

Comments on Pre-Submission Draft of the City of London Local Plan "City Plan 2040"

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

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Letter CoL LocalPlan RachelBlakeOffice.docx;

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Please find attached comments on the Draft Local Plan.

Rachel

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Labour's candidate to be the MP for Cities of London and Westminster

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17th June 2024

Environment Department
City of London Corporation
The Guildhall
London EC2V 7HH

By email: planningpolicyconsultations@cityoflondon.gov.uk

Dear Planning Policy Team,

City of London – Local Plan Regulation 19 Consultation

Thank you for the opportunity to comment on the Pre-Submission Draft of the City of London Local Plan “City Plan 2040”. Considering the urgent need to improve and expand housing provision in the City, the need for commercial renewal, the sensitivity of the City’s architectural heritage, together with the role of the Local Plan ensuring the City’s successful conservation, I set out my comments on this version of the draft below.

Summary

- Broadly, while I support many of the aims of this document, I consider the draft Plan to be unsound in its present form.
- This letter briefly outlines four areas of concern: Housing, Heritage and Bevis Marks
- I am aware of both the important role of the City of London in terms of the regional and national economy – Labour supports truly sustainable development and Good Growth. However, this draft Plan would not deliver either as it does not conform with national and regional planning policy across several areas.
- Policies within the draft Plan would preclude meaningful conservation of the historic environment in the City. Essentially, potential housing targets and the imperative for conservation conflict with delivering the quantum of office floorspace growth envisaged and new tall buildings in the form and locations identified. The Plan may not be effective as a result.
- If adopted, the Plan would entail severe harm to the significance of St Paul’s Cathedral, to the Outstanding Universal Value of the Tower of London World Heritage Site, to the significance of many of the City’s finest buildings and to the City’s historic character.
- It would be beneficial to rebalance the relationship between the economic, social and environmental strategic objectives to ensure the draft Plan aligns with sustainable development principles.

Much of the content of the draft Plan sets out positive aspirations for the historic environment. I welcome the recurrent theme in various sections of the Plan on the retrofit and refurbishment of existing buildings, however more attention should be given to the realities of how this effects housing. I also note the extensive evidence gathering and assessment work that has been undertaken since the previous consultation on the Local

17th June 2024

Plan. This has enabled greater clarity over key elements of the Plan, not least the location and heights of tall buildings.

This document is an opportunity to better anticipate future needs for housing and this is a key gap in the document.

Housing

As the "City Plan 2040 Housing Topic Paper" states "Housing delivery in the City has for many years relied upon windfall development and future housing delivery is expected to continue this trend, relying entirely on new windfall sites being brought forward by developers." (p.7) This is a precarious approach, and more consideration should be given to positive infill and densification of existing housing. The City should start a site identification process.

There is an absence of policy on retrofitting and encouraging improvements of the existing housing stock in the City.

Heritage

The current draft Plan fails to strike an appropriate balance between conserving the City's heritage and delivering growth. I do not believe the Plan reflects other various requirements in the NPPF, including unambiguous policies (para 16d), being underpinned by a relevant and up to date evidence base (para 31) and providing a positive strategy for the historic environment (para 196). I am also concerned that it would impede the ability to meet the statutory requirements and relevant international obligations (para 2), as well as the sustainable development principles (para 8) of the Framework.

Importantly, in the proposed Plan, there remains uncertainty as to the relationship between this 1.2m sqm minimum target and the amount of development either under construction or already in the formal planning process. We cannot currently know whether publicly quoted amounts of new floorspace in the pipeline are part of or additional to the 1.2m sqm.

17th June 2024

Bevis Marks

City Corporation's current proposal is to define an "immediate setting" is an unacceptably minimal approach to the matter, based on an inadequate heritage assessment and a failure to appreciate important Jewish historical, cultural and religious considerations.

Conclusions

I consider the Regulation 19 consultation version of the City of London's Local Plan to be unsound. As set out in this letter I do not consider it would be effective in its objectives, is not justified in terms of the evidence base and to an important degree is not in conformity with both national and regional planning policy.

The policies relating to offices and tall buildings would, if implemented, severely harm the significance of St Paul's Cathedral and the Outstanding Universal Value of the Tower of London and compromise the City's rich historic character. They would, therefore, directly contradict the Plan's generally welcome policies for the conservation of the historic environment. This contradiction flows from failings in the Plan's evidence base.

I am aware of the important role the City of London plays in both the regional and national economy.

Finding a way to reach an appropriate balance between the strategic objectives and to revise the Spatial Strategy will clearly require further work on the part of all stakeholders.

However, I consider this is both important and necessary if both conservation of the City's extraordinary historic environment and housing growth are to be successfully enabled.



Rachel Blake
The Labour and Co-operative candidate for Cities of London and Westminster