

Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)

Key areas of change
(Source: draft City Plan 2036: Shaping the Future City. Digitised by Alan Baxter)

Buildings above 50m AOD
(Source: City of London, data updated April 2019)

- 32 - 70m above ground level
- 70 - 107m above ground level
- 107 - 145m above ground level
- 145 - 182m above ground level
- 182 - 220m above ground level
- 220 - 257m above ground level
- 257 - 295m above ground level

Modern contours
(Source: Environment Agency)

- 0 - 2.5m
- 2.5 - 5m
- 5 - 7.5m
- 7.5 - 10m
- 10 - 12.5m
- 12.5 - 15m
- 15 - 17.5m
- 17.5 - 20m
- 20 - 22.5m

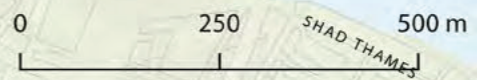
CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE
HISTORIC ENGLAND STUDY

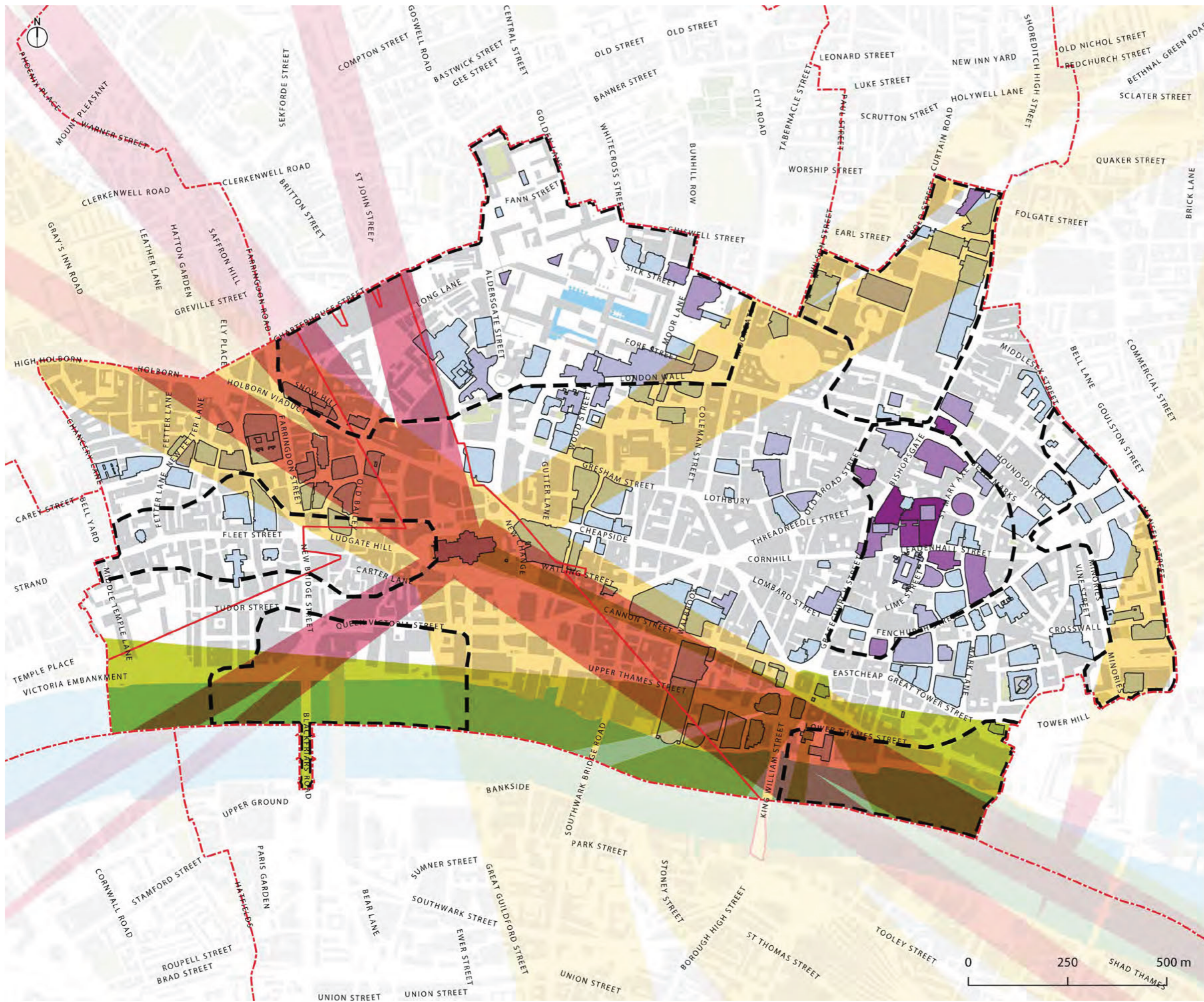
TALL BUILDINGS:
BUILDINGS ABOVE 50M AOD,
WITH TOPOGRAPHY AND KEY
AREAS OF CHANGE

1733/260 Map 11

MARCH 2021

Alan Baxter





- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
 - Key areas of change
(Source: draft City Plan 2036: Shaping the Future City. Digitised by Alan Baxter)
 - St Pauls Heights Policy Area
(Source: City of London)
 - LVMF Landmark Viewing Corridors (Source: GLA)
 - LVMF Background Wider Setting Consultation Area (Source: City of London)
 - Monument Views and Setting (Source: City of London)
- Buildings above 50m AOD
(Source: City of London, data updated April 2019)
- 32 - 70m above ground level
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CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE HISTORIC ENGLAND STUDY	
TALL BUILDINGS, PROTECTED VIEWS + KEY AREAS OF CHANGE	
1733/260 Map 12	
MARCH 2021	Alan Baxter

Alan Baxter

Prepared by Robert Hradsky, Richard Pollard, Gemma Fowlie

Reviewed by Robert Thorne

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T:\1733\1733-260\10 Reports\Main Report Live Version

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City of London Local Plan Regulation 19 Consultation

Response by Historic England – May 2024





Historic England

Our ref: PL00509022

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

By email: planningpolicyconsultations@cityoflondon.gov.uk

24 May 2024

Dear Planning Policy Team

City of London – Local Plan Regulation 19 Consultation

Thank you for consulting Historic England about the Pre-Submission Draft of the City of London Local Plan. Given the sensitivity of the City's historic environment, together with the central role of the Local Plan in ensuring its successful conservation, we have substantial comments to make on this version of the draft.

