

Felgate, Gavin

From: Ben Crowne [REDACTED]
Sent: 14 June 2024 07:48
To: Planning Policy Consultations
Subject: Local Plan representation

Categories: CONFIRMED

You don't often get email from [REDACTED]. [Learn why this is important](#)

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:

1a. HE1 does not adequately protect heritage assets. "Enhancement" should be actively sought and pursued, it is not enough that development should "consider" enhancing conservation areas;

1b. HE1 also does not adequately protect Bevis Marks Synagogue. As drafted, HE1(8) refers to the Synagogue's defined "immediate setting"; however this term is not defined. 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. As with other heritage assets, the whole setting of the Synagogue should be protected, including protection from encroachment/overshadowing by tall buildings.

2. S12 and S13 tall buildings policies are also inadequate. These must pay full regard to and preserve and enhance the significance of heritage assets, and not simply "take into consideration local heritage assets" as 12(5) states. S13 should protect views of and from the Synagogue in a similar way to the way a contemporaneous and similarly-significant structures like The Monument is treated (albeit special regard should also be paid to the culturally and religiously important setting of the Synagogue).

3. 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. This would avoid ambiguity for users of the plan and prevent the local plan from being misunderstood as superseding these considerations.

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.

Kind regards,

Ben Crowne