

City of London

City Plan 2040

## Heritage & Tall Buildings Explanatory Note

Published by the Environment Department

August 2024

## Table of Contents

1.	Introduction .....	3
2.	Consultation responses.....	3
3.	Tall buildings policy and contours.....	4
4.	Bevis Marks Synagogue.....	10
5.	Conservation Areas .....	12
6.	Other heritage assets .....	13
7.	City Churches .....	13
8.	National Policy .....	14
9.	Next Steps.....	14

## 1. Introduction

- 1.1. The draft City Plan 2040 was subject to a Regulation 20 consultation between the 18<sup>th</sup> April and 17<sup>th</sup> June 2024. There were 293 respondents and over 2,000 specific comments on parts of the plan. Several respondents made detailed comments on Chapter 11 ‘Heritage and Tall Buildings’ and the purpose of this explanatory note is to clarify the approach taken when drafting this chapter.
- 1.2. As set out in the Procedure Guide for Local Plan Examinations (paragraph 1.6), Local Planning Authorities (LPA) sometimes submit to the examination a list of proposed changes to the published plan that have not been the subject of consultation. The Inspector will not treat those proposed changes as part of the plan to be examined. However, the Inspector may consider it appropriate for some or all of the LPA’s proposed changes to be discussed at the hearing sessions, and in appropriate circumstances they may form the basis for Main Modifications.
- 1.3. In the context of paragraph 1.6 of the Guide, the City Corporation will submit to the examination a list of proposed changes to the published plan. While the City Corporation does not believe Main Modifications to be required at this stage to make the plan sound, these changes are being proposed in the spirit of ongoing collaboration with stakeholders and to inform discussions at the hearing sessions. Should the Inspectors consider it appropriate, the City Corporation would welcome the opportunity for these to be discussed at the hearing sessions, and (in appropriate circumstances) for these to form the basis of Main Modifications, should the Inspectors consider Main Modifications necessary. This explanatory note makes reference to areas of the plan where the City Corporation will propose changes, in line with the approach set out in paragraph 1.6 of the Procedure Guide.

## 2. Consultation responses

- 2.1. During the Reg. 19 consultation on the City Plan 2040, a number of consultees raised concerns about the policies in the City Plan 2040 that relate to the City’s historic environment. These include the following:

### **Tall buildings policy and contours**

- a. The proposed City Cluster would be harmful to the setting of St Paul’s Cathedral and the Outstanding Universal Value of the Tower of London World Heritage Site, and would ‘bake in’ this harm;
- b. The City Corporation should explain more clearly how the attributes of Outstanding Universal Value of the Tower of London World Heritage Site and the significance of strategic heritage assets have informed the tall building contours, and the relationship between the contour rings and the 3D tall building cluster shapes that were used for the impact assessments is unclear;
- c. Policy S12 is insufficiently flexible in relation to proposals for tall buildings that would exceed the height of the contour lines within the two clusters;

- d. Policy S12 should recognise the potential for tall buildings to come forward on some sites outside the two clusters;
- e. Tall building contour lines should be amended to allow for greater capacity on some sites.

#### **Conservation areas**

- a. The City Plan should reinstate policy CS14 in the adopted local plan, which deems tall buildings inappropriate in conservation areas
- b. Policy HE1 should go further than requiring development to ‘consider’ enhancing conservation areas

#### **City churches**

- a. The City Plan should give greater recognition of the contribution of the City’s churches, specifically their heritage significance, their value as a group, and their religious, community and tourist value

#### **Bevis Marks Synagogue**

- a. The City Plan 2040 gives insufficient protection to the Synagogue and its setting. In particular, development would have a harmful impact on the sky view seen above the Synagogue from its courtyard and would harm light levels within the Synagogue

#### **National policy**

- a. Policy HE1 (2) conflicts with paragraphs 207-209 of the National Planning Policy Framework (NPPF)

