

Felgate, Gavin

From: Michael Hilton [REDACTED]
Sent: 29 May 2024 21:14
To: Planning Policy Consultations
Subject: Representation from Michael Hilton
Attachments: Bevis0624.pdf

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THIS IS AN EXTERNAL EMAIL

Please find my representation about the City Plan 2040 attached

Kind regards

Rabbi Dr Michael Hilton

Author, Campaigner, Scholar, Teacher, Friend



Rabbi Dr Michael Hilton



Planning Policy Team
Environment Department
City of London Corporation
The Guildhall
London EC2V 7HH

30th May 2024

Sent by email to planningpolicyconsultations@cityoflondon.gov.uk

Dear Planning Policy Team

City of London - Local Plan Regulation 19 Consultation

I am writing to submit my views about the local plan which I read in detail to prepare my recent submission in relation to the proposed redevelopment at 31 Bury Street.

Clearly the plan has, in general, high level aspirations for the historic environment of the City, but it is hard to reconcile those with the target of a minimum of 1.2 million square metres of new office floorspace in the form of tall buildings in the two tall buildings zones. It is impossible both to safeguard the City's heritage and to achieve these targets. The plan is so aspirational that it is in effect worthless. It tries so hard to achieve everything that in effect it will achieve nothing. It would conflict with London Plan policies D9 Tall Buildings, HC1 Heritage Conservation, HC2 World Heritage Sites, HC3 Strategic & Local Views and HC4 London View Management Framework.

I was part of the campaign to create the new Creechurch Conservation Area. Yet the plan effectively undermines - or perhaps I should say casts a shadow over - the Conservation Area by amending Policy 12 Tall Buildings to remove the statement that such development is not suitable for a Conservation Area. Most of the Conservation Areas are in low rise areas and one must ask what is the point of having them if their character is not to be conserved?

Furthermore the National Planning Policy Framework defines the setting of a heritage asset as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.' This Framework makes no distinction at all between

the immediate and the wider setting of a building as the Local Plan seeks to do. The 'immediate setting' of a building refers only to immediate adjacent buildings, but any historic building requires wider protection than that, as has frequently been stated in City of London plans in the past and present. Preserving the Historic Environment is a fundamental objective of the National Planning Policy Framework.

As it stands, this plan would cause serious and permanent harm to the historic environment of the City of London. The economic benefits of London Plan policies GG1, GG2 and GG5 would be at the expense of the City's character and heritage.

Policy DE7 rightfully identifies places of worship as sensitive to changes in daylight and sunlight levels which could come about through developments nearby. However, it will not be possible to reconcile this with the proposed increases in high rise buildings particularly in areas in which they are already clustered. DE7 is therefore unsound.

Policy HE1 Clause 8 lays down the principle of an 'immediate setting' to Bevis Marks Synagogue, which is confined to the immediately adjacent buildings. But the National Framework makes it clear that the setting of a heritage asset is not something fixed in this way. It is not only the immediate setting which should be the primary consideration in considering development proposals, but the wider setting as well.

Last week I was a guest at the restaurant at the top of the Gherkin Building, which is adjacent to Bevis Marks Synagogue. It is so close that it can be considered part of the wider setting of the Synagogue. However, the Synagogue was not visible from the 38th floor and the Gherkin is not visible from the synagogue because of the building in between. Therefore the Gherkin has no impact on the synagogue. However other existing and proposed buildings, particularly to the south where the daylight comes from, have a major impact. As the policy singles out the Synagogue for special mention, it should offer a much better degree of protection than it does. I draw your attention to the requirements of the local planning authority in sections 66(1) and 16(2) of the Planning (Listed Buildings & Conservation Areas) Act 1990 that there should be 'special regard' to the preservation of listed buildings and their settings. The term 'special regard' therefore needs to appear in your Policy.

I send these brief remarks for your kind consideration.

Yours sincerely

A rectangular area of the document has been redacted with a solid black box, obscuring the signature of the sender.

Rabbi Dr Michael Hilton