

**Felgate, Gavin**

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**From:** Abigail Green [REDACTED]  
**Sent:** 16 June 2024 08:11  
**To:** Planning Policy Consultations  
**Subject:** Representation re: City Plan 2040  
**Attachments:** 240521 - Abigail Green Representation-City-Plan-2040 v1.0.docx

**Categories:** CONFIRMED

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Abigail Green  
Professor of Modern European History,  
Brasenose College,  
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Check out the Jewish Country Houses project: <https://jch.history.ox.ac.uk/>

Available for preorder: *Jewish Country Houses* (eds. Juliet Carey & Abigail Green), with new photography by H el ene Binet... <https://www.amazon.co.uk/Jewish-Country-Houses-Juliet-Carey/dp/1800810350/>

## 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

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

Professor

First Name

Abigail

Last Name

Green

Job Title

Professor of Modern  
European History

(where relevant) Organisation	University of Oxford	
(where relevant) Address Line 1	Brasenose College	
Line 2	Radcliffe Square	
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 and 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	No
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.

In general, the draft City Plan fails to give sufficient weight to heritage considerations. Despite some seemingly reassuring words, the effect of the various policies is to make it easier to justify large scale new development than to argue that such development is inappropriate for heritage and townscape reasons. This is a general objection which is applicable throughout the document, but the following are specific points of objection.

Policy HE1(6) should be strengthened. It is not enough that opportunities to enhance conservation areas should be “considered”. They should be positively sought and pursued.

Policy HE1(8) refers to the “defined immediate setting” of the Synagogue. “Defined immediate setting” is not a recognised concept, and introducing it has the effect of detracting from the generality of Policy HE1(7). HE1(8) should be amended to specify that the whole setting of the Synagogue should be protected.

The Synagogue and The Monument are given equal status as very important and sensitive heritage assets in policy HE1. However, subsequently, and specifically in policy S13 and para 11.5.11, The Monument is given significantly more protection than the Synagogue. In particular, Figure 16 shows protection given to views “of and from”<sup>1</sup> The Monument but the same does not apply to the Synagogue. The same treatment should apply to the Synagogue as to The Monument.

Policy S12(5): it is insufficient for tall buildings to “take into consideration local heritage assets”. They should pay full regard to the need to preserve or enhance the significance of heritage assets of all types.

It is inappropriate that the Tall Buildings Area and the related height contours in Figures 14 and 15 should imply that the development of tall buildings very close to the Synagogue is permissible. Either these Figures should be amended to exclude the setting of the Synagogue, or else a strong protection should be introduced elsewhere (including Figure 16) to override the generality of what is shown in these figures and to make it clear that the protection of the setting of The Synagogue is to take precedence.

The presumption against tall buildings in Conservation Areas contained in Policy CS14 of the current City Plan should be retained and imported into one of the policies of the new Plan (probably Policy S12). The current policy says that the Corporation will refuse “planning permission for tall buildings within inappropriate areas, comprising: conservation 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.

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<sup>1</sup> The wording is contained in Policy S13

The following modifications are sought. Consequential modifications to supporting text, Figures and the Proposals Map may also be required.

#### 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 ~~considered~~ positively sought and pursued;

8. Development in the ~~defined immediate~~ setting of Bevis Marks Synagogue and The Monument should preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets; and,

#### Policy S12

5. The suitability of sites for tall buildings within the identified areas and their design, height, scale and massing should ~~take into consideration local~~ pay full regard to the need to preserve or enhance the significance of heritage assets and other localised factors relating to townscape character and microclimate.

#### Add sentence:

Planning permission for tall buildings will be refused within inappropriate areas, which includes conservation areas.

#### Policy S13

2. Protecting and enhancing significant local views of St. Paul's Cathedral, through the City Corporation's St. Paul's Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and Bevis Marks Synagogue and views of historic City landmarks and skyline features;

A statement to be added to at least one of the policies to clarify that the Tall Buildings Area does not override heritage and townscape considerations.

The objector reserves the right to add to or 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

**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:

The modifications sought arise from the fact that, over a period of time, the Synagogue appears to have been the subject of a process whereby an appearance has been given of it being given protection against having its setting severely damaged by tall buildings, but in reality that protection is illusory, and the protection given in the current City Plan (where there is a presumption against tall buildings in Conservation Areas generally) is proposed to be withdrawn. This represents an abuse of process by the City Corporation, which not only renders the draft Plan unsound but would have seriously damaging consequences if not rectified.

The matter is complex and it is important the examining inspector(s) has the opportunity to have the position explained fully to them by the objector and other interested parties.

**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.