Summary

- We consider the draft Plan to be unsound in its present form.
- We are aware of both the important role of the City of London in terms of the regional and national economy and we support truly sustainable development and Good Growth, but this draft Plan would not deliver either as it is not in conformity with national and regional planning policy across a number of areas.
- Policies within the draft Plan would mean that successful conservation of the historic environment in the City and beyond would not be possible while delivering the quantum of office floorspace growth envisaged and new tall buildings in the form and locations identified. The Plan could not be effective as a result
- If adopted, the Plan would entail severe harm to the significance of St Paul's Cathedral, to the Outstanding Universal Value of the Tower of London World Heritage Site, to the significance of many of the City's finest buildings and to the City's historic character.



- If the scale of growth identified in the Plan could be justified, alternative locations and distributions for the resultant developments must be explored at a broader scale across London's Central Activities Zone.
- The evidence base and assessments of impacts in relation to the historic environment are flawed, inappropriate and non-comprehensive, and cannot justify the policies they currently underpin.
- A rebalancing of the relationship between the economic, social and environmental strategic objectives is required, together with a consequent revision of the Spatial Strategy to ensure the draft Plan aligns with Good Growth and sustainable development principles.

Historic England Advice

The City's heritage is at the heart of its identity, and, to an almost unique extent, at the heart of our national identity. In its small geographic area, the City contains over 600 listed buildings, of which the National Heritage List for England records a wholly remarkable 86 at grade I and 84 at grade II*. It includes iconic sites such as St Paul's Cathedral, the City Churches and Bevis Marks Synagogue; a rich and diverse group of conservation areas; and evidence of urban activity dating back around 2000 years in its archaeology. The City has been guarded for over 900 years by the Tower of London, now in a different administrative area but still closely bound to the City, both physically and symbolically. Many of London's cherished views encompass elements of the City's remarkable historic environment, the importance of which helps underpin the economic, social and environmental sustainability of the Square Mile.

Much of the content of the draft Plan sets out positive aspirations for the historic environment. We welcome the expanded archaeology policy and the recurrent theme in various sections of the Plan on the retrofit and refurbishment of existing buildings. We also note the extensive evidence gathering and assessment work that has been undertaken since the previous consultation on the Local Plan. This has enabled greater clarity over key elements of the Plan, not least the location and heights of tall buildings which is something that Historic England has previously asked for.

However, we consider that there is a very serious inherent conflict and incompatibility between the draft Plan's general, high level aspirations for the historic environment and the intention to deliver the identified 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 and at the heights set out



in policy S12. These two objectives cannot be achieved simultaneously. The clarity enabled by the 3D modelling has exposed clear conflict between the level of growth envisaged and the outstanding heritage of the City and its surroundings. We strongly disagree with the conclusions of the various evidence base documents that assess the impacts of these tall buildings on the historic environment.

Importantly, there remains uncertainty as to the relationship between this 1.2m sqm minimum target and the amount of development either under construction or already in the formal planning process. We cannot currently know whether publicly quoted amounts of new floorspace in the pipeline are part of or additional to the 1.2m sqm. Similarly, despite our repeated requests, it is not clear how much development the two tall building zones could deliver if they were built out to their maximum parameters, or whether projections exist for the amount of additional floorspace that would be delivered through the emphasis in the draft Plan on retrofit and refurbishment proposals. Clarity on this data is highly important in ensuring an appropriate evidence base for the Plan.

We consider that the draft Plan's policies for offices and tall buildings, in concentrating an ambitious level of new office floor space in such small geographic areas (and so entailing extremely tall buildings), would result in serious adverse effects on the City's historic environment. The 3D modelling demonstrates these impacts, and although a substantial proportion of them have not been appropriately assessed and quantified, they would inevitably create severe harm, most notably to heritage of the greatest importance, including the setting of the Tower of London World Heritage Site (WHS), St Paul's Cathedral, Bevis Marks Synagogue and other highly graded heritage assets. As well as being contrary to NPPF requirements, we consider that the policies the modelling underpins (principally S12 Tall Buildings and S21 the City Cluster) 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.

Our concern is such that we believe that policies relating to tall buildings and the City Cluster in the draft Plan represent a real threat to the World Heritage Site status of the Tower of London. We would particularly point out that UNESCO has requested a State of Conservation report for the WHS following recent notifications about tall building proposals in the City affecting the Tower of London. To support the management of the WHS the State Party has notified UNESCO of the draft Plan and requested a Technical Review. We will share this with the Corporation once it is made available.

The current draft Plan consequently fails to strike an appropriate balance between conserving the City's heritage and delivering growth. We do not consider the Plan to be sound in terms of the tests set out at para 35 of the National Planning Policy Framework (NPPF). We do not consider it to be justified in terms of its evidence, effective in terms of delivering its objectives or in conformity with national policy. Furthermore, we do not believe the Plan reflects other various requirements in the NPPF, including unambiguous policies (para 16d), being underpinned by a relevant and up to date evidence base (para 31) and providing a positive strategy for the historic environment (para 196). We are also deeply concerned that it would impede the ability to meet the statutory requirements and relevant international obligations (para 2), as well as the sustainable development principles (para 8) of the Framework.

In terms of delivering such significant growth within the City of London, we acknowledge the constraints that exist in terms of potentially appropriate locations. However, the level of growth envisaged represents a substantial proportion of the projected floorspace growth across the entire Central Activities Zone in the current London Plan. Given the severity of the heritage impacts if such an approach were to be taken forward, we consider that consideration and investigation of alternative spatial distributions of office development should be undertaken. London-wide solutions should be considered to avoid London-wide adverse impacts.

We consider that the amendment to the wording of policy S12 Tall Buildings to remove the statement that such development is inappropriate in conservation areas would significantly weaken the level of protection for the historic environment. While we would acknowledge that there are tall buildings within some conservation areas currently in the City, we cannot agree that these have all preserved or enhanced the special character or appearance of these areas. The logic for this change in policy wording is therefore highly questionable. If adopted this approach would fail to reflect the differing nature of the City's conservation areas (many of which are of a lower-rise character) and would not set out a positive strategy for their conservation. As such it would be a retrograde step in terms of protection for the historic environment. The wording in the currently adopted local plan should therefore be reinstated.

We do not consider that the reference to the immediate setting of the Bevis Marks synagogue, listed at Grade I, in policies HE1 Managing Change to the Historic Environment and S21 City Cluster conforms to national policy. The NPPF defines setting 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 NPPF definition does not distinguish between an immediate and wider setting. Making this distinction without also providing policies applicable to the wider surroundings provides only a partial policy framework for managing change in the setting of the synagogue, and infers, incorrectly, that its setting effectively includes only the six buildings that enclose the synagogue and its courtyard. This partial approach introduces ambiguity and confusion given the other content of HE1 and indeed regional and national policy on harm to heritage. This should be substantially reworked.

