

Celebrating Heritage SPD Consultation Statement

1. Introduction

This document, alongside the engagement summary included at Appendix 1, forms the 'Consultation Statement' under Section 12 (a) of the Town and Country Planning (Local Planning) Regulations, 2012. It sets out the dates and detail of the formal public consultation and informal engagement carried out with regard to the Celebrating Heritage SPD.

Appendix 2- 'What We Heard' document sets out the detail of the informal engagement which took place in Autumn 2025.

2. Scope of the Regulation 12/13 consultation

The draft SPD and supporting material was 'made available' from 16 March to 15 April 2026. The documents were made available at the City Corporation's principal offices, the libraries within the Square Mile and on the Corporation website: [Planning guidance - City of London](#). The website also contained links to the 'Konveio' consultation portal.

All persons registered on the City of London Corporation's Local Plan Consultation Database were informed of the consultation by email, including information on where to find the SPDs and supporting documents.

A series of consultation events also took place as per the below. These events were also promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

- 24 March (9-10:30am) [SPD information session \(external link\)](#) at Aldgate Centre, London, EC3N 1AB
- 31 March (6:30-8pm) [Residents session \(external link\)](#) at Artizan Street Library, London, E1 7AF
- 8 April (9-10:30am) [Heritage session \(external link\)](#) at St Ethelburga's Centre for Reconciliation and Peace Venue, London, EC2N 4AG

3. Results of the Regulation 12/13 consultation

A total of 24 email and online representations were received and 18 written representation notes during the events. These amounted to a total of 256 comments were made in relation to the Celebrating Heritage SPD. These are all contained in the table at Appendix 1 alongside a City of London Corporation response, indicating where proposed changes have been made.

The main issues raised were as follows:

- **Role of SPD:** Lack of clarity on how the SPD relates to statutory duties, national policy (National Planning Policy Framework (NPPF)) and Local Plan (City Plan 2040) policies particularly Policy S11. SPD should be more explicit that it does not override statutory duties.
Historic England (R13_26), Historic Royal Palaces (R13_18), HGH/S&P Sephardi Community (R13_10), City Heritage Society (R13_08), Resident/Other stakeholder (R13_04), City Property Association (R13_29), Barbican and Golden Lane Neighbourhood Forum (R13_14).
City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England. The role of the SPD and its relationship with legislation, policy and the City Plan has been clarified throughout the draft.

- **Heritage Significance vs Character:** Blurring of distinction between the significance of heritage assets (NPPF) and wider townscape/character considerations. It was suggested that Appendix 1 reads more like a City of London Character Statement than a heritage significance framework. How setting contributes to significance and reference to Historic England's Good Practice Advice Note 3.

Historic England (R13_26), SAVE Britain's Heritage (R13_21), HGH/S&P Sephardi Community (R13_10), AB/Deanery & City Churches, Church of England (R13_37), City Heritage Society (R13_08), Caroe Architecture (R13_25).

City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England. The arrangement of the guidance, the disposition of themes and subject matter, and the emphasis on townscape and heritage has been carefully calibrated across the document, following extensive Historic England input.

- **Sustaining Character (Principle 1):** Objection to the wording in Principle 1(d) relating to development being '*manifestly commercial in function*'.

AB/Deanery & City Churches, Church of England (R13_37), Resident/Other (R13_04), Barbican and Golden Lane Neighbourhood Forum (R13_14).

City Corporation response: this was a common theme from the consultation responses. The wording of this Principle has been revised accordingly to omit the wording in question, and the supporting text of this Principle has been clarified.

- **Conservation Areas:** Further clarity should be provided in SPD on how it can be applied within the City's Conservation Areas (CAs). CAs should be assessed through statute and national policy rather than character principles.

Historic England (R13_26), Barbican and Golden Lane Neighbourhood Forum (R13_14).

City Corporation response: references to conservation areas have been included at several places within the document, most germanely in the first section, 'Spirit'.

- **Harm and Public Benefits:** SPD principles could risk implying that harm is more easily justified than national policy allows. Public benefits do not outweigh harm by default and should be avoided or minimised first. Concern about how the SPD addresses tall buildings and major developments and around impact of cumulative development.

Historic England (R13_26), SAVE Britain's Heritage (R13_21), HGH/S&P Sephardi Community (R13_10), City Heritage Society (R13_08), Resident/Other (R13_04), Caroe Architecture (R13_25), City Property Association (R13_29), Barbican and Golden Lane Neighbourhood Forum (R13_14).

City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England.

- **Terminology & Accessibility:** Definitions of 'conservation' and 'setting' should align with NPPF. Concept of setting is not clear and clearer signposting to Historic England's Setting of Heritage Assets guidance. Use and definition of 'relevance' and 'irrelevance' wording which may conflict with national policy and confusion in decision making. 'Deference' is overly prescriptive and not best practice (see Principle 8). How terms should be methodologically applied. Greater precision of terminology to aid non-specialist understanding.

Historic England (R13_26), Historic Royal Palaces (R13_18), SAVE Britain's Heritage (R13_21), HGH/S&P Sephardi Community (R13_10), AB/Deanery & City Churches, Church of England (R13_37), City Heritage Society (R13_08), The City of London Archaeological Trust (R13_02),

London & Middlesex Archaeological Society (R13_16), Resident/Other (R13_04), Caroe Architecture (R13_25), City Property Association (R13_29), Twentieth Century Society (R13_15), Barbican and Golden Lane Neighbourhood Forum (R13_14), Resident/Other (R13_05).

City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England.

- **Historic Fabric (Principle 5):** Term ‘historic fabric’ can be misinterpreted. Consideration of harm should not be limited to fabric and setting alone.

Historic Buildings & Places (R12_23), Historic Royal Palaces (R13_18), SAVE Britain’s Heritage (R13_21), Caroe Architecture (R13_25), Avison Young (R13_28), Historic Buildings and Places (R13_23), Barbican and Golden Lane Neighbourhood Forum (R13_14).

City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England.

- **Case Studies:** Some case studies are welcomed but consider others inappropriate or misleading due to heritage harm. Link between archaeology, design outcomes and public benefit need to be clearly set out. London Mithraeum (Bloomberg) could be included and Smithfield Market (Museum of London).

Historic England (R13_26), Historic Buildings & Places (R12_23), Historic Royal Palaces (R13_18), SAVE Britain’s Heritage (R13_21), HGH/S&P Sephardi Community (R13_10), AB/Deanery & City Churches, AB/Deanery & City Churches, Church of England (R13_37), City Heritage Society (R13_08), The City of London Archaeological Trust (R13_02), London & Middlesex Archaeological Society (R13_16), Resident/Other (R13_04), Caroe Architecture (R13_25), City Property Association (R13_29), Historic Buildings and Places (R13_23), Barbican and Golden Lane Neighbourhood Forum (R13_14), Resident/Other (R13_05).

City Corporation response: this was a theme of many of the respondents. Amendments have been made to the case studies, including the removal of the One Undershaft case study, and the expansion of the text of each to add the further detail suggested.

- **Archaeology and guidance:** Clearer alignment with Policy HE2 and adopted Archaeology and Development Guidance SPD. Principles set higher bar and go beyond policy requirements in City Plan 2040. Public display not always appropriate or beneficial but encourage inclusion of public participation where appropriate. Burial ground principle may imply acceptability or total loss.

Historic England (R13_26), The City of London Archaeological Trust (R13_02), London & Middlesex Archaeological Society (R13_16), Resident/Other (R13_04), Caroe Architecture (R13_25), Council for British Archaeology (R13_33), Barbican and Golden Lane Neighbourhood Forum (R13_14).

City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England.

- **Tower of London World Heritage Site (WHS):** Where development may impact the Tower of London applicant should refer to UNESCO Impact Assessment (2022) guidance and May of London’s Heritage Impact Assessment Practice Note (2026). The SPD should explicitly refer to impacts on the attributes of Outstanding Universal Value (OUV) of the Tower of London WHS.

Historic England (R13_26), Historic Royal Palaces (R13_18).

City Corporation response: this has been addressed through the amendments and refinements to the text made in close consultation with Historic England.

- **Non-designated heritage assets:** Clarity required on City's local listing process.
Historic England (R13_26), Council for British Archaeology (R13_33), Barbican and Golden Lane Neighbourhood Forum (R13_14).
City Corporation response: the proposed text as published for consultation is considered robust enough as it stands, and no further change is proposed.
- **Illustrations/images:** Recommendation that all illustrations be reviewed to ensure relevance to accompanying text.
AB/Deanery & City Churches, Church of England (R13_37), The City of London Archaeological Trust (R13_02), London & Middlesex Archaeological Society (R13_16), Caroe Architecture (R13_25).
City Corporation response: imagery has been comprehensively overhauled.
- **Monitoring and engagement:** Welcome continued engagement especially on intangible heritage and impact on how SPD influences development over time.
Historic England (R13_26), Historic Royal Palaces (R13_18), City Heritage Society (R13_08), City Property Association (R13_29), Resident/Other (R13_05).
City Corporation response: noted.

