

## Appendix 2 – draft policies on Historic Environment

### Policy CS XX: Historic Environment

The City's heritage assets, their significance and settings will be conserved and enhanced, by:

1. Conserving and enhancing heritage assets to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing;
2. Encouraging the viable use of heritage assets consistent with their conservation and enhancement;
3. Seeking improved public access, and enhanced interpretation of the City's heritage;
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;
5. Preserving and seeking to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.

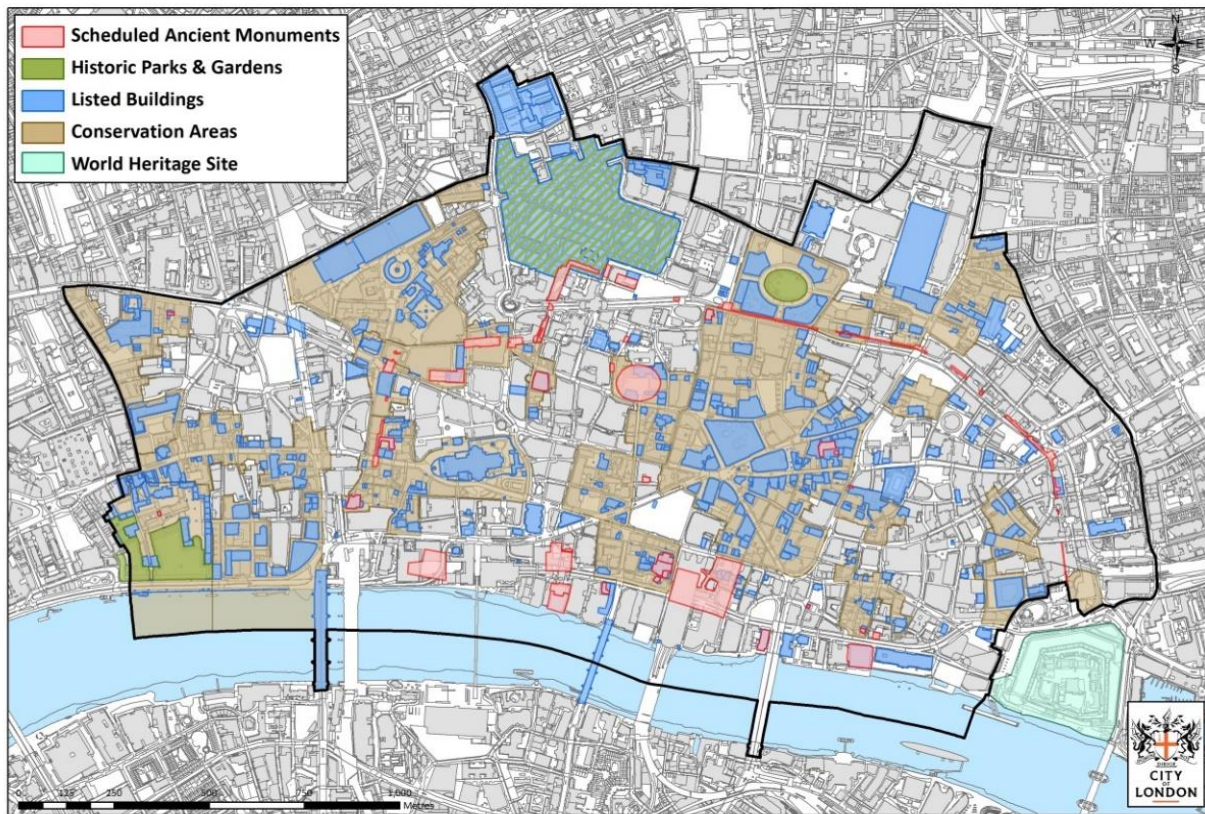
#### Reason for the policy

The City of London is the historic centre of London and has a rich and varied historic environment that reflects this. The City's heritage assets<sup>1</sup> contribute to its unique identity, adding to its character, attractiveness and competitiveness. This is of benefit to all the City's communities, visitors, residents and businesses.

There are a large number of designated heritage assets<sup>2</sup> in the City, with over 600 listed buildings and many structures such as statues, monuments and sculptures. Listed buildings range from a 17<sup>th</sup> century home on Cloth Fair and Wren's iconic St Paul's Cathedral and churches to modern buildings by renowned architects such as the Barbican Centre and the Lloyds Building. As well as listed buildings there are 26 conservation areas, 48 Scheduled Ancient Monuments and 4 Historic Parks and Gardens. Furthermore, the City provides an immediate backdrop for the Tower of London World Heritage Site.

