



New Life for
Remarkable Buildings

Ms Charlotte Glancy
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29.05.25

Dear Ms Glancy,

City Plan 2040 | Examination in Public, Matter 7: Heritage & Tall Buildings

SAVE Britain's Heritage has submitted objections to the Draft City Plan 2040 as part of the Regulation 19 consultation stage in May 2024.

Following the postponement of matter 7 (heritage and tall buildings) from March to June 2025, and the publication by the City of London of additional evidence documents, we wish to submit the following **updated** written statement.

Representatives of SAVE will be attending the resumed hearing on 10th, 11th and 12th June and will be glad to answer any questions or clarifications if the Inspector wishes so.

I ask that this be given careful consideration by the Planning Inspectorate and that SAVE is informed of any further consultations regarding the heritage and tall buildings policies of the Draft Plan.

Yours sincerely,

A handwritten signature in black ink that reads "Lydia Franklin".

Lydia Franklin
Conservation Officer

DRAFT CITY OF LONDON LOCAL PLAN 2040
EXAMINATION IN PUBLIC
SUBMISSION BY SAVE BRITAIN'S HERITAGE
TALL BUILDINGS AND CONSERVATION AREAS

1. SAVE Britain's Heritage submitted objections to the Draft City Plan 2040 as part of the Regulation 19 consultation stage in May 2024. SAVE is now submitting a written statement for the public examination to be carried out by the Planning Inspectorate focussing on Chapter 11 of the Draft Plan, and in particular the issue of tall buildings and conservation areas. This updated version follows the postponement of consideration of tall buildings and conservation areas from March to June to allow the City to make amendments to its proposals.
2. SAVE will attend the Hearing to answer questions or clarifications if the Inspector so wishes.
3. The City of London contains 28 conservation areas whose character and appearance are crucial to the character of the City and London. The City of London has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve and enhance them. Controlling the scale and height of new buildings and extensions to existing buildings plays a critical part in preserving and enhancing their character and appearance. New developments that fail to harmonise with the existing prevailing scale, massing and height can be extremely harmful to the cohesive character and appearance of conservation areas and can have a negative impact.
4. This was recognised in the adopted City Plan 2015 where existing Policy CS14 states that tall buildings within inappropriate areas, including conservation areas, will be refused. This policy has been dropped from the Draft City Plan 2040. SAVE considers that it should

be reinstated so that the City Corporation can continue to fulfil its statutory duties.

5. SAVE notes that conservation areas have the same status as designated heritage assets as statutorily listed buildings, scheduled ancient monuments or registered parks, and can have similar levels of significance. No 'hierarchy' of heritage assets is set out in Government policy or guidance that relegates conservation areas to a lower status of protection.

6. The Draft Plan defines tall buildings as those over 75 metres AOD, and identifies three areas where these may be suitable. SAVE questions the appropriateness of the tall building definition and the boundaries of the proposed Eastern Cluster tall building areas.

7. The majority of the existing conservation areas in the City of London do not contain tall buildings. Aside from St Paul's Cathedral, the towers of historic churches, the Monument, the dome of the Old Bailey, and the 20th century point blocks of the Barbican and Golden Lane estates (see paragraph 12 below) there are very few buildings or structures within conservation areas over 75 metres AOD. The City's adopted Supplementary Planning Documents for its individual conservation areas all stress the important contribution that height and scale of development make to the character and appearance of those areas, and hence to their heritage significance. Any tall post-war buildings that do exist are deemed to have a negative impact on their character and appearance (with the exception set out in paragraph 12 below).

8. SAVE considers that the proposed tall building definition of 75 metres AOD across the whole of the City is too high and an insensitive and inadequate tool for preserving the City's conservation areas. The City's justification for this single, very high, definition is set out in its Topic Paper 'Tall Buildings Evidence Base', reference ED-HTB 1, dated January 2024. The assertion on page 252 that the majority of the City has a prevailing building height of 15-21 storeys

is entirely misleading and inaccurate, not only in terms of its conservation areas but also for much of the City that is outside conservation areas. The prevailing building height in the majority of the 28 conservation areas is in the region of 8-10 storeys. In some conservation areas the prevailing scale is even less. SAVE invites the Inspector to visit them.

