



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 4 of the Local Plan – Offices. This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Matter 4: Offices

Q2: Are the policies relating to offices justified by appropriate available evidence, having regard to national guidance and context, and are they in general conformity with the London Plan?

As a general point, we would note that there remains some doubt as to the level of forecasted office demand on which the office-related policies are based, as well as the other policies in the CP intended to deliver such development. We note that statistics from TfL continue to show that use of public transport across London remains well below pre-Covid levels (Bank station is at 26% below the equivalent period of February 2019 according to latest figures¹), while hybrid working trends continue to be well established.

The substantial majority of the target figure for the increase in office floorspace across the plan period is intended to be delivered through the expansion of the City Cluster. However, while the 3D modelling gives a clear illustration of how this expansion could occur in terms of its height and massing, there is no available figure as to how much net additional floorspace would be delivered were the Cluster to be built out to the maximum parameters.

This means it is not possible to determine where or how the profile of the expanded Cluster could be amended to address concerns over impacts on the historic environment, but also that it is not known definitively whether the office policies (and their target figures for floorspace) can be justified.

In a related point, policy S4 sets out the proposed phasing of the 1.2m sq m net additional floorspace to be delivered. It has been publicly stated by the City Corporation² that as of March 2024, 1m sq m of development was either under construction or already in the planning pipeline.

¹ tfl.gov.uk/network-demand-report

² Property Week, 27.3.24

It has not been made clear as to the relationship between these two figures – i.e. whether the 1m sq m is part of or additional to the 1.2m sq m target. Understanding this is important in assessing the wider impacts as to the anticipated level of growth.