica supports the emphasis the vision places on creating a healthy, resilient and inclusive public realm and the aspiration to work in partnership with businesses and organisations across a wider geographical area to tackle the causes of poor health. Publica supports the delivery of new open spaces, the opening to the public of private open spaces and the delivery of accessible, permeable buildings and amenity space at upper roof levels.

Publica welcomes the support of the creative and cultural sectors in the Square Mile and the development of new, innovative ways of working as the City responds to the Covid-19 pandemic. Publica strongly supports the development of Culture Mile and the strengthening of this new cultural quarter for London.

Publica strongly supports the City's ambition to widen pavements, reallocate road space to cyclists and pedestrians and to add wildlife-friendly planting, sustainable urban drainage systems and greenery in the public realm to improve the safety and public life of the City. The supporting strategy to re-time and consolidate deliveries to reduce peak congestion is strongly supported as is the support for zero-emission vehicles to undertake last-mile logistics deliveries.

Overall, Publica strongly supports the place-based approach taken in the Local Plan. The ambition to strengthen active travel, support culture in the City, promote evening and night time activities, increase and improve green and open spaces to deliver a healthier and more inclusive environment is welcomed. The plan positively sets out how this can be achieved while preserving and enhancing heritage assets, valuing design and strengthening the key and unique economic role of the City.

### **Strategic Policy S1: Healthy and Inclusive City**

Publica strongly welcomes the strategic approach to health and inclusivity being adopted in the draft local plan. In particular, the mitigation of negative environmental impacts of pollutants and excessive light pollution is strongly supported. The desire for new developments to contribute to improving air quality and the expectation that developments should provide opportunities for training and skills development to improve access to employment, particularly for local residents, is strongly supported. We would encourage the plan to require social value statements to accompany major planning applications, setting out clearly a strategy and monitoring process for delivering additional benefits to local communities such as employment, training, improved health opportunities, environmental improvements and other locally experienced social benefits.

### **Strategic Policy S3: Housing**

Publica strongly supports the delivery target for affordable housing. The addition of a minimum net 2,482 dwellings over the plan period should be supported by a strategy for the provision of new social infrastructure including: the development of new and improved play spaces, health and leisure facilities, cycle parking and shared mobility as a service provisions.

### **Strategic Policy S4: Offices**

Publica supports the use of planning conditions to deliver long term office and commercial uses, and protect office spaces from conversions to uses that would undermine the CAZ function of the City. To deliver Strategic Policy S6 We would encourage a more robust policy to secure affordable workspaces and support, in particular, creative uses which can contribute greatly to the character and identity of an area and deliver economic growth.

### **Strategic Policy S5: Retailing**

Publica welcomes policies seeking to improve and differentiate the experience of visiting retail areas. We

support the encouragement of town centre uses and active frontages across the City as long as these do not detract from the viability of core retail areas. We suggest that policies support the co-location of retail with other uses that fall within the new Use Class E. The plan could encourage the development of new business models and improve the leisure and entertainment offer for visitors. The plan could support extending non-retail activities in the Principal Shopping Centres and Retail Links later into the evening and night time as well.

#### **Strategic Policy S6: Culture, Visitors and the Night-Time Economy**

Publica strongly supports the requirement for Cultural Plans to be developed as integral to major developments. This recognises that developments can contribute in a variety of ways to enriching culture, heritage and the creative economy of the City. We welcome broadening the definition of culture adopted in the plan. We strongly support the use of culture to activate public spaces, as well as the use of Cultural Plans to animate and activate underused ground floor spaces, such as office lobbies. Publica recognises this as a response to the Mayor's Public London Charter with its ambition for more welcoming ground floor spaces.

Publica welcomes the support of night time industries and activities in The City. We would suggest that this supportive planning policy is aligned with licensing decisions. Publica recommends the development of a night time strategy for the City which could identify and map existing night time businesses, activities and stakeholders and explore opportunities for extending opening hours for a range of businesses (as outlined in the GLA's recent guidance for developing night time strategies). We would recommend a flexible and adaptable approach to mixing and diversification of land uses, extension of opening hours, use of meanwhile spaces for night time uses and the extensions of planning and licensing permissions to encourage outdoor events at night.

#### **Strategic Policy S7: Smart Infrastructure and Utilities**

Publica supports the need for developments to consider infrastructure requirements in the early stages of design. Not currently identified is how this policy could strengthen wider shifts towards the electrification of transport and heating as key contributions to the transition to a low carbon society.

#### **Strategic Policy S8: Design**

Publica strongly supports recognition of, and emphasis upon, the role of design in promoting safe and inclusive active travel. A strategy that improves the conditions for walking and cycling by taking into account the impacts of deliveries and servicing, the permeability and layout of a site and the design of active, public-facing frontages is particularly welcomed. Publica recognises that the City has been at the forefront in responding positively to the pressures Covid-19 placed on transport systems and the public realm.

