



Examination of City of London Local Plan
Historic England, Hearing Statement Addendum
May 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 Addendum

Introduction

This addendum to Historic England's (HE) matter 7 hearing statement responds to the four documents detailing proposed amendments to the City Corporation's tall buildings policy and contour lines as set out at Regulation 19 stage. It should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan, along with our original Statement of Common Ground agreed with the City Corporation on 25 November 2024.

Since the hearing sessions in March 2025, Historic England and the City of London have provisionally agreed some modifications to the text of the draft City Plan 2040. Those modifications address some of Historic England's concerns with the text of the draft plan and will be set out in a Statement of Common Ground addendum. This has yet to be finalised at the time of submission of this document. The City Corporation is also considering additional proposed wording in relation to other specific issues at this point in time.

However, those modifications do not address Historic England's concerns in relation to the details of the proposed contour lines or the evidence base which has informed those contour lines. We are also therefore proposing further changes to the contour lines at the eastern edge of the City Cluster. These suggestions are reflected in the Statement of Common Ground addendum, but have not been agreed by the City of London at the time of submission of this hearing statement addendum.

As a result, at the time of submission of this document, HE does not consider the proposed contour lines, in either Regulation 19 or amended form, meet the City Corporation's objective to 'minimise the possibility of harm to the settings and OUV/significance of the three Strategic Landmarks; the Tower of London, St Paul's Cathedral and the Monument' (ED-HTB36, para 1.6), or indeed other heritage assets of the highest significance.

Matter 7: Heritage and Tall Buildings

Our comments on the three proposed amendments (as in ED-HTB36) to the contour lines at the southern fringe of the City Cluster and the proposed tall building site at Broadwalk House are set out below.

We note that the assessment of the visual impacts of the proposed amendments has been undertaken on the same methodological basis as the Regulation 19 proposals, both in terms of the Strategic Views Impact Assessment (SVIA) and the Heritage Impact Assessments (HIAs) for St Paul's Cathedral and the Tower of London. HE,

along with other stakeholders, has been clear that there are flaws in this approach in relation to assessing harm to heritage significance resulting in the adverse impacts of the proposals being underplayed in those assessments. Full details of this are set out in our Regulation 19 response, but we consider that the further assessments are similarly non-comprehensive and methodologically unsound in their approach to the issues. Additionally, the SVIA and HIA addendums consider only the impacts of the proposed amendments rather than an assessment against the existing context. Given it does not look at the cumulative impacts of the Regulation 19 proposals together with the proposed amendments, this is an incomplete assessment of the overall effects that would ensue. We would also point out the revised assessments do not take into account any harm to the significance of other highly graded heritage assets in the City and beyond.

We note that the additional impacts of the proposed amendments would be less significant than the overall expansion of the Cluster's profile as proposed in the Regulation 19 consultation. However, we consider that the changes to the profile of the Cluster would further exacerbate harmful effects on the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (WHS).

We also note that the proposed amendments all further expand the profile of the City Cluster or create a new tall building zone, with varying degrees of additional impact on heritage significance.

We also therefore note that the proposed amendments, if adopted, would all add further capacity in terms of new office floorspace in the City.

As indicated above, HE has discussed with the City Corporation potential revisions to the contour lines at the eastern edge of the expanded Cluster that would go some way to addressing the harmful impacts on OUV that we and others have identified. We have submitted these changes to the City Corporation in digital format and are keen to continue discussions to reach further common ground. We await these at the time of submission of this addendum.

Proposed amendments

Broadwalk House

We note that the City Corporation's Tall Buildings Topic Paper (ED-HTB1) prepared to support the preparation of the local plan concluded that the area in which Broadwalk House is located is 'very sensitive' to tall buildings and that as a result was deemed to be unsuitable for such proposals. Given the sensitivities identified by the City Corporation, any moves to allow tall building proposals in the local plan in the area must be carefully considered and justified.

The proposed tall building location would form part of the emerging cluster very close to the boundary of the City and the London Borough of Hackney. Existing and consented tall buildings in this area, including 2 Finsbury Avenue, have already created impacts on views of St Paul's Cathedral. We note that in assessed views (including LVMF views 16b1 and 15b2) the proposed site would add relatively minor cumulative effects to those of this emerging northern cluster and would clearly be read as part of it. In other views it would be hidden by existing buildings (for example 8A and 10A1).

We note the distinctive massing of the proposal being promoted at Broadwalk House, which may assist in reducing adverse impacts on the sky gap around St Paul's from LVMF view 8A. Although providing clarity on maximum permissible heights, the contour lines will not fully define the final form of buildings that will be subject to further design considerations. Therefore, it will be important that the combination of contours, policy wording and supporting text in the plan are sufficient to avoid or minimise impacts on the Cathedral's setting and significance.

The additional wording that we have requested within the Statement of Common Ground addendum (if agreed) – both in relation to the St Paul's Setting Study, and the contribution of sky space within wider settings – would help to secure an appropriate level of protection.

We support the conclusion of the City's tall building topic paper that this is an area very sensitive to tall building proposals, both for their potential effects on LVMF views and strategic landmarks as well as more localised impacts on heritage assets both within and outside the City. Should the local plan be modified to include the designation of the Broadwalk House site as suitable for a tall building of the height put forward, it would consolidate the effects of the growing cluster of tall buildings emerging on both sides of the boundary between the City of London and the London Borough of Hackney. Any related plan policy should also include clear parameters to ensure that no harm to heritage significance ensues either within or beyond the City of London.

