

Morgan, Jackson

From: Coco Whittaker [REDACTED]
Sent: 17 June 2024 14:45
To: Planning Policy Consultations; Environment - Local Plan
Subject: Draft City of London Local Plan 2024 Regulation 19 Consultation C20 Society
Attachments: C20 Society Letter FINAL.docx

Categories: CONFIRMED

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THIS IS AN EXTERNAL EMAIL

Please find attached a letter from the Twentieth Century Society in response to the consultation on the local plan. We would be grateful if you could confirm receipt of this consultation response.

Kind regards,
Coco

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(she/her)
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Reg. charity no: 1110244





Emailed: PlanningPolicyConsultations@cityoflondon.gov.uk

17 June 2024

Dear Planning Policy Team at the City of London

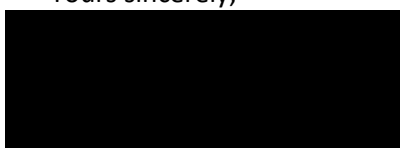
RE Draft City of London Local Plan 2024 Regulation 19 Consultation

Thank you for consulting the Twentieth Century Society on the pre-submission Draft of the City of London Local Plan 2024. The Society takes serious issue with aspects of the draft, including

- The omission of the statement made in Core Strategy Policy CS12 of the adopted local plan (2015) which identifies the need for “1. Safeguarding the City’s listed buildings and their settings, while allowing appropriate adaptation and new uses. [and] 2. Preserving and enhancing the distinctive character and appearance of the City’s conservation areas, while allowing sympathetic development within them.” No similar stated aim has been included within the draft plan and this should be amended.
- Policies set out in S11 of the draft plan relating to Managing Change to the Historic Environment (within Policy HE1) are welcomed. But the City’s intention to conserve its historic environment is not compatible with the intention outlined in the draft plan to deliver a substantial amount of new office floorspace in the form of tall buildings.
- The change in wording of policy S12 Tall Buildings to remove the statement in CS14 of the adopted local plan that tall buildings are inappropriate in conservation areas. This would seriously undermine the level of protection provided for the historic environment. The wording in the adopted local plan should be reinstated.
- Policy HE1(6) should be strengthened to require that opportunities to enhance conservation areas be positively sought and pursued, not merely ‘considered’. Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes clear local authorities’ duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The wording of the Local Plan should reflect this.
- We welcome policies OF1(1a) and S8(1) & (2) to prioritise the retention and retrofitting of existing buildings.

We hope that these comments are of use to you.

Yours sincerely,



The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

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Coco Whittaker

Head of Casework

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in the *Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.