

Celebrating Heritage SPD

City of London Corporation
March 2026



A Prospect of the City of London from S. George's Fields in SUNNY, 1751

This version of the Heritage SPD is a draft for the regulation 13 consultation that is running from the 16th March - 15th April. Upon adoption this SPD will support the policies of the City Plan 2040.

You can provide comments on <https://cityoflondon.konveio.site/> or email us at planningpolicyconsultations@cityoflondon.gov.uk

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II. Preamble

Purpose

- II.1 The purpose of this Supplementary Planning Document (SPD) is to provide guidance on how development should consider heritage assets and how it might incorporate consideration of the character of the City of London as a place into the planning and design of new development proposals, thus building on the principles of City Plan 2040 strategic policy S11, which seeks to:
- Celebrate and broaden access to the City's heritage (S11 (1), (3; f)),
 - Put heritage at the heart of placemaking (S11 (3; a))
 - Draw on the contribution made by the historic environment to the character and identity of a place (S11 (3; c),
 - Sensitively adapt or retrofit heritage assets (S11 (3; b; d)).
- II.2 The SPD sets out the City of London's expectations on how the Square Mile's heritage assets should be treated and how they play an active role in placemaking. It applies to all relevant stages of the design and planning process from initial designs to final outcomes.
- II.3 The SPD builds on policy S11 'Historic Environment' and its overarching theme of 'Celebrating Heritage' – and other relevant policies from the National Planning Policy

Framework (NPPF) and the London Plan. It does not elaborate on the associated and overarching requirements in statute, national and local policy to conserve and enhance the significance of heritage assets, including any contribution made by their setting.

Structure

- II.4 The SPD is structured to provide guidance appropriate to the different scales at which planning in the City is undertaken.
- II.5 **Part one** of the SPD, 'Spirit', provides guidance on how strategic policy S11 can be implemented in relation to the wider townscape of the City. This section addresses how development might be designed to be sympathetic to the City's wider character and the historic environment which, in the main, substantiates this character, as well as to the wider metropolis of which it is part.
- II.6 In **part two** of the SPD, 'Street', there is a more granular level of focus on how change should be approached in relation to individual heritage assets. It provides guidance on how policy S11 should be applied in relation to direct and indirect impacts on heritage assets, impacts to fabric and exploring issues of 'setting'.
- II.7 **Part three**, 'Strata', relates to archaeology and sets out guidance for the application of policy S11 and policy HE2 'Ancient Monuments and Archaeology'.



Scope

II.8 This SPD is intended to give guidance and clarity on how development could enact policy. It is not intended to constrain how heritage can be conserved, instead it aims to offer a further layer of context and guidance. In every case, the individual circumstances of the asset in question should be the principal factor in the development of proposals.

Format

II.9 The SPD guidance is expressed as a series of **principles** supported by explanatory text. Illustrative case studies are provided throughout as examples of best practice. The principles are drawn directly from policy S11 'Historic Environment', the London Plan and the **NPPF**. Some principles are split into sub categories or 'traits' as appropriate.

II.10 Words in bold are defined in the navigational panel and within the glossary.

II.11 The text within the SPD refers to the 2024 NPPF, not the recent new draft published for consultation on 16 December 2025.

Strategic Policy S11: Historic Environment

The City's historic environment will be protected, celebrated and positively managed by:

1. Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets;
2. Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness;
3. Seeking wider social, cultural, economic and environmental benefits by:
 - a. placing heritage at the heart of placemaking and delivering high quality buildings and spaces which enrich and enhance the settings of heritage assets;
 - b. encouraging the beneficial, continued use of heritage assets through sensitive adaptation that is consistent with their conservation and enhancement, including those on Historic England's Heritage at Risk Register;
 - c. encouraging heritage-led regeneration by identifying opportunities to draw on the contribution made by the historic environment to the character and identity of the place;

- d. encouraging sensitive sustainable retrofit of designated as well as non-designated heritage assets and improvements that would benefit climate resilience and adaptation;
 - e. encouraging sites adjacent to and near heritage assets to work collaboratively with owners and operators of heritage assets to seek improvements to environmental performance, accessibility or other aspects of the functioning of heritage assets that are challenging to address;
 - f. Seeking enhanced public access and interpretation of the City's cultural and heritage assets, ensuring that opportunities to experience and enjoy the City's heritage and culture is available to a wide and diverse audience in a way that is socially and economically inclusive;
4. Protecting and promoting the assessment and evaluation of the City's ancient monuments and archaeological remains and their settings, including the interpretation, archiving and publication of archaeological investigations; and
 5. Preserving and seeking to enhance the Outstanding Universal Value (OUV), architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its setting.

Excerpt from Policy HE1 from City Plan 2040

Policy

II.12 The key relevant policy is S11, illustrated overleaf. Relevant regional and national policies include:

The National Planning Policy Framework (December 2024)

II.13 The Government issued the latest version of the National Planning Policy Framework (NPPF) in December 2024, updated in February 2025. The NPPF sets out planning policies for England and how these should be applied. The NPPF states, at paragraph 11, that ‘at the heart of the Framework is a presumption in favour of sustainable development’. Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act. The NPPF notes, at paragraph 202, that heritage assets ‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.’ The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 207). It goes on to say that ‘the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’

London Plan (March 2021)

II.14 The London Plan is ‘the overall strategic plan for London.’ It was adopted in March 2021. The policies are heritage-related in Chapter 7, ‘Heritage and Culture.’ Policy HC1 on ‘Heritage

and Culture.’ Policy HC1 on ‘Heritage conservation and growth’ notes that development proposals that affect heritage assets and their settings should ‘conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings’.

City Plan 2040

II.15 The strategic priorities of the City Plan sets out the environmental objectives for the Square Mile, which include celebrating, protecting and enhancing the City’s unique heritage assets. This objective, and the following policies, have informed this SPD:

- Strategic Policy S1: Healthy and Inclusive City.
- Policy HL1: Inclusive buildings and spaces
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to the Historic Environment
- Policy HE2: Ancient Monuments and Archaeology

II.16 Additionally, the guidance in this SPD could also helpfully inform how proposals respond to the following strategic skyline policies, noting that a more substantive Views document will be produced in due course to fully address their requirements.

- Policy HE3: Setting of the Tower of London World Heritage Site
- Policy S12: Tall Buildings
- Policy S13: Protected Views

1. Spirit

Introduction

- 1.1 The City of London is a place where ancient and modern are always meeting, a place of many layers that results in a unique, picturesque sense of drama and contrast. Architecturally, age and youth are rarely experienced apart from one another, but more often intermingled. This creates a complex spatial character, with the historic environment and the modern environment experienced in continuous juxtaposition.
- 1.2 There is an essential 'spirit of place' which arises from all of this, substantiated by the City's many heritage assets and their significances. This spirit of place is further animated by the City's intangible living traditions, and experienced within an evolving streetscape, where the City's commercial function acts as a catalyst for change.
- 1.3 The City considers that, in the general sense, to sustain this character is to be sympathetic to the City's heritage – and development which achieves this could be most likely to represent heritage-led placemaking and accord with the aims of policy S11, the London Plan and the NPPF.



Principle One

The City's character can be sustained, and its heritage complimented, by development that has regard to some or all of the following:

- (a) Having specificity which results from the historic street plan, or from skyline considerations, or from more local views, or from archaeological considerations, or from some or all of these;
- (b) Possessing enduring quality, stemming from clear conceptual and architectural coherence, regardless of scale or architectural style. This quality should be evident at all stages of inception, determination and execution;
- (c) Preserving, sustaining or, where possible, facilitating the City's living traditions and other intangible heritage;
- (d) Being manifestly commercial in function, or related to or supporting this function.

1.4 The City has been a place of international business for nearly two thousand years, creating a distinctly commercial and cosmopolitan character both traditional and progressive. Insofar as there is an overarching character to the City, it lies in these abiding qualities or 'traits' and their results which, if appropriately considered throughout the development of proposals, could successfully sustain this character and spirit of place.