We do not consider the various assessment and appraisal documents that underpin the draft Plan to constitute an appropriate evidence base or to justify the draft policies. Our detailed comments are set out in Appendix B, but each report has specific shortcomings. Taken together they fail to adequately assess the effects of the two tall building zones on wider historic character, as well as the numerous important heritage assets that make a key contribution to City's historic environment. There are flaws in some methodologies (for example in relation to the Sustainability Appraisal), gaps in the evidence base, as well as conclusions that cannot be supported by the evidence.

In particular, we fundamentally disagree with the conclusions in the Heritage Impact Assessments relating to St Paul's Cathedral and the Tower of London World Heritage Site. We consider that the quantum of development proposed would result in severe harm to the significance of St. Paul's Cathedral and the Outstanding Universal Value of the Tower of London. In the case of St. Paul's, our conclusion is supported by the setting study which we and the Dean and Chapter have jointly commissioned. The final version of this will be forwarded to you in the next few days. The study makes clear the critical contribution that setting makes to the cathedral's significance, and, therefore, its vulnerability to the effects of unsympathetic development. We consider that a number of elements of the evidence base should be revisited to ensure it is comprehensive, appropriate and better reflects the level of impacts and harm.

The further reasoning behind our position that the Plan is unsound is set out below and in Appendices A and B. We also append the Alan Baxter report *City of London Statement of Heritage Significance* which we commissioned in 2021 and previously shared with you, as this forms the basis of our understanding of the City's significance. We have also suggested in Appendix A how a rebalancing of the Plan's strategic priorities together with revisiting the manner in which the Spatial Strategy would deliver them could enable the Plan to align with both sustainable development objectives and Good Growth principles set out in the current



London Plan. We would welcome further discussion to address these concerns before the Plan is submitted for examination.

Conclusions

Historic England considers the Regulation 19 consultation version of the City of London's Local Plan to be unsound. As set out in this letter and appendices A and B, we do not consider it would be effective in its objectives, is not justified in terms of the evidence base and to an important degree is not in conformity with both national and regional planning policy.

The policies relating to offices and tall buildings would, if implemented, severely harm the significance of St Paul's Cathedral and the Outstanding Universal Value of the Tower of London, harm the significance of many of the City's finest buildings, and profoundly compromise the City's rich historic character. They would, therefore, directly contradict the Plan's generally welcome policies for the conservation of the historic environment. This contradiction flows from failings in the Plan's evidence base.

Historic England is acutely aware of the important role the City of London plays in both the regional and national economy. We wish to work with the City to find ways to accommodate growth while conserving the historic environment. Both objectives are necessary ones, and both are fundamental objectives of the National Planning Policy Framework.

Finding a way to reach an appropriate balance between the strategic objectives and to revise the Spatial Strategy will clearly require further work on the part of all stakeholders. However, we consider this is both important and necessary if both conservation of the City's extraordinary historic environment and growth are to be successfully enabled.

We would welcome the opportunity to discuss the City's Plan and its evidence base further in order to find consensus ahead of the examination process, including by way of a Statement of Common Ground with the City Corporation.

If it is not possible to reach agreement on any, or all, of the issues, we would wish to participate in the subsequent hearing session to explain and clarify our concerns, if necessary, and to answer any questions the Inspector may have.



Historic England

Yours faithfully

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Appendix A: Table of Historic England’s comments on the Pre-Submission Draft of the City of London Local Plan 2040

Overarching comments

As drafted, we do not consider that the draft Plan sets out a spatial strategy or objectives that would enable outcomes that align with the NPPF or the good growth principles of the London Plan. The over-concentration of tall building development within the City would lead to highly damaging effects to historic character, heritage significance and the Outstanding Universal Value of the Tower of London World Heritage Site. The draft Plan requires revisions to its spatial strategy to guide and shape new development towards less intensive and intrusive forms and locations, together with revisions to its tall buildings policy to help deliver this. A revised and comprehensive evidence base will help in understanding how and in what form these revisions should happen.

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
1. p7	1 Strategic Priorities	Unsound	Given the emphasis on economic growth within the Plan, at the expense of environmental and heritage protection, we do not consider the Plan would deliver sustainable development as defined in the NPPF (para 11). The scale and pattern of growth envisaged would not lead to environmental improvements, and there would be serious and permanent harm caused to the historic environment. The balance of the three strategic priorities is therefore unacceptable.	

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>Furthermore, it would fail to reflect the central concept of the 2021 London Plan in achieving Good Growth – growth that ensures that the City and all the London boroughs develop and grow sustainably. The imbalance between the economic and the environmental imperatives in the draft Plan are highly problematic when considering the requirements of London Plan policies GG1, GG2 and GG5. The economic benefits are clearly demonstrated to be at the expense of heritage, character and identity in both the City and beyond.</p>	
2. p12	2 Spatial Strategy	Unsound	<p>We do not consider that the Strategy can be effective given our position above on the Strategic Priorities. Further, and as per our wider comments elsewhere in this response, separate constituent parts of the Strategy are in direct conflict – ie the level of office development targeted in part 2 cannot be achieved while conserving views and the historic environment as set out in parts 10 and 11.</p> <p>Delivering the quantum of net additional office space specified in the Plan in the City Cluster and Fleet Valley Tall Building Zone would counteract efforts towards the protection of strategic and local views and the conservation of the City’s historic environment.</p>	<p>We consider that a rebalancing of the strategic priorities, and therefore alignment with sustainable development and good growth principles, is possible through a refinement of the Spatial Strategy.</p> <p>Consideration and identification of spatial</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>The Spatial Strategy is the spatial expression of the Plan’s strategic objectives. We consider that a more successful balance between the economic, social and environmental objectives can be achieved by exploring both alternative spatial distribution strategies for the level of office demand in tandem with adopting an approach that seeks lower-rise and more context-friendly development. Much of the policy content of the Plan in terms of design and the historic environment is already framed in this way, but we consider the fundamental issue to be the way this conflicts with the form and quantum of development envisaged with the result being both cannot be achieved simultaneously.</p> <p>We would acknowledge the undoubted importance of the City of London to both London’s and the national economy. The dynamism and health of the City is something that is in the interests of everyone. Our comments here are intended to start further discussions as to how we can move towards a consensus on achieving good growth and that satisfies economic, social and environmental imperatives.</p>	<p>alternatives in delivering ambitious levels of new office space would potentially enable the harmful impacts through policies S12 and S21 we have identified to be addressed to a meaningful degree. Given the scale of impacts that the current draft Plan would create across London, we believe it is critical that an approach that better distributes growth across the Central Activities Zone is required to properly balance economic, social and environmental objectives.</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
				<p>Combined with the work undertaken by the City Corporation to understand potential capacity, we consider this would enable a 'gentle densification' approach to growth to allow for new development to be successful in its context within the City.</p> <p>Further comments on the level of office development and the contribution to this that can be made by retrofit and refurbishment initiatives are made elsewhere in this response.</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
				<p>However, we note there are no assessments as to the role of such approaches to the total quantum of new development. This takes no account of the way in which existing buildings (including listed buildings) can be kept in use as a result and avoid becoming ‘stranded assets’ – a trend emphasised in the evidence base document.</p>
3. p69	Section 5 Offices: Strategic Policy S4 Offices	Unsound	<p>We note the minimum target of 1.2m sqm of net additional office floorspace across the plan period. However, on the basis of the draft Plan and the available evidence, we do not consider this level of growth to be justified in relation to two aspects. Clarity is required as to the total amount of net additional floorspace that would be delivered if the maximum parameters of the 3D modelling were achieved to put the 1.2m sq m target in context.</p>	