The policy positively responds to the Mayor's Public London Charter by promoting the delivering of freely accessible public roof terraces as part of tall buildings, around City landmarks and along the River Thames. These spaces offer new opportunities for experiencing the city's unique built heritage and could strengthen connections and provide views to surrounding area.

Our work on the Case for a Cultural Strategy for the River Thames highlights the very diverse character that exists along the river and it is important that interventions with the river and its banks enhance the specific and distinctive character at that point and provide the highest levels of public and inclusive access.

Publica strongly supports the policy which is sensitive to the impacts of light spill and pollution on the character of public spaces. While lighting is important in helping to make the public realm accessible, legible and safe after dark, the retention of very subtly-lit and dark spaces and the use of sensitive, well-designed and intelligently controlled lighting is important to help protect local ecology. Lighting designs should respect and enhance distinctive character areas and should be balanced between streets and spaces.

#### **Strategic Policy S9: Vehicular Transport and Servicing**

Publica strongly supports the strategy to deliver step free access to all existing mainline rail, London Underground stations and river piers. We also strongly support the safeguarding of land for increasing public transport capacity, recognising that public transport is key to the economic and environmental

sustainability of the City.

The reduction of the impacts and negative externalities of servicing and freight activities is supported. The re-timing of deliveries outside of peak hours, enforced in planning conditions, and the use of freight and servicing consolidation to allow for deliveries by foot or bicycle is encouraged. These policies will improve the safety of street for active travel at peak hours, and reduce congestion and air pollution. We also strongly support the requirement for Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans to ensure that new developments support the City's vision and strategic transport objectives.

Publica welcomes the support of infrastructure for alternative-fuel vehicles being delivered through the plan. We would however recommend that in certain locations, on-street rapid electric vehicle chargers may be appropriate to support to increase the capabilities of freight vehicles, private hire vehicles and taxis to replace their fleets with electric alternatives. Off street chargers and slower chargers in inappropriate locations could encourage increased car use and longer parking in the City which would negatively impact congestion and undermine The City's ambitious transport objectives. Charging infrastructure should be based on a detailed model of land uses and socio-economic characteristics, locating slower chargers for businesses and residents to charge overnight and rapid chargers to cater to daily top-up charging. Charging infrastructure needs to be designed as part of the public realm, avoiding impacts on views of landmarks, narrowing footways or reducing the safety of cyclists and pedestrians.

#### **Strategic Policy S10: Active Travel and Healthy Streets**

Publica strongly supports the expansion of the cycle network across the City with the ambitious target of all property entrances being within 250m of the network. We also welcome the support for active travel but suggest that this policy should include the provision of amenities, such as drinking fountains, public toilets, seating and secure bicycle parking to support active travel. Signage and direct wayfinding should be complemented by informal interventions which support intuitive wayfinding.

#### **Strategic Policy S11: Historic Environment**

Publica supports the approach to preserving and enhancing cultural and heritage assets and the recognition that these contribute to quality of life and wellbeing. We would encourage the City to build upon recent initiatives which recognise the value of social heritage and to ensure that key community, leisure and social spaces and land uses be preserved.

#### **Strategic Policy S14: Open Spaces and Green Infrastructure**

Publica strongly supports the protection of existing open and green spaces as well as the desire to provide new open and green spaces. We would encourage the development of clear standards and expectations for the provision of new green and open spaces delivered through public realm improvements, new developments and transport investments. In response to the newly adopted London Plan and required contributions to Urban Greening Factors, we would suggest that the City establish standards to be achieved for different schemes to ensure the delivery of valuable green infrastructure. Furthermore, with the aim of improving biodiversity in the City, we would recommend the introduction of policies to require bird or bat bricks and boxes to be installed in major developments.

#### **Strategic Policy S16: Circular Economy and Waste**

Publica strongly supports the ambition of the City to move towards becoming a Zero Waste City and the adoption of Circular Economy Principles and the Waste Hierarchy. This policy could be strengthened by setting out clearly the expectations for the re-use of materials, support for building refurbishment and the application of Circular Economy principles to the built environment sector. Expectations for a Circular Economy Statements, as introduced in the recently adopted New London Plan, should be outlined and clarified.

#### **Strategic Policy S17: Thames Policy Area**

Publica strongly supports the designation of the Thames Policy Area and the future preparation of a Thames

Strategy SPD and a joint Thames Strategy with neighbouring boroughs. We welcome the protection of public access to the riverside, the strengthening of connections running north-south to the river, the creation of a continuous riverside walk and the improvement of views both to and along the river as well as the recognition of the cultural, economic and biodiversity value of the river.

Publica would recommend that the strategy make reference to the GLA and Port of London Authority's *A Case for a River Thames Cultural Vision* which was launched in 2019. The document assesses the character of the river across all of London and highlights the opportunities to link the river to cultural venues, visitor attractions, and built heritage. The report calls for the development of a cultural vision with the aim to communicate and promote the cultural life of the Thames; embrace 24 hours on the Thames; celebrate history and heritage on the Thames; champion design of the highest quality on the Thames; promote and improve access to the natural heritage of the Thames; foster collaboration and relationships connected by the Thames; empower cultural champions for the Thames; and enable the long-term viability of culture on the Thames.

