

**Stennett, Jasmine**

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**From:** Brennan, Tim [REDACTED]  
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Dear Planning Policy Team

Please find attached a response to the above consultation from Historic England. Please do not hesitate to contact me if you would like any further information.

Regards

Tim Brennan

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6 February 2026

Dear Planning Policy Team

### **City Plan 2040 – Main Modifications Consultation**

Thank you for the opportunity to comment on the proposed main and additional modifications to the draft City Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments in relation to individual modifications are set out at Appendix A. We also have some overarching comments in relation to the likely impacts of the draft Plan as a whole.

We welcome changes that were agreed with the City of London Corporation at the Examination in Public, and are pleased that the collaborative approach established with City Officers has led to these improvements. However, Historic England remains concerned that the quantum, scale and location of development that would be enabled by the draft Plan would cause serious harm to the historic environment, including the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (WHS). The reasons for Historic England's position have been rehearsed throughout the plan making process, including at the examination hearings, and we have offered solutions which we believe could achieve the City Corporation's aspirations for growth with less harm to heritage of the greatest importance.

The risks to the WHS have been underlined by the most recent decision of the UNESCO World Heritage Committee ([UNESCO World Heritage Centre - Decision - 47 COM 7B.135](#)) for the Palace of Westminster and Westminster Abbey including St Margaret's Church World Heritage Site (July 2025 after the conclusion of the hearings), requesting that the City Plan is revised. This followed concerns being raised by ICOMOS International in its Technical Reviews of the

City Plan (October 2024) and of the state of conservation of the World Heritage Site (July 2025). Although modest changes have been suggested with reference to the WHS (see below), these do not address the concerns of Historic England and the International bodies in relation to the potential effects of the Plan on the OUV of the World Heritage Site. It is the responsibility of the UNESCO World Heritage Committee to decide whether its concerns about the Tower of London place its World Heritage status formally at risk. That decision will be informed by the view of their advisor ICOMOS.

As indicated in Appendix A, we support the broad aim of main modification 46 and the proposed amendment to policy HE3 (1), which introduce new text relating to the use of OUV in shaping development proposals. This would help ensure that proposals affecting the WHS are informed, designed and respond to the OUV of the WHS in a positive fashion. Nevertheless, the use of the word ‘interpreted’ is ambiguous to a degree, as it could be understood to mean that OUV can be used to shape development proposals in a number of different ways. We consider that the following amended wording would offer greater clarity and help ensure the Statement of Outstanding Universal Value (SOUV) is applied to development proposals consistently:

‘... that shows how the OUV of the Tower of London has ***informed development proposals***’.

We do not support main modification 47 and the proposed new paragraph at 11.4.0 which relates to how this process could be undertaken. Historic England has been clear that the City Corporation’s interpretation, and the analysis of OUV that has led to the proposed contour lines and profile of the expanded City Cluster, is inconsistent with UNESCO’s methodology. Indeed, ICOMOS International, an adviser to the UNESCO World Heritage Committee, has expressed similar concerns to Historic England’s with regard to the underlying methodology, questioning whether the approach is in line with the UK’s obligations under the World Heritage Convention (Technical Review of Tower of London’s state of conservation June 2025). Historic England has also been consistent in questioning whether this approach also complies with international obligations as set out at paragraph 2 of the NPPF.

Historic England continues to consider that if the City Cluster is built out to the maximum parameters illustrated by the 3D modelling, harm would ensue to the OUV of the WHS through the consequent tall buildings. Some attributes of the Tower of London’s OUV have already been ‘compromised’ (see State Party submission during the Third Cycle of Periodic Reporting published 2024). The adopted Statement of Outstanding Universal Value also notes that the Tower’s ability to reflect its strategic siting and historic relationship with the City was already ‘vulnerable’ at the time of its inscription. This situation would be exacerbated by the draft Plan in its current form.



We acknowledge that economic growth in the City is an important national aspiration, but, as set out, the text of main modification 47 would lead the reader to understand that following the same process as the City Corporation's would result in schemes which would deliver that growth without harm to OUV and in ways that would be acceptable in heritage terms, which we do not consider would be the case.

In any event, the distinct nature of different proposals is likely to require bespoke assessment rather than following a template. For the reasons above, HE considers the first sentence of main modification 47 to be superfluous and potentially unhelpful and should therefore be omitted.

I trust the comments in this letter are helpful. Please do not hesitate to contact me should you require any further information.

Yours faithfully

**Tim Brennan MRTPI**  
Historic Environment Planning Adviser

**Appendix A**

<b>Main modification</b>	<b>Section</b>	<b>HE comments</b>
41	Policy HE 1 (6)	Support. We welcome the inclusion of further text to make clear that where available, opportunities should be taken to enhance conservation areas.
46 and 47	Policy HE 3 (1) and supporting text	<p>We support the broad aim of main modification 46 and the proposed amendment to policy HE3 (1). This would help ensure that proposals that would affect the WHS are informed, designed and respond to the OUV of the WHS in a positive fashion. Nevertheless, the use of the word ‘interpreted’ is ambiguous to a degree, as it could be understood to mean that OUV can be used to shape development proposals in a number of different ways. We consider that the following would offer greater clarity and help ensure the Statement of Outstanding Universal Value (SOUV) is applied to development proposals consistently:</p> <p>‘... that shows how the OUV of the Tower of London has <b><i>informed development proposals</i></b>’.</p> <p>We do not support main modification 47 and the proposed new paragraph at 11.4.0. Historic England has been clear that we consider the City Corporation’s interpretation, and the analysis of OUV that has led to the proposed contour lines and profile of expanded City Cluster, is inconsistent with UNESCO’s methodology for assessing impacts.</p> <p>As set out, the text of main modification 47 would lead the reader to understand that following the same process as the City Corporation’s would result in schemes which would not cause harm to OUV and would be acceptable in heritage terms, which we do not consider would be the case. HE considers the first sentence of main modification 47 to be superfluous and potentially unhelpful and should therefore be omitted.</p>

49	Policy S12 (3)	Support. We welcome the reference to heritage significance in relation to the location of proposed tall buildings.
50	Policy S12 (8) c	Support. HE welcomes the removal of reference to immediate setting.
54	Para 11.5.12.	Support. We welcome the inclusion of text relating to the assessment of cumulative effects of tall buildings as well as those on the historic environment. We would point out that in the table of modifications there is a duplicate of this modification (MM43).
57	Policy S13.	Support. HE welcomes the inclusion of a reference to the setting of the City landmarks.
63	Policy S21.	Support. HE welcomes the removal of reference to immediate setting.
Additional modifications		
71	Policy S12 (5)	Support. HE welcomes the inclusion of text that helps strengthen the role of the historic environment in decisions on locations for tall buildings.
74	Para 11.5.13	Support. HE welcomes the strengthening of conservation area considerations in relation to tall building proposals. We would point out that MM74 in the table of modifications incorrectly refers to para 11.5.13 when it is in fact 11.5.14 in the Plan itself. Also, the further inclusion of the word 'all' in the table of modifications is not reflected in the tracked changes pdf version of the Plan.
76	Para 11.6.6	Support. HE welcomes the commitment to use the evidence gathered during both the plan making process and the consultation exercises in producing a revised Protected Views SPD.
75	Policy S13 and paras 11.4.3 and 11.6.6	We note that the reference to 2016 in relation to the World Heritage Site Management Plan has been deleted in Policy S13 (3). This is helpful and supported, given the current process to update the Management Plan which will be

		concluded soon. We would therefore suggest the references to 2016 at paras 11.4.3 and 11.6.6 should also be deleted.
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