

R0235

Chapter and policy number	Comment	Do you consider the Local Plan to be Legally Compliant? (yes/no)	Do you consider the Local Plan to be Sound? (yes/no)	Complies with Duty to Cooperate (yes/no)
Chapter 11 Tall Buildings, Strategic Policy S12	<p>"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.</p> <p>Conflict with the National Planning Policy Framework (NPPF)</p> <p>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.</p> <p>Specifically, the NPPF outlines:</p> <ul style="list-style-type: none">- Paragraph 201: Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal.	No	No	No

	<p>- 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.</p> <p>- 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Current and Foreseeable Demand for Office Space</p> <p>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.</p> <p>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</p>			
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	<p>vacancies and underutilised spaces, further contradicting principles of sustainable development.</p> <p>Duty to Co-Operate</p> <p>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)."</p> <p>"Amend the policy to prevent the incursion of tall buildings in to a) Conservation Areas, b) the setting of Bevis Marks Synagogue, c) the setting of the Tower of London World Heritage Site, and d) Grade I listed buildings within the City of London.</p> <p>Amend the policy so that it is compliant with the NPPF.</p> <p>Amend the policy to demonstrate meaningful co-operation with other planning authorities, as well the authorities responsible for a) the Tower of London World Heritage Site, and b) Bevis Marks Synagogue.</p> <p>Amend the foundation of the policy to be based on a sound economic analysis. Amend the policy to prevent the incursion of tall buildings in to a) Conservation Areas, b) the setting of Bevis Marks Synagogue, c) the setting of the Tower of London World Heritage Site, and d) Grade I listed buildings within the City of London.</p> <p>Amend the policy so that it is compliant with the NPPF.</p>			
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<p>Chapter 1 Spatial Priorities, 1.2</p>	<p>"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.</p> <p>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.</p> <p>It is also 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.</p> <p>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</p>	<p>Yes</p>	<p>No</p>	<p>No</p>

	<p>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."</p> <p>Better analysis, using a wider data set not supplied to you by a firm with vested interest in construction.</p>			
<p>Chapter 14 The Temple, the Thames Policy Area & the Key Areas of Change, Policy S21</p>	<p>"Our objection to elements of Chapter 14 has overlaps with our objections to Chapters 1 and 11 as stated in separate submissions.</p> <p>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.</p> <p>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.</p>	<p>No</p>	<p>No</p>	<p>No</p>

	<p>There is no reference within S21 to the impact on other local planning authorities, or to the negative impacts the proposed development within the City Cluster would have on the protected setting of the Tower of London World Heritage Site. 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)."</p> <p>"Amend S21 and the related policy map to prevent tall buildings from damaging Conservation Areas and the settings of Bevis Marks Synagogue, the Tower of London and Grade I listed buildings.</p> <p>Detail how you have meaningfully co-operated with other affected planning authorities, and the authorities responsible for the Tower of London and Bevis Marks Synagogue."</p>			
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