### **3. Tall buildings policy and contours**

#### **Background on policy development**

- 3.1. The draft City Plan 2040 differs in approach from the City’s adopted Local Plan (2015). Under the 2015 Plan, tall building development is prioritised in the City’s Eastern Cluster (CS14 (1)), and a series of ‘inappropriate areas’ are identified where they would be refused (CS14 (2)). Elsewhere, tall building development is possible only sites that are suitable in respect of impacts on the City skyline, character and amenity, heritage assets and skyline feature. Aside from the ‘Eastern Cluster’ (the boundary for which is imprecisely drawn), the 2015 Plan is not explicit about locations where tall buildings could be suitable, and does not suggest appropriate heights.
- 3.2. In drafting the tall building policy for City Plan 2040, the City Corporation has followed the provisions set out in policy D9 of the London Plan, specifically B (1) and (2), determining if there are locations where tall buildings may be appropriate forms of development, and identifying these locations and appropriate tall building heights on maps in the City Plan. The need for this approach was reinforced when the Mayor of

London identified in 2021 that there was a matter of non-conformity between the City Plan and the London Plan with respect to this matter. This has meant a shift in the overall approach to tall buildings and the City Plan sets out, in the forms of the contour line maps, the future potential for tall building development in the City in unprecedented detail.

- 3.3. This detail has enabled stakeholders to see, for the first time, a suite of views of potential heights in the City Cluster and the new proposed Fleet Valley Cluster.

## Harm to St Paul's Cathedral and the Tower of London

- 3.4. Some respondents have expressed the view that the proposed City Cluster, in particular, represents a dramatic level of expansion compared with the existing situation and that it would be harmful to the Outstanding Universal Value of the World Heritage Site and the significance of St Paul's Cathedral. In broad terms, some respondents consider that the proposed Cluster form would, in the relevant views (notably from Tower Bridge, the South Bank and Waterloo Bridge), diminish the presence of these assets and shift the visual focus away from them, to the detriment of viewers' perceptions.
- 3.5. The City Corporation's position is that the proposed Cluster would amount only to a careful expansion of the existing entity (as set out in the future baseline of implemented and consented schemes) and, having been modelled in response to OUV/significance, it would achieve appropriate relationships with these heritage assets and is therefore part of a positive strategy for the conservation and enjoyment of the historic environment that takes into account the desirability of sustaining and enhancing the significance of these heritage assets.
- 3.6. The City considers that the proposed Cluster form would have appropriately deferential edge conditions in the places where it is closest to these assets in the views (conditions which the Evidence Base acknowledges as sensitive) and that it would, through its three-dimensional distance from them, be visually disassociated from both heritage assets, which would remain pre-eminent in their respective low-rise historic surroundings.

## The potential to 'bake in' harm

- 3.7. Some respondents make their conclusions of harm based on the indicative heights and their positions in the Clusters set out in the contour lines, and consider that the City Plan 'bakes in' harm due to these heights and positions.
- 3.8. The City Corporation is of the view that while these facts are sufficient to allow a partial assessment of the potential impacts of development, a full and comprehensive conclusion on harm is not possible at the plan-making stage; and that the proposed Cluster cannot itself entail or cause harm, being a broad,

- undetailed series of contours rather than a detailed planning proposal at planning application stage.
- 3.9. The City Corporation is of the view that it has taken the correct approach in plan making, in accordance with national policy and in general conformity with the London Plan. The NPPF requires local plans to set out a positive strategy for the conservation and enjoyment of the historic environment and requires this strategy to take into account the desirability of sustaining and enhancing the significance of heritage assets. The approach to tall buildings in the City Plan is part of that strategy, with the potential heights and areas for tall buildings being informed through an understanding of the character of the City and the significance of heritage assets, and taking an approach that (amongst other objectives) seeks to minimise the possibility of harm to the Tower of London, St Paul's Cathedral and the Monument.
- 3.10. A local plan is not a planning application, the processes for considering which allow significantly greater opportunity for consideration of the potential for a proposed development to cause harm. This is reflected in the policy approach in the City Plan, which – alongside identifying contour heights for the tall building areas – sets out a series of requirements that applications for tall building proposals will need to consider, including the need to take account of strategic and local views, local heritage assets, the effect on the City skyline and historic skyline features, the significance of heritage assets and their immediate and wider settings, and a broad range of other areas. This sits alongside the requirements set out in policy D9 of the London Plan, which also include various requirements for tall building applications. The NPPF itself (reflected in the City Plan policy) sets out how harm should be considered as part of the determination of planning applications. This approach recognises the distinction between plan making and decision making, with the latter allowing for a more detailed and comprehensive consideration of the potential impacts of proposed developments.