4. How those issues have been addressed in the Celebrating Heritage SPD

General editorial approach

The overall editing of the draft post-consultation has been heavily informed by close consultation with Historic England, who have provided specific and detailed editorial input on wording, phrasing and emphasis. This involved an iterative process of amendments by the City Corporation, in consultation with HE, an example of the kind of textual refinements achieved is given below:

Paragraph 1.22 text as published for consultation:

'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'.

Paragraph 1.44 text as revised for adoption:

'There will sometimes be instances where a heritage asset has significantly influenced a new scheme, but despite every effort to avoid or minimise this, a harmful impact arises. This harm is given great weight within the planning balance, as directed by the NPPF. In relation to World Heritage Sites, the expectation of UNESCO and ICOMOS is that no harm may be caused'.

Specific amendments

A summary of the specific amendments made to the text is given below. This should be read in conjunction with the full list of consultation comments in the table in appendix 2.

Introduction

- The scope and purpose has been clarified, noting the intended audience of professionals including officers, applicants and those professionals providing technical support and analysis.
- Clarification on the use of technical language as appropriate has been added and additional signposting to the glossary.

- Clarity on the intent of the guidance to sit alongside but not replace existing guidance and policy, with a focus on the design development process rather than final analysis of impacts.
- The focus of each chapter has also been clarified.
- Further referencing of relevant national policy has been made.
- The selection of case studies has also been clarified, seeking to showcase where policy is tested.

Chapter One, 'Spirit'

- Emphasis that this chapter deals with design and townscape considerations.
- Reference made to the Central Activities Zone, and the wider London context.
- Principle One has been edited to:
 - Remove reference to 'commercial function'
 - Additional clause 'c' added separating conceptual approach from tests of quality.
- Explicit reference made to conservation areas.
- Further reference made to the health and well-being of communities and specific contribution of historic spaces.
- Reference made to historic desire lines.
- Emphasis on the importance of consultation.
- Explicit reference made to residents.
- Clarification that further designations will be made as more late twentieth century buildings pass the thirty year threshold.
- Clarification on the application of the traits as set out in principle one and how this should be applied alongside national and local policy tests.
- Clarification to wording of principle 2, and how its application should encourage the appropriate application of the NPPF.
- Emphasis that it is harm to the significance of heritage assets that is material to an assessment of impact.
- Clarification on the importance of minimising harm.
- Emphasis on experiential potential of interpretation.

Chapter Two, 'Street'

- Emphasis that existing setting assessment studies and guidance as relate to the Cathedral and Tower of London has been included.
- Encouraging clear defined terms are used when assessing levels of less than substantial harm.
- Further nuance added to discussion of patina, including encouraging use of qualified practitioners.
- Removal of term 'irrelevance'.
- Distinguishing that historic significance is not dependent on access to a structure.
- Reference to Historic England sustainability guidance is made.
- Clarity added on how Principle eight sits along side existing setting guidance, with explicit reference to the design development proposals.
- Emphasis on the experiential nature of setting.
- Emphasis on important consideration of the cumulative scenario when assessing schemes.

Chapter Three, 'Strata'

- Emphasis on feasibility of Principle Ten
- Removal of principle fourteen.

Case Studies

- The selected case studies have been amended, and reference text re-written to highlight the reasons behind their selection.

Appendix 1- Consultation Responses

SEQ no.	Rep number	Organisation	Comment	City Corporation response/ theme response (blue)	SPD amendments?
3	R13_01_003	Port of London Authority	With regard to the Celebrating Heritage SPD, the PLA support the references to the River Thames and the Thames riverside as an integral part of the City of London's significance.	Thank you for your statement of support	No change
5	R13_02_001	The City of London Archaeological Trust (CoLAT)	SPD Consultation on Celebrating Heritage Many thanks for consulting the City of London Archaeological Trust (CoLAT) about the proposed new SPD about Celebrating Heritage. We offer the following comments. There is much to praise in this document. There are also points to improve, both in content and style. The purpose is to ensure development draws on the contribution made by the historic environment, both above and below ground. This is already policy (Strategic Policy S11). Here the approach is briefly described at three levels, and principles are stated. Level 1: Spirit. The City's built character is a probably unique complex mix of historic environment and modern architecture. Some sentences seem to be written for other planners, not for the public. At 1.18, what is relevance to localities? In what way is the Elsing Spital arch relevant to its present surroundings? This is badly written planner-speak. Please explain the idea here. P15 One Undershaft: may be a pinnacle in the City Cluster, but it is not respectful of the heritage around it. Its shadow will fall permanently on St Helen Bishopsgate. This does not seem to be the best choice for this Case	Thank you for your response, each of the queries will be addressed in turn.	The SPD is intended as a technical document for practitioners including planners, architects and officers. There is therefore use of technical language where it has implications or interactions with local or national planning policy, using accepted terms where appropriate and necessary in order to ensure the SPD is aligned

			Study; or you should allow it has no heritage context in the caption.		with and builds upon existing policy language. Further clarity on the use of the term 'relevance' and its intention in the document has been added within the glossary alongside other conceptual terminology and their specific intended use within the SPD; The case studies have been altered to select different examples, and introductory comments added to make clear that while harm may be identified in certain circumstances the response embodied in the proposals still reflects a best
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					practice approach.
6	R13_02_002	The City of London Archaeological Trust (CoLAT)	Level 2: Street P20 London Archive is actually London Archives, plural, and is located in the borough of Islington, not the City. P21 para 2.7: this encourages heritage statements for proposed developments to sometimes include study of the building in question within its style or work of its architect. This seems to be new, and to be encouraged; we have not seen this comparative work in any heritage statements so far.	Typo corrected; thank you for your support of the aims of the document	Typographical error corrected
7	R13_02_003	The City of London Archaeological Trust (CoLAT)	Level 3: Strata. We are impressed that six of your fifteen Principles relate to archaeology. Keep that proportion. The section might usefully be renamed to recognise that archaeological features exist above and below ground, such as the City Wall. This section should also recognise that many buildings, which are listed or historic assets, preserve significant remains below ground, from earlier periods and with different land uses. It might also include reference to the contribution of historic and archaeological knowledge and results of investigations to inform interpretation, signage and way finding. Reference to the relationship between the modern townscape and below ground	Noted, thank you. Guidance on such interpretation is to be found elsewhere in the document; refinements to the text have been made in line with suggestions.	No change

			remains should be included, with examples, eg Blue Plaques and the London Wall Walk. Interpretation material and marking out of below ground features using contrasting paving materials is a powerful way to make connections between the past and present, eg the Roman Amphitheatre in Guildhall Yard and the City Wall. In this guideline you do draw attention to the importance of the desk-based archaeological assessment, but this could be strengthened: what significance is, how it can relate to the character and identity of a building or space. It should include how the archaeological heritage can be better understood, celebrated and enhanced as well as how any harm to heritage assets can be avoided.		
8	R13_02_004	The City of London Archaeological Trust (CoLAT)	You will not thank us for pointing out that the text still needs a good copy-edit. Scattered through the text, not in a numbered sequence, are apparent superscript footnote references – but we are not told what they are for, and there are no references. Check the grammar: 1.13 circumstances have, not has; 1.15 the words ‘some of which are now listed buildings’ can be dropped P23 We are missing para 2.14. P25-6 Paras 2.20 to 2.25 are mixed up and one is repeated. P27 para 2.30 ‘Absolute characteristics such as relative height’ is rather odd English. P36 the old spelling of Boudicca is in the Pagentry (which should be Pageantry) para; stick with Boudica as you have elsewhere. Some of the images do not appear to be relevant to the	Typos corrected, thank you. The illustrations have also been reviewed and corrected.	Typographical error corrected

			text and would benefit from an address and short description.		
95	R13_04_086	None	The purpose of this Supplementary Planning Document (SPD) is to provide guidance on how development 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: If there was any concern for heritage assets then, surely, the “purpose” should be “consideration of how the existing “historic environment of the City of London” should incorporate the planning and design of new development proposals” rather than putting the cart before the horse.	thank you for your comments on the SPD. The structure of this document has focussed on the design process. Further clarity has been given that this is not intended to supersede or preclude the importance that assets have within policy, or the associated tests within the NPPF.	Change made- but need to say where and what changed
96	R13_04_087	None	Celebrate and broaden access to the City’s heritage (S11 (1), (3; f)), v Put heritage at the heart of placemaking (S11 (3; a)) v Draw on the contribution made by the historic environment to the character and identity of a place (S11 (3; c), v Sensitively adapt or retrofit heritage assets (S11 (3; b;	Additional definitions have been added to the glossary.	change made but need to say what has been added

			d)). The use of “character of the City of London”, “heritage”, “historic environment” and heritage assets”, especially with the lack of definitions is both confusing and unhelpful.		
97	R13_04_088	None	This SPD sets out the City of London Corporation’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 though to the final outcomes. “expectations” is very weak and should be replaced by “requirements”.	As an SPD, this document is un-able to set policy however it seeks to provide further guidance in line with the new City Plan.	No change
98	R13_04_089	None	This 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. Surely “to conserve and enhance the significance of heritage assets” should be the underlying purpose?	Noted	This is addressed by clarifications elsewhere
99	R13_04_090	None	This SPD is structured to provide guidance appropriate to the different scales at which planning in the City is undertaken. What are the “different scales”? Please explain.	As explained in the preamble, the strategic and local contexts for a site	Further definition has been provided within the glossary.
100	R13_04_091	None	Part one of this 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	Noted. We consider the definitions robust enough.	No change

			environment which, in the main, substantiates this character, as well as to the wider metropolis of which it is part. “might” is, again, very weak to the extent that it’s meaningless. Without definition of “character” it’s difficult to understand the meaning of “wider” and “substantiates” in this context.		
101	R13_04_092	None	In part two of this 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’. “how change should be approached” suggests not only acceptance but the means of enabling harm to “setting”, particularly in the context of the last sentence of II.3 above.	thank you for your comments. Development concerns change of some kind, In general the SPD will not be applicable in a no change scenario, notwithstanding the core principle of the great weight the conservation of heritage assets has in national policy.	No change
102	R13_04_093	None	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 heritage asset in question should be the principal factor in the development of proposals. The first sentence differs from that of II.1 above. How are “individual circumstances defined? Again, “should” is weak.	Noted. It is consider the definitions are clear enough	No change

