



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 94 of the Local Plan – Key Areas of Change. This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Matter 9: Key Areas of Change

Q1 Are the policies relating to The Temple, the Thames Policy Area & the Key Areas of Change justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

Policy S21 City Cluster establishes the spatial context for the delivery of the anticipated tall building development that will constitute the majority of the 1.2m sq m minimum target of net additional floorspace across the plan period.

As such, our concerns with regard to the evidence base for Tall Buildings policy S12 apply to S21 equally. We consider that the justification for the quantum and form of such tall building development to be based on incomplete and flawed assessments that both underplay the effects that the CP would create on the historic environment and reach conclusions that cannot be supported by the evidence.

Please see our Regulation 19 consultation response and our statement in relation to Matter 7 for further details. As such it does not reflect the requirements of paragraph 31 of the NPPF for the preparation of policies in local plans to be underpinned by relevant evidence.

The local context to the City Cluster is clearly atypical in terms of London and indeed the rest of the country's built environment. This context includes a dense concentration of designated heritage assets within the City of London, the presence of the Tower of London WHS site immediately adjacent to it, the designation of a number of strategic views that cross the City and multiple tall buildings (both existing and in development) that can and will be seen from great range with consequent effects on substantial areas of Greater London. Clearly, such sensitivity requires the greatest care in managing change. We do not consider the approach undertaken by the CP to be appropriate to its context.

Nevertheless, HE does not consider the City Cluster to be an inappropriate location for tall buildings in principle. However, given the flaws in the evidence and

assessments, we consider that S12 fails to conform with LP D9(2) in that it does not identify *appropriate* heights – i.e. the heights specified would create unacceptable impacts on the historic environment.

Q4 Are the policies clearly defined and unambiguous so that it is evident how a decision maker should react to proposals?

As above, we consider that S21 is closely inter-related with S12 Tall Buildings in terms of the impacts on the historic environment it will create. As such, the expanded profile of the Cluster demonstrated by the evidence base and the 3D modelling creates ambiguity in terms of adverse impacts on heritage significance to the extent that consistency in decision making would be impossible to achieve.

CP S21(6) indicates that development proposals should ‘have regard to the immediate setting of Bevis Marks synagogue, referring to the definition introduced by the City Corporation of the immediate setting being the six buildings that are immediately adjacent to the synagogue.

The concept of immediate setting has no basis in either legislation or policy, while the NPPF glossary also makes clear in its definition of ‘setting’ that its extent ‘is not fixed and may change as the asset and its surroundings evolve’. *Historic Environment Good Practice Advice Note in Planning 3 – The Setting of Heritage Assets*¹ (p5) further indicates that ‘*Reference is sometimes made to the ‘immediate’, ‘wider’ and ‘extended’ setting of heritage assets, but the terms should not be regarded as having any particular formal meaning*’.

As well as the lack of conformity to legislation and policy, the introduction of the immediate setting of the synagogue as a consideration here would also create a problem with the wider consideration of setting of heritage assets including in HE1(1). This creates a question as to which ‘level’ of setting should take precedence.

The inclusion of the reference to immediate setting in S21 (as well as S12) is confusing for decision makers and contrary to national planning policy and should be removed.

¹ [The Setting of Heritage Assets](#)