## Consideration of OUV and significance in the development of the tall building contours

- 3.11. Some respondents have questioned how the Cluster envelopes were modelled and assessed in relation to the City's historic environment. In particular, the process by which the Cluster envelopes accounted for Outstanding Universal Value (OUV) and heritage significance has been queried.
- 3.12. As set out in the Evidence Base, the Cluster locations and envelopes were modelled to respond to the three strategic heritage assets in or near the City: the Tower of London World Heritage Site, St Paul's Cathedral and the Monument. The OUV of the Tower and the significance of the Cathedral and Monument shaped the Clusters – strategic parameters for a strategic plan-making exercise.
- 3.13. To have attempted to shape the envelopes in response to all potentially relevant designated heritage assets in the City would have been unworkable and disproportionate to this exercise. Instead, the City considers the appropriate time to

consider the impacts of Cluster schemes on these assets would be at the detailed stage of individual planning applications, and the City Plan sets out a robust framework for doing so.

### *Modelling*

- 3.14. The starting point for modelling the future Clusters was the future baseline, i.e. the existing, consented and implemented schemes. For the Fleet Valley Cluster, this consists largely of the existing tall buildings around New Street Square and consents like 100 Fetter Lane and 120 Fleet Street; for the City Cluster, this consists of the established Cluster including 20 Fenchurch Street and various consents including 100 Leadenhall Street, 50 Fenchurch Street and 55 Bishopsgate.
- 3.15. Respondents have focused on the modelling of the City Cluster and how it took account of OUV/significance. From the future baseline, various options for the expansion of the City Cluster were tested, the detail of which is set out in the Miller Hare Volumetric Testing Report (VTR). Given that it establishes certain principles around the positions and heights of parts of the Cluster, this future baseline was seen as a realistic starting-point.
- 3.16. In modelling the Clusters the City sought to consider reasonable alternatives. Starting from the future baseline, once the 'hard constraints' outlined in the Topic Paper and Miller Hare reports were modelled in, this left only a finite number of variations on the Cluster forms to be tested. To be reasonable and proportionate, two options (A and B) were brought forward for each Cluster for consideration, one more sprawling, the other more tightly defined. In each case it is the smaller, more tightly defined Cluster that has been proposed in the City Plan.
- 3.17. Overall, the City's position is that both Clusters would amount to carefully considered expansion of existing tall building Clusters, rather than a more fundamental change in direction; and the modelling of the proposed City Cluster would see additional capacity largely contained within the parameters of the future baseline, but for some additional and carefully sculpted capacity vertically to the east (towards the WHS) and laterally and vertically to the north-east (towards the Cathedral).

### *Assessment*

- 3.18. As set out in the Topic Paper and Miller Hare reports, the modelling of the Clusters and testing of options was undertaken three-dimensionally against a set of 70+ views. The eastern, southern and north-western edges were particularly scrutinised and continually adjusted to arrive at appropriate relationships with the settings of the Tower, the Cathedral and the Monument. The process was an informal one and guided by a core group of City officers judging and agreeing each iteration of the Clusters as they evolved in real time. More detail of the process is set out in the 'Cluster Modelling' note below.

- 3.19. It was considered disproportionate and too time-consuming to carry out a full, formal Heritage Impact Assessment at each stage of this iterative modelling process; rather, it was considered more appropriate to steer the exercise by the application of professional judgement and consensus among officers, and to undertake the HIA once each Cluster envelope had been finalised, not least because, by this stage, the envelopes would have been modelled to achieve comfortable relationships with the three strategic heritage assets.
- 3.20. Several respondents have flagged concerns about the methodology employed, in particular that the City has not properly followed standard practice as set out in Historic England guidance (GPA 3) and elsewhere. The City's position is that the Clusters represent broad scenarios rather than fully realised individual proposals, and that it is consequently not possible to assess them in the usual way; for this reason, too, it was considered unrealistic to draw conclusions on heritage harm. As such, the City formed a bespoke methodology to deal with this novel situation, employing the language of townscape assessment ('adverse impacts') instead of heritage harm, and couching the assessment in provisional rather than absolute language.
- 3.21. For instance, the Evidence Base acknowledges<sup>1</sup> that in some views there is a particularly sensitive juxtaposition between the Clusters and the heritage assets in question, especially at the eastern and north-western edges of the City Cluster; having minimised the possibility of harm at this plan-making stage, the Evidence Base then sets out how any low potential for adverse impacts could be mitigated or averted through exemplary design at individual scheme stage.
- 3.22. This, it was felt, properly reflected the strategic level of assessment that is appropriate for plan-making, allowing for and signalling more conclusive judgements to take place at individual planning application stage.
- 3.23. The City Corporation intends to produce Statements of Common Ground with the Greater London Authority, St Paul's Cathedral and Historic England to explore these issues further.

