
From: DEECH, Baroness [REDACTED]
Sent: 30 May 2024 14:47
To: Planning Policy Consultations
Subject: Draft new City Plan
Attachments: Bevis Marks.docx

Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Representation attached

Baroness Deech DBE KC
[REDACTED]

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Model Representation Form for Local Plans



Ref: Reg 19

Local Plan Publication Stage Representation Form

(For official
use only)

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

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). Please also see our Statement of Representations Procedure available at: City Plan 2040 - City of London.

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.

Part A

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.*

2. Agent's Details (if
applicable)

Title

Baroness

First Name

Ruth

Last Name

Deech

Job Title

Peer

(where relevant)

Organisation (where relevant)	House of Lords	
Address Line 1	Westminster	
Line 2	London	
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (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	HE1, S12, S13	Policies Map	Yes
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes		No	

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.

The draft City Plan fails to protect one of the most important religious buildings in the world, Bevis Marks. It has to prevent large scale and tall new developments in its vicinity. In general too, there should be no more such large and tall new buildings in the City, its history and atmosphere risk being ruined. Para HE1(6) should mandate the preservation of conservation areas. Para HE1(8) should specify that the whole setting of the synagogue and its immediate surrounds should be protected. In para S13 the Monument is protected and the synagogue should be given the same protection. Policy S12(5) - tall buildings must give way to the preservation of heritage assets; it is not enough to take them into consideration. Tall Buildings Area and related height contours in Figs 14 and 15 must exclude the synagogue and its setting. The presumption against tall buildings in conservation areas which is currently in Policy CS14 of the City Plan should be included in the new Plan.

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.

Modify as follows

Policy HE1.6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be **positively sought and pursued**

8. Development in the **setting** of Bevis Marks Synagogue . . should . . enhance the elements of setting that contribute to the significance of these heritage assets

Policy S12.5. The suitability of sites. . **should pay full regard to the need to preserve or enhance the significance of heritage assets . . Planning permission for tall buildings will be refused within inappropriate areas, which include conservation areas**

Policy S13.2 after "Monument" add **and Bevis Marks Synagogue**

Add to Policies **Tall Buildings Area does not override heritage and townscape considerations**

I reserve the right to add to amend these proposed changes in due course

(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:

Over time the protection given to the Synagogue has become insufficient and the draft new City Plan would remove it altogether if not modified, with very damaging consequences that would be felt beyond the UK. The examining inspector needs to have this fully explained by interested parties and the objectors who have the preservation of the heritage and beauty of the city at heart.

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.