- 1.5 These traits, which could also be described as 'significance' in planning terminology, are further elaborated in Appendix 1.
- 1.6 Development which exhibits some or all of these traits is more likely to be characteristic of the City, more likely to be sympathetic to relevant individual heritage assets and therefore more likely to accord with the aims of policy S11 and NPPF paragraph 210. However, these traits are not intended to be prescriptive or limit the potential historic or architectural importance that a specific site may embody or effect. It is therefore important that a holistic assessment of the site captures any material architectural, historic and archaeological qualities beyond the points of focus that the traits articulate above.

Intangible Heritage

- 1.7 As well as its built heritage, the City has an intangible heritage stemming from its medieval and later phases: the liveries and guilds, markets, public houses, places of worship and their congregations, the legal, banking and insurance sectors, the City Corporation itself, the living traditions and institutional memories of them all, and all of the pageantry, rituals and customs which flow from them. The City's streets and spaces have continued to evolve, creating new layers of meaning and importance that reflect the City's changing and diverse community.
- 1.8 New work can affect the City's tangible heritage; it can also affect the City's intangible heritage, in the sense of the built environment of the City as a backdrop or setting for its more intangible living traditions as enacted by the City's diverse communities.
- 1.9 The meetings, rituals, processions, the particular ceremonies (religious and secular) – many of these take place in the streetscape, frequently spanning across multiple buildings and spaces. They have compelling value, through their longevity but also ability to prove adaptable to within the present-day City environment. Sustaining the City's character involves new work that embodies the character traits set out above – and it also involves ensuring that these aspects of intangible heritage can continue to take place and, where feasible, are better facilitated, commemorated or interpreted.
- 1.10 Intangible heritage may not always be immediately known or understood, and it is important that development prioritises community engagement within the research and consultation phases to ensure any potential conflicts are identified and addressed as early as possible. Although possessed of very long-established institutions and traditions, the City also has a particularly transient character, reflecting a daily flux which results in very different uses and occupations of a space occurring within a 24 hour period and seasonally.
- 1.11 Engagement should therefore proactively reflect this temporal quality to ensure all the communities which use a space are taken into consideration, and avoid prioritising these communities according to economic activity. This is essential to maintain a responsive approach to planning which best meets the needs of those for which the City is an important space.¹²

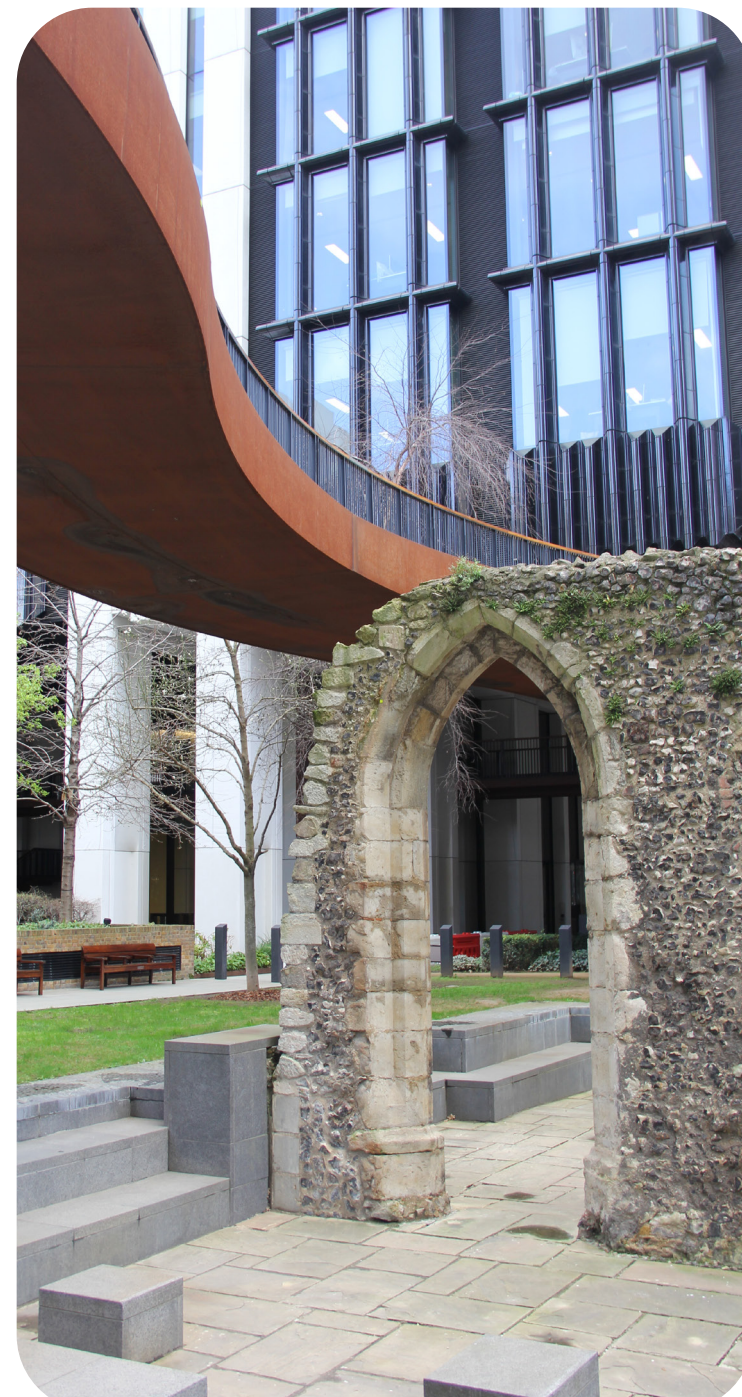


Change, Commerciality & Cosmopolitanism.

- 1.12 While the City has been shaped by epoch-defining historic events such as the Boudican revolt (AD 61), the Great Fire of London (1666), the coming of the railways (early-mid C19), the Blitz (1940-41) and even the Covid-19 Pandemic (2020), an important catalyst for change at more incremental and consistent level is its function as a commercial centre. The City's built environment has constantly adapted to meet the needs of industry, business and changing social structures, spurred on by the imperative to remain nationally and globally competitive. This has been directed strategically through local government intervention but also as a result of individual enterprise.
- 1.13 The capacity of the City to adapt to maintain this commercial function, without overly diluting its tangible and intangible heritage, goes to the heart of how **conservation** in the City can operate. Whilst this is true of many places in Britain, the pressures bearing on the City are recognised as unique (financial, international, competitive, hierarchical). Equally the City's singular circumstances – as an international financial centre just over a square mile in size – has also intensified the pace of change in those parts of it where change was able or desirable to be accommodated.
- 1.14 This has resulted in the City's continuous renewal. The nature of this renewal, however, has not always been wholesale but most often incremental, the result of innumerable individual initiatives and tastes, illustrating fluctuations in sentiment and pragmatism and flavoured by shifts in styles and scales. All of this has added to the varied and layered experience at street and

skyline level.

- 1.15 In such a place, what constitutes 'heritage' is not necessarily capped at a particular point, but continually augmented. For instance, the City's many twentieth century listed buildings were often controversial in their time but are now recognised as an important layer of the City's tangible heritage – some of which are now listed buildings. This is because they are regarded as upholding the City's tradition of a particular kind of high-quality architectural change. Importantly, conserving the City's character therefore is not only about managing the City's existing layers but also about allowing for complementary new layers.
- 1.16 Accordingly, a specific style should not be prescribed for new development. Whether new work should be labelled 'contextual' or 'contemporary' matters less; insofar as the City has an overarching context, it consists of the traits sketched out by Principle One, and adhering to these is most likely to produce a building that is quintessentially 'City'. Whilst there may well be instances where it is evidently important, say, for new work to match its neighbours in materials or proportions, this is a more secondary form of contextual design compared with adhering to the primary, conceptual contextual traits set out above.



Principle Two

Harm to heritage assets can be avoided or minimised by ensuring they have influenced development, and this influence helps to sustain their ongoing relevance.

Relevance

1.17 The NPPF defines a heritage asset as being a 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. The NPPF³ sets out (in paragraph 203) a number of factors that positive strategies for the conservation and enjoyment of the historic environment should take into account, relating not only to the heritage assets themselves but also – and importantly – to:

- The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- The desirability of new development making a positive contribution to local character and distinctiveness; and
- Opportunities to draw on the contribution made by the historic environment to the character of a place.