Publica would recommend that the role of culture along the Thames be strengthened in the Local Plan with particular attention on the activation of the Thames over 24 hours to ensure it remains inclusive, safe, accessible and animated during the evening and night time. A future Thames Strategy SPD should explore opportunities to strengthen cultural activities along the Thames.

### **Strategic Policy S21: City Cluster**

Publica welcomes the support for the Easter City Partnership outlined in the Draft Local Plan and the recognition of the unique heritage assets that contribute significantly to the character and identity of the area. We support the enhancement of streets, spaces and public realm in this area and the prioritisation of pedestrian movement during the daytime in key streets as well as the delivery of high-quality public realm to address projected increased worker and visitor numbers. We are particularly supportive of policies that mitigate and improve the micro-climatic conditions of the area and increase urban greening. The policy's support of complementary retail, leisure, cultural, health and educational land uses to encourage active frontages at ground floor is strongly supported.

Publica recommends that streetspace enhancements in the area should strengthen connections to the river and improve the 'gateway experience' of entering the cluster from the south. Improvements to large open spaces should improve seating, greenery and lighting and allow for activity and events. Smaller streets and lanes, alleyways and unique public spaces such as courtyards and churchyards should also be targeted for improvement, providing amenity and respite from larger, busier streets and spaces. Wayfinding should direct pedestrians to local open and green spaces around the area and external planting could increase the connections and access to nature in the area.

Ground floors and roofscapes should be designed to extend and interact with the public realm to deliver welcoming spaces that serve populations beyond building tenants and occupants. Publica also recommends encouraging spill-out activity for cafés, restaurants and bars along some of the key pedestrian routes. This could strengthen night time activity in the area and encourage a wider diversity of businesses and land uses in the area.

### **Strategic Policy S23: Smithfield and Barbican**

Publica supports the desire to maintain pedestrian permeability across the large cultural and residential sites in the area. Publica strongly supports the improvements to Beech Street and the proposed reduction in traffic volume and pollution across the wider area. Publica also strongly supports the ambition for a local Zero Emission Zone covering Barbican and Golden Lanes by 2022. We would recommend an even more ambitious proposal to improve the public realm further when traffic has been reduced and pollution mitigated by activating some of the blank frontages along Beech Street and improving the arrival experience to the area. We would also recommend strengthening connections to the highwalks in the area which are unique to the area's character.

Publica welcomes the identification of the area as having a mixed use character but would recommend clarification over what constitutes the special character of the area and would encourage greater

acknowledgement of the unique character and heritage of the area. The area is particularly striking for the layers of history that are visible and these should be highlighted and protected.

#### **Strategic Policy S24: Culture Mile**

Publica welcomes the strong support for Culture Mile in the Draft Local Plan and the reference to the Look and Feel Strategy for guiding signage, wayfinding and public realm design. Publica strongly supports the ambition to use Culture Mile to benefit local communities by improving access to culture, education, skills and employment opportunities.

Publica also supports the provision of cultural facilities within buildings and the public realm and the encouragement of diverse leisure, retail, food and beverage uses along the Culture Spine key route. Publica strongly supports the provision of premises for start-ups, creative and cultural workers. We also support the strategy for public realm improvements to accommodate increased pedestrian flows and support the desire to improve lighting, signage and wayfinding across the area.

#### **Strategic Policy S26: Liverpool Street**

Publica supports the improvement to key walking routes and the recognition that this area will act as a key transport hub with the potential to strengthen east west links to the City Cluster and the Smithfield and Barbican areas. Publica also welcomes the recognition of the value of creative businesses to the area and the desire to foster links between the creative sector, and education institutions. The support for night time activities, new retail and leisure activities as well as strengthened links to local markets is welcomed. These strategies can support an active, vibrant and characterful place to welcome workers and visitors.

Publica welcomes the ambition to provide step free access to Liverpool Street and to improve entry points while delivering high-quality public realm across the area. Additional thought should be given to the ways in which public realm designs can connect the area to surrounding areas that differ widely in character. Public realm improvements should also reduce visual clutter and barriers and strengthen signage to station entrances and other public transport networks.

## APPENDIX

### CITY OF LONDON AREA STRATEGIES

#### Bank Area Enhancement Strategy



The Bank area sits at the very heart of the City of London as the historic and contemporary home of London's financial and business communities. A thriving commercial centre, the area is the principal location of international banks, insurance companies and other financial establishments. Historic institutions, ancient churches, guilds and livery companies are also found within its streets.

The area is also a significant transport hub: Bank junction is the meeting point of six key roads and the underground station is one of the busiest on the network. Large volumes of people currently travel through the area daily, particularly during the morning and evening rush hours, and with significant new developments planned, a large uplift in the volume of users is anticipated.

Publica was commissioned by the City of London to develop a single public realm vision for the streets and spaces of the Bank area and to suggest positive ways in which the public realm could be improved and upgraded to accommodate anticipated future growth. Publica proposed addressing this project in two stages – with detailed stakeholder conversations and consultation before any strategic design would start.