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<sup>1</sup> A heritage asset is 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. Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields and Conservation Areas that are 'designated' under the relevant legislation. Non-designated heritage assets are those which have a heritage interest, but have not been formally designated.



**Figure XX: Designated heritage assets in the City of London**

The City has a rich archaeological heritage including many designated and non-designated monuments visible in the townscape and surviving as buried remains below buildings and streets. The whole of the City is regarded as having archaeological potential.

The City contains a rich variety of architectural styles and materials, a medieval street pattern and a long history as a centre for commerce and trade. The diversity of the buildings and townscape creates a rich juxtaposition between the historic and the modern. This and the dense nature of development helps to differentiate the City of London from other global commercial centres and makes the City a unique place to live, work and visit.

The City's rich heritage contributes to the City's primary function as a business centre, its cultural role, as a home to its small resident population and increasingly its role as a visitor destination. Approximately two thirds of listed buildings have a commercial use, including offices, retail, and hotels<sup>3</sup> and provide vital small and medium-sized office space. The City also has one of the greatest concentrations of architecturally significant places of worship in the country, with 44 listed medieval and Wren churches and an equally unique collection of over 60 churchyards embedded within a dense townscape.

<sup>3</sup> The Land Use of Listed Buildings in the City of London, City of London, 2017

Heritage assets can significantly contribute to London's economy,<sup>4</sup> providing valuable office space suitable for small to medium-sized occupants as well the creative industries. In order to build upon the wider social, cultural and economic benefits of the historic environment, public access to the City's heritage will be sought as part of development proposals in line with the wider policies in this Plan.

The policy allows for adaptations to be made to heritage assets where the alterations are consistent with the conservation and significance of those assets. The sensitive adaptation of heritage assets contributes to the continual growth of the City's economy. This and continued investment ensures that buildings retain an active use so that the City's buildings and heritage can be appreciated by present and future generations.

In addition to the heritage assets within in the City, just outside the boundary lies the Tower of London, a UNESCO World Heritage site of outstanding universal value.

### **Policy DM XX: Managing Change to Heritage Assets**

Development proposals which affect heritage assets or their settings should conserve and enhance the significance of the heritage asset and meet the following criteria:

1. They are supported by evidence, in the form of a Heritage Assessment, to evaluate the significance of relevant heritage assets to inform the proposals and maximise enhancements;
2. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted. The reinstatement of historic routes and the creation of new routes will be sought;
3. Development should conserve and enhance the special architectural or historic interest and the significance of heritage assets and their settings. The demolition or removal of designated heritage assets will be resisted;
4. Development in conservation areas should conserve and enhance the character or appearance of the conservation area. The removal of features which contribute to the character, appearance or significance of a conservation area will be resisted;
5. Development should not adversely affect Historic Parks and Gardens that are included on the Historic England register.

#### Reason for the policy

It is important that applicants provide a clear and comprehensive understanding of the heritage significance of a building, proportionate to the nature and scale of the proposed development. This may require detailed archival research to understand the historical evolution of the building in order to inform the proposals as well as the impact of the development on the heritage asset. This can require expert input.

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<sup>4</sup> Translating Good Growth for London's Historic Environment, Historic England, 2017

The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have historically been lost to the detriment of the City's historic townscape. Where possible, via development, the City will seek to re-open or reintroduce such routes.

The designation of conservation areas carries with it the statutory duty to consider how an area or areas can be preserved and enhanced. The City Corporation will take the opportunity presented by development proposals within a conservation area to strengthen the special character of that conservation area and its setting.

In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.

Many buildings in conservation areas, whilst not being listed, make a significant contribution to the character of these areas. Proposals for the demolition of a non-listed building will be considered in terms of the building's significance, its contribution to the character or appearance of the area and the level of potential harm.

Even minor changes to listed buildings can have a significant impact on their character and appearance. Listing descriptions are unlikely to refer to every feature of significance and buildings' interiors and plan forms are also of importance. Inspections of listed buildings will be necessary to identify the special interest and significance of the building and its curtilage.

Extensions to listed buildings should be of an appropriate scale and character and will be acceptable where the overall impact on the building is minimised. The bulk, height, location and materials of roof extensions will be particularly important and should be appropriate to the period and style of the building and its setting. Where listed buildings are no longer used for their original or previous purpose, it is important to find alternative uses that safeguard their future, while being compatible with the character of the building.