- 1.18 An important consequence of this wider role for heritage is for heritage assets to have increased 'relevance' to their localities. The concept and active process of **relevance**, as enacted by designers and decision makers, ensures that heritage assets are viewed positively, invested in and engaged with, and seen as active participants in the continuum of City life.
- 1.19 In turn, the ability of heritage assets to change, or to support change in line with the conservation of their significance, is instrumental in their ability to participate. In the design of new development, the City's heritage assets should not merely be a reactive consideration – they should have agency, and actively influence the design of new development conceptually and/or architecturally. This is of course proportionate to their significance and scale – in this vein, less will be expected of a grade II listed K6 telephone kiosk, for instance, than the likes of St Paul's Cathedral. Fundamentally, for development to be enduring and successful it should be responsive to the heritage around it.
- 1.20 The degree to which heritage assets are influential within the design process of proposals has a proportional relationship to the concept of **harm** in the planning system. The more that heritage assets have influenced, visibly so, the design of a new development, the less likely it should be that that new development would cause harm to them, and the more likely a development should represent heritage-led placemaking in line with policy S11, the London Plan and the NPPF.
- 1.21 Clearly, the starting-point for expressing this influence should be the context and significance of the asset in question, and further guidance on how this could be achieved is detailed in part two, 'Street'.
- 1.22 There will always be instances where a heritage asset has significantly influenced a new scheme, but something unavoidable about that scheme still results in a harmful impact. This harm is given great weight within the planning balance, as directed by the NPPF.

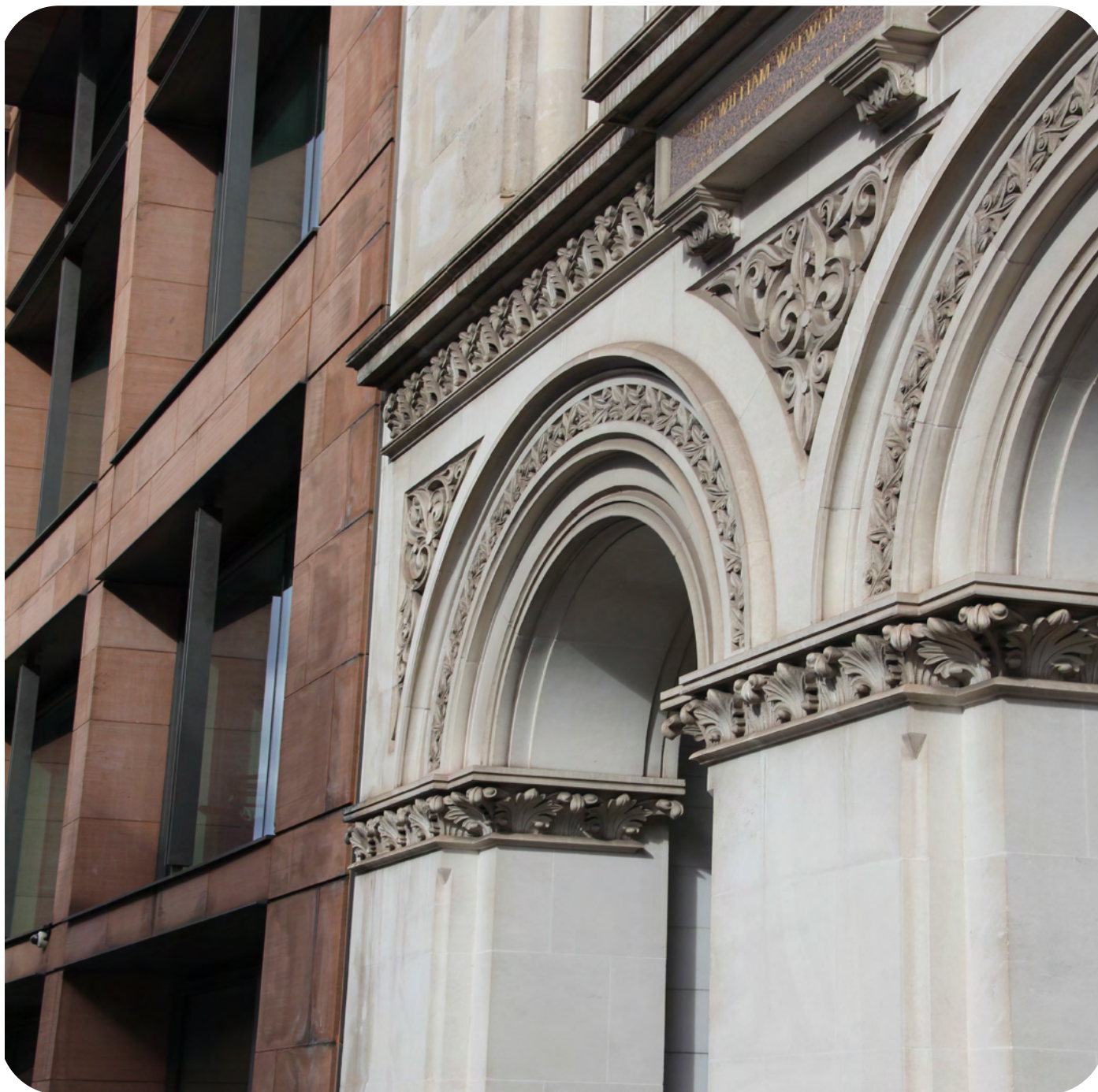


Principle Three

Broadening access to the City's heritage and history is a form of public benefit.

Heritage Interpretation

- 1.23 As well as presenting barriers to access, some heritage assets, and their histories may be imperfectly known or understood. There is accordingly an opportunity for development to broaden access to the City's heritage, and there are a number of ways that this might be achieved. This is normally considered as 'heritage interpretation.'
- 1.24 Conservation should be an expansive, active process which fosters a sense of belonging for all City communities. Development should optimise opportunities to provide better interpretation – for instance through creative intervention, the sponsoring of new archival research, or more traditional inscriptions or artwork to signal the associations of a site with a particular person or event (S11; 3(c and f)). When successfully achieved, development could better reveal that which we did not already know.



Hidden Histories

- 1.25 Within the established narrative, there are often only glimpses of groups which have not historically wielded civic or economic power. There is an opportunity to reveal the City's historic diversity, illuminating how this has contributed to today's urban realm. Historic interpretation and other steps that actively seek to address and reveal these histories will therefore be encouraged, acknowledging the importance of these interventions in generating a sense of belonging and ownership.
- 1.26 Such interpretation should be forward-looking and make use of inclusive design approaches and technology to ensure information is accessible to all and intrusive fixings are minimised as far as possible.
- 1.27 The rarity of historic fabric with specific communal value relating to these under-represented groups is recognised and development is encouraged to actively identify, celebrate and protect this heritage throughout the design and development process of a site.

Contested Heritage

- 1.28 This approach encourages the appropriate re-contextualisation of historic places with links to contested heritage including slavery and the slave trade, recognising this process is important to understand any contested asset's true significance. Interventions of this kind should be driven by consultation with the communities affected, prioritising the well-being and safeguarding of participants, alongside detailed research into its history, provenance and significance. In some cases the removal or relocation of contested heritage may remain the

most appropriate outcome; in others the retention and explanation of the asset will be the course, as informed by the processes outlined in the NPPF, DCMS and Historic England guidance have been followed and led to this conclusion. ⁴

⁵Heritage Led Placemaking

- 1.29 Heritage interpretation should consider the wider context of the City and move away from an emphasis on 'display' to an active creative approach that encourages participation and cultural wayfinding, responding to its specific location to facilitate enjoyment of place and belonging in the broadest sense.



Case Study: One Undershaft

One Undershaft was granted planning permission in 2024, a 74-storey office building that when delivered will be the tallest building in the City and the clear apex and central 'totem' of the City Cluster. It owes its height and site to strategic view considerations, and its architectural confidence and charisma to the trend of architectural singularity established by the Lloyd's Building in this location; it is substantially commercial in function, but also carries on the City's recent traditions of schemes that provide generous amounts of public space, including at the Level 11 garden and at the elevated public spaces in the building's apex. It is considered a fine example of Principle One.



