

CP 2040 consultation

Roger Hoefling [REDACTED]

Mon 6/17/2024 5:27 PM

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

 1 attachments (684 KB)

HCMM CoL City Plan 2040 consultation 16.6.2024.pdf;

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THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

Submitted on behalf of the Honourable Company of Master Mariners (<https://www.hcmm.org.uk/>), attached is a representation made in response to the City Plan 2040 consultation.

Roger Hoefling

[REDACTED]



THE HONOURABLE COMPANY OF MASTER MARINERS

City Plan 2040 – Regulation 19 public consultation

16th June 2024

THE HONOURABLE COMPANY OF MASTER MARINERS

City Plan 2040 – Regulation 19 public consultation

1. To which part of the 'Heritage and Tall buildings' chapter does your representation relate? (Representations must be made on a specific policy, paragraph or map within the chapter and this should be specified in the box below).

HE1: Managing Change to the Historic Environment

2. Do you consider that this part of the 'Heritage and Tall buildings' chapter is legally compliant?

No.

3. Do you consider that this part of the 'Heritage and Tall buildings' chapter is sound?

No.

4. Do you consider that this part of the 'Heritage and Tall buildings' chapter complies with the Duty to Co-operate?

No.

5. Please give details of why you consider this part of the 'Heritage and Tall buildings' chapter is not legally compliant, 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 Plan, or its compliance with the duty to co-operate, please also use this text box to set out your comments.

The Honourable Company of Master Mariners is a City of London livery company, its membership primarily comprising senior Merchant Navy and Royal Navy officers but drawn also from the wider maritime sector. The Company (<https://hcmm.org.uk>) sets and maintains professional standards through the Chartered Master Mariner and Mentoring Schemes while also offering educational opportunities for schools and support through its charitable activities.

Formed in 1926, the Company had the title 'Honourable' conferred upon it by HM King George V in 1928, an accolade previously bestowed on only the Honourable Artillery Company and the Honourable East India Company. In 1932, the Court of Aldermen of the City of London granted the Honourable Company of Master Mariners (HCMM) livery status, the first so recognised for 84 years. Her Majesty The Late Queen, Master of the Merchant Navy and Fishing Fleets for the whole of her reign, was the HCMM's Patron from accession in 1952, while His late Royal Highness The Duke of Edinburgh, Lord High Admiral of the United Kingdom, was also the HCMM's Admiral. Since May 2024, the HCMM's Patron has been His Majesty The King.

In 2020, concern over the potential effect of the development on the Tower of London World Heritage Site and its Local Setting Area prompted the Honourable Company of Master Mariners to submit a representation opposing 'The Tulip' planning appeal. Similarly, in 2021 it opposed the planning application for No. 31 Bury Street's redevelopment as it has recently done again for the revised application and that relating to Holland House.

Heritage protection is the objective. The Tower of London can hardly be better known but the Local Setting Area to its north, Tower Hill, encompasses Trinity Square Gardens. Within is The Merchant Navy Memorial bearing 36,000 names of the wartime dead who have no grave but the sea, a total greater than that of any other Commonwealth War Graves Commission memorial in the UK. It is both Grade I and II*-listed. Alongside is the Tower Hill Memorial marking the site of 399 years of public executions from 1381. Primarily reserved for prominent figures, perhaps the best-known is Sir Thomas More, beheaded in 1535. The buildings arcing around Trinity Square have their parts in

history too. The General Steam Navigation Company at No.15 sent its paddle steamers to rescue troops from Dunkirk in 1940 while it was to No.10 that Thames river boatmen were summoned to be asked if they would sail there too. Next door, Trinity House was responsible for laying 73 lighted buoys in the Channel on 6th June 1944 to guide the 6,939 ships involved in the D-Day landings. There is much more, so much history being represented on Tower Hill. Like the Tower however, it is in Tower Hamlets, sharing its border with the City.

Plaudits such as *'unparalleled'*; *'rich'*; *'unique'*; *'important'*. *'unrivalled'* and *'at the heart of cultural placemaking'* are given by the Corporation to the City's heritage. This Plan though proposes to expand the Eastern Cluster further to the detriment of not only City heritage assets but also neighbouring boroughs, not least Tower Hamlets. The latter lies between the City and Tower Bridge which the Corporation is keen that people visit. Tower Hamlets has to be crossed therefore with Tower Hill being rich in history and a focal point for maritime heritage. It is out of maritime trade with the world that the City and so much of Britain grew. Why does the Corporation ignore it despite the claims it makes for the value of heritage and its declared aims for Destination City?

The HCMM was one of many organisations and individuals who voted to define and establish a conservation area around the Bevis Marks Synagogue. Albeit apparently agreed by the Corporation, it is now ignoring the undertaking after rewriting its rules in favour of a marginally revised version of the original application. Once again, a lot of concerned people have had to get involved to defend heritage. Planning aside, is reputational damage considered of no consequence?

If that is so, will the Corporation also ignore Historic England's 24th May response to the City Plan 2040? That it has had ready currency in the national media is telling of itself but perhaps even more so is that Historic England declares in it 28 times that the Plan is 'unsound'.

6. Please set out the modification(s) you consider necessary to make the City Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified 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.

The HCMM asks that the Corporation implements Historic England's advice cited above, restoring the credibility of its conservation areas, conforming to national planning policies and consulting neighbouring local authorities.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, participation in hearing session(s) is not required.

END