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>Similarly, we acknowledge it is reasonable to assume that the welcome emphasis on retrofit and reuse of policies OF1 Office Development and S8 Design in the draft Plan may not deliver a significant amount of ‘new’ floorspace by definition. However, consideration of how much floorspace it could effectively safeguard and ensure the continued use of through upgrading in terms of amenity, greater environmental performance and reflecting market requirements should play an important role in satisfying demand while helping to address environmental impacts in their widest sense. Avoiding the prevalence of ‘stranded assets’ to use the terminology of the Knight Frank/Arup report would be an important contribution to a positive strategy for the historic environment.</p> <p>Similarly, we have noted recent public comments from the Chairman of the Planning & Transportation Committee as to the amount of new office floorspace either under construction or in the development pipeline. It is not clear whether this total (1m sqm) is in addition to or part of the 1.2m sq m identified in the Plan. Clarity on this is clearly important in understanding the total potential impacts as a result of tall buildings.</p>	

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>Secondly, given the impacts likely as a result of growth on this scale, we consider that in order to achieve a sustainable policy framework greater consideration needs to be given to delivering growth across a wider area. This would likely mean that growth would be less dense and not require the need for the scale of buildings required by the current draft Plan. This is an issue that affects large parts of the Central Activities Zone (and beyond) and alternatives should be considered at this broader scale.</p>	
4. p145	Section 9 Design: Policy DE7 Daylight & Sunlight	Unsound	<p>We note and welcome the identification of places of worship as a sensitive receptor to changes in daylight/sunlight levels as a result of development proposals. However, given the policy emphasis elsewhere in the Plan relating to tall buildings and their agglomeration, particularly in the City Cluster, it raises the issue of subsequent potential impacts in terms of daylight on affected places of worship. As a result, DE7 is unlikely to be effective.</p> <p>The policy should go further to avoid tall building proposals introducing difficulties in ensuring the continued use of places of worship due to daylight issues.</p>	<p>Clause 2: ‘Development proposals should have regard to the daylight and sunlight levels of historic interiors <i>and significant adjacent external spaces and how this may affect their continued use</i> and should seek opportunities ...’</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
5. p179	Section 11 Heritage & Tall Buildings: Strategic Policy S11 Historic Environment	Unsound	<p>While we note and welcome the contents of this policy and would broadly agree with its aims, we do not consider that it would be effective given the wider economic development objectives of the Plan. As demonstrated by our comments elsewhere in this response, the impacts of tall building development on the historic environment would be such that there is a fundamental conflict with S11, particularly given the commitment in clause 2 to conserve and enhance the setting of heritage assets. Please see further comments in relation to the evidence base and impacts on the historic environment at Appendix B.</p> <p>Furthermore, we also consider this conflict would mean the City Corporation would be unable to reflect the requirements of para 2 of the NPPF in satisfying both international obligations and the legislative requirements of the 1990 Planning (Listed Buildings and Conservation Areas) Act.</p>	
6. p183	Policy HE1 Managing Change to	Unsound	<p>Clause 8 introduces the principle of an 'immediate setting' for the Grade I listed Bevis Marks synagogue. This immediate setting is defined in the supporting policy paper as the six buildings that effectively encircle and enclose the synagogue and its courtyard. This is not in conformity with the</p>	Delete clause 8.

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
	the Historic Environment		<p>NPPF, which in the glossary makes clear that the setting of a heritage asset is not fixed and may change over time.</p> <p>Furthermore, clause 8 as set out carries an inference that effects on the immediate setting should be the primary consideration in determining development proposals. This adds ambiguity to such proposals, contrary to NPPF para 16d, may work to counter the objectives of S11 and should be deleted.</p>	
7. P190	Policy HE3 Setting of the Tower of London World Heritage Site	Unsound	Given the adverse impacts on the Tower of London World Heritage Site (discussed in detail at Appendix B) we do not consider this policy could be effective in its objectives. As with comment 5 above, we do not consider that the City Corporation would be able to reflect the requirements of para 2 of the NPPF in satisfying international obligations or those of the 1990 Planning (Listed Buildings and Conservation Areas) Act.	
8. p192	Strategic Policy S12 Tall Buildings	Unsound	This policy is not justified by the evidence and would not be effective in supporting the Plan's overall strategic objective in relation to the conservation of the historic environment. Indeed, in establishing these proposed heights and locations for tall building development, we	1. Revisit and revise the relevant evidence base and assessment reports, as well as the contour