103	R13_04_094	None	This 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. "principles" recalls the words of Groucho Marx. Not sure if "traits" is the right word.	Noted.	No change
104	R13_04_095	None	The text within this SPD refers to the 2024 NPPF, not the recent new draft published for consultation on 16 December 2025.	The version of the NPPF is the current adopted version, and therefore the language used in this published version is the one referenced.	No change
105	R13_04_096	None	The strategic priorities of the City Plan 2040 set out the environmental objectives for the Square Mile, which include celebrating, protecting and enhancing the City's unique heritage assets.	Thank you- corrected	Error corrected
106	R13_04_097	None	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. Aren't all heritage assets unique? "could also helpfully" isn't understood.	Thank you- corrected	Error corrected
107	R13_04_098	None	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. "picturesque" is	Thank you for your comment, further definitions have been provided within the glossary.	Further definition has been provided within the glossary.

			subjective, if not meaningless. Where is the dividing line between “historic environment” and “modern environment”?		
108	R13_04_099	None	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. This is obviously self-serving but presumably has a meaning.	Principle One has been edited, to provide further context for traits defined within this principle	Edit to Principle One
109	R13_04_100	None	The City of London Corporation 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 Why? Please explain.	Noted. It is considered that the SPD already explains this with great clarity.	No change
110	R13_04_101	None	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.	Principle One has been edited, to provide further context for traits defined within this principle	Edit to Principle One

			The “character” can be sustained without any intervention. “Some” suggests two only – half – but both (a) and (b) are subjective and why is the only acceptable function “commercial”?		
111	R13_04_102	None	How does a “trait” have a result? “Could” is not an adequate reason for the potential destruction of heritage assets.	Noted.	No change
112	R13_04_103	None	“Likely”, with or without “more” is not positive enough to justify “development”	Noted	No change
113	R13_04_104	None	Are the historic streets evolving?	Noted	No change
114	R13_04_105	None	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 . What is “new work”? In what way can it “affect the City’s tangible heritage” etc? Please explain “living traditions as enacted” etc.	Thank you for your comment, the language has been clarified here.	Clarifying edits made to the relevant section
115	R13_04_106	None	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. Whatever “new work” may be, it’s difficult to see how the City’s character can be sustained through intervention.	Noted	no change

116	R13_04_107	None	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. “must” not “should”. There seems to be a contradiction in the highlighted parts – “avoid prioritising” seems to contradict “meets the needs of those for which the City is an important space”.	Noted	no change
117	R13_04_108	None	What about residents and housing?	Additional reference incorporated thank you.	Change made in relevant section
118	R13_04_109	None	This is very difficult to justify but, equally, it’s impossible to prove a negative.	Noted	No change
119	R13_04_110	None	The problem is that development in the City is more about creating asset wealth than celebrating heritage.	Noted	No change
120	R13_04_111	None	This is nonsensical. Listed buildings are obviously listed buildings. These buildings aren’t listed because of any tradition of a “particular kind of high quality architectural change”, whatever that means.	Noted.	No change
121	R13_04_112	None	What is the difference between “development” and “work” in the context of “new”? Please describe what is meant by “quintessentially City”. Where does line come between the “primary” and “secondary” contexts?	Additional reference incorporated thank you.	Change made in relevant section
122	R13_04_113	None	Were that the case in reality.	The SPD is intended to encourage best practise in this regard.	No change
123	R13_04_114	None	Please explain “is instrumental in their ability to participate”. What is it participating in? Presumably the grade of listing is irrelevant to significance?	Additional clarification	Edit to first section and glossary.

				incorporated thank you.	
124	R13_04_115	None	The more that heritage assets have influenced, visibly so, in the design of a new development, the	thank you for your comment, in this case the specific meaning of the word has been retained.	No change
125	R13_04_116	None	In what way do heritage assets present barriers to access, and access to what?	Additional clarification incorporated thank you.	clarification incorporated
126	R13_04_117	None	“Creative Creative intervention”, “the sponsoring of new archival research” and “more traditional inscriptions or artwork” should not have to rely on development. It’s difficult to understand how development could “better” reveal that which we did not already know.	Noted. Edited.	Edit made to relevant section - removal 'that which we did not already know'
127	R13_04_118	None	The reference to “established narrative” is an unsupported generalisation. “Historic interpretation shouldn’t require development.	Noted	No change
128	R13_04_119	None	Again, development isn’t necessary for this.	Noted	No change
129	R13_04_120	None	And again.	Noted	No change
130	R13_04_121	None	Where is the “emphasis on ‘display’”?	Noted	No change
131	R13_04_122	None	Factually, the 2024 planning permission followed an earlier planning permission which was implemented to enable the demolition of St Helen’s Tower, a Miesian building from 1969 by Gollins Melvin Ward. The effect of the implemented planning permission on the City’s heritage is, of course, absent from the above. “Architectural confidence” is, of course, subjective. Who considers it a “fine example”?	The case-studies have been updated and revised.	Undershaft case study removed

132	R13_04_123	None	The heritage value of the Lloyd's Building is obvious from the fact that it's 40 years old and still standing.	The case-studies have been updated and revised.	Lloyds case study removed and transmogrified into a more multifarious study of schemes
133	R13_04_124	None	Words such as "intelligent" and "considered" are objective and unhelpful.	Thank you for your comment, in this case the specific meaning of the word has been retained.	No change
134	R13_04_125	None	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. It is not only Beckford's links to slavery but also the City's.	Additional clarification incorporated thank you.	Edit to relevant case study
135	R13_04_126	None	The City has 600+ listed buildings, 28 conservation areas, 48 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 maximised. It would be hoped that "Celebrating Heritage" would include all the City's CAs.	Additional clarification incorporated thank you.	Edit to relevant section
136	R13_04_127	None	Development which accords with the first and second principles of this SPD along with careful consideration of the asset's 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;... "Careful consideration" is the operative phrase, especially when linked with "usually likely". That's not good enough.	Noted	no change

137	R13_04_128	None	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 applications . 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. What is the difference between a “Heritage Statement” and a “Heritage Impact Assessment”? Do officers provide “decision making”?	Noted	No change
138	R13_04_129	None	For the City of London, the London Archive is a particularly useful resource and includes an extensive repository of archival photographs.	Noted, thank you	No change
139	R13_04_130	None	Is “fabric” used correctly here in view of Principle 5?	yes, thank you for the query.	No change
140	R13_04_131	None	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 of London Corporation 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. Perhaps “fabric will cause harm, to varying degrees”.	Noted. The wording is considered robust enough as drafted	No change

141	R13_04_132	None	"Patina" could be as a result of the failure to maintain a heritage asset, as much as its age being significant of its heritage value.	Clarification given, thank you	Edit to patina section
142	R13_04_133	None	It is difficult to understand how "cleaning" can be "necessary to maintain facades". Also the difference between the finish of a test panel and the rest of the building could easily cause harm to the heritage asset. Although many gravestones and tombs within Bunhill Fields Burial Ground are listed, conservators are currently destroying inscriptions, as well as the patina such as rare and protected mosses and lichens. Their current activities are destroying many years of plant growth in the wildlife area which will require leaving untouched for many years if it is ever to be restored to its pre-destruction state. That growth was part of the heritage, even if outside the City boundary. Additionally, the recent cleaning of the listed faux gable of 1 Golden Lane has done nothing for its appearance, confirming that the patina of heritage assets is best left alone	Additions given regarding impact on detail and plant life, thank you	Edit to patina section
143	R13_04_134	None	Agreed.	noted, thank you	No change
144	R13_04_135	None	If "inaccessible" does not relate to a lack of a public right of way "or an ability to otherwise access an asset or its setting", what is "the high risk of irrelevance"? How is "wasteful" defined in this context? Does it refer to St Paul's for instance?	Wording clarified thank you	Change made to relevant section

