


## City Plan 2040 – Regulation 19 public consultation - LAMAS Comments

R0104

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Sat 6/8/2024 12:10 PM

To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>  
[REDACTED]

 1 attachments (62 KB)

Model Representation Form for City Plan 2040 LAMAS Comments.docx;

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**THIS IS AN EXTERNAL EMAIL**

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning matters relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage. We have reviewed the proposed City Plan 2040 and our comments are summarised in the attached Model Representation Form for Local Plans, for your consideration.

Kind Regards  
Stephen Gill  
HBCC  
London and Middlesex Archaeological Society

## Model Representation Form for Local Plans

 <p><b>CITY OF LONDON</b></p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p><b>Ref: Reg 19</b></p> <p><b>(For official use only)</b></p>
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**Name of the Local Plan to which this representation relates:**

City Plan 2040

**Please return to City of London Corporation BY 11:00PM 31 May 2024**

emailing to: [planningpolicyconsultations@cityoflondon.gov.uk](mailto:planningpolicyconsultations@cityoflondon.gov.uk)

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at [www.cityoflondon.gov.uk/privacy](http://www.cityoflondon.gov.uk/privacy)). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](http://City Plan 2040 - City of London).

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This form has two parts –

Part A – Personal Details: need only be completed once.

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

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### Part A

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#### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title

#### 2. Agent's Details (if applicable)

(where relevant)

Organisation

London and Middlesex  
Archaeological Society

(where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone  
Number

E-mail Address  
(where relevant)

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## 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

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please tick 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 also use this box to set out your comments.

LAMAS welcome the City of London Local Plan 2040, but regret that it has no direct statement to say that the City of London are fully committed to the protection and safeguarding of the City of London's listed buildings and conservation areas. Local Plan 2015 - Policy DM 12.2 – Development in Conservation Areas, and policy DM 12.3 - Listed Buildings have both been deleted from the 2040 Local Plan, diminishing the emphasis on the protection of these irreplaceable assets and spaces.

The 2015 plan - Core Strategic Policy CS12: Historic Environment identifies the need to:

1. Safeguard the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.
2. Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them

There is no similar stated aim within the 2040 plan to safeguard listed buildings and conservation areas.

Local Plan 2015 Core Strategic Policy CS14: Tall Buildings para 2 states that 'planning permission for tall buildings will be refused within inappropriate areas, comprising: conservation areas'. There is no equivalent aim stated in the 2040 plan. The City of London has a duty to protect conservation areas, which should continue to include the refusal of planning permission for tall buildings in these areas.

(Continue on a separate sheet /expand box if necessary)

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.

It should be clearly stated within Strategic Policy S11: Historic Environment that the City of London are fully committed to the safeguarding of the City of London's listed buildings and conservation areas, in accordance with Section 16 of the NPPF 2021.

Strategic Policy S12: Tall Buildings should be amended to include the stated aim that 'planning permission for tall buildings will be refused within conservation areas', as currently stated in the City of London Local Plan 2015 Core Strategic Policy CS14.

(Continue on a separate sheet /expand box if necessary)

**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)?

**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.