Case Study: The Lloyd's Building

Lloyd's of London was completed in 1986 to designs by the Richard Rogers Partnership and Ove Arup & Partners. Whilst it entailed the demolition of a fine 1930s building by Edwin Cooper, the building is widely recognised as a design exemplar and listed at grade I. It made ingenious use of the irregular, medieval dimensions of its plot by creating a simple, efficient orthogonal floor plan in the centre and grouping and distributing all service functions into 'towers' placed in the leftover, irregular parts. Of palpable inner coherence and confidence, the building is the latest in a series of HQ's for this seminal insurance market and helps to illustrate how the City's commercial function is itself multifarious and many-layered; it is, overall, an exemplar of the traits in Principle One.



Case Study: Holborn Gate

In 2025, planning permission was granted for the redevelopment of site on High Holborn to provide a new ten storey building and pocket park. The site is surrounded by the Chancery Lane Conservation Area which has directly influenced the proposals' intelligent contextual approach, including features such as large radiused corner of the northwestern block which aids transition from the frontages found along High Holborn and Southampton Buildings, as well as evoking the form of the Knights Templar church once located on the site. The rich material palette, incorporating a dark red terracotta façade above a grey-pink granite plinth, echoes the strong datums within the streetscene which establish distinctive hierarchies in the locality. In all these respects the aesthetic influence of the conservation area is plain to see, and the scheme is considered a strong example of Principle Two.



Case Study: Beckford Statue

A statue of William Beckford is located in the Guildhall, dedicated to an address he made to King George III in 1770. As part of the 'Revealing the City's Past' project, an additional piece of interpretation was commissioned to contextualise the statue and make clear William Beckford's links to slavery. The project resulted in a plaque fixed to the base of the statue plinth, and includes a commissioned poem and historic research. It is a project created in consultation, and was a product of engagement with intergenerational and accessibility panels, independent experts and arts and heritage charity Culture&. The project represents a shift in narrative, with a range of Black voices represented foregrounded permanently within the Guildhall and in further interpretation through an exhibition and online information. The content is fully accessible and engaging for those who might have additional needs, focusing on both the in person and online experience. The project is considered an exemplar of Principle Three.



2. Street

- 2.1 The City has 600+ listed buildings, 28 conservation areas, 53 scheduled ancient monuments and four registered parks and gardens. By celebrating these heritage assets, and putting them at the heart of placemaking in line with policy S11, their ongoing relevance to the City around them can be maximised.
- 2.2 Nevertheless, when it comes to works to heritage assets themselves, whether that be the refurbishment and alteration of a listed building, or the development of a site in a conservation area, there will be limits to the level of change that the heritage asset can accommodate before its significance could start to be affected – and ‘harm’ caused.
- 2.3 Development which accords with the first and second principles of this SPD along with careful consideration of the assets significance, is usually likely to minimise the possibility of harm by putting the City’s character, so largely derived from its heritage, at the heart of placemaking; yet there are specific circumstances where harm may still arise, and these are discussed below with a focus on how harm might be avoided, or minimised at least, while seeking to deliver the benefits outlined by policy S11.



Principle Four

High-quality Heritage Statements facilitate the decision-making process and are an essential step in ensuring proposals celebrate the City's heritage from inception.

- 2.4 Key to any application with the potential to affect the significance of a heritage asset is ensuring the significance of these assets are appropriately understood and expressed in the supporting information of application. Commissioning high quality research into an asset, in order to articulate its heritage significance, should form the baseline from which proposals are developed. This will ensure proposals are in compliance with policy S11 through the celebration of heritage significance from the inception stages of a scheme. Additionally, the early production of this information assists officers in providing advice and decision making throughout pre-application and determination stages.
- 2.5 This research, normally presented in the form of a Heritage Statement, can be undertaken in a variety of ways and formats. Visual materials such as archival photographs and plans, historic mapping and colour-coded phasing plans are particularly useful communicative tools to efficiently set out the relative contribution of a building's fabric to its significance. Within the City of London, the London Archive is a particularly useful resource and includes an extensive repository of archival photographs.



- 2.6 Applicants should make use of best practice guidance from Historic England, such as 'Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12' which provides helpful potential sources of information and suggests useful formats and workflows in order to undertake this analysis.
- 2.7 In order to understand the particular sensitivity of a building it is often useful to undertake a comparative study, situating the building within the body of work of a particular architect, or assessed as part of a particular style or movement, or in reference to a particular building typology.
- 2.8 Importantly, high quality Heritage Statements will go beyond the just the dating of a particular building's phases, to express what aspects make a particular contribution to significance and what that significance encompasses. This research should be proportional to the sensitivity of the fabric effected and the degree to which there is potential to harm or enhance an aspect of an asset's significance. While lengthy text analysis of the history of the site can be useful, this is not always necessary to effectively capture a building's significance in order to assist decision making.



Principle Five

Historic fabric is irreplaceable and its loss is very likely to result in harm.

Fabric

- 2.9 The NPPF is clear that heritage assets are an irreplaceable resource (para 202). Whether, for instance, a section of original roof structure in a listed building, or an unlisted historic building in a conservation area, their constituent fabric is finite. Fabric embodies the asset, its design and morphology; it is a direct physical connection to the past and is often of a standard or type of materials or craft skill which cannot now be directly replicated. For all these reasons, fabric possesses inarguable authenticity and time-depth and is inherently sensitive to change, particularly where past alteration has been avoided.
- 2.10 The authenticity and integrity of heritage assets will derive, to varying degrees, from their fabric and its state of preservation as well as from other aspects of significance, including from their settings. As a general rule, the City considers that in many cases fabric is likely to be a major contributor to a heritage asset's significance and proposals which result in the loss of historic fabric are very likely to cause harm, to varying degrees.



Principle Six

Patina is as irreplaceable as fabric, though sometimes more elusive to identify and assess, so its loss could be likely to result in harm.

- 2.11 Patina upon fabric is the accretive product of time and cannot be replicated once lost. Patina is the weathering, mottling, aging finish of the passage of time upon fabric; it is elusive to define and dependent on the material in question and its location. It is similarly difficult to be conclusive about whether its loss would always be harmful. Patina might be described as the timeworn quality of a heritage asset – the quality of not being new. It enables an appreciation of a heritage asset's significance by communicating its age.
- 2.12 The cleaning of heritage assets, whilst sometimes necessary to maintain facades, should pursue a minimally invasive approach and in general should only be supported where materials and methods are accepted conservation practice. In most cases, a test panel should be undertaken to ensure an appropriate result. Applicants will be required to demonstrate that they have followed relevant guidance from the Institute of Historic Buildings which specifies appropriate cleaning tools and methodologies depending on the material in question. Where the cleaning of fabric is consented, conditions may refer to the appropriate British Standard code to control the methods used.
- 2.13 *The addition of washes to fake or replicate patina once lost is unlikely to mitigate or compensate for harm.*



Principle Seven

Increasing the inclusivity and/or sustainability of heritage assets can be an especially clear and convincing justification for harm, and can be a form of public benefit.

Sensitively adapt or retrofit heritage assets

2.15 Buildings and spaces which are inaccessible or wasteful carry a high risk of irrelevance. Those which are inclusive and efficient, correspondingly, could achieve high relevance – to the City around them and, to the broadest spectrum of user groups. Irrelevance is however not a test of public access, as is made clear in Planning Practice Guidance on the historic environment which states the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access an asset or its setting (PPG Paragraph: 013 Reference ID: 18a-013-20190723 Revision date: 23 07 2019).

Inclusivity

2.16 In considering planning proposals, the City Corporation will take all reasonable steps to secure an appropriate level of public access and inclusivity to heritage assets. If this leads to proposals that could result in a degree of harm, the pursuit of greater inclusivity is considered to be an especially clear and convincing justification for harm and a public benefit that can be significant enough to outweigh harm, in line with the balancing exercise outlined within the NPPF Applicants should use guidance from Historic England such as 'Easy Access to Historic Buildings' 2015, as a reference point (an updated to this document is currently being drafted).