145	R13_04_136	None	In considering planning proposals, the City of London 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 update to this document is currently being drafted). Presumably, this relates to planning proposals for heritage assets. However, “an appropriate level of public access” and “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” are generalisations based on subjective opinion.	This wording relates to judgements regarding the planning balance exercise indicated in the NPPF. Wording has been added to clarify this point.	Edits to clarify meaning in relevant section
146	R13_04_137	None	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 of London Corporation’s – and the UK’s – response to the challenges of the changing climate. Similarly, the City of London 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. “Decarbonisation” in this context relates to the	Noted, thank you	No change

			replacement of gas or fuel fired boilers as the decarbonisation of the electricity grid is ongoing.		
147	R13_04_138	None	Where a heritage asset has fallen into under-use or is vacant and at risk of disrepair, the City of London 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. The unfortunate downside of this policy is, for example, 137 Aldersgate Street where the listing of the building has enabled a change of use from a bank to a coffee shop despite it being unable to provide step free access.	Noted, thank you	No change
148	R13_04_139	None	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. Isn't the last sentence understandable without the highlighted section?	Wording in this case retained for emphasis, thank you	No change
149	R13_04_140	None	How is "character" defined?	Noted. The meaning of this word is considered clear enough to a general audience, and not requiring a specific definition	

150	R13_04_141	None	More widely, new work could have regard to the character traits set out in Principle One of this SPD (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).	Wording in this case retained for emphasis.	No change
151	R13_04_142	None	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. It also has to protect residential amenity.	This text deals with inherent qualities of a design rather than the broader impact of a proposal, however further reference to the importance of residents and their consideration has been added to the document	Edit to section 1
152	R13_04_143	None	To this end, this SPD seeks to support the use of an appropriate design work flow that iteratively responds to its heritage context, rather than prescribe one single aesthetic approach. An independent design review process is necessary here.	Noted. Design Review is not considered necessary; there is no shortfall in resource or independent scrutiny	No change
153	R13_04_144	None	Any evolution of the heritage asset and or its setting will be dictated by planning permissions, so it is up to the planning process to protect the heritage asset from harm.	Noted	no change
154	R13_04_145	None	By the very nature of them, planning statements support change and “objective and accurate” would be better than “high quality”.	This has been clarified, thank you	Edit to relevant section

155	R13_04_146	None	for instance, the mentioned 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 of London Corporation . Sorry but where are these mentioned?	This has been clarified, thank you	Edit to relevant section
156	R13_04_147	None	In such instances, as set out in the second principle of this SPD ,	Wording in this case retained for emphasis.	No change
157	R13_04_148	None	In relation to these more neutral cases, the City of London Corporation'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.	Wording in this case retained for emphasis.	No change
158	R13_04_149	None	between the proposals and heritage asset in question is maintained), or it could manifest through the layout, building line or even	Wording in this case retained for emphasis.	No change
159	R13_04_150	None	In particular, the City of London Corporation will seek to ensure development does not impair, reduce or erode an appreciation of the character traits in the first principle. Surely a "deferential approach" must "be worked" into the "absolute characteristics".	Noted.	No change
160	R13_04_151	None	The last sentence seems to be pure conjecture, as well as being a generalisation. One example of a lack of deference is the recent approval of the upward extension of 45 Beech Street. The acceptance of a poor facsimile of the Grade II listed Barbican barrel roofs being, frankly, embarrassing.	Comment noted.	No change

161	R13_04_152	None	The City of London 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. The failure of the City of London Corporation to maintain a schedule of identified NDHSS suggests that identification is made only when development is proposed. The results of identification suggests that the process is weaponised for the City of London Corporation's benefit. Examples here are London Wall West and Milton Gate.	The NPPF allows decision makers to identify NDHAs as part of the consideration of proposals.	No change
162	R13_04_153	None	This is contradictory, either there is an adherence either to HE guidance or the current mix and match policy. In any event a schedule of identified NDHAs should be published.	Emphasis added to ensure consistency with HE guidance, thank you	Edit to relevant section
163	R13_04_154	None	This is a contradiction since identification is only revealed when development proposals emerge. The Salisbury Place development has involved the demolition of several NDHAs but this was an "in house" project where identification was irrelevant.	Noted. It's for the LPA to identify NDHAs.	No change
164	R13_04_155	None	A previous planning application was refused on officers' recommendation because the harm of that proposal outweighed its public benefit. The refusal is also an exemplar of those principles.	The case studies are focussing on best practise, so in this instance the existing wording has been retained.	No change
165	R13_04_156	None	The proposals were supported by in-depth investigative works which provided clear justification for all interventions, meeting best practice guidelines and standards	Amended thank you	Change made- but need to say where and what changed

166	R13_04_157	None	Works to the shopfronts along Chiswell Street to improve 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. This is not a good example of Principle Eight. As the objections to this scheme reveal, unfortunately, the “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” will unnecessarily destroy the heritage assets and the purpose of the Brewery Conservation Area. Approval of the proposed 1 Silk Street scheme, along with the already consented, by delegation, Milton Gate scheme, will complete the job. As such, this case study shows all that is wrong with the City of London Corporation’s approach to its heritage.	Noted	no change
167	R13_04_158	None	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 SPD , all in accordance with the aims of S11.	Wording in this case retained for emphasis.	No change
168	R13_04_159	None	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. Where is the proof of the highlighted claim?	Wording in this case retained for emphasis.	No change

169	R13_04_160	None	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. Whatever may be “highly likely” the use of “marvels” ignores the value of day-to-day artefacts discovered in excavations. Worse, calling items “marvels” denigrates the skills of the makers.	Wording in this case retained for emphasis.	No change
170	R13_04_161	None	As policy HE2 suggests, there is a distinction between archaeological features and artefacts. Archaeological features are that which cannot be picked up and carried; artefacts are, by their design, that which can be.	Wording in this case retained for emphasis.	No change
171	R13_04_162	None	Typically, archaeological 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.	Wording in this case retained for emphasis.	No change
172	R13_04_163	None	Some archaeological 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 archaeological features will be the extent to which they were tangible to and figured in the experiences of past City communities.	Wording in this case retained for emphasis.	No change
173	R13_04_164	None	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	Wording in this case retained for emphasis.	No change

			worthwhile; Perhaps the highlighted phrase would be best deleted.		
174	R13_04_165	None	Human remains, for obvious reasons, belong in a category distinct from both ‘ archaeological features’ and ‘artefacts’.	Wording in this case retained for emphasis.	No change
175	R13_04_166	None	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 of London Corporation	Wording in this case retained for emphasis.	No change
176	R13_04_167	None	Some, however, take the form of open spaces, not managed by the City of London Corporation, that are incorporated into building plots and less visually legible as public gardens that were formerly churchyards. The former Jewish Cemetery, parts of which, at least, are under the Barbican Estate’s Thomas More Gardens and the adjoining London Wall West site. However, there seems to be no interest on the City of London Corporation’s part to carry out an aerial survey of the exposed areas.	Wording in this case retained for emphasis. Noted, the commissioning of this work is outside of the scope of this SPD.	No change
177	R13_04_168	None	Broadening public access to archaeology is one of the City of London Corporation’s priorities. See comment under previous.	Wording in this case retained for emphasis.	No change
178	R13_04_169	None	There was consensus that, in view of the importance of the archaeological features, 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. Presumably Appendix 1 below is from a City Plan 2040 document and is set out verbatim. Otherwise, a number of corrections are necessary.	Additional introductory text added to appendix for clarity, thank you.	edit to relevant section

179	R13_04_170	None	"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). By extension,]this should include NDHAs identified by the City of London Corporation	Noted	No change
180	R13_04_171	None	They are therefore eminently relevant to all development proposals, and this relevance should be clearly expressed at all stages of the application process as well as in the final design	Wording in this case retained for emphasis.	No change
181	R13_04_172	None	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. Are the highlighted words above necessary?	Wording in this case retained for emphasis.	No change
182	R13_04_173	None	Setting: The surroundings in which a heritage asset is experienced.	Wording in this case retained for emphasis.	No change
249	R13_05_001	N/A	"Influence"? Can this lead to pastiche in developments	Noted.	No change

