

## Morgan, Jackson

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**From:** Guy Newton [REDACTED]  
**Sent:** 17 June 2024 17:00  
**To:** Planning Policy Consultations  
**Subject:** City Plan 2040  
**Attachments:** City Plan 2040. The Victorian Society x.docx  
**Categories:** CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Please find our letter of advice attached above.

Many thanks,



**The  
Victorian  
Society**

**Campaigning for  
Victorian & Edwardian  
Built Heritage**

**Guy Newton**  
Conservation Adviser

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**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

[planningpolicyconsultations@cityoflondon.gov.uk](mailto:planningpolicyconsultations@cityoflondon.gov.uk)

17 June 2024

Dear Sir/Madam,

**RE: City Plan 2040**

Thank you for consulting the Victorian Society. We have significant concerns about the draft City Plan 2040 and the evidence underpinning several policies.

We first would like to support policies OF1(1a) and S8(1) & (2) that prioritise the retention and retrofitting of existing buildings- a sustainable and conservation-focused approach to development.

The Victorian Society welcomes the City of London's greater compliance with the London Plan D9(B). The clear and defined boundaries of areas suitable for tall buildings, shown in Figure 14, provide a plan-led approach that gives all parties greater certainty.

However, we are greatly concerned about the lack of clarification regarding tall buildings within conservation areas across the City of London, including the seven conservation areas partially and fully included in the proposed City Cluster and Fleet Valley. The extant City Plan has a presumption against tall buildings within conservation areas, but this presumption has been removed in the latest draft plan. We strongly believe this should be reinstated to maintain current protections.

While the principle of setting out the maximum permitted height for specific areas suitable for tall buildings within the City Cluster and Fleet Valley, as indicated in Policies Maps C and D and Figure 15, could provide greater clarity, we are concerned about the evidence underpinning the height allowance within these areas. There appears to be no robust rationale and a lack of consideration for the permanent harm that could be caused to conservation areas, heritage assets, and

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protected views. One area identified for a maximum height of 280-300m covers almost the entirety of the St. Helen's Place Conservation Area.

Despite the draft Plan's statement that "tall buildings should not necessarily be designed to maximize height within these contours," we believe the introduction of these maximum height contours would encourage height maximisation within these specific contoured areas—areas that are not always consistently suitable for tall buildings in terms of heritage impact. This highlights the need for robust evidence to underpin the suitability of these maximum heights.

Despite the presumption against tall buildings within conservation areas in the extant City Plan and repeated objections from the Victorian Society and other heritage bodies, permission for tall buildings has been readily granted, greatly damaging the special qualities these areas were designated to protect. A recent example includes the 30-storey tower at 85 Gracechurch Street within the Leadenhall Conservation Area—a scheme that will significantly damage the setting of the Grade II\* listed Leadenhall Market, one of the City's great 19th-century landmarks. An application under consideration for the construction of a 43-storey building at 31 Bury Street is situated within the newly established Creechurch Conservation Area. The proposal threatens the integrity of the seminal Grade II\* listed Holland House and would cause significant harm to an area defined by 19th-century warehouses, offices, and religious buildings.

Significantly, the proposals at Liverpool Street Station, situated within the Bishopsgate Conservation Area, would, if approved, cause substantial harm to the Grade II\* listed station and hotel and the conservation area. The removal of the current presumptions against tall buildings could open the floodgates to a greater number of such proposals.

We are therefore greatly alarmed at the diminishment of heritage protections and the potential for serious and permanent harm to conservation areas across the City and within the City Cluster and Fleet Valley. In the proposed City Plan, we strongly feel the boundaries of these areas should be redrawn to exclude conservation areas, in addition to the reinstatement of the presumption against tall buildings within conservation areas.

The Victorian Society also seeks greater clarity on the rationale for designating certain sites as inappropriate for tall buildings. We believe there are strong grounds for deeming many sites inappropriate for tall buildings across the City on heritage, local, and pan-London strategic grounds, yet robust evidence has not been provided.

We agree with Historic England's suggestion that "an approach that better distributes growth across the Central Activities Zone is required to properly balance economic, social, and environmental objectives." This approach would help alleviate pressure on heritage assets and help mitigate harm to the historic environment within the city and London-wide.

We also seek clarification on whether the authority's stance, if adopted, would mean that any proposal in an area deemed inappropriate for tall buildings would automatically fail to comply with London Plan Policy D9.

We share Historic England's concerns about the mismatch between the City's ambitions for the historic environment and the targeted growth of 1.2 million square meters of floorspace. 3D modelling shows multiple conflicts with the historic environment. We also disagree with the evidence provided on the impact of tall buildings on the historic environment. This results in a direct contradiction with London Plan policies D9 Tall Buildings, HC1 Heritage Conservation, HC3 Strategic & Local Views, and HC4 London View Management Framework.

We welcome the comments, assessment, and advice provided by Historic England and agree with their conclusion that the City Plan, in its current form, is "unsound." While we acknowledge the need for growth within the City of London, the plan clearly favours economic benefits to the great detriment of the City's unique heritage and character.

In conclusion, the draft City Plan 2040 diminishes heritage protections, conflicts with local, regional, and national policies, contradicts its aspirations for sustainable development and Good Growth with its policies on heritage, and lacks the robust evidence needed to underpin the proposed policies.

We are aware that this is an ongoing process, and we would welcome the opportunity for further consultation with the Corporation.

Yours sincerely,

Guy Newton

**Conservation Adviser**