## Flexibility in relation to proposals that would exceed the height of contour lines

- 3.24. Within the proposed Cluster areas, the appropriate heights and their positions are expressed as contour rings. Draft policy S12 (3) sets out how 'Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour.'
- 3.25. The London Plan requires development plans to set out appropriate heights for tall buildings; however, this is not a straightforward task in a complex area such as the

---

<sup>1</sup> SVIA p.213 para 8; Topic Paper p.273 para 30.78



City. Setting flat maximum heights across each site would fail to adequately respond to the strategic views and the settings of strategic heritage assets, or would need to be set so low as to falsely represent the potential capacity of many sites. On the other hand, setting a fully formed complex three-dimensional shape as policy (as has been used for illustrative purposes in the impact assessments) would not only be overly complex to represent in a local plan policy map, but would also be unduly restrictive and risks unsatisfactory design when translated into individual proposals for new buildings.

- 3.26. As such, the contour lines are not fully formed three-dimensional shapes that future tall building development must, in time, precisely fill out. Instead, they are best thought of as frameworks to guide future tall building development. This is intended to provide the right balance between the requirements of the London Plan and the need to provide sufficient flexibility and creativity as new buildings are designed.
- 3.27. There has been some confusion about the relationship between the two-dimensional contour lines and the purple, three-dimensional Cluster envelopes depicted in the SVIA and HIAs.
- 3.28. For clarity, it is the two-dimensional contour line maps that comprise the policy, not the three-dimensional purple shape. This purple shape is an illustration of the likely absolute maximum envelope of development that policy (and the policies map) might allow (although, of course, it includes roads/listed buildings/open spaces that would never become tall building sites).
- 3.29. This purple shape is included in the Evidence Base because the complexity of the contour lines makes three-dimensional depictions of them hard to assess and understand in relation to an underlying digital City model – whereas the simplified purple shape is clearer and its outlines and extent are easier to discern.

## Sites outside the clusters

- 3.30. The London Plan requires local plans to identify areas that may be suitable for tall buildings. The City Corporation have undertaken an extensive process of characterisation of different places in the City, which has informed the areas identified for tall buildings. The City Corporation will consider producing Statements of Common Ground with developers promoting sites for tall buildings outside the two clusters.

## Amendments to tall building contours to allow for greater capacity on some sites

- 3.31. As described above, the contours in the tall building clusters have been carefully considered and informed by extensive evidence. The City Corporation will consider producing Statements of Common Ground with developers proposing heights should be greater on specific sites within the tall building clusters.

## 4. Bevis Marks Synagogue

- 4.1. There have been numerous representations on the City Plan concerning the Synagogue, including from representatives of the Synagogue community. These concerns focus on the potential impacts of tall buildings on the Synagogue, and in particular on light levels and the views from the courtyard. There are also concerns regarding the ‘immediate setting’ area that is included in the City Plan 2040, and concerns regarding the lack of a policy that would see tall buildings in conservation areas refused (this latter issue is discussed in section 5 of this paper).
- 4.2. The City Corporation recognises that Bevis Marks Synagogue is a highly significant building and that its religious community play an important role in the life of the City. The Synagogue is a grade I listed building and rightly enjoys a high level of statutory protection that the City Plan would in no way change. The City Plan 2040 is the first local plan for the Square Mile that recognises Bevis Marks Synagogue and that contains policies that seek to ensure development preserves and enhances the Synagogue. The Synagogue is recognised explicitly both in policy HE1 (Managing Change to the Historic Environment) and policy S21 (City Cluster).
- 4.3. The City Corporation are keen to continue engaging with representatives of Bevis Marks Synagogue and have agreed to produce a Statement of Common Ground, which would clearly set out respective positions and seek further alignment where possible.

