

## Local Plan 2040

R0034

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To: Planning Policy Consultations &lt;PlanningPolicyConsultations@cityoflondon.gov.uk&gt;

THIS IS AN EXTERNAL EMAIL

Dear Sirs

Please treat this as my formal representation in relation to the Local Plan 2040 (the Plan).

As currently drafted, in my view the Plan is unsound. I make this representation generally but specifically with regard to Policies HE1, S12 and S13 and the Policies Map.

HE1 does not adequately protect heritage assets. It is not sufficient that development should "consider" enhancing conservation areas; positive enhancement of such areas should be an express objective. In particular, HE1 does not adequately protect Bevis Marks Synagogue. As drafted, HE1(8) refers to the Synagogue's defined "immediate setting"; however, the concept of an immediate setting is misconceived. As with other heritage assets, it is the entire setting of the Synagogue that 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 on the Synagogue and its setting.

The tall buildings policies in S12 and S13 are also inadequate. They should not simply "take into consideration local heritage assets", as S12(5) provides. They should pay full regard to, and preserve and enhance, the significance of such assets. S13 should protect views of and from the Synagogue in a similar way to that in which The Monument is treated. In addition, special regard should be required to be paid to the cultural and religious importance of the Synagogue.

The presumption against tall buildings in Conservation Areas in the current Local Plan Policy CS14 must be retained in the Plan. In addition, it should be stated clearly and unequivocally that the Tall Buildings Area does not override heritage and townscape considerations.

I reserve the right to make further representations in due course.

Yours faithfully

Donna Seruya