

Appendix including:

- *Email from Oliver Caroe, Surveyor to the Fabric, to the Corporation of the City of London City Plan EIP team (cc Historic England) – sent Fri 25/04/2025 12:21*

Noting the Cathedral's enquiry to the City regarding methodology and if the Setting Study could better assist the EIP process.

Dear City Plan 2040 Team,

It was a fascinating opening day to see the EIP in progress, and to experience the conduct of proceedings. Thank you very much for your time on Tuesday to receive early sight of the new representations and changes to the tall-building policies on which the City will consult, as you have trailed. We look forward to receiving the proposals document you shared in the meeting.

We came away mindful of the Inspectors' encouragement for City/Historic England/St Paul's to use the time between now and June to work collaboratively on narrowing the gap in views on the Heritage/Tall building matters. The challenge and opportunity the Inspectors identify is to make the Heritage and Tall Buildings examination days in June more/most effective.

You have explained that the City does not yet have a timetable for how the additional tall building matters will be expressed on paper, nor an actual formal timetable for consultations. You have kindly consulted ourselves and HE separately about the emerging amendments to the Plan informally. I recall that there was a suggestion of orchestrating a round-table with HRP/HE/St Paul's to look at the new submissions? Would that still be on the cards?

In our meeting on Tuesday I trailed the idea that we might (mutually) ask if there is anything that the Inspectors might be willing to offer as 'guidance', so we can all make best use of this time. You kindly said that you would consider this idea, whilst indicating that you felt it might be unlikely. We can but try?

In our covering letter to our EIP statements, we asked a number of questions. Two of these were:

1. *How can the Setting Study form part of the examination in public process and ultimately in this plan making process?*
2. *How can the inspection process address and hopefully settle questions around methodology of analysis of heritage impacts and harms in regard to the evidence base of the plan?*

We spoke briefly about the Setting Study on Tuesday. It was heartening that Tom does feel that there is much of value in the Study, whilst also saying there are some matters with which the City have issues, which we understand and acknowledge. Our conversations to date have not actually discovered exactly, in detail what those issues are. However, I am sure that if, together, we can create

some version of the Study for public consultation and the City would support a consultation on the Study now, both St Paul's and HE would concur that this could be 'for the greater good'.

St Paul's and HE would welcome an opportunity for the jointly commissioned Setting Study to play some part in this new, formal, additional consultation process – with or without edits and inputs from the City on the report. It is interesting to recall that, in the SOCG with St Paul's, the City Plan team were offering to consult with the Setting Study in some future review of Protected Views SPG. Our concern is that this would only frame the extensive work within the Study as a 'views-only' issue. The document was purposefully written about *heritage significance*, in which - as you will be aware – the role of views only plays a part. It was our hope and intention at inception that the Study should be used to inform heritage policy and guidance within the Plan as a whole.

As was reinforced by the Inspectors at the EIP, it is the City Corporation's Plan. Only the Corporation can decide if the additional evidence that we have offered in the Setting Study is materially useful to your new consultation. As we also learned in the too-and-fro on the legal position with regards to conformity with the LP and NPPF that, if the participants to the Plan consultation process cannot agree or narrow our differences, then it falls to the Inspectors to judge the weight to give to evidence (ie the Setting Study) and methodological matters related to assessment (HIA and SVIA). Surely given the completion of the Study and that it is available now, would it not be remis to miss this new window of time, to create a process for a consultation on the Study? I am sure you have the ingenuity to design a suitable consultation if you agree this would be desirable and it can be agreed within your governance constraints.

Therefore, may we ask whether the City would (with HE and St Paul's support) ask the Inspectors if they could be minded to give an early indication on:

- a) whether Inspectors feel the evidence base offered by the Setting Study could, in their view, be materially useful to the plan-making process, and thus - in general terms – might benefit the Corporation's evidence base. Can we all ask the inspectors if they too would support a consultation on the Study now?
- b) also, would it not be helpful to us all, if Inspectors could give some initial guidance on their position around the disagreements relating to assessment methodology?

You mentioned on Tuesday that the City is not going to change the assessment method within your new consultation. I did wonder if this is a matter of principle or expedience? By the time we get to the June Heritage and Tall Buildings dates, what I am sure none of us want to find is that we are still offering the same critique of *methodology*. If possible, guidance from Inspectors on appropriate methodology would ensure that those June days were focussed and fruitful – and we could talk about *outcomes* and *conclusions* based on an agreed methods for assessment. If there were some guidance offered now from the Inspectors, then the City (and St Paul's with HE) would be consulting on new material in a much less contested space.

What none of us want to find, in 2 months time, is that the City have gone back out to consultation with either the same assessment methodology or some variant on it, and all the consultees are then spilling more ink (and time) with a critique of *methods*, rather than narrowing down the issues to have a constructive discussion about outcomes and conclusions.

We would be more than happy to have this conversation openly and jointly with the Inspectors – but we are first writing to you on the procedural question as to whether it would be possible and appropriate to ask the Inspectors to offer a steer – which might navigate us all into a more effective and narrow discussion around MM7 particularly.

Yours sincerely,

Oliver Caroe; RIBA AABC