



**Examination of City of London Local Plan**  
**Historic England, Hearing Statement**  
March 2025

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice. Historic England advises the Government in relation to World Heritage Sites and compliance with the 1972 Convention Concerning the Protection of World Cultural and National Heritage.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework (NPPF) in relation to the historic environment as a component of sustainable development.

## Historic England - Hearing Statement

### Introduction

This statement addresses the Inspector's questions with regards to Matter 2 of the Local Plan. This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

### Matter 2: Spatial Strategy

#### **Q1: Is the Spatial Strategy for the City of London justified by appropriate available evidence, having regard to national guidance and local context, including the London Plan?**

We acknowledge the challenges involved in delivering new office floorspace in the City of London, both in terms of constraints including effects on important heritage assets and strategic views as well as the constrained geographic area concerned. As a result, in order to deliver the amount of new floorspace that the CP identifies as a target (and which it repeatedly makes clear is a minimum) the Spatial Strategy concentrates the substantial majority of such growth into the City Cluster. This will result in extremely tall buildings with the profile of the Cluster undergoing a significant expansion.

We consider that this expansion would entail adverse impacts on the historic environment, including on St Paul's Cathedral, the Tower of London World Heritage Site (WHS) and Bevis Marks synagogue. The Cluster would grow taller and more prominent in the setting of all three of these landmarks, affecting their significance and in the case of the WHS eroding the already vulnerable Outstanding Universal Value (OUV).

Historic England considers that the evidence base and assessments undertaken to underpin the tall buildings and City Cluster policies (and therefore the Spatial Strategy's objective to deliver tall office buildings within the Cluster) are flawed and inappropriate. As we have made clear in our Regulation 19 consultation response, the methodology used in the Heritage Impact Assessments for the three strategic landmarks is not appropriate, given, for example, the focus on townscape and views rather than assessing effects on significance.

As set out in our Regulation 19 response, we consider that the HIA for the WHS substantially underplays the adverse effects the CP would have on its OUV. In particular, we consider that it fails to appropriately understand the way the changes to the setting of WHS would have consequent impacts on the attributes and integrity of its OUV. Further, as the ICOMOS International Technical Review of the CP has

made clear (October 2024), the HIA is purely retrospective in its approach, with the assessment, analysis and conclusions it has drawn not having been applied to the development of the Cluster profile in an iterative process

Given the sensitivity of the affected heritage assets (including those of international importance), we consider it is critical that all potential impacts of the CP should be properly understood in order to avoid or at the very least minimise them. The evidence available cannot justify the policies in the CP or the harmful effects on the historic environment that would follow its adoption.

The evidence underpinning the level of office growth identifies a minimum of 1.2m sq m of net additional floorspace to be delivered across the plan period. However, there are no available figures for how much net additional floorspace would be achieved if the expanded Cluster were to be built out to the maximum parameters identified in the 3D modelling. While the 3D modelling and volumetric testing is highly detailed, its development did not involve discussions with stakeholders that could have informed its overall profile.

As a result, it is not possible to understand or identify any reductions in height or spatial extent of an expanded Cluster that could still deliver the required additional floorspace. This is an important gap in the evidence base that prevents the identification of amendments that could ensure greater protection for the historic environment and the avoidance of adverse impacts. It is not possible to know whether the harm to heritage that the CP as proposed would create can be justified as alternatives are unknown. Historic England would be keen to be involved in further work that could explore such alternatives

**Q3: Is the Spatial Strategy for the City of London effective and will it ensure the delivery of the identified economic, social and environmental objectives within the Plan period?**

We do not consider that the Spatial Strategy can be effective in delivering both its stated economic and environmental objectives within the Plan period. The scale, quantum, form and locations of tall building development would be such that while economic objectives may be achieved, there would be significant adverse effects on the historic environment, as well as on strategic and local views.

We consider that the 3D modelling and other illustrative views (such as in the volumetric testing papers) demonstrate clearly these adverse effects. Additionally, the inclusion of the contour mapping and associated 'appropriate' heights within policy S12 itself would create ambiguity as to decision making on such proposals within the Cluster. This carries the inference that such heights are acceptable, and sets up a conflict with clause 8 of S12, particularly as this states that tall buildings 'must have regard to' impacts on heritage significance rather than ensuring their

conservation. This in itself does not reflect the requirements of section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

As a result, we do not consider that the objectives in relation to the historic environment set out at paragraph 11 of the Spatial Strategy are realistic or effective while at the same being able to deliver the envisaged office growth in the form of tall buildings within the City Cluster.