

**From:** WOLFSON OF TREDEGAR, Lord [REDACTED]  
**Sent:** 27 May 2024 12:52  
**To:** Planning Policy Consultations  
**Subject:** Local Plan 2040

**Categories:** CONFIRMED

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I make this representation that the Local Plan 2040 as drafted is **not sound**. I make this representation generally, but specifically in respect of Policies HE1, S12 and S13 and the Policies Map.

I consider the draft unsound on the following grounds:

HE1 does not adequately protect heritage assets. It is not enough that development should “consider” enhancing conservation areas; enhancement should be actively **sought and pursued**. HE1 also does not adequately protect Bevis Marks Synagogue. As drafted, HE1(8) refers to the Synagogue’s defined “immediate setting”; however no such concept of immediate setting exists. As with other heritage assets, the **whole** setting of the Synagogue should be protected. This is particularly important because the Synagogue is included in the Tall Buildings Area, and the permissible height contours in Figures 14 and 15 clearly impinge upon the Synagogue and its setting.

S12 and S13 tall buildings policies are also inadequate. They should not simply “take into consideration local heritage assets” as 12(5) states, but must pay **full regard** to and **preserve and enhance** the significance of those assets. S13 should protect views of and from the Synagogue in the same way as The Monument is treated.

The current Local Plan Policy CS14 presumption against tall buildings in Conservation Areas must be retained in the new draft. As well, a sentence should be added to clarify that the Tall Buildings Area does not override heritage and townscape considerations.

I reserve the right to add or amend my proposed changes.

Yours sincerely

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**Lord (David) Wolfson of Tredegar, KC**

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