Sustainability

2.17 Sustainability in the context of heritage assets should include positive approaches to the extent to which heritage assets can share and contribute towards the common goal of decarbonisation and greater efficiencies as part of the City's – and the UK's – response to the challenges of the changing climate. Similarly, the City Corporation considers that the designated status of heritage assets does not preclude them accommodating measures to make them more energy efficient. The City of London Retrofit Toolkit (2024) should be consulted a source of best practice and proactive advice to this end.

2.18 Where an asset has fallen into under-use or is vacant and at risk of disrepair, the City Corporation will seek to ensure that the asset is put to a viable use consistent with its conservation. Proposed changes of use will be considered in accordance with relevant policies in the development plan and the Offices SPD, alongside recognising the specific opportunities and constraints that an individual heritage asset may present.



Principle Eight

Displaying deference towards heritage assets can be a particularly effective way for development to minimise, or avoid, the possibility of harm.

Design affecting the visual character or the setting of heritage assets

2.19 There will be instances where proposals for works to a heritage asset do not involve the loss of historic fabric but do result in visible new elements such as roof extensions, access ramps or, in the case of conservation areas, new buildings, which could affect the visual character of the heritage asset and consequently its significance.

2.20 In such instances, the integrity of the existing visual character of the heritage asset should be prioritised. However, this will not always equate to a test of visibility – i.e. that the visibility of new proposals alone is inevitably a cause of harm.

2.21 Rather, it is usually the character of new proposals that can result in harm, chiefly where it conflicts with or undermines the visual character (as it contributes to significance) of the heritage asset. New work should have regard to this, and to that end should exhibit the influence of the heritage asset, complying with Principle Two set out above.

2.22 More widely, new work could have regard to the character traits set out in Principle One of this document (and if there is tension between these overarching traits and the particular circumstances of the heritage asset in question, this should be resolved in favour of the latter). Where this is the

case, new work is unlikely to be harmful and has the best chance of succeeding as a new chapter in the life of the heritage asset.

2.23 Parameters such as:

- Hierarchy
- Roofline features pitch and character
- Sense of enclosure or openness
- Datums
- Decorative detail
- Material palette

2.24 All provide appropriate points of reference or counterpoint that new work could use to ensure proposals respond successfully to their surroundings. It is important that this identity is expressed at all the scales at which it is appreciated. This includes the macro scale of overall mass and skyline presence, but also in the micro detailing of jointing, fixings and finish.

2.25 Importantly, new development does not have to replicate the appearance or aesthetics of a host heritage asset in facsimile to be successful, but should seek to sustain a specificity and identity of place. To this end, this document seeks to support the use of an appropriate design workflow that iteratively responds to its heritage context, rather than prescribe one single aesthetic approach.



2.20. Importantly, new development does not have to replicate the appearance or aesthetics of a host heritage asset in facsimile to be successful, but should seek to sustain a specificity and identity of place. To this end, this document seeks to support the use of an appropriate design workflow that iteratively responds to its heritage context, rather than prescribe one single aesthetic approach.

2.21. While heritage assets themselves are irreplaceable, the NPPF sets out how their settings, or 'the surroundings in which a heritage asset is experienced', 'may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'. In other words, the setting of a heritage asset is not finite or irreplaceable, but often inconstant and, potentially, capable of infinite variation provided the significance of an asset is not harmed.

2.22. While harm can arise to heritage assets, when change within their settings is of a harmful character, such impacts are generally more open to interpretation than the clear-cut loss of irreplaceable fabric. High quality heritage statements that make clear the relative contribution of setting to an appreciation of an asset's significance will assist decision-makers when making this judgement.

2.23. Elements of setting can make a particularly clear and enchanting contribution to the significance of a heritage asset – for instance, the aforementioned Fleet Street views of St Paul's Cathedral. Instances like these are typically clear and long-established and make a convincing contribution to significance. In such cases, the very visibility of a proposal, as well as its visual character, will be important considerations for the City.

2.26 The contribution of setting to significance can also be neutral, with setting in such instances simply forming the 'surroundings in which the heritage asset is experienced'. In such instances, as set out in the second principle of this document, there is an opportunity for heritage assets to be at the heart of placemaking by clearly and legibly influencing the design of new developments around them.

2.27 In relation to these more neutral cases, the City's key consideration will not typically be the visibility of a development in relation to heritage assets, but usually the character of such development. Accordingly, development should have regard to the character traits outlined in Principle One and the aims of Principle Two, and should also seek ways to exhibit **deference** to heritage assets.

2.28 Deference can take many forms, depending on the circumstances. It could be expressed through the proposal's height or mass, or it could take the form of an architectural expression (modelling, articulation, tonality, detailing – though it is important that clear contrast between the proposals and asset in question is maintained), or it could manifest through the layout, building line or even the disposition of uses in a proposal; or it might even be a combination of all three.

2.29 While a new development may well be visible, even prominent, in relation to a heritage asset, by displaying clear and legible deference, the viewer can quickly understand that the heritage asset has influenced its surroundings, that it has a presence to be acknowledged, respected and appreciated – that it is relevant to the City around it.



2.30 Absolute characteristics such as relative height, scale or massing will usually have a greater bearing on impacts than detailed design considerations. When a deferential approach can be worked into these absolute characteristics, the resultant proposal will likely not detract or distract from, or dominate, the heritage asset in question. Moreover, deferential design should not reduce the legibility of the heritage asset; indeed, it should enhance it, and where possible should signpost its particular significance. It is important, of course, that this deference is judiciously worked into the overall architectural diagram and does not appear tokenistic, or as an afterthought. In particular, the City Corporation will seek to ensure development does not impair, reduce or erode an appreciation of the character traits in Principle One.

2.31 Development which successfully displays deference could still be of a significant scale and/or architectural exuberance. And this deferential approach enables heritage assets to be active participants in the evolution of historic places, at ease with the visual character of today being established alongside them.



Principle Nine

Non-designated heritage assets can and should inform the design and/or public offer of development.

Non-Designated Heritage Assets (NDHAs)

- 2.32 The City Corporation will assess relevant buildings and spaces against the criteria in relevant Historic England guidance, including guidance on Local Listing and relevant Listing and Selection guides, and with consideration of the character traits set out in the first principle.⁶
- 2.33 For this designation to be meaningful, there must be a high bar to qualifying for Non-Designated Heritage Assets (NDHAs) status. It will not be lightly bestowed.
- 2.34 Similarly, there will be an expectation that, where identified NDHAs are on development sites, proposals for those sites will be informed by consideration of the NDHAs.



Case Study: Custom House

In 2025, planning permission and listed building consent were granted for the conversion of the iconic, grade I listed Custom House to a hotel and the comprehensive reimagining of its associated quayside and wider public realm. While the works entailed some heritage harm to the significance of the building, such as interventions to make the building step-free as well as improving its energy efficiency, these harms were considered justified and supported by justification to deliver a minimised harm scenario. As such the harms were found to be outweighed by the benefits of the scheme, which reintroduced public access into the interior as part of a highly compelling cultural offer. The proposals have been developed with the input of key heritage sector consultees, including Historic England. The proposals are an exemplar of Principles Five, Six and Seven.



Case Study: St Bartholomew's Hospital

The North Block of St Bartholomew's hospital (James Gibbs, c.1732) is the ceremonial centrepiece of an elegant early Georgian square which forms the heart of the hospital. In 2025, planning permission and listed building consent were granted for the conversion of the North wing to a museum, function venue and archive store, offering a viable new future for the previously under-utilised and irregularly maintained North Block. The proposals were supported by in-depth investigative works which provided clear justification for all interventions, meeting best practise guidelines and standards. While some harm was found to arise as a result of the works, this was determined by officers to be outweighed by the compelling heritage benefits identified, in particular the restoration of original fabric and plan form, and the project illustrates a meticulous approach to fabric, exemplifying Principle Five.