9. The reference to numbers of storeys as well as height above ordnance datum (AOD) is confusing. The height of street level above AOD within the City ranges from Thameside locations, quite close to mean sea level, to the high points of Ludgate Hill, Cornhill and High Holborn, which is 21.6 metres AOD. This has not been clearly addressed in pages 251-253 of the Tall Buildings Evidence Base. AOD has been an important measure for controlling St Paul's Heights (where absolute height is critical in protecting long, often elevated, views from outside the City). However, in terms of townscape, numbers of storeys, or the height of buildings above street or ground level is more generally used by other boroughs in their tall buildings policies (see paragraph 11 below). Height or number of storeys above ground level is a better tool for accessing townscape context, certainly more easily understood by the general public.

10. The Planning Officer's Report 'City Plan 2040 – Tall Buildings & Heritage' to the Local Plan Sub-Committee on 20th June 2023 states, correctly that 'the City has a varied character with a striking spatial contrast'. It then, illogically, concludes that 'it is not considered appropriate to prescribe a granular approach to a definition of tall buildings ... but instead to have a single definition for tall buildings across the area'. SAVE considers that 75 metres AOD is far too high a benchmark for the whole of the City. A building of 74 metres AOD in height would be intrusive and inappropriate in every one of the 28 City conservation areas. In order to retain the marked contrasts within the City, SAVE considers that a more sensitive approach to tall buildings and their definition is required.

11. London Boroughs that directly adjoin the City of London take a more contextual approach to their definition of tall buildings. In its Draft Local Plan Camden defines tall buildings as ‘buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres in height elsewhere in the Borough, when measured from the lowest part on the ground to the uppermost part of any rooftop structures including plant and lift overruns.’ The London Boroughs of Tower Hamlets and Islington define tall buildings as over 30 metres from ground level. Very precise sites, rather than wide areas, are identified where tall buildings might be appropriate.

12. Only one conservation area in the City of London, the Barbican and Golden Lane Conservation Area, has tall (over 75 metres AOD) 20th century buildings that contribute positively to the character and appearance of the Conservation Area. Indeed, the Barbican and Golden Lane Conservation Area Supplementary Planning Document (February 2022) clearly identifies and describes these as Great Arthur House on the Golden Lane Estate, and Cromwell, Shakespeare and Lauderdale Towers in the Barbican. Policies within the SPD state that their settings must be carefully preserved, essentially ruling out any further tall buildings within the area. It would rule out buildings of 74 metres AOD in height, which under the current Draft Plan’s definition would not be considered ‘tall’ buildings.

13. The 28 conservation areas within the City of London are generally compact, sometimes very small, areas with carefully and tightly drawn boundaries. SAVE acknowledges that beyond these boundaries there are sometimes tall buildings which might affect the setting of nearby conservation areas. These sometimes instil a sense of ‘cheek-by-jowl’ that is perhaps a part of some of the City’s character, referred to above. However, in the opinion SAVE, the setting of a conservation area is a different issue to the inherent significance of the conservation area itself as a designated heritage asset where scale of development is a crucial part of its character and appearance. The fact that tall buildings might be close to a conservation area does not

justify the acceptability of their encroachment within a conservation area itself. To allow tall buildings within conservation areas would undermine the special spatial contrast that exists within the City.

14. Although the boundaries of the City's conservation areas are tightly drawn most of the CAs have some existing buildings which make a neutral or even a negative contribution to the character and appearance of the conservation area. The redevelopment or extension of such buildings needs careful control, particularly of scale and height. The proposed change of policy in the new City Plan would undermine the ability to do that.