### Impact of tall buildings on Bevis Marks Synagogue

- 4.4. While the Synagogue is included in the City Cluster tall building area, this is not unusual; there are a number of other listed buildings (primarily churches) within the area. This is also a continuation of the adopted policy situation, with the Local Plan 2015 identifying the Eastern Cluster area (see Figure G, page 72) as being appropriate for tall buildings, and this area includes Bevis Marks Synagogue.
- 4.5. The City Plan 2040 is very clear that “The suitability of sites for tall buildings within the identified areas and their design, height, scale and massing should take into consideration local heritage assets” and that tall buildings “must have regard to... the significance of heritage assets and their immediate and wider settings.” (policy S12: Tall Buildings). Policy HE1 (Managing Change to the Historic Environment) is clear that development “should preserve and where possible enhance and better reveal the special architectural or historic interest and the significance of heritage assets and their settings”.
- 4.6. These policies are considered by the City Corporation to give significant protection to Bevis Marks Synagogue (and other heritage assets in the City Cluster) while providing a suitable framework for managing the development of tall buildings in the area.

## Views of the sky from the Synagogue Courtyard

- 4.7. A number of responses specifically refer to the view of the sky above the Synagogue, as seen from the Synagogue's courtyard, and its historic and religious significance. It is stated in some responses that the Synagogue, the Hebrew name of which is 'the Gate of Heaven', was intended to be seen against clear sky as this enables worshippers to see the religiously significant path of the moon and the appearance and disappearance of stars.
- 4.8. In the view in question, the Synagogue is seen with a number of existing tall buildings visible in the background on either side of the view, with clear sky in between and directly behind the Synagogue. It is important to note that the City Cluster contour lines, if developed to their fullest extent, would not lead to the complete loss of clear sky behind the Synagogue. While development within the contours could consolidate and expand the Cluster in a way which would be clearly visible from the courtyard, there would still remain a substantive element of clear sky setting behind the Synagogue, allowing the moon and stars to still be observed from the courtyard.

## Light levels

- 4.9. The City Corporation recognises that there is the potential for development near the Synagogue to have an impact on daylight levels. The City Plan 2040 includes a policy (DE7) that requires developments to demonstrate that daylight levels to 'sensitive receptors' (including places of worship) would be acceptable, and this is reflected in policy S12 (Tall Buildings) part 8d that requires tall buildings to have regard to daylight and sunlight impacts on surrounding buildings and the public realm.

## Immediate setting area

- 4.10. The City Plan includes an 'Immediate Setting' policy area for Bevis Marks Synagogue, in recognition of this listed building's importance and the way in which its immediate setting makes a specific, important contribution to its heritage significance. This 'Immediate Setting' policy is modelled on that which already exists for the Monument in the 2015 Plan (and carried through to the 2040 Plan), though tailored to the specific circumstances of Bevis Marks. The City Plan's proposals for an 'Immediate Setting' area around the Synagogue would identify the key elements of the Synagogue's setting (namely, the historic scale and plot size, the shared materials and detailing and the group value of the historic buildings) that contribute to its significance in order that these be safeguarded.
- 4.11. Respondents have criticised the exclusion of the site of 31 Bury Street from the immediate setting area. This building is not considered by the City Corporation to be a significant part of the immediate setting of the Synagogue and so is not included within the Immediate Setting policy area boundary. The policy would complement

and build on, rather than alter, the existing high level of statutory protection enjoyed by the Synagogue.

- 4.12. Comparisons have also been made between the approach taken for the Synagogue's immediate setting and the Monument, where views of and from the Monument are protected (see Policy S13).
- 4.13. The City Corporation believes that it is appropriate to take different approaches for these two very different buildings, responding to their individual heritage significance. One of the primary, original functions of the Monument was as a viewing gallery and so views from it are clearly fundamental to its heritage significance. Its 'Immediate Setting' policy suppresses heights on the sites immediately adjacent to it so that its views are unobstructed.