250	R13_05_002	N/A	Heritage and public benefits how can these be secured long term and not reduced in subsequent apps	Noted, thank you. Such matters are outside the scope of this SPD	No change
251	R13_05_003	N/A	Health and wellbeing benefits from heritage	Additional wording on health and wellbeing added, thank you	edit to relevant section
252	R13_05_004	N/A	clarity around access - academic or physical reduce red tape to allow greater access to LBS and enable events.	Additional wording on Access and inclusivity added for emphasis, thank you	edit to relevant section
253	R13_05_005	N/A	Make language accessible and non-planning	Noted	No change
254	R13_05_006	N/A	Just processes? (Principle 6)	Noted	No change
255	R13_05_007	N/A	Language needs to be more straightforward (Principle 3)	Noted	No change
256	R13_05_008	N/A	Where are conservation areas mentioned? (principle 3)	Additional text on conservation areas has been added, thank you	edit to section 1
257	R13_05_009	N/A	A design review panel would help (principle 4)	Noted, thank you, but outside the scope of this SPD	No change
258	R13_05_010	N/A	City needs to have a register of NDHAs (principle 5)	Noted. See above related response	No change
259	R13_05_011	N/A	Could include - journeying/routes to/in/around) - physical accessibility? Often difficult to change historic buildings (principle 2)	Further text on the importance of desire lines, access, and the changes to historic spaces to improve	Edits to sections 1 and 2

				inclusivity has been added.	
260	R13_05_012	N/A	No hierarchy (principle 1)	Text in principle one edited for clarity to emphasis the clauses are not intended to indicate a hierarchy	Edit to preamble
261	R13_05_013	N/A	Activities (churches) inside "heritage" can be apart of the city & community and should be given credit (principle 1)	Text has been added under intangible heritage.	Edit to section 2
262	R13_05_014	N/A	Not all "heritage" assets serve the same purpose i.e churches vs commercial - nuance needed?	Text in principle one edited for clarity to emphasis the clauses are not intended to indicate a hierarchy	Edit to section 1
263	R13_05_015	N/A	Some additional clarity that this is about both heritage buildings and surrounding (all and any development)	Text has been added to clarify.	Edit to relevant section
264	R13_05_016	N/A	No mention of protecting, preserving or enhancing (principle 8)	thank you for your comment. The SPD scope is to sit alongside but not replicate the tests under national policy, so this language is not repeated where it would not added further clarity.	No change
265	R13_05_017	N/A	Commercial can't be a heritage consideration (principle 1)	Noted	relevant part of Principle One deleted

266	R13_05_018	N/A	Commercial isn't immediately clear how it relates to heritage - be more specific, perhaps 'commercial character'? otherwise, claiming that commercial function is 'heritage' seems like a reach. The city has a multitude of heritage which is more than just commercial (principle 1)	Noted	see above
267	R13_06_001	None	Facilitating Intangible Heritage (Principle One c) The draft's focus on "living traditions" is excellent. My work aims to take these from behind the glass and put them onto the table. By reinterpreting 19th-century customs—such as sourcing period-correct crockery or engraving silver to reflect the tradition of guests bringing their own precious cutlery—we turn the "Spirit of the City" (1.2) into a profound sensory memory. I suggest the SPD explicitly recognises "Culinary and Experiential Interpretation" as a primary tool for facilitating intangible heritage.	Further emphasis added to section on interpretation.	Change made- but need to say where and what changed
268	R13_06_002	None	Heritage Recycling & "Active" Backdrops (Principle Two) You mentioned that heritage should not be a "reactive consideration." I propose the concept of Heritage Recycling: using immersive events to generate the income and engagement necessary for conservation. When we revive a site's history, we aren't just using a room; we are reviving the site's agency. We should emphasise in the SPD that "Active Interpretation" (where participants live the history) ensures assets remain "active participants in the continuum of City life."	Noted	No change
269	R13_06_003	None	Streamlining Permissions for Temporary Events To ensure heritage sites are "active participants" rather than just "protected fabric," the SPD should address the practical barriers to activation. • Comment: Could the policy include a framework to streamline permissions for temporary events? Currently,	Noted	No change

			restrictions such as "no red wine" or "no dancing" often stifle the very engagement the SPD seeks to promote. Providing guidance on how to manage these risks creatively would allow these buildings to function as living community spaces.		
270	R13_06_004	None	Broadening Access: The Heritage Activation Fund (Policy S11) We talked a lot about accessibility being social and economic, not just physical. To meet the goal of Social and Economic Inclusivity (S11 3; f), I propose a Heritage Activation Fund. This could provide direct grants for "Open Access" immersive events or allow experiential programming to be counted as a formal "Public Benefit" (S106) contribution, provided a portion of the attendance is subsidised for a wide and diverse audience.	Noted, thank you, but outside the scope of this SPD	No change
271	R13_06_005	None	Case Studies in Emotional Footprints & Heritage Activation The Soane Era & Sinta Tantra (Cultural Intervention): At Sir John Soane's former summer house, Pitzhanger Manor, we collaborated with the artist Sinta Tantra for her exhibition opening. We gathered the "crème de la crème" of the art world for a dining experience that linked her contemporary work with Soanian architectural principles. By involving private chefs, historians, and crockery connoisseurs to source materials and era-specific wines, we created a "cultural intervention." The food was not merely fuel; it was a connector that allowed guests to engage with the architecture on a psychological level, creating an emotional footprint far deeper than a traditional gallery viewing.	Noted	No change

272	R13_06_006	None	The Middle Temple "Wine and War" (Historical Anecdote): We utilised the anecdote of King Charles II and the "last spilled wine" as a gateway into a narrative about the City's shifting trade routes. By serving Port and explaining its rise as the "patriotic" alternative to French wine during the trade embargoes and wars of the late 17th and early 18th centuries, we turned a simple drink into a tangible lesson on the Square Mile's commercial history.	Noted	No change
273	R13_06_007	None	The Psychology of the Experience: My background in psychology informs my belief that the best way to preserve heritage is through sensory engagement. When a participant experiences history through taste, sound, and touch, it becomes a permanent memory. This emotional connection is a powerful tool for engagement; a guest who has "lived" a site's history is far more likely to support its future funding and conservation than someone who has merely viewed an object behind glass. This is particularly effective for corporate engagement or funding drives; I hope you find these comments and case studies helpful .I would be delighted to continue the conversation or help in any way I can if my expertise can further support the development of these themes.	Noted	No change

274	R13_07_001	St Giles Cripplegate	Thank you for your time and the session today. The conversations were really good. You suggested I email some thoughts - forgive the brevity - happy to pursue these further if helpful? The processes of planning and heritage don't connect with the reality of the stakeholders involved. This is the problem for the Local Authority, because it renders their consultation processes invalid. The officers and reports and consultants and schema by which planning works simply can't connect with the reality of dozens of small dispersed charities (including the churches) with tiny staff teams, and largely volunteer run. We have seen the evidence for this.	Further emphasis on engagement has been added to principle one.	edit to principle one and section one
275	R13_07_002	St Giles Cripplegate	The heritage report is celebratory and positive, but does it have teeth? How will it hold planners and developers to account?	Thank you for your positive comments. The SPD is intended to provide further weight to the policies set out in the City Plan 2040 and provide further guidance to inform planning proposals and decisions. We appreciate you taking the time to respond to this particular SPD.	No change

276	R13_07_003	St Giles Cripplegate	The danger of heritage being decorative in the City - frilly fringes vs. the development of more boring glass and steel offices. The heritage and particularity of the City (including the churches and the churches' green and open and humane and cultural and spiritual etc spaces) being a HUGE attraction factor for the very development that threatens it. At some point the balance is tipped, and the heritage and quirky, rich, particularity of The City is so squashed/marginalised that it is no longer sufficient to attract. The development, effectively, killing its own golden goose.	Noted	No change
277	R13_08_001	City Heritage Society	The City Heritage Society welcomes the opportunity to respond to the draft Celebrating Heritage SPD. The Society has existed since 1973 to campaign for the preservation of the City's unique heritage and to argue for high standards of architecture and design in its new buildings and public spaces. We respond to this consultation in that spirit. We wish to record at the outset that the SPD is a significant, and in many respects impressive, document. Its treatment of fabric (Principle Five), patina (Principle Six) and archaeology (Principles Ten to Fifteen) is thoughtful and well-grounded. The ambition to put heritage at the heart of placemaking, and the attention given to intangible heritage and hidden histories, reflects a genuinely broad conception of what the City's heritage encompasses. We commend these aspects unreservedly. Our concerns are focused and specific. We raise them not to oppose the document but because we believe they point to gaps and framings that, left unaddressed, could undermine the SPD's protective intent when individual applications are being determined. We believe that we write in the spirit of goals that the	Support noted, thank you	No change

			Corporation itself has set out in the draft City Plan 2040, advancing, as it does in the Chairman’s foreword, a need and desire to be “celebrating, protecting and enhancing the City’s unique heritage assets”.		
278	R13_08_002	City Heritage Society	<u>1. The omission of the Section 66 duty</u> The preamble (paragraph II.3) explicitly states that the SPD “does not elaborate on the associated and overarching requirements in statute, national and local policy to conserve and enhance the significance of heritage assets.” We understand the document’s focus on design guidance, but we are concerned that this disclaimer effectively removes from view the most important statutory protection available to listed buildings. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers to have special regard to the desirability of preserving listed buildings, their settings, and their features of special architectural or historic interest. The courts have consistently held that this duty imposes a higher standard than the ordinary planning balance, and that failure to treat harm to a listed building as a matter of considerable importance and weight, distinct from and additional to the NPPF balancing exercise, constitutes an error of law. In our experience, this duty is not always	Thank you, further clarity on the Acts has been added to section one.	Edit to section 1 and preamble