30 Fenchurch Street, Minster Court and New London House amendments

The three amendments to the proposed expansion of the City Cluster are all located along its southern and south-eastern edge. All three propose amending the contour lines to allow development at each location to be taller. Given their location and orientation, in relation to the three strategic landmarks the impacts of these amendments are most evident in relation to the WHS.

Our position as to the harmful effects of the expanded City Cluster profile on heritage significance and the OUV of the WHS is set out in detail in our Regulation 19

response. The adverse impacts of this expansion would be far-reaching and permanent and would alter the historic character of the City of London and its relationship with surrounding heritage assets (notably the WHS) given the scale and form of development the City Plan envisages. In particular, a number of the attributes of OUV as defined in the WHS Management Plan would be affected, including its landmark siting and the physical dominance of the White Tower.

As the WHS Management Plan makes clear, the Tower is vulnerable to development in its setting including through the expansion of the Cluster.

The proposed amendments would allow parts of the Cluster to become taller and in some areas to create further bulk, thus increasing the impacts that the City Plan would enable. They would further emphasise the prominence of the Cluster in relation to the WHS, would continue the trend of tall building development undermining the dominance of the Tower and further erode the ability to appreciate and understand its significance, including other attributes of Outstanding Universal Value.

30 Fenchurch Street

The proposed amendment to the contour lines across this site is the most prominent of the three to the Cluster and would result in the greatest impact. The contour line for the majority of the site would increase to between 140m and 160m with an increase to 100m to 120m for a small area at the southern edge. This change would mean the Cluster would become more prominent in views from the Inner Ward of the Tower of London, which as an enclosed historic place has a sense of being apart from the City beyond (albeit one that is being increasingly eroded with tall development outside of the Tower). Views 32, 33 and 36 in the revised SVIA (ED-HTB36) demonstrate this impact clearly and in particular the appearance of the silhouette of the Cluster on either side of the west tower and bell cupola of St Peter ad Vincula (grade I). In view 36, the tower and cupola would be completely overtopped by development in its setting.

This effect would harm the OUV of the Tower through affecting the ability to appreciate the outline of the Tower and the way it relates to the City beyond. The SVIA itself acknowledges (para 6.154) that there would be a 'denser' backdrop to the Chapel and at para 6.165 indicates that it 'would have more of a quantitative effect'. However, the SVIA fails to assess the resultant harm to significance and OUV but rather simply describes the appearance and location of the amendments. The appearance of the further expanded Cluster profile on both sides of the Chapel tower would further erode its prominence on the skyline and would create a sense of encroachment on the existing profile of the Chapel Royal, its relationship with the other elements of the WHS, and the sense of being apart from the city beyond. The

amendment would therefore impact the landmark siting and surviving medieval remains attributes of OUV.

When observed from LVMF viewpoint 10A1 (page 19 SVIA Addendum), this amendment would also adversely affect the WHS's attribute of OUV derived from its visual dominance as well as adding further to the effects of the spatial footprint of the Cluster expanding southwards towards the WHS thus affecting the sense of separation between the two (attribute of landmark siting). We would note the guidance in the LVMF SPD (para 183) that 'the Tower of London should not be dominated by new development close to it' and that visual separation should be maintained between the White Tower and the Cluster.

As with our Regulation 19 response, we consider the impacts on the WHS and its OUV to be harmful. The Regulation 19 proposals would adversely affect views from the Inner Ward. Given the amendments would create further harm, we do not consider they are justified in the light of the available evidence or would allow related plan policies to be effective.

Minster Court

This amendment would allow for greater height by allowing the next higher contour line to cross the site. Increasing the height and mass of development in this way, both in comparison to the existing buildings and the Regulation 19 proposal, would affect the sense of separation between the WHS and the Cluster. This is evident in view 37 of the SVIA addendum from the Inner Curtain Wall North. The increased scale of development would also affect the ability to appreciate the WHS's OUV in LVMF views 10A1 and 25A1. In these views, we consider that the increased spatial extent of tall buildings, including their southern edge, would be particularly noticeable with consequent impacts on the visual dominance attribute of OUV.

We acknowledge that this amendment would be observed with taller buildings of the Cluster in its backdrop and the nature of any impacts would also therefore depend on detailed design. The potential harm resultant from the contour changes are therefore most notable in relation to the existing separation and relationship between the WHS and tall buildings in the City.

Ensuring the amended contours will retain a staged height transition between the Cluster and lower rise buildings closer to the WHS would help to avoid the cluster dominating the WHS. This would also support a clearer sense of visual separation between the two, helping address the further harm over and above the Regulation 19 proposals these amendments would create.

New London House

The proposed contour changes at New London House are relatively modest and based on the views presented in the SVIA addendum it is difficult to reach a view on any additional harm that could be created. HE has recently responded to a planning application at this site which may be of a similar scale and height. Given the site's position in relation to the Tower of London and the former Port of London Authority Building (grade II*), our response to that application indicated that the detailed design and form of the proposed building will be important to minimise harm to the OUV and significance of these two heritage assets.