Publica created a baseline survey of current conditions, documenting the specific qualities and condition of each street, character, patterns of use, movement, policy and the development context, with methods including mapping, film and photography. This baseline document formed the basis for an extensive multi-strand consultation process developed and run with the City of London, which included a mix of qualitative and quantitative research methods. Large multi-party stakeholder workshops run and facilitated by Publica were particularly productive, establishing an emerging set of shared aims and principles for the future. These priorities included improving the pedestrian environment – particularly around Bank junction – and reducing conflict between different modes of transport.

The strategy culminated in a vision for the Bank area's public realm and drawn briefs for identified streets and spaces. It focused on ways in which opportunities afforded by the area's historic alleys and lanes could be used as alternative routes for pedestrians and cyclists during peak hours and quieter rest spaces at other times. Publica worked closely with transport planners from Atkins and City of London planning officer to develop and refine the strategy.

In early 2013, following the City's public consultation on the draft strategy, Publica was additionally commissioned to analyse and report on its findings. The Bank Area Enhancement Strategy was adopted by City members in Summer 2013.

## Liverpool Street Area Enhancement Strategy



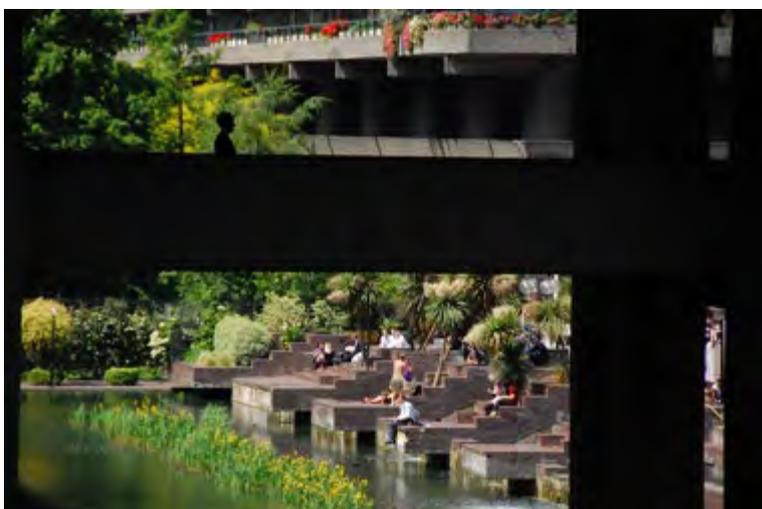
Publica was commissioned by the City of London to develop a survey, evidence base and strategy for the Liverpool Street Area in 2013. The strategy sets out the City's vision for transportation and public realm improvements in the Liverpool Street Area over 5 to 10 years. The area is part of the dynamic heart of the City of London and is key to its historic and contemporary status as home to a number of London's financial and business communities.

The area's townscape is derived from its historical development and its situation immediately outside London's old city wall. The street patterns comprises medieval lanes and alleyways, overlain by later, wider streets. The dense urban condition is broken up by a number of small open spaces.

The evidence base documents a number of challenges facing the area. The strategy area experiences high volumes of pedestrian use, with peaks coinciding with commuting patterns. The area is also a gateway to a number of emerging destinations such as Spitalfields, Brick Lane and Shoreditch.

The strategy identifies four key opportunity areas that sit within the Liverpool Street area at Middlesex Street, Bishopsgate, Sun Street/Eldon Street and the wider Liverpool Street, Moorfield and Moorgate area. These overlapping opportunity areas have differing characters, histories and urban conditions and the recommendations for place-specific-enhancements are tailored to respond to these diverse conditions. The plan was adopted as City of London policy in 2013.

## Barbican and Golden Lanes Area Strategy



Located in the north-west of the City of London, the Barbican and Golden Lane area has a unique and extraordinary urban mix. Internationally renowned residential estates and world-class cultural institutions sit alongside the world's largest financial centre.

Publica was commissioned by the City of London to develop an evidence base report and public realm strategy for the Barbican and Golden Lane area, alongside a complementary vision for the City of London cultural hub. Developed through a year-long process, the strategy provides a holistic appraisal of the aspirations and opportunities for the district and sets out recommendations and projects for improvements to streets and spaces, including those within the listed Barbican and Golden Lane estates.

The Barbican and Golden Lane Public Realm Strategy was developed alongside the Vision for the City of London Cultural Hub, bringing the physical and cultural aspects of the area together. The strategy seeks to retain and enhance the area's special and distinctive character, ensuring that the quality of the district's streets, spaces and public realm matches that of its world-class architecture, heritage and institutions. It proposes balancing wider change and development occurring across the district with aspirations for environmental improvements expressed through City of London policy, and by the area's resident, business and visitor communities.

Publica's response to this challenging context was to first undertake extensive fieldwork, research, analysis and engagement with local stakeholders. The findings of this work were summarized into 15 key points, which were further developed into a number of objectives for the area.