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>consider that the Plan would lead to serious and permanent harm to the historic environment as a whole as well as to individual designated heritage assets of the highest importance.</p> <p>Further detailed comments in relation to the evidence and assessments underpinning this policy are set out in Appendix B. In summary however, we fundamentally disagree with the various conclusions that any harm as a result of subsequent tall building development to the heritage assets assessed is negligible, minor or in any way acceptable. As set out, we consider the draft Plan would further exacerbate a situation where harmful tall building proposals continue to come forward.</p> <p>Furthermore, we consider that the Strategic Visual Impact Assessment is flawed in its approach to effects on historic character given its basis in townscape terminology and methodology and that it takes no account of the effects on heritage significance as opposed to simply visual impacts.</p> <p>We also note the number of highly graded assets that have not been assessed in any way. Not including St Paul's Cathedral, there are 44 Grade I listed churches in the City. Even where the setting of these assets has</p>	<p>mapping derived from the digital modelling.</p> <p>2. This exercise, together with our comments elsewhere in this response regarding the spatial distribution of new development and the approach to gentle densification across the City, should be used to revise the height, extent and massing of the tall building zones to achieve a successful relationship with the City's historic environment and avoid further harm to significance.</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>already been harmed by subsequent development, there remains the potential in many cases for further harm through the expansion of the Cluster – as evidenced by Historic England’s objection to the proposal for 1 Undershaft. As a result, we consider the evidence base for this policy to be partial in parts and flawed in others. It cannot be regarded as appropriate as a result and contributes to our position that the Plan as drafted is unsound.</p> <p>We note that the policy wording regarding tall building in conservation areas being regarded as inappropriate has been removed. The logic for this amendment remains unclear given that we consider the previous wording was not in conflict with the approach set out in London Plan policy D9. The previous wording was a well understood and long-standing element of the City’s policy approach to tall buildings which has helped with managing emerging proposals. We also consider it is potentially problematic given the relatively low-rise nature of some conservation areas within the City. As a result, and given the amendment is a retrograde step in terms of the protection of the historic environment, we consider it should be reinstated.</p>	<p>3. Clause 3 implies encouragement towards proposals that include building heights up to the maximum notional heights in the contour mapping at Fig 15 without adequate consideration of wider impacts. Revise first sentence to: <i>‘Where proposals meet these requirements, potentially appropriate building heights within the identified tall building areas’</i> Para 11.5.11 should also be amended to reflect this.</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>We note the indication in clause 2 that tall building proposals will be subject to the requirements in this and other policies. However, we judge that the wording in relation to historic environment considerations is not such that it would provide adequate protection. Clause 8 requires that proposals <i>'must have regard to ... the significance of heritage assets'</i>. This infers a lower level of consideration and therefore protection than 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.</p> <p>Given our position on the effects of the expanded Cluster which is detailed in Appendix B, we consider the inclusion of notional heights within the policy itself to be problematic. As set out elsewhere, we consider that the the shape, massing and heights of the expanded Cluster should be revisited. Notwithstanding this however, we consider that the policy should contain further caveats to make clear that whatever heights are notionally acceptable within the Cluster, avoiding harm to heritage should be built into the process. As set out, we consider the policy in this sense</p>	<p>4. Clause 8c: <i>'conserving</i> the significance of heritage assets ...,</p> <p>5. Reinstate text indicating that tall building proposals are inappropriate in conservation areas</p> <p>6. Reinstate text indicating that tall building proposals should take appropriate account of the cumulative impact of the proposed development in relation</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>ambiguous and not justified. Please see suggested change 3 in next column.</p> <p>We also note that the draft Policy no longer contains any reference to considerations of the cumulative harm potentially created through separate and multiple tall building proposals. Given the dynamism of the City's development sector, this is an important consideration that should be reinstated.</p> <p>Given the far-reaching adverse impacts of the office and tall buildings policies demonstrated by the modelling on heritage significance including on the Tower of London WHS, we consider they would prevent effective application of London Plan policies HC1, HC2, HC3 and HC4. Furthermore, it would work counter to the intention of policy D9 to ensure tall building proposals should avoid harm to heritage assets.</p> <p>Taking these issues together, if adopted, this policy would lead to inappropriate and harmful tall building proposals coming forward with impacts across the City of London and beyond. It would effectively embed harm to the historic environment within the Plan.</p>	<p>to other existing and proposed tall buildings</p>

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
9. p201	Strategic Policy S13 Protected Views	Unsound	We do not consider this policy would be effective given the impacts on the setting and significance of St Paul's Cathedral and the setting, significance and Outstanding Universal Value of the Tower of London World Heritage Site. Further details of our position in relation to the effects on both these assets are set out in Appendix in relation to each of the HIAs. We are clear that the impacts on significance and OUV would be such that this policy could not achieve the objectives set out at clauses 2 and 3, including particularly (but not restricted to) protecting the setting and backdrop of the Cathedral and the World Heritage Site.	
10. p264	Section 14 Key Areas of Change: Strategic Policy S21 City Cluster	Unsound	As with detailed comments set out elsewhere in this response, we consider that the consequent impacts of tall building development envisaged in the City Cluster area are such that this policy would not be effective in its stated aim at clause 5 of preserving heritage assets and their settings. Furthermore, we do not consider that it is justified in terms of the evidence provided given the harmful effects referred to.	

Ref/ Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>Please also see comment 6. Clause 6 and its requirements in relation to the ‘immediate setting’ of Bevis Marks synagogue are not in conformity with national planning policy. This should be deleted.</p> <p>We would also reiterate our position as at comment 8 in relation to clause 6 and its requirement that development proposals ‘have regard’ to the immediate setting of Bevis Marks synagogue. We do not consider this offers an appropriate level of protection for the Grade I listed building as it does not reflect the statutory duty of the 1990 Act.</p>	
11. p270	Strategic Policy S22 Fleet Street & Ludgate	Unsound	We do not consider this policy to be justified in terms of the evidence available in relation to the impacts of the Fleet Valley tall buildings zone – please see comments in Appendix B. Furthermore, while the policy includes a clause enabling tall building proposals in this zone, it does not include any reference intended to ensure that there are no adverse impacts on the historic environment as a result as with S21.	



Historic England





Appendix B: Table of Historic England's comments on the evidence base documents and assessments underpinning the Pre-Submission Draft of the City of London Local Plan

Overarching comments

Taken together, Historic England does not consider the documents analysed below to represent a comprehensive or appropriate evidence base for the policies in the Regulation 19 consultation version of the local plan. They do not fully or effectively analyse the serious and permanent harm to the historic environment that would ensue from the adoption of the Plan. In particular, they underplay the adverse effects on heritage significance to large numbers of highly important heritage assets, historic character and the Outstanding Universal Value of the Tower of London World Heritage Site. There are over 600 listed buildings in the square mile (over 140 of which are either Grade I or II*), but the impacts flowing from the Plan would be such that the effects would be visible right across London and indeed would register in public perception terms much further afield such is the capital's profile. Furthermore, there are serious flaws in the methodology and conclusions to the Sustainability Appraisal and its analysis of the environmental effects of the Plan.

As a result, the policies in the Plan (and the effects they would have on the historic environment) cannot be justified, are not in conformity with the NPPF in terms of its evidence base, while the Plan as a whole would not be effective or deliverable.