15. This issue was highlighted during the recent designation of the City's latest conservation area, the Creechurch Conservation Area, formally designated on 11th January 2024. The designated boundary includes One Creechurch Place, a 19-storey office tower (about 65 metres AOD) completed in 2017, which is specifically identified in the designation report as having a **negative** architectural contribution to the area because of its height and scale. The implication is that the excessive height and scale of One Creechurch Place should not be regarded as a precedent for similar scale development within the Creechurch Conservation Area. The reason that One Creechurch Place was included in the designated boundary, following considerable debate, relates to the historic and archaeological significance of its site, being the location of both the medieval Holy Trinity Priory and the Great Synagogue (1690-1941), once the focus of this very important Jewish Quarter.

16. Creechurch Conservation Area also contains several existing buildings which make a **neutral** contribution to its character and appearance, where the building is an appropriate scale but possesses little architectural or historic merit. One of these is the 5-7 storey 31 Bury Street, built in 1967.

17. SAVE believes that much of the motivation for changing the established Policy CS14 in the existing Local Plan stems from

longstanding proposals for the redevelopment of 31 Bury Street, close to Bevis Marks Synagogue. Proposals (20/00848/FULEIA) for a 48-storey tower to replace the existing building were submitted in October 2020. They were recommended for approval by the City Planning Officer, but after a large number of objections, the application was refused by Planning Committee on 21st October 2021, with the decision issued in June 2022.

18. Subsequently a consortium of interested parties and amenity societies, including the Bevis Marks Synagogue, The Georgian Group, Victorian Society, Twentieth Century Society and SAVE, lobbied for the designation of a new conservation area that would include 31 Bury Street. A detailed analysis and report were prepared by these Third Parties and presented to the City Corporation early in 2023.

19. During initial informal discussions the proposed conservation area met with resistance from the City Planning Officer. When options for potential boundaries of a new conservation area were eventually put by the City Planning Officer to the Planning Committee on 18th July 2023 Option 1, favoured by the officers, excluded the site of 31 Bury Street. It is perhaps no coincidence that the City Planning Officer was concurrently in negotiation with the owner of Bury Street leading to the submission of a revised application (43 storeys) for the site (24/00021/FULEIA).

20. Following wide public consultation in autumn 2023, which generated an unprecedentedly large public response, the Creechurch Conservation Area was adopted by the City Corporation in January 2024 with the boundary originally recommended by the consortium of Third Parties that included 31 Bury Street.

21. It is not surprising, therefore, that the City Planning Officer, still supporting proposals for a tall building on 31 Bury Street which was now in a conservation area, would seek to amend existing Local Plan Policy CS14 in the Draft Local Plan.

22. The designation of the Creechurch Conservation Area also exposes a fundamental policy conflict because it lies almost entirely within the boundary of the Eastern Cluster Zone where tall buildings are considered appropriate. The overlap of boundaries triggers a tension between the desire to encourage tall buildings which might contribute towards the City's office floorspace targets and the statutory requirement to preserve and enhance the character and appearance of the conservation area.

23. This tension was well demonstrated in the Planning Officer's report to Planning Committee on 13th December 2024 recommending the approval of the revised scheme for 31 Bury Street. In the summary (pages 3-12) the Planning Officer places considerable emphasis on the location of the site within the City Cluster 'which contains the greatest density of businesses and jobs in the City'...and 'can accommodate significant growth in office floorspace and is a location for tall buildings'. The contribution that the proposed tower would make to the aims of the tall buildings cluster was seen by the Planning Officer as outweighing any harm to the Creechurch Conservation Area. 'Officers consider the site to be acceptable for a tall building, supporting the consolidation of the City Cluster. While there is conflict with Local Plan policy CS7 (3) and CS14 (2) and London Plan D9 B (3), because the site is within a conservation area and therefore considered inappropriate for a tall building, officers nevertheless find that the qualitative impacts of the proposal would be acceptable'. Summarily overriding existing Policy CS14 and ignoring the designation report for the conservation area, officers actually found that the proposed tower 'would preserve the special interest, character and appearance of the Creechurch Conservation Area'.