The City's heritage assets are not just appreciated and understood from the ground, but also from above. Development proposals should facilitate public appreciation of the City's historic roofscapes. The effect of a development on the setting of an asset from high level locations is also a material consideration.

Development proposals that affect the City's historic parks and gardens will be assessed to ensure that overshadowing does not cause undue harm, that their historic character is maintained, and that the setting, enjoyment, and views into and from these

gardens are respected. Development should not detract from the layout, design, character, appearance or setting of the park or garden or prejudice its future restoration.

#### How the policy works

Developers will be required to provide supporting information describing the significance of any heritage assets whose fabric or setting would be affected, along with the contribution made by their setting to their significance and the potential impact of the proposed development on that significance. A heritage asset's significance can be evidential, historic, aesthetic or communal. The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets.

#### **Policy DM XX: Ancient Monuments and Archaeology**

1. Development proposals which involve excavation or ground works affecting sites of archaeological potential must be accompanied by an archaeological assessment and evaluation of the site, addressing the impact of the proposed development, mitigation of harm and identification of enhancement opportunities;
2. The City Corporation will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking enhancement, public display and interpretation where appropriate;
3. Proper investigation and recording of archaeological remains will be required as an integral part of a development programme, together with publication and archiving of results to advance understanding.

#### Reason for the policy

The entire City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks. The City Corporation will indicate the potential of a site, its significance and relative importance and the likely impact on archaeology at an early stage so that the appropriate assessment, evaluation and design development can be undertaken.

#### How the policy works

Planning applications that involve excavation or ground works must be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development. An evaluation should include trial work in agreed specific areas of the site to provide more information and inform consideration of the development proposals by the City Corporation.

In some cases, a development may reveal a monument or archaeological remains which will be displayed on the site, or reburied. On sites where significant monuments or archaeological remains exist, development must be designed to enhance physical



preservation and avoid disturbance or loss. This can be done by the sympathetic design of basements, raising ground levels, site coverage, and the location of foundations to avoid or minimise archaeological loss and securing their preservation for the future. Undesignated archaeological remains equivalent to a scheduled monument will be given equal weight to designated heritage assets.

The interpretation and presentation to the public of a visible or buried monument and enhancement of its setting should form part of the development proposals. Agreement will be sought, where appropriate, to achieve public access. The City Corporation will refuse schemes which do not provide an adequate assessment of a site, make any provision for the incorporation, safeguarding or preservation of significant monuments or remains, or which would harm or adversely affect those monuments or remains. Where display of a monument or archaeological remains would harm the heritage asset or make it vulnerable and reburial is necessary, there should be interpretation to widen knowledge and contribute to the interest of the townscape.

A programme of archaeological work for investigation, excavation and recording and publication of the results to a predetermined research framework and by an approved organisation should be submitted to and approved by the City Corporation, prior to development. This will be controlled using conditions and will ensure the preservation of those remains by record. The programme of archaeological work should include all on-site work, including details of any temporary works which may have an impact on the archaeology of the site and all off-site work including the post-excavation analysis, publication and archiving of the results.

#### **Policy DM XX: Setting of the Tower of London World Heritage Site**

1. Development proposals affecting the setting of the Tower of London World Heritage Site should preserve and seek to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.
2. Development proposals within the defined Local Setting Area of the Tower of London World Heritage Site should seek opportunities to enhance the immediate surroundings of the World Heritage Site, through improvements to the public realm and pedestrian and cycle accessibility.

#### **Reason for the policy**

The Tower of London is a UNESCO World Heritage site of Outstanding Universal Value. While the Tower itself is within the London borough of Tower Hamlets, part of the defined Local Setting Area is within the City and is shown on the Policies Map. The local setting of the Tower comprises the spaces from which it can be seen from street and river level, and the buildings that enclose or provide definition to those spaces. The area

around the Tower includes some streets with heavy traffic flows, and there is scope for improvements to be made to the public realm and to accessibility for non-motorised road users. Developments within a wider area may also affect the setting of the Tower, depending on their scale, form and location.

#### How the policy works

Any potential impacts on the setting of the Tower of London World Heritage Site need to be considered in the relevant documents accompanying planning applications, such as in Heritage Statements, Townscape and Visual Impact Assessments or Transport Assessments.

The Tower of London World Heritage Site Management Plan 2016, the Mayor of London Supplementary Planning Guidance 'World Heritage Sites – Guidance and Settings 2012' and the Tower of London 'Local Setting Study 2010', provide guidance on how the setting of the World Heritage Site can be positively managed, protecting its heritage, while accommodating change.