Case Study: Montcalm Brewery

The Montcalm Brewery comprises a collection of buildings within the former Whitbread Brewery complex, including a number of listed buildings, within a conservation area. In 2025, planning permission was granted for the expansion of the hotel with a striking, contemporary roof extension, evocative of the former industrial history of the site, expressed through the roof pitch, use of materials and approach to fenestration. Works to the shopfronts along Chiswell Street to improved activation and animation, as well as reveal internal features of heritage interest such as vaulted ceilings, iron pillars and skylights which had been covered in previous unsympathetic refurbishments. The project demonstrates how proposals can defer, appropriately, to heritage assets without sacrificing their own inner confidence and coherence, as a good example of Principle Eight.



3. Strata

Principle Ten

The revelation of archaeology, designated and non-designated, to public view and experience on development sites is a public benefit.

- 3.1 The City has a substantial and significant presence underground: ancient footings, abandoned masonry, paleoenvironmental remains, Roman, medieval and post-medieval burial grounds, ancient quays and wharfs, Roman plasterwork, Georgian wells and more – and all the ephemera of life in between, reflecting 2,000 years of intense occupation.
- 3.2 There is an extraordinary breadth of evidence below ground, surviving to extraordinary depth: the City's archaeology can still survive beneath modern basements, being present up to 6m below current ground level. And the whole is a record of the evolution of Britain's most important urban centre.
- 3.3 The archaeology of the City, in a national context, is unique in its extent, diversity and importance. Most powerfully of all, though, it records, and directly connects us with, past City communities: their property, in the form of found, lost, or discarded ephemera, and their properties, in the traces of their footprints, handprints, thumbprints – and, not uncommonly, their physical remains.
- 3.4 Archaeology can often enrich the historical

record – discoveries can plug gaps in knowledge, or square off, or round out, or even reshape, the conclusions of historians. But, almost as importantly, there is a palpability, a freshness, a directness, about archaeology. Newfound features or remains capture the imagination like no historical record quite can. Despite its ancientness, archaeology can be thrillingly immediate.

- 3.5 A discarded oyster shell, a fragment of plaster, a ring glinting in the mud – such discoveries require no explanation, at first, but shrink the gap between the times of their owners and our own time. In this, archaeology is an unparalleled public learning opportunity. While there will of course be considerable opportunities for the more scholarly work of advancing archaeology and history as specialist disciplines, in the City's archaeology are powerful opportunities for the public to meet past City communities – and for development to put heritage at the heart of placemaking in accordance with the aims of S11.



Principle Eleven

Archaeology can, where appropriate, beneficially inform the design and/or the public offer of development.

3.6 As well as these educational opportunities, the archaeology of individual development sites can, through its influencing on the shaping of or display within individual proposals can help to convincingly ground them in their City context and embody trait (b) in the first principle of this document, all in accordance with the aims of S11.

Principle Twelve

The ‘significance’ of features will be judged on a case-by-case basis, in consultation with the Greater London Archaeological Advisory Service (GLAAS), and with reference to Historic England’s Scheduling guidance and the City’s particular history and archaeological record.

3.7 However, despite the City being one of the most archaeologically investigated places in western Europe, not every depth has been plumbed; not every site has been exhaustively dug and documented. And such is the City’s archaeological sensitivity that it is a factor not only in major developments, but also in retrofit and other projects where strengthening of foundations and new service runs may affect archaeology even if no new basements or significant excavation are proposed.

3.8 Furthermore, the whole of the City of London is

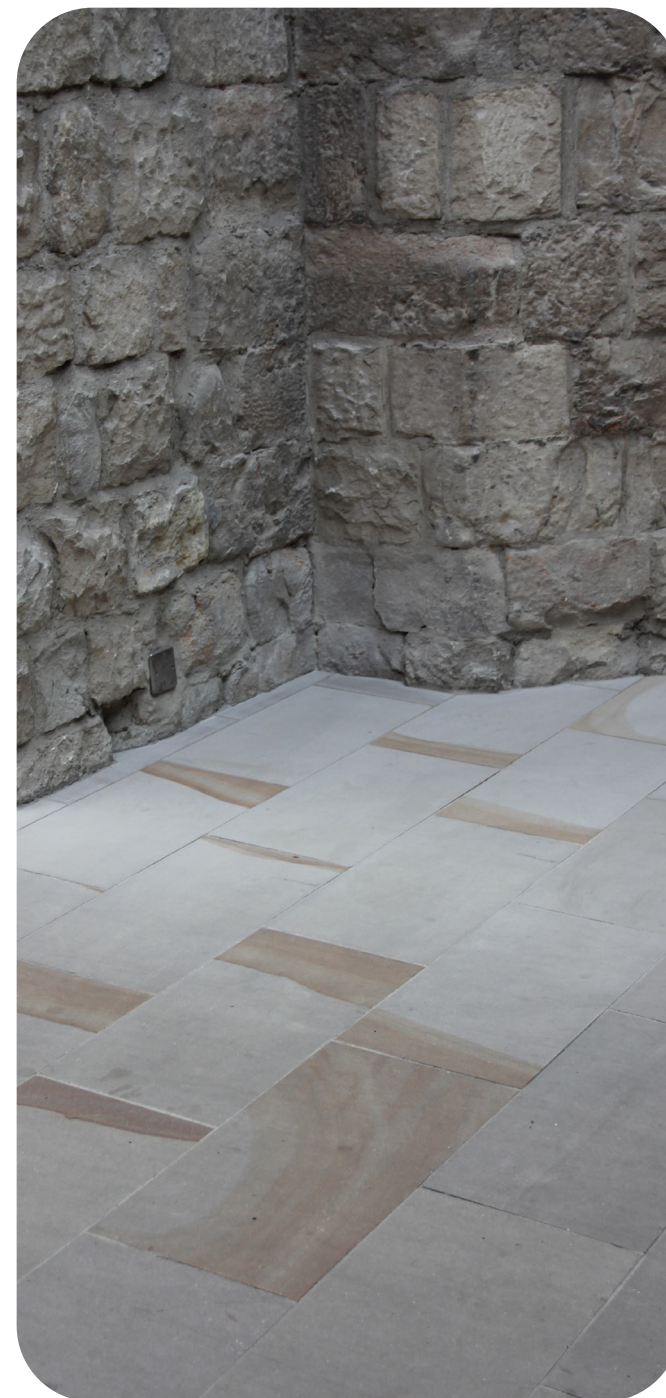
equivalent to a Tier I Archaeological Priority Area (APA) – or, a defined area which is known, or strongly suspected, to contain a heritage asset of national significance (a scheduled monument or equivalent); or is otherwise of very high archaeological sensitivity.

3.9 In other words, it’s highly likely that marvels remain to be discovered, even below the relatively deep basements of existing buildings. For this reason, City Plan policy HE2 requires the retention and where feasible display of significant, substantive archaeological features on major development sites – in recognition of the status of archaeology as a shared resource, to be learned from and either preserved and reburied or revealed to public view according to circumstance.

3.10 As policy HE2 suggests, there is a distinction between features and artefacts. Features are that which cannot be picked up and carried; artefacts are, by their design, that which can be.

3.11 Typically, features of the requisite significance to warrant preservation in-situ, in accordance with policy HE2, are likely to be those of ‘national significance’ and therefore eligible for designation as a Scheduled Ancient Monument.

3.12 Some features, however, may not quite meet this high bar, but may still be of such local significance, relative to the City’s history and archaeological record, as to warrant retention and where feasible display in line with policy HE2. Of particular importance in assessing features will be the extent to which they were tangible to and figured in the experiences of past City communities.



Principle Thirteen

The 'substantiveness' of features will take into account not only their physical quantum, but also their quality of survival and evidential value

3.13 Then there is the question of the scale or 'substantiveness' of the archaeological features. This may not always be simply a matter of extent or quantum and is closely linked to the question of significance. For example, preserving in situ, by dint of great effort, expanses of comparatively featureless wall footings, even if they are ancient, may ultimately not be worthwhile; doing the same for much slighter sections of once-upstanding walling, actually experienced by past City communities, could be said to be much more meaningful.

Principle Fourteen

The wholesale archaeological loss of an ancient burial ground is likely to be harmful. This could be partially mitigated through enhanced study of the human remains thereby excavated.