As part of the evidence base, Publica carried out an in-depth spatial and contextual study of the neighbourhood alongside an extensive engagement process, with stakeholders ranging from residents and businesses to major cultural and educational institutions. In total, the process engaged more than 4000 individuals.

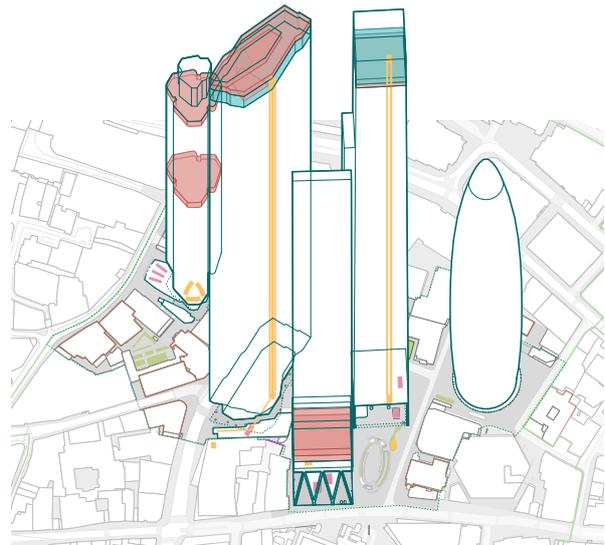
Our team undertook extensive mapping to record every cultural organisation, venue, public art, event and festival in the area, providing a comprehensive overview of local cultural activity. We also mapped the existing neighbourhood amenities, including schools, medical centres, cafes, pubs, shops and restaurants, play areas and green spaces. The findings of these analytical spatial studies informed the development of the Barbican and Golden Lane area strategy and the Vision for the City of London Cultural Hub.

The Barbican and Golden Lane Area Strategy sets out recommendations and projects for improvements to the district's streets and spaces. It responds to upcoming changes that will affect how the area functions, as well as the needs of its many users and residents.

The Cultural Hub Vision represents an innovative and important step in advancing the concept of the Cultural Hub and provides a framework for the City of London, its cultural partners and stakeholders to shape actions, further develop partnerships and effectively guide next steps.

Following consultation on the draft strategy in summer 2015, the Barbican and Golden Lane Area Strategy was adopted as City of London policy on 3 December 2015.

## Eastern City Partnership



The Eastern City area of the City of London is a globally recognised, thriving and commercially vibrant district. Stretching from Liverpool Street station to the entrance of Tower Bridge, the area encompasses the iconic tower cluster for the City, recognisable across the world as a calling card to London and a symbol of economic strength and confidence. The area is home to the greatest density of businesses and jobs in the square mile and although synonymous with the banking and insurance sectors, more recent years have seen a diversification of business types with an increasing number of SMEs, creative industries and a growing retail and leisure offer. The area presents an astonishing mix of old and new as some of the capital's oldest buildings and spaces sit juxtaposed against its most impressive contemporary architecture.

Despite the Covid-19 pandemic, the Eastern City is set to see significant growth due to its ongoing development pipeline. The introduction of the Elizabeth Line will play a major role in future expansion, with pre-Covid-19 projections bringing an additional 100,000 workers to the City of London by 2026. Whilst this presents substantial opportunity for the area, it also poses significant challenges including issues such as traffic congestion, increased air pollution and the potential overcrowding of the public realm. The City of London has already identified and begun to respond to the challenges associated with the forecasted growth in the Eastern City with their City Cluster Vision which sets out a clear strategy to enhance pedestrian priority, increase greenery and promote cultural activity across the area to ensure that it remains an attractive and competitive destination in the future.

The Eastern City Partnership has emerged to assist the City of London in delivering this vision, supporting growth in the area and aiming to make meaningful interventions within the public realm. Bringing together property owners, investors and occupiers, the Partnership will develop a collective voice for the business community and will galvanise the private sector in working together with the City of London on this important agenda. This collective voice will also allow the Partnership to harness the opportunities proffered by development in the area and to maximize the value of its world class assets.

Publica where commissioned to produce a Public Realm Asset Audit, which sits alongside a separate recommendations report entitled, *Contributing to the Transformation of Streets and Spaces*, that together identify and set out the steps required for the Partnership to achieve these ambitions. This audit is an important body of work focusing on the role and quality of publicly accessible public and private spaces across the area. The audit aims to provide a rigorous assessment of context - an evidence base - that will assist in informing priorities, concepts and projects, enabling the area to reach its full potential.

## Making London Child-Friendly



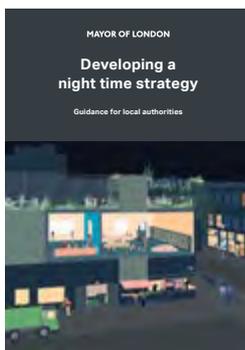
The Making London Child-Friendly report for The Mayor's Good Growth by Design programme, highlights how the design of the built environment can increase opportunities for young Londoners to become happier and healthier, by becoming independently mobile within their neighbourhoods and the city.

