

**Stennett, Jasmine**

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**From:** Bella Buffini [REDACTED]  
**Sent:** 06 February 2026 09:25  
**To:** Planning Policy Consultations  
**Cc:** Roger Hepher  
**Subject:** City Plan 2040 Modifications Consultation  
**Attachments:** BMS City Plan Modifications Response.pdf

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Good morning,

On behalf of our client, The S&P Sephardi Community, please find attached a response to the City Plan 2040 Modifications Consultation.

I would be grateful if you could please confirm receipt of this email and the representations.

Kind regards,

Bella

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**Bella Buffini**  
Principal Planner



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Local Plan Team  
City of London Corporation  
Guildhall  
London  
E2P 2EJ

6 February 2026

Dear Sir/Madam,

### City Plan 2040: Modifications Consultation

We write on behalf of our client, The S&P Sephardi Community ('the Community'). The Community welcomes the opportunity to comment on the proposed Modifications to the City Plan 2040. These representations follow continued engagement with the City Plan 2040 throughout the consultation and examination periods.

The Community welcomes the several proposed Main and Additional Modifications which reflect the content of the Community's previous representations, and Statements of Common Ground between the Community and the City, and Historic England and the City. These include:

1. **MM41** which amends the wording of Policy HE1(6) to make it clear that opportunities to enhance conservation areas should be sought, where appropriate.
2. **AM70** which amends the wording of Policy HE1(8) to make it clear that development in the defined immediate setting of Bevis Marks Synagogue will be carefully managed to preserve, and where possible, enhance the elements of setting that contribute to its significance.
3. **MM42** which adds an additional sentence of supporting text to make it clear that proposals for tall buildings within conservation areas should demonstrate how they would preserve and, where possible, enhance the conservation area.
4. **MM49** which amends the wording of Policy S12(3) to ensure that tall buildings are required to respect both heritage significance and townscape character.
5. **MM50** which amends the wording of Policy S12(8c) to be clear that tall buildings must have regard to the entire settings of heritage assets.
6. **MM57** which amends the wording of Policy S13(2) to be clear that the City will protect and enhance both views and the settings of historic City landmarks and skyline features.

It is the Community's view that these Modifications are all essential to ensure the Plan is effective in protecting the City's heritage assets including the Grade I Listed Bevis Marks Synagogue.

Nonetheless, the Community has remaining concerns in relation to the soundness of the plan, particularly with regard to the removal of the long-standing presumption against tall buildings in Conservation Areas. The Community's views on this have been explained in detail in previous representations and Hearing Statements.

The Community has concerns over the addition of AM73 and MM51, which relate to tall buildings outside of the identified tall building clusters. AM73 states that “*there may be some circumstances where the redevelopment of an existing tall building could contribute towards meeting these needs*” (referring to the need for office floorspace) and MM51 makes the following additions to supporting text:

*“Outside the identified new tall building areas, particularly on sites where there is no tall building currently, would be likely have significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.”<sup>1</sup>*

The effect of these amendments is to potentially encourage the redevelopment of existing tall buildings outside of the tall building areas. Even where there is currently a tall building, its redevelopment with a taller or larger building could result in unacceptable harm. It is the Community’s view that the City Plan should clarify that the redevelopment of a tall building outside of the tall building areas is not likely to be acceptable where an increase in height and massing is proposed.

In addition, in the plan as drafted, it remains that Bevis Marks Synagogue is denied even the level of protection afforded to The Monument, where views out and in are given protection.

On that note, it is disappointing to see that an addition to supporting text agreed in the Community’s Statement of Common Ground with the City has been excluded from the Modifications. The agreed Modification would have added the following wording to supporting text at paragraph 11.2.1 of the City Plan:

*“11.2.1 The City Corporation has identified ‘immediate setting’ areas around the Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City (the Monument is also scheduled) and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of their immediate setting to that significance. This includes features and characteristics of the enclosures around them, and the space that remains.*

*11.2.1a It should be noted that the contribution that any part of the totality of a setting makes to the significance of a designated heritage asset is afforded protection by relevant legislation, national policy and Policy HE1. This would include consideration of impacts on sky space in views, where this enables aspects of their significance to be appreciated. The identification of the immediate settings of the Monument and Bevis Marks Synagogue in policy is therefore intended to further strengthen their protection.”*

The Community strongly disagrees with the contention that this change to supporting text, which is intended to add clarity to how two of the City’s most sensitive heritage assets should be considered, would have the effect of elevating Bevis Marks Synagogue above other heritage assets.

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<sup>1</sup> The wording of paragraph 11.5.4 should also be reviewed in detail to resolve grammatical errors within the text.

The synagogue is already recognised as a hugely important historic building in the City of London, being the only non-Christian place of worship within the City. It is Grade 1 Listed and located within the Creechurch Conservation Area. It is the only synagogue in Europe (possibly the world) to have maintained regular worship since 1701 without interruption, and it remains the focus of an active Jewish community. It is already recognised within the City Plan, alongside other assets such as the Tower of London, Monument and St Paul's Cathedral, as being of outstanding significance.

The purpose of the proposed additional text is not to elevate the Synagogue above other heritage assets; it is merely to ensure it is clear to decision-makers and prospective developers that there are unique and specific considerations in relation to this important heritage asset which must be taken into account; namely the importance of the sky space in views.

As set out in previous representations, The significance of the synagogue derives from several factors, including the substantially open view of the southern sky which is appreciable by people standing in the synagogue courtyard. The Hebrew name of the congregation of BMS translates as the Holy Congregation of the Gate of Heaven. Visual access to the heavens is therefore of great symbolic importance. The ability to see the stars and moon is also of practical significance. Specific prayers and blessings are associated with the stars and moon, including Kiddush Levana which is recited monthly at BMS upon the sighting of the new moon.

The relationship between the synagogue and the sky is not purely visual (as is the case for many other heritage assets) but deeply functional. In that sense, sky space is an important part of the setting of the synagogue; as per Historic England's Good Practice Advice Note 3 which states that a heritage asset's "*intangible associations with its surroundings, and patterns of use*" should be considered as part of an analysis of setting, and that "*functional relationships and communications*" can contribute to the significance of setting. The open view of the sky is therefore of great importance to the setting of the heritage asset, which was always intended to be the most dominant building in the locality.

As far as we are aware, this unique and functional relationship with the night sky only applies to the Bevis Marks Synagogue, and no other heritage asset within the City of London. It appears to be accepted that there are features of the settings of the Tower of London, the Monument and St Paul's Cathedral which should be drawn out and identified within the plan; the same should apply to Bevis Marks Synagogue.

## Conclusions

The Community is pleased to see that several of its previous comments on the City Plan have been addressed through the Main and Additional Modifications. However, it continues to identify deficiencies within the City Plan as drafted, with regard to heritage and tall buildings, which mean that in its present form it fails to deliver a positive strategy for the conservation and enjoyment of the historic environment as required by the NPPF.

The proposed additions at 11.2.1 would assist decision-makers and prospective developers in their understanding of Bevis Marks Synagogue, and the significance of its immediate and wider settings. It is critical that the City Plan contains clear policy which will make clear to developers the scale and nature of the development that will be acceptable in proximity to the synagogue, and guide decision-makers on how to react to development proposals in an appropriate and consistent way with regard to the historic, cultural, religious, architectural, communal and archaeological significance of the synagogue. We therefore respectfully request that the inclusion of the text above is re-considered.



Please do not hesitate to contact Roger Hepher ([REDACTED]) or me  
[REDACTED] should you wish to discuss the contents of this letter.

Yours faithfully,

[REDACTED]

**Bella Buffini**  
Principal Planner