			applied with sufficient rigour in the City. An SPD that is silent on it risks compounding that pattern. We ask that the adopted document includes, at the very least, a clear statement directing applicants and officers to the Section 66 duty and its implications for how harm to listed buildings and their settings must be weighted in decision-making.		
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279	R13_08_003	City Heritage Society	<u>2. The treatment of setting</u> Linked to the point above is the treatment of setting. The SPD's "Street" section addresses setting across paragraphs 2.21 to 2.29, and Principle Eight introduces the concept of "deference" as a means of managing the visual relationship between new development and heritage assets. We welcome this. However, we believe the SPD misses a significant opportunity to assist applicants, officers and decision-makers in understanding what "setting" actually means in practice, and how to assess its contribution to significance. The NPPF defines setting as the "surroundings in which a heritage asset is experienced", and the SPD quotes this directly. But the experience of setting is not simply a visual matter: it encompasses movement through space, approach sequences, acoustic and sensory qualities, historical associations, and the relationship between an asset and the activities that take place in its vicinity. The SPD does not address these dimensions, and in consequence the guidance it offers on setting is weighted almost entirely towards massing and visual character. These are of course the parameters most useful to developers and architects, but they are not necessarily always the most important from a heritage significance perspective. The SPD would be significantly strengthened by including practical guidance on how to identify and articulate the contribution that setting makes to an asset's significance — guidance of the kind that Historic England's Good Practice Advice Note 3 (The Setting of Heritage Assets, 2017) provides, but which is not currently cross-referenced in the SPD. In particular, the document could usefully explain: how setting should be characterised through a structured assessment rather	Thank you, Further text added to give further guidance to setting assessments, drawing on the experiential qualities of setting.	edit to section 2
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			than a visual appraisal alone; how different elements of setting (including auditory, experiential, and associative elements) should be weighted; and how the significance of setting contributions should be graded to assist in harm assessment. Without this, applicants and officers lack a shared framework for a concept that is frequently disputed in complex applications. We also note that paragraph 2.21 of the SPD states that “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.” While technically accurate, we are concerned that this framing, without accompanying guidance on how to assess setting’s contribution to significance, may be read as licence for incremental change to settings that cumulatively erodes significance.		
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280	R13_08_004	City Heritage Society	<u>3. Cumulative impact</u> The SPD is, in fact, silent on the question of cumulative impact: the harm caused not by any single development proposal but by the aggregation of multiple changes, each individually modest, to heritage assets or their settings over time. This is a significant omission, both because cumulative harm is explicitly recognised in national policy and the London Plan, and because it is a pattern we believe to be particularly acute in the City. The London Plan (Policy HC1c) requires that “the cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed.” In our experience, however, this requirement is not routinely applied in City of London decision-making. Individual applications affecting conservation areas or the settings of listed buildings are typically assessed in isolation, with the question of harm framed solely by reference to the specific proposal. The cumulative effect of successive changes, to streetscape, to roofline, to the pattern of uses in a conservation area, is rarely considered at application stage. The SPD could make a material contribution here. We ask the Corporation to consider adding a principle or section addressing cumulative impact explicitly, which might include: an expectation that Heritage Statements for proposals in established conservation areas address the history of recent change and its cumulative effect on character and significance; guidance on how officers should frame cumulative harm in their reports to committee; and a commitment to periodic review, perhaps through the conservation area appraisal and management plan process, of how the cumulative effect of consented development is affecting the significance of	Thank you for your comment, further text added addressing the importance of cumulative impacts.	edit to section 2
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			heritage assets over time. Without such a mechanism, the SPD's principles risk being applied case by case while the broader picture deteriorates.		
281	R13_08_005	City Heritage Society	<u>4. The concept of "irrelevance" and its risks</u> The SPD introduces "irrelevance" as a defined term — glossed as the "loss of active use, becoming inoperable or the lack of constructive participation in the planning process." It is used to motivate the importance of keeping heritage assets commercially and functionally viable, which we agree is a legitimate and important aim. However, the concept has no basis in statute or in the NPPF, and we are concerned about how it may operate in practice. A building that is commercially underperforming, or that has become functionally outdated, does not thereby lose the statutory protection afforded to it by its listed status. Yet the framing of "irrelevance" – and its implicit counterpart, that a heritage asset must remain commercially relevant to retain its full weight in the planning balance – risks	Thank you for your comment, further text added emphasising that the lack of an active use/access/inefficient use of resources has no bearing on the level of protection afforded by national planning policy.	removal of concept of 'irrelevance'

			providing a ready-made argument for treating the significance of inconvenient listed buildings as diminished. This concern is not hypothetical. In live cases before the Corporation, applicants have already deployed precisely this kind of language, describing listed buildings as having “fallen behind” environmentally, economically and socially as a basis for justifying extensive intervention. We would ask the Corporation to clarify, in the adopted SPD, that irrelevance in the sense defined by this document does not affect the weight to be given to a listed building’s significance under the statutory framework.		
282	R13_08_006	City Heritage Society	<u>5. Principle Two and the substitution of design process for harm assessment</u> Principle Two proposes that harm to heritage assets can be “avoided or minimised by ensuring they have influenced development.” Paragraph 1.20 goes further, suggesting that the degree to which heritage assets have visibly influenced a scheme’s design has a “proportional relationship to the concept of harm”. In effect, this argues that a well-informed and responsive design process is itself evidence of reduced harm. We are concerned by this formulation. The question of whether a proposal causes harm to the significance of a heritage asset is a substantive one, assessed against the asset’s identified significance and the specific impacts of the proposal upon it. It is not, and should not be, answered by reference to the quality of the applicant’s research or the demonstrable attentiveness of their architects. A scheme can be thoroughly informed by its heritage context and still cause substantial harm; equally, a modest scheme by a less sophisticated team may cause no harm at all. We are concerned that	thank you for your comment, this section has been Edited to make clear that the design workflow suggested does not replace the assessment tests as set out in the NPPF.	edit to sections 1 and 2

			Principle Two, as currently drafted, could be used to argue that a thorough Heritage Statement and an iterative design process have already discharged the harm question, bypassing the formal assessment required by NPPF paragraphs 207-221. We ask the Corporation to revise this principle, to make clear that design responsiveness is a means of minimising harm, but is not a substitute for its independent assessment.		
283	R13_08_007	City Heritage Society	<u>6. The selection of case studies</u> The SPD's case studies are presented as exemplars of good practice. However, all of the cases selected involve proposals where harm was either found to be absent or was judged to be outweighed by public benefits. There is no example of a case where harm was found to be unacceptable, where consent was refused on heritage grounds, or where a proposed scheme was substantially redesigned following officer concern. This is not a neutral editorial choice. A reader approaching the SPD could reasonably conclude that harm is routinely justifiable and that refusal on heritage grounds is an exceptional outcome. That impression is inconsistent with the statutory framework, which treats substantial harm to the most significant assets as something to be refused except in wholly exceptional circumstances. We ask that the adopted document include at least one case study illustrating a case where heritage protection resulted in a refusal or a fundamental revision of	thank you for your comment. The case studies and supporting text has been revised. The SPD seeks to focus on best practice in the interests of being the most usefully instructive to practitioners, so a refusal scenario has not been included	re-curation of case studies

			proposals, demonstrating that the principles of the SPD have teeth as well as vision.		
300	R13_10_001	HGH consulting on behalf of the S&P Sephardi Community	We write on behalf of our client, The S&P Sephardi Community ('the Community'). The Community welcomes the opportunity to comment on the emerging Celebrating Heritage SPD. The Community's response is informed by an interest in the development of the City generally, and more specifically in relation to the Grade I listed Bevis Marks Synagogue ('BMS' or 'the Synagogue'), the oldest and most historically significant synagogue in the country. BMS is one of the City of London's most valuable heritage assets and reference to it should be included within the Celebrating Heritage SPD. The Community considers the draft SPD as a whole to be a positive and useful document which largely meets its aim to provide guidance on how development should consider heritage assets. In particular, the Community welcomes the references to the City's living traditions and intangible heritage, which are a key part of the Synagogue's significance, alongside its architectural, artistic, historic and archaeological significance. Despite this welcome recognition of the importance of intangible heritage, it is notable that none of the case studies included demonstrate how this should be considered by development. The Community therefore proposes that	Noted. We have given this careful consideration and have concluded that including a reference to the Creechurch Conservation Area in Section 1 would be the best way of addressing the comment.	insertion of reference in section 1