As indicated throughout our consultation response, we consider the potential adverse impacts on the historic environment to be of such a scale that they outweigh other potential benefits that are envisaged. This imbalance in approach would mean that the Plan as a whole would fail to meet the NPPF requirements to achieve sustainable development.



We include various references in comments below in relation to specific views and visualisations provided as part of the Plan’s evidence base, including from the SVIA and volumetric testing documents. However, our overall position has been arrived at following consideration of all the evidence available including the digital 3D modelling data.

Document	Comments
St Paul’s Heritage Impact Assessment	1. We note the structure of the HIA and the methodology as set out in sections 1 and 2, including the statement at para 2.21 that Historic England’s approach to the assessment of effects on significance (as set out <i>in GPA3 The Setting of Heritage Assets</i>) has been followed through this process. However, we do not consider this to be the case. Step 4 of this approach involves assessing the effects of the proposal on the significance of the asset in question. However, at paragraph 6.53 the HIA concludes that the expanded form of the City Cluster strikes an appropriate balance between the visual dominance of the Cathedral and ‘the consolidation of the Cluster form’. This is repeated at para 8 of the conclusions of the document. This is a judgment focused on the visual appearance in the cityscape of the Cluster rather than the effects on the significance of the asset based on a full understanding of the latter.
	2. It is not clear which visualisations/illustrations (those either in the volumetric testing papers or the SVIA documentation) have been used to test the effects of the tall building zones.
	3. Section 6 of the HIA makes several references to the analysis in the Strategic Visual Impact Assessment (SVIA) that has also been undertaken to help support the development of the Plan – see for example para 6.49 and 6.57 (our

Document	Comments
	<p>comments in relation to this document are set out below). However, the SVIA is an assessment that focuses narrowly on visual and townscape effects and does not encompass analysis of impacts on heritage significance. We do not consider that its analysis is appropriate within an HIA and particularly that it should inform conclusions. As the staged approach set out in GPA3 makes clear, it is the degree of effect on the contribution to significance provided by setting that should be under consideration rather than any visual impact.</p>
	<p>4. We strongly disagree with the conclusions of para 6.58 that the overall massing of the expanded Cluster would ‘minimise the possibility’ in future that individual tall building proposals would harm the significance of the Cathedral. We would point out that the growth in the number of new tall buildings envisaged by the draft Plan is not a new phenomenon, but is instead a potential acceleration of a trend that has been prevalent (and enabled by planning policy) for a number of years. The result of this has been harm to heritage assets, many of which are vulnerable to further adverse effects from further potential tall building development. The number of contentious tall building proposals across the City in recent years demonstrates the failure of the current approach. The statement at para 6.58 ignores these impacts and the implicit assumption that the overall expanded outline and massing of the Cluster would also create further harm across the Plan period. The implication that a further expansion of tall building areas would somehow draw a line under subsequent harmful effects on the historic environment is not supported by evidence or experience.</p>
	<p>5. We note that the assessment of effects on significance (para 6.44 onwards) to an extent reflects the structure of the setting study of St Paul’s currently being prepared by Historic England and the Cathedral. However, we disagree</p>

Document	Comments
	<p>with the conclusions reached against a number of attributes of the setting. Our response here follows elements of the draft setting study:</p> <ul style="list-style-type: none"> • Clear sky space: while the expanded cluster would retain clear sky space on either side of the cathedral from the key viewing points analysed, it would raise the height of the outline of the cluster when viewed from the west as well as filling in the current gap between buildings thus presenting a solid wall of development to the cathedral’s eastern side. This would further erode the visual prominence of the Cathedral on the skyline as the bulk of the Cluster solidifies and grows. This effect is most evident from LVMF viewing point 15B1 (view c18 in the volumetric testing documents), but also from 17B1. 17B1 also illustrates the same effect, albeit to a lesser degree resulting from the Fleet Valley tall building zone to the north west of the cathedral. • Clear sky space: 15B1 also illustrates the degree to which the expanded Cluster would affect the ability to appreciate the scale and magnitude of the Cathedral in relation to its surroundings which is an important element of its setting that contributes to its significance. The expanded massing of the Cluster accentuates the imbalance in relationship between the two outlines, undermining the extent of the presence and pre-eminence of the Cathedral on the skyline. It creates an uneven relationship as a result. While not a strategic view, the significant change in the publicly accessible view from Somerset House Terrace, which recalls a famous view depicted by Canaletto, (view 44 in the SVIA) is damaging in the way it almost closes the gap between the dome of the Cathedral and its existing backdrop – as acknowledged in the HIA. • Clear sky space: the change in the overall relationship between the two outlines would also damage the ability to appreciate the architectural composition and the relationship between the upper parts of the Cathedral. As its dome and silhouette become subservient to the taller buildings, the effective focus of the

Document	Comments
	<p>collective skyline moves away from the Cathedral meaning that the viewer loses some understanding of its various elements and their inter-relationship.</p> <ul style="list-style-type: none"> • River corridor: the change to the character of views of the Cathedral from the river (for example 15B1-2 and 17B1-2) would harm the contribution of setting to the significance of the Cathedral by reducing in relative terms its scale and pre-eminence. A taller and bulkier Cluster (and to a lesser degree the increasing visibility and intrusion of the Fleet Valley zone) introduces a sense of interference in the Cathedral’s setting. It would also conflict with the LVMF guidance in relation to 15B1, which states that ‘consideration should be given to the space St Paul’s Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect’, and would conflict with the requirements of London Plan policy HC4 London View Management Framework. • Conclusions: we therefore conclude that the proposed tall building zones would in fact have serious effects on the setting of one of the most important buildings in the country in terms of its heritage significance. We therefore consider the HIA is not appropriate to underpin the proposed tall buildings policy and cannot justify it.
Tower of London World Heritage Site Heritage Impact Assessment	<ol style="list-style-type: none"> 1. For the reasons set out below, we disagree with the conclusion that the impacts from the proposed expansion of the City Cluster on the significance and Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (WHS) would be ‘minor and of no concern’ (para 5 of the conclusions). In contrast, we consider the impacts would be serious and permanent. Indeed, we believe they would be harmful to such a degree that there is a risk that the World Heritage Status of the site would be threatened if the relevant policies to the Plan underpinned by this assessment are adopted.