Developed in collaboration with the Greater London Authority, the report acts a catalyst to make London's built environment more child-friendly and accessible for young people. The four lenses of the inquiry – policy, participation, management and design – promote an integrated and holistic approach to independent mobility: the freedom to occupy and move around the public realm without adult supervision

Independent mobility is in decline, with significant consequences for the physical, social and mental development and health of people under the age of 18. Between 1971 and 2010, the number of children in the UK of primary school age allowed to walk to school by themselves has fallen from 86 percent to 25 percent.

Making London Child-Friendly examines best practice examples from around the world and identifies a range of recommendations for built environment practitioners to consider, in order to facilitate the independent movement of children and young people. The report is intended as a facilitator for a continued process of making London's built environment more child-friendly and accessible for young people through the development of dedicated design implementation. It was launched at City Hall on Monday 27 January 2020.

## Night Time Strategy Guidance



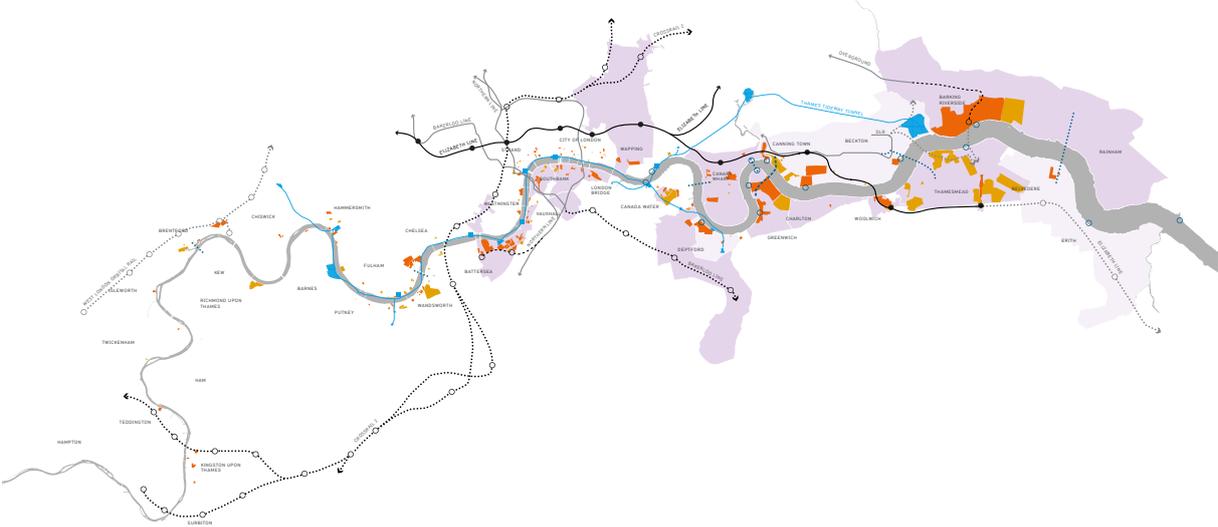
The guidance is addressed to local authorities in London seeking to develop a night time strategy, as recommended in the new London Plan. The guidance covers the creation, delivery and monitoring of a holistic night time strategy and is made up of three parts:

- Part 1: Guidance on process
- Part 2: Guidance, precedents and case studies
- Part 3: COVID-19 and the recovery of public life at night post-lockdown

The guidance advocates a holistic approach to night time. It emphasises that the allocation of land uses, and design and management of the public realm, must acknowledge and specifically plan for late and extended opening hours and use over 24-hours to help support responsible post-6pm activity. The guidance promotes

an evidence-based, partnership-led approach to planning and management of night time, and a nuanced and flexible attitude towards regulation to help support businesses and entrepreneurs who want to diversify activities to improve their viability, and test new ideas, while ensuring that workers' and residents' amenities are looked after.

### The Case for a River Thames Cultural Strategy



Publica was commissioned by the Greater London Authority (GLA) and the Port of London Authority (PLA) to build a case for the first ever cultural vision for the River Thames. An extensive evidence base was gathered through fieldwork and desk-based research, including a compilation of international precedents. The research informed short- and long-term recommendations for the GLA, forming the first phase of a multi-stage process for delivering a world-class vision. The is underpinned by robust research and analysis and was completed alongside extensive engagement with stakeholders through workshops with 98 individuals from 67 organisations, including representatives from riparian boroughs, Business Improvement Districts, major cultural organisations, and developers.

OTHER

### **Quality of Life Foundation Literature Review**

The Quality of Life Foundation commissioned Publica to conduct a literature review of current academic studies and government reports, guidance, strategies and policies addressing the links between quality of life and the built environment. The aim of the review was to identify key themes and specific pathways through which the buildings, communities and neighbourhoods where people live and work support a high quality of life.

Quality of life was conceptualised broadly as the ease, comfort, independence and enjoyment that people experience to support happy, active, sociable, interesting and meaningful lives. It is the accumulated impact of day-to-day activities and encounters that leads to an overall sense of physical and mental wellbeing. Across all the material studied in this review it is understood, to a degree, that quality of life and wellbeing can be supported, or infringed upon, by the places in which people's lives play out.