24. In paragraphs 172-208 of the main body of the Planning Officer's report, the argument is put that existing CS14, despite its explicit wording, does not dictate that tall buildings **must** be refused in conservation areas. In the case of 31 Bury Street, the Planning Officer suggests that because there are tall buildings (either existing or

proposed) **close** the conservation area, a tall building is therefore acceptable within it. This is precisely the matter raised by SAVE in paragraph 14 above. With such an attitude, nowhere in the City of London would be safe.

25. When considered against the wording set out in paragraph 11.5.13 of the Draft Plan the Planning Officer's report placed far greater emphasis on the merits of the 'juxtaposition of old and new architecture that ...makes a positive contribution to the character of the Square Mile' rather than any constraints of being 'informed by the potential impact on heritage assets'

26. It was only the determination of a majority of Planning Committee members, supported by substantive and articulate objections from Third Parties, that resulted in the refusal of the amended Bury Street scheme in February 2025.

27. A repetition of this policy conflict can only be resolved by amending the boundaries of the Eastern Cluster to exclude conservation areas. To do otherwise would threaten the character and appearance not only of the Creechurch CA but also Leadenhall Market Conservation Area, St Helen's Place Conservation Area and parts of Lloyds Avenue Conservation Area and Eastcheap Conservation Area which lie within the boundary of the Eastern Cluster.

28. In the way that conservation area boundaries are tightly drawn, the same should apply to areas which are considered suitable for tall buildings. It appears that the Fleet Street and Broadgate tall buildings area has been drawn to exclude existing heritage assets. The Eastern Cluster boundary should be redrawn to exclude designated conservation areas.

29. The Tall Buildings Evidence Paper provides an analytical justification for the tall buildings areas proposed in the Draft Plan, seeking to comply with the London Plan which requires London Boroughs to identify specific sites or areas suitable for tall buildings.

The exercise divided the City into nine ‘character areas that have characteristics which make them distinct from each other’. Seven of these areas were found to be ‘very sensitive’ to tall buildings and were therefore ‘sieved out’ of the search. In the analysis of the Eastern Cluster, SAVE strongly disagrees with the assertions in paragraphs 19.118-19.121 that the Creechurch Conservation Area is, itself, ‘a place of contrasting architectural scales’ and the implication that tall buildings within the conservation area would be acceptable.

30. While it is acknowledged that paragraph 11.5.9 of the draft Plan states that ‘the identification of the two tall buildings areas does not mean that all sites in the two areas are suitable (for tall buildings)’, the inclusion of conservation areas with the tall building zones and removal of the existing policy CS14, is a weakening of protection for conservation areas throughout the City.

31. SAVE considers that the amendments proposed by the City for consideration at the resumed hearing in June 2025 do not ameliorate or mitigate the concerns and objections of SAVE as set out above.

32. In conclusion:

a) SAVE recommends that the existing policy CS14 is retained as part of the City Plan 2040, thus ensuring that the City Corporation can properly carry out its statutory duty under the Town and Country Planning (Listed Buildings and Conservation Areas Act) 1990 to preserve or enhance the character and appearance of its conservation areas.

b) SAVE recommends that the boundaries of the areas identified as suitable for tall buildings be redrawn to exclude conservation areas.

c) SAVE recommends that a tall building within the City of London be defined as over 40 metres above street level, to correspond with the definition used by the London Borough of Camden. Within the areas of the City identified as potentially suitable

for tall buildings might, guidance should be given for specific sites where buildings of 40 metres or more above ground level might be appropriate.

SAVE Britain's Heritage
May 2025

Author: This submission was prepared on behalf of SAVE Britain's Heritage by Alec Forshaw (IHBC, MRTPI). Alec Forshaw was Principal Conservation and Design Officer for the London Borough of Islington, where he worked from 1975 – 2007. He was joint author of the report submitted to the City Corporation recommending the designation of the Creechurch Conservation Area. He has written widely on historical and architectural matters, including *New City, Contemporary Architecture in the City of London* (2013), *The Barbican, Architecture and Light* (2015), and *Smithfield, Past, Present and Future* (2015). He gave evidence on behalf of SAVE Britain's Heritage in support of the City of London's refusal of planning and listed building consent at the Custom House Public Inquiry in February 2022.