## 5. Conservation Areas

- 5.1. Policy CS14 (Tall Buildings) of the adopted Local Plan 2015 commits the City to "*refusing permission for tall buildings within inappropriate areas, comprising: **conservation areas**; the St Paul's Heights area, St Paul's protected vista viewing corridors; and Monument views and setting...*" (emphasis added).
- 5.2. The City Plan 2040 does not include this clause, which has attracted criticism from some respondents, including HE and many representations received in relation to the Synagogue. (Other respondents, including the City Property Association, are in favour of not including such a policy.)
- 5.3. A blanket clause to this effect is not considered by the City Corporation to be effective. Following the approach set out in the London Plan, the City Plan identifies areas that may be suitable for tall buildings, rather than identifying 'inappropriate areas'. A blanket approach assumes that tall buildings would necessarily be a harmful form of development in conservation areas, and would be at odds with the need to assess the actual impacts of a proposed development. Several of the City's conservation areas include tall buildings, and while many are predominantly low or medium-rise areas where tall buildings may not generally be appropriate forms of development, in a place of the City's density and eclectic, contrasting character, there could be circumstances in which they may be acceptable; indeed, there have been recent planning applications where tall buildings were found not only to be acceptable within a conservation area but also to enhance its character and appearance (85 Gracechurch Street).
- 5.4. Policy HE1 part 6 (Managing Change to the Historic Environment) states that:

*Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should*

*be conserved and opportunities to enhance conservation areas should be considered;*

- 5.5. Some respondents have criticised the final clause of this policy, suggesting that it should go further than simply requiring the enhancement of conservation areas to be “considered”.
- 5.6. This policy needs to be read as a whole. The first sentence relates to development proposals in conservation areas, and is clear that they “should ... where possible, enhance ... the conservation area”.

## 6. Other heritage assets

- 6.1. Many respondents have felt that the City Plan and Evidence Base show enough detail to suggest harm would be caused to the WHS and the Cathedral, but not enough to understand the impacts on other heritage assets in the City. As set out above, it was considered disproportionate and unworkable to have assessed the effect of the Clusters on every heritage asset in the City, and to assess only some would have been only a partial exercise.
- 6.2. Instead, the draft City Plan, as part of the positive strategy for the historic environment, would maintain the existing level of statutory protection across all heritage asset types, and adopts a ‘Celebrating Heritage’ approach (draft policy S11), making heritage central to placemaking and placing more of an emphasis on enhancing (as well as preserving) the significance, access to and understanding of heritage assets and archaeology (particularly HE2). The City’s position is that this provides a robust and positive framework for considering the impacts of development on individual heritage assets at individual planning application stage, the right moment to do so; this is also built into draft policy S12 for Tall Buildings.
- 6.3. As part of this, the Plan proposes some asset-specific measures, such as the Immediate Setting policies for the Monument and Bevis Marks Synagogue, and it maintains the approach of the 2015 Plan to City Landmarks and Skyline Features, which seeks to protect the skyline presence of the City Churches in particular.

## 7. City Churches

- 7.1. Some respondents have suggested that the City Plan should give greater recognition of the contribution of the City’s churches, specifically their heritage significance, their value as a group, and their religious, community and tourist value.
- 7.2. The City Corporation recognises the great contribution of the City’s churches to the life of the City and its built environment. The City Plan already recognises the value of the City’s churches across many policy areas, including policy S11 (Historic Environment); policy S1 (Healthy and Inclusive City); policy CV1 (Protection of

existing Visitor, Arts and Cultural Facilities); policy S14 (Open Spaces and Green Infrastructure); policy OS1 (Protection and provision of open spaces); policy OS5 (Trees); and specific churches are identified within the relevant Key Areas of Change.

- 7.3. To ensure this is fully reflected, the City Corporation will propose the addition of wording in the justificatory text to policy S1, recognising the important role of the City's churches and other faith communities.

## 8. National Policy

- 8.1. Some respondents have commented that policy HE1 (Managing Change to the Historic Environment) is not fully in line with the National Planning Policy Framework, as the policy sets tests for development proposals that could cause harm to heritage assets that are different in small but important ways to the tests in paragraphs 205-207 of the NPPF (2023).
- 8.2. The City Corporation is of the view that the policy adequately aligns with these paragraphs in the NPPF, and that development plan documents do not need to identically repeat national policy. However, the City Corporation will submit a proposed modification to policy HE1 that the Inspector may consider appropriate to be discussed at the hearing sessions, in order to seek to avoid any potential impression of conflict with national policy.

## 9. Next Steps

- 9.1. The City is committed to working towards, and in some cases has begun, Statements of Common Ground with key stakeholders who have raised concerns on the matters outlined above. Through these Statements the City hopes to resolve some or all of the concerns raised and/or to establish a shared basis of understanding from which to move forward into Examination in Public.