			Bevis Marks Synagogue is included within the SPD as a case study; noting the topicality of the new visitor centre, which is due to open this year, and which will hopefully transform public knowledge and appreciation of this unique building. The suggested text for a case study is included at Appendix 1 of this letter. This case study demonstrates several of the principles set out in the draft SPD, including: • Principle One, part (c) – preserving, sustaining and facilitating the City’s living traditions and other intangible heritage; and • Principle Three – broadening access to the City’s heritage and history, including revealing ‘hidden histories’ of the City.		
301	R13_10_002	HGH consulting on behalf of the S&P Sephardi Community	As a Grade I listed heritage asset of exceptional national and international significance, it is appropriate and important for BMS to be identified and discussed within the Celebrating Heritage SPD as a case study. Similarly, it is appropriate for it to be referred to within the SPD in the same way as other significant heritage assets e.g. St Paul’s Cathedral. For example, the following addition could be made to paragraph 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, and the culturally and spiritually significant southern sky view from Bevis Marks Synagogue. Instances like these are typically clear and long-established and make a convincing contribution to significance. In such cases, the very visibility of a	See above for response	See above for edit

			proposal, as well as its visual character, will be important considerations for the City.”		
302	R13_10_003	HGH consulting on behalf of the S&P Sephardi Community	More generally, the Community urges the City to ensure that the language used within the Heritage SPD is clear, unambiguous and consistent with national policy. For example, while the principle of ‘deference’ is considered a useful concept, the SPD should be clear that this will take different forms in relation to different heritage assets. In some cases, visibility itself will be a cause of harm, and engagement with key stakeholders and communities can assist in understanding the most appropriate form of deference. The SPD must recognise that the NPPF requires a strict and objective assessment of whether harm is caused to a heritage asset’s significance, irrespective of the architectural style of new development. The Community encourages Officers to continue working with heritage bodies including Historic England to ensure the language within the SPD is robust and consistent with national policy. Paragraph 2.21 of the SPD suggests that 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”. The Community disagrees with this assertion in principle. While it is recognised that the setting of a heritage asset is not fixed and can often accommodate change, it is sometimes the case that certain elements are finite and irreplaceable.	The text here has been edited in conjunction with comments from Historic England.	edits to section 2

			For the Synagogue, the setting is highly sensitive; the specific sky views and natural daylight are finite resources essential to the building's religious and architectural significance.		
303	R13_10_004	HGH consulting on behalf of the S&P Sephardi Community	Finally, the Community considers that the SPD should provide further guidance on how early and meaningful engagement can lead to positive outcomes and avoidance of harm, in accordance with the City of London Developer Engagement Guidance referenced at Appendix The following amendments are suggested: • Paragraph 1.10: "Intangible heritage may not always be immediately known or understood, and it is important that development prioritises community engagement with in the research and consultation phases to ensure any potential conflicts are identified and addressed as early as possible, and harm is minimised or avoided." • Principle 4 – supporting text should state that where appropriate, Heritage Statements should be informed by engagement with key stakeholders and communities. It is important for the SPD to recognise that the City is a constrained environment where objectives are often competing among those who inhabit the space. Building on the Developer Engagement Guidance, it would be appropriate for the SPD to encourage co-operation between developers and local communities. Recognising	Text has been added to clarify, thank you.	Change made- but need to say where and what changed

		that agreement may not always be reached, developers should consider exploring opportunities such as mediation alongside the use of external facilitators as set out in the Developer Engagement Guidance. Early and meaningful engagement with communities can also shape the public benefits of a proposal to ensure that these are effective in outweighing harm, where this cannot be avoided. The SPD should encourage developers to ensure that where possible, public benefits have a connection to the local historic environment. For example, providing additional views of a heritage asset. Overall, The S&P Sephardi Community is broadly supportive of the draft Heritage SPD. However, it considers it to be extremely important that Bevis Marks Synagogue is identified as being one of the City's most important heritage assets. The proposed case study and inclusion within supporting text reflect the Synagogue's significance which is comparable with St Paul's Cathedral and the Tower of London.	
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314	R13_14_001	BGLNF	General comments What is the status of the preamble – is it part of the SPD? Its status is not clear 1. There is very little mention in this document about protecting heritage assets – yet it is hard to celebrate something that has not been or is not being protected. Moreover, Strategic Policy S11 emphasises protecting heritage assets. This SPD adds little to the spirit or letter of S11; in some ways it undermines it. This could be addressed by re-ordering the document to put an expanded Street section first. The expansion should conform to Strategic Policy S11's protections. The basic concept is that the SPD should first explain what it is trying to protect, followed by the ways in which it can be enhanced or at least harm can be reduced. Certainly, the first principles should not be harm reduction when the City Plan and national policy calls for enhancement. 2. We were also surprised at the sparse references to the City's many conservation areas; those mentions that do occur are not material. 3. The SPD talks about the value of non-designated heritage assets. But the City has no list of non-designated heritage assets; if it did it could draw applicants attention to them. Is it the City's intention to produce a register of non-designated heritage assets? 4. We would repeat our request that the City should establish a design review panel. Given the number, size, and variety of the heritage assets that exist in the City, such a panel would help officers and members to be able better to protect and celebrate heritage. We note the case study on Montcalm Brewery and consider that the roof extension could have been much more sympathetic to its setting had it been critiqued by	The pre-amble is to set the SPD in context of other policy documentation and set out its scope and function. Further text has been added clarifying the relationship between the SPD and Local Policy, and strengthen the protection of heritage assets. The SPD seeks to establish a specific design workflow that sits alongside the tests and standards set out in national and local policy. A strategic section is helpful here to provide overarching context, so the existing structure has been retained, noting that additional wording strengthening the protection of heritage assets has been provided	Edits to section 1 and 2
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			an expert panel. Something less dark and overbearing could still have evoked the industrial heritage of the building, while looking more in scale.	throughout. Additional text on conservation areas and NDHA as also been added. INDEPENDENT REVIEW	
315	R13_14_002	BGLNF	Specific comments 5.Principle 1 Parts (a), (b), (c) have some relevance to heritage. Part (d) has none and should be removed. The entire City Plan 2040 makes clear the importance of commercial office development to the City. An SPD which is about celebrating and (we say) protecting heritage should be about doing that in the context of the City Plan's priority for commercial office building: it doesn't need to double count the importance of a commercial function by including it in this principle. Section (a) should be re-written along the following lines: "responding to and enhancing the setting of heritage assets. This can be done through generally having proper	Principle one has been re-written.	Principle One has been edited accordingly

			regard for and dialogue with the heritage assets. This can be shown by some or all of the following: restoring historic street plans, enhancing local views, revealing archaeology.” There is nothing in the NPPF or London Plan that would justify the inclusion of (d)		
316	R13_14_003	BGLNF	6.We think Principle 5 (Historic fabric is irreplaceable and its loss is very likely to result in harm) should have more prominence, rather than being the last of the principles. Para 2.9 on heritage being an irreplaceable resource – move this more prominently	Further text has been added clarifying that there is no hierarchy to the principles as they are set out.	Edit to preamble
317	R13_14_004	BGLNF	7.We welcome the following statement and are pleased to see the commitment given to giving great weight to heritage harm within the planning balance “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”	Noted	No change
318	R13_14_005	BGLNF	8.We think that principle 15 should be removed because it gives unnecessary prominence to engaging with archaeological processes. At present it has the same weight as Principle 10. But the public benefit of revealing “archaeology, designated and non-designated, to public view and experience on development sites (principle 10)” is surely a greater public benefit than simply “engagement with archaeological processes (principle 15).” This might	Further clarity has been given to these principles to give appropriate weight to the outcomes of engagement and display.	Principles in question refined and edited

			encourage developers to document an archaeological exploration rather than display the outcome.		
335	R13_15_001	Twentieth Century Society	Paragraph 1.15 C20 Society welcomes this paragraph's assertion that "what constitutes 'heritage' is not necessarily capped at a particular point, but continually augmented." and that "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." It would be helpful to augment this paragraph to acknowledge that there is much still to do to ensure the preservation of the best C20 (and C21st) buildings in the City and that further statutory and local listing should be anticipated and encouraged. it could be amended as follows... "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 these are already listed buildings, and many more will deserve designation in the future, particularly as they pass the thirty-year threshold" .	Suggested amendment incorporated	Change made to relevant section
336	R13_15_002	Twentieth Century Society	Case Study: The Lloyd's Building – this does not acknowledge the significant retention of the façade of the Edwin Cooper building, which both ensured continuity, and retention of significant fabric and added	The case studies and text have been reviewed.	Case studies have been reviewed

			to the architectural significance of the now listed Rogers building-- please can this be added in.		
337	R13_16_001	London & Middlesex Archaeological society	Preamble Page 4 Purpose We support the principle of an SPD to provide additional guidance on the protection and enhancement of historic assets and conservation areas but note that this must be read in the context of legislation policies and plans already in place. A brief paragraph on how the national and local policy documents, including the SPD, work together would be helpful. The opening paragraph states that this SPD is to provide guidance on how development should consider heritage assets. Para 11.2 states that the SPD sets out how heritage assets should be treated, however, suggesting that this SPD is mandatory. Such treatment is already laid out in planning legislation, the NPPF, the City Plan and policy S11. There is a risk that introducing this further level could create differing advice to users of this SPD. Whilst para 11.8 further states that the SPD is for guidance only, it should be consistently stated in the SPD that this is for guidance only and any application impacting upon heritage assets should be in accordance with national legislation and planning policies. Strategic Policy S11: Historic Environment also contains further guidance on how the policy works. It might provide a more consistent approach if the 'Principles' followed the statements listed in the policy guidelines.	Further text explaining the interaction between the SPD and national policy has been added.	Edits to relevant sections

