

**Felgate, Gavin**

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**From:** [REDACTED]  
**Sent:** 24 May 2024 12:22  
**To:** [REDACTED]  
**Subject:** Representation to the Draft City Plan 2040  
**Categories:** CONFIRMED

THIS IS AN EXTERNAL EMAIL

To whomever it may concern,

I consider the draft City Plan 2040 to be unsound for the following reasons:

### ***Strategic Policy S12 Tall Buildings***

The policy wording regarding tall building in conservation areas being regarded as inappropriate has been removed. The logic for this amendment remains unclear given that the previous wording was not in conflict with the approach set out in London Plan policy D9. The previous wording was a well understood and long-standing element of the City's policy approach to tall buildings which has helped with managing emerging proposals. It is potentially problematic given the relatively low-rise nature of some conservation areas within the City.

Therefore I consider the amendment would significantly weaken the level of protection for the historic environment.

### ***Policy HE1 Managing Change to the Historic Environment***

Clause 8 introduces the principle of an 'immediate setting' for the Grade I listed Bevis Marks synagogue. This immediate setting is defined in the supporting policy paper as the six buildings that effectively encircle and enclose the synagogue and its courtyard. This is not in conformity with the NPPF, which in the glossary defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'.

This NPPF definition does not distinguish between an immediate and wider setting. Making this distinction without also providing policies applicable to the wider surroundings provides only a partial policy framework for managing change in the setting of the synagogue,.

Furthermore, clause 8 as set out carries an inference that effects on the immediate setting should be the primary consideration in determining development proposals. This partial approach introduces ambiguity and is contrary to NPPF.

### ***Section 14 Key Areas of Change: Strategic Policy S21 City Cluster***

Clause 6 states that development proposals 'have regard' to the immediate setting of Bevis Marks synagogue. This does not offer an appropriate level of protection for the Grade I listed building as it does not reflect the statutory duty of the 1990 Act.

I reserve the right to add or amend my proposed changes and I should welcome being invited to participate in discussion at the Plan's examination.

Please confirm receipt of this representation,

Kind regards,

Keren Querfurth MSc. BArch(Hons) FRSA

