

R0164

## City Plan 2040 Response

chair@cityheritage.org.uk [REDACTED]

Mon 6/17/2024 10:18 PM

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

📎 1 attachments (212 KB)

240613 CHS City Plan 2040 Response.pdf;

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THIS IS AN EXTERNAL EMAIL

To whom it may concern,

Please find attached a letter on behalf of the City Heritage Society.

We have completed individual forms on the Commonplace website under each relevant chapter.

Yours faithfully,

Chris Fowler

Chairman, City Heritage Society

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# CITY HERITAGE SOCIETY

The Civic Amenity Society of the City of London  
Founded 1973

Registered Charity No. 275988

Chair: Christopher Fowler

14 June 2024

Dear Mr. Richards and the City of London Planning and Development Team,

## **Reference: CITY PLAN 2040, Regulation 19 Consultation**

I am writing on behalf of the City Heritage Society to formally object to the City of London Corporation's City Plan 2040. Our grounds for this objection are set out in this letter. We wish to participate in the examination hearing sessions.

Chapter and section references below are taken from the "Revised Proposed Submission Draft", dated April 2024 and retrieved on 27 May 2024.

### Chapter 1: Strategic Priorities

The basis for much of the harm that will be caused by provisions of the City Plan 2040 is your erroneous and poorly evidenced strategic priority of increasing office floor space in the City by 1.2m square feet of net additional floor space by 2040.

As a result of this, we believe that your Economic Objective, set out in Section 1.2 of the draft Plan, is not sound. It is not based on an objective consideration of the City's needs, but rather a report from a renowned architecture and engineering firm which stands to profit considerably from the policy whether or not the subsequent office space is used. Projections for increases in office space demand are not referenced in the report for further scrutiny.

Furthermore, it is not sound, as it is not based on considering sustainable development across other authorities and London as a whole, and is not justified by post-pandemic demand data.

The City's office vacancy rate stands at 12.1% in 2024, up from 10.8% in 2023 and above the projections by Savill's of 8.3%. This remains higher than the vacancy rate in the West End for the fourth year in a row. The vacancy rate in the Docklands is currently estimated at between 16.6% and 20% by CoStar and Green Street. Savill's, among others, highlights that refitting for quality is driving the market, rather than new space. This makes sense in a world where London and South East rail operators report that commuting is still down at 67% of pre-pandemic levels, with no growth in this figure expected in this financial year, and where the Chartered Institute for People Development reports that over a third of UK employers advertise all or most of their new vacancies as featuring home working.

### Chapter 11: Heritage and Tall Buildings

This section is not sound due to a) conflict with the principles outlined in the UK National Planning Policy Framework, b) the current and foreseeable demand for office space post-Covid-19 pandemic, your erroneous and poorly evidenced forecasting of which drives the apparent demand for tall buildings, and c) failure to abide by the duty to co-operate.

## **Conflict with the National Planning Policy Framework (NPPF)**

The UK National Planning Policy Framework (December 2023) emphasises the protection and enhancement of Conservation Areas. The NPPF states that these areas are designated to conserve and enhance the historic environment, and any development within these areas must respect their unique character. It further articulates that the significance of heritage assets should be sustained and enhanced.

Specifically, the NPPF outlines:

- Paragraph 201: Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal.
- Paragraph 205: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
- Paragraph 206: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Your 'City Cluster' area, in which buildings of up to 300 metres above ordnance datum will be permitted, overlaps with seven Conservation Areas, two in their entirety, and is adjacent to three others. It contains around 20 listed buildings, of which six are listed at Grade I.

The construction of very tall office buildings within Conservation Areas would irreversibly alter the historic character and appearance of these areas, contravening the core principles of the NPPF designed to protect them. Tall buildings in or adjacent to the ten Conservation Areas affected will not respect the unique character of those, supposedly protected, parts of the City, which are low-rise and human in scale.

While we welcome your warm words in Chapter 2, Section 1.11, which states that “the unique character of different parts of the City [...] will be celebrated, protected and enhanced”, we do not see how this is consistent with the City Cluster area plan set out in Strategic Policy S12.

### **Current and Foreseeable Demand for Office Space**

As we note above, the rationale for permitting such developments appears to lack consideration of the current economic climate and market trends. The demand for office space has softened significantly following the Covid-19 pandemic, a trend that is expected to continue. Many businesses have adopted remote and hybrid working models, reducing the necessity for large office spaces.

Market analyses and forecasts indicate that this reduced demand for office space is not a temporary phenomenon but rather a long-term shift in how businesses operate. Approving the construction of very tall office buildings in this context will lead to unnecessary vacancies and underutilised spaces, further contradicting principles of sustainable development.

### **Duty to Co-Operate**

There is no reference in Chapter 11 to the impact on other local planning authorities. Given its location and the permitted heights therein, the City Cluster tall buildings area will inevitably have an impact on, among others, the London Borough of Tower Hamlets (including on the setting of three of its conservation areas: The Tower, Wentworth Street and Artillery Passage).

### **Chapter 14: The Temple, the Thames Policy Area & the Key Areas of Change**

Our objection to elements of Chapter 14 has overlaps with our objections to Chapters 1 and 11 as stated above.

Specifically in regards to Bevis Marks Synagogue, we find it astounding that the City has sought to carve out a protection scheme for the synagogue without the inclusion of the Bevis Marks community. At your heritage event on 14 May 2024, Rabbi Shalom Morris of Bevis Marks made clear that neither he nor the worshipping community at large had been consulted on this policy.

The resultant “immediate setting of Bevis Marks synagogue”, detailed in Strategic Policy S21, is drawn on your policy maps in such a way as to exclude the contentious 31 Bury Street development from the protected area. Given that Common Councillors wisely chose to reject the 2021 planning application against the advice of the Corporation’s planning officer, we consider the lack of consultation with the synagogue community and the omission of 31 Bury Street from the protected area to be deliberate and done in such a way as to aid the approval of the new 2024 planning application for 31 Bury Street. We therefore do not believe that Strategic Policy S21, as detailed in Chapter 14 and set out in the policy maps, is sound, due to being neither positively prepared nor justified. It is also at odds with NPPF paragraph 206, given that permitted development on the 31 Bury Street site should clearly be considered development within the setting of a Grade I listed building, and substantial harm to it should therefore be wholly exceptional.

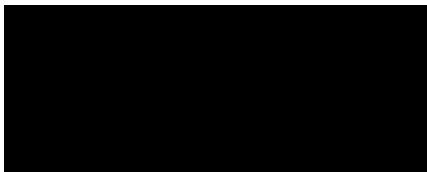
### Request for In-Person Representation

In light of these significant concerns, we request that the City Heritage Society be granted the opportunity for in-person representation at the forthcoming examination sessions. Our participation will ensure that the importance of heritage and of the unique townscapes protected by our Conservation Areas are given due consideration.

We trust that the City of London Corporation will give careful consideration to our objections. The preservation of our Conservation Areas is of utmost importance, and we must adhere to the spirit and letter of protections afforded by the NPPF to safeguard these valuable heritage assets for future generations.

Thank you for your attention to this matter. We look forward to your response and to the opportunity to contribute further to the planning process.

Yours sincerely,



Christopher Fowler  
Chairman, City Heritage Society