3.14 Human remains, for obvious reasons, belong in a category distinct from both 'features' and 'artefacts'. There are circumstances in which human remains can be discovered in small, more sporadic quantities, either as complete or partially complete skeletons or as 'disarticulated' remains, where the components of the body survive more fragmentarily. Whilst such discoveries can often be predicted (through desk-based assessment and trial holes), they can also be unexpected.

3.15 Contrastingly, the City's many ancient burial grounds can contain significant assemblages of human remains, often generations of the same parish, from the early medieval period until the Victorian. The locations of these burial grounds are generally known and the majority of them are now public gardens usually (but not always) under the management of the City Corporation. Typically their former burial function is obvious in their fabric and visual appearance, being typically of raised level (indicating burials), enclosed by iron railings and with funerary monuments visible.

3.16 Some, however, take the form of open spaces, not managed by the City Corporation, that are incorporated into building plots and less visually legible as public gardens that were formerly churchyards. There have been recent development proposals which have entailed the incorporation of some of these into development sites, and their full excavation as part of the development proposal. Whilst this has allowed for the study of the assemblage of human remains, advancing knowledge in relevant spheres, such wholesale losses can also cause harm through the removal of the significant, substantive presence of past City communities.



Principle Fifteen

Broadening engagement with archaeological processes is a form of public benefit.

3.17 For all archaeological work, public engagement is highly important. Broadening public access to archaeology is one of the City's priorities. This could take the form of site tours (particularly for under-represented groups) during excavations, or the enhanced promotion of the findings of a project. Prompt and high-quality publication, archiving and dissemination of the findings of a project is similarly essential.

Case Study: 85 Gracechurch Street

In 2023, planning permission was granted for the redevelopment of this site in the City Cluster to provide an office tower with a public hall and Roman Forum-Basilica exhibition at level 5. Subsequent archaeological investigation revealed the presence of substantive and highly significant remains of the first Forum-Basilica below the site. There was consensus that, in view of the importance of these remains, the scheme be reworked to preserve these in situ and revealing them to public view in the form of a new free public exhibition accessed from the public hall at ground floor level. Planning permission for this reworked scheme was granted in 2025.



Appendix 1 City of London Significance

reproduced from the Topic Paper in the Evidence Base 2024

The significance of heritage and its conservation is at the heart of the City's approach to design. Specific to the City, the following Statement of Significance articulates its particular architectural and historic interest using the values defined by the National Planning Policy Framework (2024). Within them, the City's heritage significance is further broken down into a series of themes, with reference made to the contribution of setting as appropriate. The development precepts or principles are drawn specifically in reference to this significance, seeking to preserve and enhance the traits set out below.

Historic Interest

AGE. As the capital's ancient core, the City has immense historical significance in a London context. It was the place where urban settlement was founded by the Romans shortly after AD 43 and, barring a few centuries of early medieval vacancy, has been intensively occupied and developed ever since. Only a few Roman towns have continued in use in this way, and none were or continue to be more important to the nation's economic fortunes than the City of London. This is appreciated through the physical fabric of the city's buildings, but also in the wider street pattern, with Victorian arterial routes overlaid upon Medieval and Saxon courts and alleys. The continued use of markets, the ceremonial theatre of the Processional Route, as well as the Lord Mayor's Show, all evidence the length of occupation within the city walls.

COMMERCE. Although not the first Roman city (Colchester) in Britannia, Londinium quickly became the most important, particularly for trade with the continent; the City of London has remained a commercial centre to the present day. It has been hugely influential on an international level, a place in which practices of high finance, insurance, banking and associated disciplines were pioneered, were evolved and refined, and came to an ascendancy in the C19/C20. Subsequently London is known to be the home of major international companies, including the East India Company, Lloyd's of London and latterly Goldman Sachs and Bloomberg.

Uniquely, the City can claim to be the birthplace of a number of professions, perhaps the most important being that of insurance. This trait is physically expressed by the institutional architecture of the Royal Exchange, Bank of England and the London Stock Exchange. In addition, the density of historic guilds and their 95 Livery Halls, which set the trade standards and 'Hallmarks', create a unique townscape within the European and International context. The relative abundance and close proximity of commercial and financial buildings establishes the sense of dense financial architectural ecosystem, emphasised by the tight knit spatial relationship between relevant building types.

PEOPLE. The City has associations with huge numbers of influential historic figures, too numerous to name in full, across spectrums of politicians, businessmen and women, clergy, architects, literary figures and rebels. Relatedly, St Paul's Cathedral had come to act as a pantheon for great national figures, including Nelson, Wellington and Wren, to name a few.

COMMUNITIES. The City is a home, work environment and place of leisure and respite for a diverse range of communities. Many of these are defined through association with a particular profession, craft, art, sport or spiritual practice. The city recognises its heritage has been shaped by these communities and the historic environment should be preserved to facilitate the enjoyment and amenity of these groups into the future.

COSMOPOLITANISM. The City was founded as an outpost of an empire; over intervening centuries it gradually becoming the centre of what was the British Empire in the 19th century. More than any other part of Britain, the City has had from the beginning of its existence an international reach and reputation expressed through the flow of trade and commerce the benefits of which flowed back to the Capital. The City has distinctive associations with certain communities – Liveries, Jewish community, international groups of professionals from Lombardic bankers to Hanse (Baltic) merchants. The creation of a tall building cluster has also come to be representative of a city with a global reach, with the skyline in particular

often used as an Avatar for the City and the Capital. The variety of building types specific to certain communities, when appreciated as a group, creates a diversity which also amplifies the sense of the cosmopolitan City.

PAGENTRY & EVENTS. The City has association with a number of famous and seminal events, including Boudicca's Revolt (c.AD 61), the Royal Charter (1067), Magna Carta (1215), the Black Death (1348-49), the Great Uprising (1381), the Reformation (1530s-1559) the readmission of the Jews (1650s) the Great Plague (1665) and the Great Fire (1666), the Great Storm (1703), Gordon Riots (1780), Nelson's (1806) and Wellington's (1852) funerals, Great Stink (1858), the Blitz (1940-1941), the Big Bang (1986), and the Bishopsgate bombing of 1993. The Processional Routes to St Paul's Cathedral and between the Tower and Westminster, all animate the city streets bring a tangibility to these historic traditions and folklore. Similarly, the pageantry associated with Corporation and Livery traditions, including the election of Sheriffs and Lord Mayors and multifarious customs like the Lord Mayor's Show, the Beating of the Bounds, the Trial of the Pyx, and Doggett's Coat and Badge Race create a unique experiential interest. Symbolic Processional Routes and the sites of pageantry create an architectural 'theatre' of interrelated use. Additionally St Paul's Cathedral provides a home to services of national significance.

Architectural/Artistic Interest

On a national and possibly even international level, the City is a unique example of a City of Classical origin which retains its original purpose as a commercial centre. The evolutions of commerce and high finance mean that the City's street pattern, buildings and skyline are subject to continual development pressure; the scarce land available means the result is a highly idiosyncratic urban entity, with development compressed, clustered and grown from barely a square mile in the heart of London. Unique to London is the appreciable retention of a historic street pattern, and

the subsequent responsive curation of its tall building cluster which has been developed with reference to the City's historic interest but remains equally a strong part of its architectural identity. This is apparent at various scales. London and the City's tall building cluster in particular are perceived in numerous long distant views, with the surrounding hills and parklands creating a verdant backdrop which offsets the pronounced urbanity of the City, typified by the Cluster. These views have been represented in numerous paintings, engravings and photographs, creating specific attendant artistic and historic interest. The important contribution of these views is often reflected through their identification within the London Views Management Framework (LVMF). The City's riverside location is also of profound historic importance, beyond the creation of a pleasing waterside foreground. The River Thames itself can be understood as a physical manifestation the trade routes which caused the city to thrive. Equally the river provides an experiential route via which the unfolding vistas of the city are seen in context with neighbouring boroughs such as the City of Westminster and London Borough of Southwark.

STREET PATTERN. The City's ancient origins are immediately recognisable in its street pattern. Barring a few planned enclaves and newer streets of the nineteenth and twentieth centuries, the street network remains largely medieval and evolutionary in character, and several Roman and Saxon streets survive in recognisable form or have been revealed again through new developments. It is the most extensive of its kind in the UK and exerts a powerful influence upon the City's character. The remaining influence of the city walls creating a sense of contrast between street grains within and without the city's Roman wall. Equally connected Processional Routes from Westminster and other centres of religion during the medieval period are also of importance.