Document	Comments
	<p>2. The spatial extent of the City Cluster under the draft Plan has increased significantly in comparison to both its current footprint and that during the previous Regulation 19 consultation. It now encompasses further areas both to the south and east of the current boundary, bringing it closer to the WHS and moving further into its backdrop as experienced in important locations for appreciating the OUV both within and around the Tower. This spatial adjustment is not acknowledged or analysed in the assessment.</p>
	<p>3. We do not consider the approach undertaken to the HIA to be neutral in its consideration of the form of the proposed expanded Cluster. The language and tone of the report, most particularly in paras 6.9 to 6.18 is positive in its references to the potential appearance of the Cluster and how it will relate to its context, for example the reference to the ‘achievement of a coherent urban form’ at para 6.9. This is not relevant to the purpose of the document in assessing impacts on heritage significance. The assessment does not start from a neutral or impartial viewpoint.</p>
	<p>4. We note that the conclusions of the effects of the expanded Cluster consider these against a number of the attributes of the Tower’s OUV. We disagree with a number of these conclusions, with our reasoning relating the constituent components of each attribute set out below. Our conclusion is that there would be serious effects to the setting of the WHS with consequent adverse impacts on its OUV.</p> <p>Attribute: Internationally famous monument. HIA conclusion: very small change to setting, very minor effect</p> <ul style="list-style-type: none"> • Component: <i>the iconic White Tower, its physical form and visual dominance.</i> The relationship between the Tower and its setting is central to the ability to appreciate this component of its OUV. While there would not

Document	Comments
	<p>be an effect on the fabric of the WHS, we consider that its visual dominance in relation to its context would be adversely affected. We note that the existing sky gap would be retained between the outline of the WHS and the Cluster, but at its closest point the height of the Cluster would be greatly increased. This is illustrated in views from LVMF view 10A1 on Tower Bridge. The height of the expanded Cluster at this point would inevitably change perceptions of viewers of the dominant elements of the cityscape at the expense of the Tower's OUV. It would be diminished.</p> <ul style="list-style-type: none"> • Component: <i>the Tower's distinctive silhouette as seen in the view from the south bank of the Thames (LVMF view 25A1-3).</i> The greater bulk and massing of the Cluster would further change the focus of this view as well as the relationship between the tall buildings and the silhouette of the WHS. Proportionately, the silhouette would become a smaller element of the view, and the ability to appreciate its entire outline would be eroded. This would diminish the ability to appreciate and understand how the Tower functioned as a symbol of the strength of the monarchy.
	<p>Attribute: Landmark siting. HIA conclusion: small change to setting and minor effect</p> <ul style="list-style-type: none"> • Component: <i>key views of the Tower up, down, across and from the River.</i> As the World Heritage Site Management Plan makes clear, this attribute is expressed in the Tower's setting. A number of key views of the WHS, notably LVMF 25A1 and 10A1, would be substantially altered by the expanded Cluster. In some views, the outline of the Cluster would move closer to the silhouette of the WHS, but in all in would be larger thus changing the relationship between the two and altering perceptions of the viewer. The increased scale of the tall buildings would undermine the remaining dominance of the WHS, so making it harder to appreciate the overall attribute.

Document	Comments
	<ul style="list-style-type: none"> <li data-bbox="584 424 2033 651">• Component: <i>the Tower's relationship to the City.</i> The change in relative sizes of the WHS outline and the Cluster would contribute to the changing relationship with the City of London. While the trend for the City to become more the dominant element in the relationship through the expression of its commercial nature in increasingly taller buildings has been ongoing for some time and leading to increasing vulnerability of the WHS's OUV, further expansion of the Cluster would exacerbate this. <li data-bbox="584 655 2033 927">• Component: <i>the Tower's relationship to the City.</i> The illustration of effects of the change in the Cluster from LVMF 10A1 demonstrate how the relationship would continue to change. We note the retention of a marginal sky gap between the eastern edge of the Cluster and the silhouette of the WHS, but the substantial increase in height at its closest point would present a significant distraction from the Tower in the view and erode any ability to appreciate its OUV, as well as adding further to the cumulative harm already created. <li data-bbox="584 932 2033 1203">• Component: <i>the Tower's relationship to the City.</i> We disagree with the assertion at para 7.17 that the expanded Cluster would have 'an improved reading as a distinctly separate form from the White Tower'. Historic England considers that the changing appearance of the Cluster (taller, bulkier and more prominent) would exacerbate an already negative effect. It would appear as an overbearing presence, with a cliff edge relationship visually with the WHS at the eastern side, making it harder to appreciate the significance/OUV of the WHS. <li data-bbox="584 1208 2033 1394">• Component: <i>the Tower's skyline (silhouette) as seen from the river and from across the river.</i> The greater bulk and massing of the Cluster would change the focus of LVMF view 25A1 as well as the relationship between the tall buildings and the silhouette of the WHS. The outline would become a smaller element of the view, and the ability to appreciate its entire outline would be eroded.

Document	Comments
	<p>Attribute: Physical dominance of the White Tower. HIA conclusion: very small change to setting and minor effect</p> <ul style="list-style-type: none"> • Component: <i>iconic silhouette against the sky from within its local setting and particularly from the lower level viewpoints of the river itself and its south bank.</i> The physical dominance of the Tower is clearly expressed through its setting (WHS management plan, para 3.4.11). As with our comments above on other attributes and components of OUV, understanding this attribute is not possible without considering the way setting contributes to it. We consider that the greater bulk and height of the proposed Cluster would contribute to the way the WHS is perceived by the viewer in key views from and across the river. Its prominence would be further diminished, and the focus of the cityscape would shift towards the City. The greater height and cliff edge appearance of the eastern end of the Cluster would be a distracting presence in these views. • We note that the HIA draws on analysis from the SVIA at paragraph 7.22. Given the townscape focus of this assessment we do not consider this appropriate within an HIA. As the UNESCO guidance on this subject makes clear at section 4.3, assessments of impact on World Heritage involves determining effects on OUV. • In relation to the unsuccessful relationship between the WHS and the eastern edge of the expanded Cluster, we are struck by the acknowledgment at para 7.22 the potential that individual future development proposals within the Cluster to be in conflict with relevant policy. We would in consequence reiterate the purpose of an HIA to identify and ensure that relevant policy avoids harm to the historic environment. • We also strongly disagree with the statement at para 7.24 that the expansion of the Cluster is ‘beneficial through its future proofing of the separation’ between it and the WHS. If this growth (which we would not describe as incremental but dramatic) is accepted, then we see no guarantee that further expansion and harm could not be justified in future in similar terms.