By reviewing existing evidence, identifying gaps in the literature and assessing current practices, the review sought to reveal unexplored avenues for the Quality of Life Foundation to influence decision-makers.

Six themes were identified to organise the literature review. These address what people need from their homes and communities to support quality of life:

- A sense of control and agency among residents over their environment
- Ease of movement
- Belonging and togetherness
- Feeling cared for
- Access to nature
- Enjoyment, fun and wonder

The review sets out strategies for ensuring these drivers of quality of life are embedded in the places and neighbourhoods currently being built. Publica identified opportunities for better delivering and valuing quality of life outcomes during the land assembly, planning, design, construction, management and evaluation of new developments. The research therefore both identifies what makes a place supportive and conducive to a good quality of life and the practices that either support or hinder these outcomes being delivered.

The research and findings were presented to the Quality of Life Foundation board in January 2020 and on March 1st 2021, the Quality of Life Foundation will launch its framework, building upon the six identified themes to establish the actions developers, designers, communities and local authorities can take to deliver places that promote a good quality of life for all, now and in the future.

10th May 2021

Dear Sir/Madam,

**Re: Regulation 19 Consultation - City Plan 2036**

On behalf of the Fleet Street Quarter ('FSQ'), a business-led Partnership which represents a number of businesses within the Fleet Street area, we would like to make our representation on the draft City Plan 2036.

The FSQ's goals are to harness growth and opportunities so as to reinvigorate and enhance the Fleet Street area into a vibrant and sustainable district. It is a long-forgotten part of the City of London, but has a rich history that presents an opportunity for its reinvigoration through the modern renewal of its past.

The Fleet Street area is an iconic location. It is the former home of the press but has changed in character as the newspaper and publishing industries moved away. The western extent of the area comprises the legal precincts of the Inner and Middle Temples and adjoins the Royal Courts of Justice in the City of Westminster. To the east, the St Paul's Conservation Area extends up much of Ludgate Hill and surrounding streets and frames the approach to the St Paul's Cathedral, which is an internationally recognised landmark on the London skyline sited at one of the highest points in the City and was London's tallest building between the early 18th century and the 1960s. Fleet Street, Ludgate Circus and Ludgate Hill form part of the ancient processional route between Westminster and the City of London (where the Temple Bar Gate once stood), providing iconic views of St Paul's Cathedral.

As stewards of change, the FSQ wants to breath life into the history of Fleet Street by ensuring that the Fleet Street area becomes a multi-use area, one that cherishes and embraces its heritage but through modern place-making provides the quality and scope to be a destination magnet all through the week for visitors, residents, workers, businesses and commerce who want to live, work, and visit. This goes to the core of making the Fleet Street area sustainable, resilient and inclusive in the City's recovery plan post Covid-19.

Only through creating the Fleet Street area as a stimulating and exciting part of the Square Mile can this be achieved and this is why the place-making consideration of the Fleet Street area through the draft City Plan 2036 is vital. The draft City Plan 2036 is a plan for the future development of the City of London, setting out what type of development the City of London Corporation expects to take place and where.

We strongly agree with the three visions/strategic objectives that the draft City Plan 2036 embraces, namely (1) to contribute to a flourishing society; (2) to support a thriving economy; and (3) to shape outstanding environments, as all three play an important role in driving regeneration and investment for the City but also for the Fleet Street area.

As much as we agree that that Fleet Street and Ludgate area are a key area of change as identified in paragraph 3.4.5 of the draft City Plan 2036, this area needs to be considered more than just a centre for the judiciary and related business in the City that will be enhanced by the development of a new court building and City of London Police Station.

The draft City Plan 2036 needs to be more radical and dynamic of its consideration of the Fleet Street area under Section 7.7. 'Fleet Street and Ludgate Key Area of Change'. The draft City Plan 2036 has to embrace the historic landscape of the Fleet Street area but has to also be innovative and creative in how it puts a new modern layer on this. The Fleet Street area needs to evolve, so as to become more attractive and inclusive in order to remain competitive.

We see the Fleet Street area as being able to successfully encompass many more offerings than the current draft City Plan 2036 envisages, namely:

- leisure/entertainment (the introduction of a Ned equivalent as seen on Cheapside, for example, as well as more public amenities and areas to be able to host outdoor events and markets);
- art and cultural offerings (including space for cinema, theatre, museum and art gallery);
- educational institutions (the potential for the introduction of a Business School and a home for the London School of Fashion);
- creation of a Tech Quarter (to 'unpack' the legal sector's value chain), specialising in cyber security services. Whilst still supporting the areas legal reputation , this would help expand the 'make up' and working patterns of the employment base within Fleet Street. The area would no longer be solely dominated by legal and financial professionals, thereby helping to diversify the demand for hospitality and leisure services, and thus improve the vitality of the area. Together, this could help to reposition Fleet Street and give it a new identity as a Tech and Legal hub;
- hospitality and retail that caters for more than just the lunchtime workers and extends beyond the Fleet Street Principal Shopping Centre as identified in the draft City Plan 2036;
- tourism offerings into the evenings and the weekends;
- better flexibility that could allow for more pop ups and meanwhile spaces;
- private and social housing (especially on the south of the Fleet Street area rather than just Fetter Lane as identified in the draft City Plan 2036);
- modern flexible office space which introduces complimentary spaces such as a cycle hub and promotes publicly accessible green roof tops as this part of the City of London currently does not have any;
- a hub-centre for people to come together where innovations can be developed;
- delivering improvements in the public realm by creating new pocket parks and outdoor event/ market spaces, promoting more publicly accessible green roof tops, opening up direct access to the River Thames, making pavements and areas wider and safe and accessible for all (including those in wheelchairs and using prams or for those who are partially sighted, for example);

providing cycling infrastructure and encouraging active public transport usage especially given the transport connections this area has (City Thameslink is within the Fleet Street area but it is surrounded on the outskirts not only by tube stations such as Chancery Lane (Central Line) and Temple (District and Circle Line) and Holborn (Piccadilly Line), but also the new Elizabeth Line at Farringdon Station);

grasping the use of digital technology in the transformation of the Fleet Street area; and

more focus around sustainability/net zero ambitions with tangible initiatives and outcomes (rather than just an overarching aim as identified in the draft City Plan 2036).

The draft City Plan 2036 not only needs to progress the above offerings but also needs to make sure that these changes can also influence our wider Partnership boundary, namely the boundary with the City of Westminster and Camden, but also with Lambeth, Southwark and Islington

The draft City Plan 2036 can support the regeneration of the Fleet Street area in a more exciting and stimulating way if the City of London Corporation stands back and thinks outside of the box. This is particularly important as we look forward to emerging from the Covid-19 pandemic. This is the once in a lifetime opportunity that the City of London Corporation has to press the reset button and to move the City positively ahead to make sure that the City remains attractive to world-class talent, enhances opportunity for all and contributes to London's and the UK's continued success. Progress requires change.

We want to celebrate the future of the Fleet Street area and we hope the City of London Corporation will embrace these proposals in the draft City Plan 2036 so as to support the ongoing regeneration and enhancement of the wider Fleet Street area.

Kind regards,



**NAME REDACTED**

Chair, FSQ Public Realm & Environment Steering Group

Fleet Street Quarter Partnership



# City of London Local Plan

## Publication Stage Representation Form

Ref:

(for official use  
only)

**Name of the Local Plan to which this representation relates: City of London City Plan 2036**

**Please return to the City of London Corporation by 6pm on 10 May 2021**

This form is in two parts:

**Part A** Personal Details

**Part B** Your representations(s). Please fill in a separate sheet for each representation you wish to make.

### Privacy Notice

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's website and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

The Planning Inspectorate has published a privacy statement for local plan examinations which is available at: [Planning Inspectorate Privacy Notice](#)

**Part A**

1. Personal Details\*

*\* If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: NAME REDACTED

Last name: NAME REDACTED

Address Line 1: [REDACTED]

Line 2: [REDACTED]

Line 3:

Line 4:

Post code: [REDACTED]

Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

## Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant      Yes       No

4.2 Sound      Yes       No

4.3 Complies with the duty to co-operate      Yes       No

**Please add a x as appropriate**

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please to set out your comments here

I wish to support the soundness of the Local Plan but would add the NLA to the list of cultural organisations who can make a contribution to the Culture Mile.

The NLA already has a base in the City Centre but the changing nature of the Square Mile, the impact of COVID and the City's Recovery Plan requires a higher profile debate about the future of cities in general, of the built environment, of sustainable design, place making, public engagement in decision-making and architectural quality. The creation of a centre of excellence for the built environment would provide space for innovation, for startups and incubation.

These are local and global issues and ones where the City can lead the national and international debate.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

***Please note:*** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

**Please note** that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date:

## NAME REDACTED

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**From:** [REDACTED]  
**Sent:** 19 May 2021 17:26  
**To:** NAME REDACTED, NAME REDACTED  
**Subject:** City Plan 2036 Consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear NAME REDACTED, NAME REDACTED,

Please accept our apologies for this late consultation response to the City of London Plan 2036. SAVE Britain's Heritage would like to propose the following wording for two important heritage related policies:

**Policy S11 (Historic Environment) (para 3):** seeking enhanced public access and heritage interpretation, ensuring that heritage and culture is for all, ensuring it is brought to more diverse audiences and demographics in a way that is socially and economically inclusive.

**Policy S19 (para 4):** preserving and enhancing heritage assets, bringing heritage to life through enhanced public access and creative interpretation, embedding heritage in the uses and Cultural Plans in a way which is socially and economically inclusive.

Yours sincerely,

NAME REDACTED

NAME REDACTED  
Conservation Officer



ADDRESS REDACTED  
Tel: NUMBER REDACTED

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