TPOLOGIES. The City has a unique collection, in

quality and quantity, of certain building types both ancient and modern. The profusion of churches and Livery Halls demonstrate the piety and prosperity of the medieval City; the dramatic skyscrapers of the City Cluster demonstrate the continuity of the City's commercial and high financial character. Above all, the development of the purpose-built office building can be closely followed and understood, in all its phases. Nowhere else in Britain has quite the same collections of these buildings.

VARIETY & DIVERSITY. The City's built form is overriding characterised by variety, heightened by the tight confines of its geographical area – leading to what has been described as 'endless surprising juxtapositions and vistas'. This quality stems from the later phases of the City's existence and is testament to the continuity of its ancient commercial purpose; nowhere else in Britain can this largely successful combination of ancient monuments and hypermodern buildings be seen together to quite the same extent.

ARCHITECTURAL CALIBRE The City's historic and modern architecture is generally of the highest quality, with a consistent level of quality of facades, materials and design rivalled only by a few other British cities, but none of these ancient rivals can match the quality of modern developments the City also possesses, from the completeness and success of the post-war Barbican to the sophisticated glass façade systems of 22 Bishopsgate. As with the insistent variety, the sheer calibre of the City's built form testifies to its historic and ongoing commercial success, itself a source of significance. Where appreciable, the planned response to an existing historic setting, particularly where newer buildings such as at New Street Square seek to reinforce historic street patterns. The creation of architectural set pieces such as at the Barbican Estate,

Finsbury Circus and Bank Junction, with individual buildings contributing to a wider townscape composition appreciated from beyond the city's limits. Numerous vistas and glimpses in which decorative detail and façade design are specifically framed and set off.

SKYLINE & HEIGHT From the earliest times, the City's confined street plan has resulted in tall buildings, both secular and ecclesiastical; more than any other place in Britain, the appetite for and skill at building tall has continued undimmed down to the present day, giving the City a pedigree for and relationship with architectural height unique in a national context. As such assets in the City often draw greatly from the importance of views and sky space. Resultingly, the City's skyline has been famous since the early modern period, particularly in views from the South Bank of the Thames, which have been drawn and depicted from the C16 and from the Processional Route between Westminster and the City. At the heart of this renown is the presence of and relationship between St Paul's Cathedral and the many City Churches, both in their pre- and post-Great Fire guises. C20 and C21 buildings of comparable scale have joined them on the skyline adding, in general, a new dynamic which speaks now of the City's ongoing commercial success. Nowhere else in Britain has a skyline so anciently famous that remains a dynamic, living entity. The cornerstones of this are the prominence and dominance of the Tower of London, St Paul's Cathedral and the Monument to the Great Fire as key influences and presences upon the skyline, and the unique collection of Wren steeples in their local and wider riparian setting.

Appendix 2 Glossary

City of London: A space historically defined by the Roman City Walls which surrounded London when first founded. Now the City of London refers to a geographical and administrative boundary, also known as the 'Square Mile'. The City of London Corporation: is the administrative body and local authority which controls planning and development within this boundary.

Heritage Asset: Defined in NPPF Annex 2: Glossary as: "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

NPPF: National Planning Practice Framework. The overarching national policy which controls planning produced by central government.

Relevance: In this context 'relevance' encapsulates the important place that heritage assets occupy in National Planning Policy and the implications for the design and decision making process. This instructs decision makers to have special regard to their conservation, and expresses the relative importance within a system which considers many different disciplines and regulatory lenses. This places them at the heart of how the City should be planned for and designed. They are therefore eminently relevant to all development proposals, and this relevance should be clear expressed at all stages of the application process as well as in the final design. Principle: Key guidelines which applicants and officers can use to assist in the design, pre-application, determination and implementation process.

Conservation: Defined by Historic England in their Good Practice in Planning Advice Notes as 'Managing Change' Harm: In this context 'harm' means an adverse impact on an aspect of an asset's significance, or ability to appreciate that significance.

Picturesque: an aesthetic category associated with the striking juxtaposition of natural, irregular or contrasting forms harmonised by composition.

Commercial: Refers to buildings which relate to a commercial use or function. See Historic England's Listing Selection Guide: 'Commercial and Exchange Buildings' 2017.

Authenticity: Defined in the context of World Heritage Sites by UNESCO as: the link between attributes [of a place] and its Outstanding Universal Value. To meet the conditions of authenticity a property's cultural importance must be truthfully and credibly expressed through a variety of attributes.

Integrity: Defined in the context of World Heritage Sites by UNESCO as a measure of the completeness or intactness of the attributes that convey Outstanding Universal Value.

Contested Heritage: Contested heritage refers to artifacts where the most appropriate conservation approach to an object is questioned or disputed. Often this is because the site, object, or story holds contradictory or conflicting significance. This arises when information is identified which directly challenges an artifact's celebratory or commendable status. Such material is often representative of or commemorating individuals or events associated with the Slave Trade and/or Britain's colonial legacy.

Decision takers are directed in the NPPF to consider contested heritage under paragraph 211 as well as under DCMS guidance 'Guidance for custodians on how to deal with commemorative heritage assets that have become contested' October 2023. Further guidance is provided by Historic England in 'Reinterpreting Contested Heritage' October 2023.

Heritage Statement: A Heritage Statement is a document required as part of a planning application or listed building consent application when proposed works may affect the significance of a heritage asset. Its purpose is to identify any assets with the potential to be affected, assess their significance, and in this context assess the potential impact of the proposed works on that significance. See Advice Notes

from Historic England which guide applicants on the drafting of heritage statements and assessments of significance.

Heritage Interpretation: Heritage interpretation is the process of communicating the meanings, and significance of heritage to the public in ways that are accessible, engaging, and informative. It aims to help people understand and connect emotionally and intellectually with a place or objects history and identity. Successful Interpretation allows a development to reveal and explain the history of a site or feature that might otherwise be overlooked. Interpretation must be inclusive and accessible, using appropriate formats, signage, digital media, public art, storytelling, installations to engage diverse audiences, consistent with good practice guidance.

N.B. While interpretation often delivers Public Benefit, it does not always equate to a 'Heritage Benefit' in the context of decision making.

Setting: The surroundings in which an asset is experienced.

Public Benefit: Benefits that deliver positive outcomes for the public at large, or for a significant section of the public, rather than just for private individuals. Public benefits are typically:

- Social, economic, or environmental gains,
- Flowing from the proposed development.

Heritage benefits can be public benefits, and these are given particular weight in decision making.

Irrelevance: In this context the loss of active use, becoming inoperable or the lack of constructive participation in the planning process. An outcome where a building becomes either unusable or only functioning as a constraint in the planning balance.

Conservation: Defined by Historic England in their Good Practice in Planning Advice Notes as 'Managing Change'

Intangible Heritage: This is defined by UNESCO as: the living traditions, practices, expressions, knowledge, and skills that communities, groups, and sometimes individuals recognise as part of their cultural heritage.

This can include:

- Oral traditions and expressions and performing arts.
- Social practices, rituals, and festive events
- Traditional craftsmanship

Appendix 3 References

- 1 Developer Engagement Guidance <https://www.cityoflondon.gov.uk/assets/Services-Environment/developer-engagement-guidance-2023.pdf>
- 2 Statement of Community Involvement <https://www.cityoflondon.gov.uk/services/planning/planning-policy/statement-of-community-involvement>
- 3 NPPF paras 203 and 210 in particular.
- 4 Historic England Contested Heritage Guidance <https://historicengland.org.uk/whats-new/statements/contested-heritage/>
- 5 DCMS Contested Heritage Guidance <https://www.gov.uk/government/publications/guidance-for-custodians-on-how-to-deal-with-commemorative-heritage-assets-that-have-become-contested/guidance-for-custodians-on-how-to-deal-with-commemorative-heritage-assets-that-have-become-contested>
- 6 Historic England Listing Selection Guides <https://historicengland.org.uk/listing/selection-criteria/listing-selection/>

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