Document	Comments
	<p>5. Conclusion. We disagree with the HIA conclusion that impacts on the OUV of the WHS would be minor and of no concern. The Statement of Outstanding Universal Value for the WHS identifies that the development of tall buildings has made the OUV vulnerable. To avoid this, robust and coherent measures should be put in place to protect the OUV. While the City’s WHS policy is intended to achieve this, the proposed planned growth of the Cluster (despite a recent and relevant planning refusal for harm to the WHS) would fatally undermine the ability of that policy to be effective. As such this plan would not protect OUV, and would indeed embed harm. This is in conflict with the commitments made by the State Party under the WHS Convention (see article 4 and 5a, 5d https://whc.unesco.org/en/conventiontext/). We consider the impacts would be serious to such an extent that there would be a realistic possibility of WHS status being threatened.</p>
Strategic Visual Impact Assessment	<p>1. This assessment has been undertaken with an urban design and townscape approach and therefore does not consider the impacts on heritage significance, nor on how inter-relationships between heritage assets contribute to significance or historic character. The emphasis on how the changing shape of the Cluster affects urban form does not add to the understanding of the effects on the historic environment. This is evident in its reference to the ‘presence’ of Strategic Landmarks (eg St Paul’s Cathedral, the Tower of London and the Monument) rather than heritage significance, although we note, even in townscape terms there are several references to the potential for the expanded Cluster to create adverse effects.</p>
	<p>2. Historic England was consulted on the draft methodology for this exercise and in our response stressed the need for a wider approach that would encompass analysis and assessment of potential effects on heritage significance.</p>

Document	Comments
	<p>This would be an appropriate and proportionate methodology given the potential for far reaching effects on the exceptional historic environment of the City and surrounding areas of London.</p>
	<p>3. Given this, we consider that there remains an important and concerning gap in the evidence base in relation to the effects on the historic environment beyond the three Strategic Landmarks and their associated HIAs. As well as the numerous conservation areas, there are over 600 listed buildings in the City of London (as well as many more beyond its boundaries potentially affected by such tall buildings). While we would acknowledge that at this stage in the plan making process it would not be proportionate to fully assess the impacts on every one, the lack of any analysis (despite the availability of the digital 3D modelling) of more than 99% of them effectively means that the impacts are unclear and there is significant ambiguity in the relevant draft policies.</p>
Sustainability Appraisal	<p>1. We note the Sustainability Appraisal and its broadly positive assessment of the draft Plan. However, given the availability of the 3D modelling and the associated illustrations (volumetric testing and SVIA imaging), the consequent impacts on the historic environment are clearly demonstrated. We are particularly concerned that the SA does not assess in any way the 3D modelling of tall buildings or any of the effects that development of this kind would have. This further illustrates the central tension in the Plan (and the resultant challenges in delivering its objectives) between the draft policies and the evidence and development targets they create. In failing to assess the effects of the modelling, the SA also fails to reflect the impacts on heritage significance and historic character through the heights and massing of the expanded Cluster and the Fleet Valley tall buildings zone, both within the City of London boundary and beyond. This is a serious flaw in the methodology and comprehensiveness of the</p>

Document	Comments
	<p>report which undermines its credibility and ability to justify the overall approach that underpins the draft Plan – its central objective of extremely high levels of new tall building development.</p>
	<p>2. We also consider that the SA fails to appropriately consider the cumulative effects of the Plan as a whole on the historic environment. We note that Table 5 (p46) indicates that there is no association between the economic objective underpinning the Plan and the historic environment. This clearly fails to appreciate the strong link between the scale of new office floorspace envisaged to be delivered through new tall buildings and the effects on individual designated heritage assets and historic character. Furthermore, there is no consideration of transboundary effects in the final report, despite the height and massing of the expanded Cluster having significant implications for heritage significance in neighbouring boroughs, not least the Tower of London World Heritage Site. As such, we do not consider that it therefore reflects the requirements of the Environmental Assessment of Plans & Programmes regulations 2004, section 16.</p>
	<p>3. Given the availability of the 3D modelling and the volumetric testing illustrations, we consider that the SA should be revisited to assess the volume of office development envisaged and to be delivered in the form of tall buildings in an expanded Cluster and the new Fleet Valley tall buildings zone. This would enable a more accurate appropriate assessment of the Plan as a whole and policies related to offices, tall buildings and the two relevant Key Areas of Change. It should also reach conclusions about cumulative and transboundary effects.</p>
<p>Tall Buildings Topic Paper</p>	<p>1. We note the assessment of the City’s heritage significance and the sieving exercise contained within this Paper, both of which are helpful in understanding what is special about the character of each of the identified sub-areas</p>

Document	Comments
	<p>and their sensitivity to further tall building development. However, much of the analysis and assessment of this sensitivity is inward looking in terms of the potential effects on character and urban grain in the immediate area. While this is clearly important, it does not assess the effects of locating new tall buildings on both neighbouring areas and those further afield, and in particular the effects on setting of assets and how that contributes to their significance. To an extent, the assessment also repeats and refers to analysis and conclusions in other evidence base documents.</p>
	<p>2. As with other evidence base documents, the topic paper takes a largely townscape and views-based approach to considering any effects from new tall building proposals and the expansion of the City Cluster and designation of the new Fleet Valley tall buildings zone. The hard constraints identified at para 28.4 have shaped the form and methodology of the assessment. This in turn means that the conclusions take little account of effects on heritage significance and emphasise the appearance of the expanded Cluster in the townscape – for example at para 30.15 and the conclusion that its form and modelling would strike ‘an appropriate balance’ between its consolidation and the LVMF guidance (which itself is not a significance based document). This is most prominent in the final sentence of the document which refers to achieving a balance between growth and the ‘presence’ of the Strategic Landmarks. The overall approach of the paper does not adequately assess the effects of such substantial growth on the historic environment in both the immediate and wider surroundings.</p>
	<p>3. We note that the document acknowledges at points that the expanded Cluster would create adverse impacts on the setting of key heritage assets. For example para 30.14 states that effects that would be observed from LVMF viewpoint 10A1 would create a ‘potential harmful impact ... adversely affecting how the setting contributes to an</p>



Document	Comments
	appreciation of the Tower's significance and OUV'. Concerningly, the report concludes that this impact could only be mitigated 'to an extent'. This would appear to justify harm to the historic environment.
	4. The methodology and conclusions of the paper also means that there remains a significant gap in the evidence base to the draft Plan in terms of identifying and understanding what the impacts would be on the substantial number of other heritage assets in the City beyond the three Strategic Landmarks.



Appendix C – St Paul’s Setting Study

Appendix D – Alan Baxter: *City of London Statement of Heritage Significance* (commissioned by Historic England in 2021)