338	R13_16_002	London & Middlesex Archaeological society	We suggest that the introduction of the term ‘traits’ is unnecessary and confusing, particularly as on p9 para 1.5 they are further described as ‘significance’ which are further defined as ‘themes’ in appendix 1. None of these terms are defined within appendix 2 – glossary of terms. Significance has a specific definition in considering applications for listed buildings, as outlined in the Historic England Guideline GPA2 - Managing Significance in Decision- Taking in the Historic Environment. All terminology should be consistent both within the document and in its context of national policies and guidelines. Para 11.10 identifies that words in bold are included in the glossary. There are, however, no words in bold in the SPD and the relevance of the definitions in the glossary do not appear to relate to any of the text in the document.	A definition of 'traits' has been added to the glossary and further edits made to ensure the distinction between them and significance is made clear.	Edits to relevant sections
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339	R13_16_003	London & Middlesex Archaeological society	Policy Page 6 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the legislation for the provision of controls in respect of buildings and areas of special architectural or historic interest. This should be the primary source for the management and protection of heritage assets and conservation areas. There is no reference to this legislation in the SPD. The NPPF provides the framework and policies in support of the 1990 act and as noted in the introduction to this 'The Framework should be read as a whole. General references to planning policies in the Framework should be applied in a way that is appropriate to the type of plan being produced, taking into account policy on plan-making.' The SPD only references specific paragraphs from the NPPF related to their significance, and makes no reference to other important sections such as in para 212 that for any development 'great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).' Similarly, the 1990 act and the NPPF references the designation of conservation areas and the protection of historic assets within these. As we highlighted in our comments on the 2040 City Plan that, whilst the current 2015 plan - Core Strategic Policy CS12: Historic Environment identifies the need to: - Safeguard the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. - Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic	Further reference has been made to the 1990s Act. It is noted the SPD is not intended to replace or restate the tests and regulations set out within the NPPF, however further references to conservation areas, and the additional weight afforded to higher graded heritage assets has been made.	Edit to relevant section
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			development within them There is no similar stated aim within the 2040 plan or this SPD to safeguard listed buildings and conservation areas. We would therefore suggest that page 6 Policy of the SPD should be restructured to better reflect the national and local legislation and policies currently in place.		
340	R13_16_004	London & Middlesex Archaeological society	Level 1 Spirit Introduction Page 7 It has previously been stated in the City Plan that the role of the City is to safeguard the City's heritage. It is disappointing therefore to read in para 1.3 that the City will accept development that is 'sympathetic' to the City's heritage. As mentioned above, we would hope to rely upon the City of London Corporation to safeguard the city's long and diverse heritage and its assets, and to see a clear statement of this intent to safeguard included.	Text has been clarified to make reference to the City's character specifically, rather than heritage.	Edit to section 1

341	R13_16_005	London & Middlesex Archaeological society	Principle One The terminology used and the intent of each of the ‘tiers’ is unclear. Specificity – specific to what? Is this suggesting that development should be in keeping with its surroundings? If so, this is not supported by the case studies presented. For example One Undershaft is not in keeping with St Helens Bishopsgate, which it will overshadow.	Principle one has been added for clarity, and the case studies selected reviewed.	Edits to section 1, principle 1 and case studies
342	R13_16_006	London & Middlesex Archaeological society	Principle Two The NPPF Annexe 2 Glossary defines the setting of a heritage asset as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.’ And the Historic England GPA3 - The setting of Heritage Assets expands on this definition. Para 1.18 of the SPD heritage appears to say assets should have increased ‘relevance’ to their localities. Can you please clarify if this is the intended meaning of this in the SPD? If so, is this section on relevance better described in the Historic England guideline GPA3? Para 1.20 infers that it is acceptable to permit harm to a heritage asset. Para 213 of the NPPF states that ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings, or grade II registered parks or gardens, should be exceptional’. The para should be reworded to reflect the NPPF.	The section on relevance has been edited to make clear this is not intended to conflict with a setting assessment. Further edits has also been made to ensure its clear that an assessment of harm will be undertaken irrespective of if this principle has been adopted into the design process, notwithstanding its the City's intension that adhering to this principle will make a harmful outcome less likely.	Edits to relevant sections
343	R13_16_007	London & Middlesex Archaeological society	Principle Three We fully support the principle that any development should provide access to heritage. It would be helpful to have on the CoL website schedules of where such	Noted	No change

			information is located within the City. For example, parish boundary markers, which should always be replaced on new developments.		
344	R13_16_008	London & Middlesex Archaeological society	Level 2 Street Page 19 Reference to policy HE1 would be of assistance here. As referenced above, it would be welcome if a statement could be included here, reflecting the principles of City Policy HE1 that the City recognises the importance of heritage assets, will safeguard the City's listed buildings, and preserve and enhance the character of the City's conservation areas. We appreciate that the designation of conservation areas is not a decision taken lightly, and appreciate that the City take all possible measures to preserve the character of these. Again, perhaps this could be highlighted in the guidance to prevent inappropriate developments such as Bury House being repeatedly submitted.	For the sake of brevity City Plan policies are not restated. Additional references to conservation areas have been made throughout.	Edit to section 1
345	R13_16_009	London & Middlesex Archaeological society	Principle 4 Is the reference to London Archive in Para 2.5 intended to refer to the London Archives in Northampton Road, Clerkenwell, which serves all of Greater London?	Clarified that this refers to the London Archives	Edit to cited text
346	R13_16_010	London & Middlesex Archaeological society	Principle Eight Deference is highlighted in bold in para 2.27, but there is no definition in appendix 2. We welcome the concept of developments deferring to a heritage asset, if this is the intention of the use of the term. Its application however, without a clear definition is likely to be open to interpretation. For example, we consider that the development of the Montcalm brewery with its sawtooth roof, is neither in keeping with, nor adequately defers to	Deference has been added to the glossary, thank you for the numbering error highlighted, this has been corrected. The case studies have been revised.	Edits to glossary and case studies

			the original building, as we pointed out in our objection to this scheme. Para numbering is out of order on pp 25-26. Para 2.24 is (presumably) a continuation of para 23 and the bullet points? Para 2.25 is repeated as para 2.20 which is on the page following para's 2.24 and 2.25.		
347	R13_16_011	London & Middlesex Archaeological society	Principle Nine We welcome the recognition by the City that NDHAs from an important part of the heritage landscape. This section could be expanded to explain the material required to understand the significance of a NDHA, its individual contribution and as part of a group of designated or non designated assets. As referred to below, it would be helpful to have included further information on the image on p28 and whether this is classified as an NDHA asset by the City, it appears to be the former Snow Hill Police Station which is listed Grade II.	Further reference has been made to the definition of significance within this context, noting that the published guidelines identified in this section are the relevant assessment criteria and are not re-stated in full here. The illustrations have been revised.	Edits to glossary and illustrations

348	R13_16_012	London & Middlesex Archaeological society	Level Three Strata The title of this section should reflect the fact that archaeological monuments and features such as the City Wall, exist both above and below ground, to be consistent with Policy HE2 of the Local Plan. In addition, the City's heritage is multilayered and many buildings, which are listed or historic assets, preserve significant below ground remains from earlier periods and with different land uses. Para 3.12 could be interpreted to imply that it is only necessary to retain features that are of national significance, and this must be changed. In Para 3.13, all features should be considered important and worthy of retention unless defined otherwise. Archaeological assessment and evaluation should be used to interpret a site and indicate significance to inform consideration of development impacts. Para 3.14 should explain that the significance of burial grounds and churchyards is the individual burials and their context, the monuments and coffins, They contain evidence of past communities, including demography, diet, disease, burial practices and social history. Guidance on work affecting human remains states that burials should not be disturbed without good reason. As noted in para 3.2, the City has a long complex history with many periods represented and this section should be expanded be consistent with the Local Plan text on how policy HE2 works, to state that the City has high archaeological potential and includes non-designated monuments which are equivalent in significance to a scheduled monument. This section should include reference to the contribution of historic and archaeological knowledge and results of investigations to inform interpretation, signage and way finding. Reference to the relationship	Further clarity has been given that these remains can be both above and below ground. PARA 3.12	Edit to section 3
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			between the modern townscape and below ground remains should be included, with examples, e.g. Blue Plaques and the London Wall Walk. Interpretation material and marking out of below ground features using contrasting paving materials is a powerful way to make connections between the past and present, e.g. the Roman Amphitheatre in Guildhall Yard and the City Wall. Attention to the importance of the desk-based archaeological assessment, and this could be strengthened: what significance is, how it can relate to the character and identity of a building or space. It should include how the archaeological heritage can be better understood, celebrated and enhanced as well as how any harm to heritage assets can be avoided.		
349	R13_16_013	London & Middlesex Archaeological society	General Comments The relevance of many of the images is unclear in the context of the accompanying text on the page. It would be helpful to have a name or address and a brief description of the point it is intending to highlight. There are many formatting and typographical errors throughout the document but presumably these will be addressed before a final document is issued. We hope that these comments are of help in finalising a useful and helpful guidance.	The illustrations have been updated, thank you	Illustrations revised

353	R13_18_001	Historic Royal Palaces	I am writing on behalf of Historic Royal Palaces (HRP), as guardians of the Tower of London World Heritage Site (WHS), in response to the City of London's consultation on the draft Celebrating Heritage Supplementary Planning Document (SPD). The Tower of London is a site of exceptional international significance, recognised through its designation as a World Heritage Site. HRP is committed to its conservation and to ensuring that its Outstanding Universal Value (OUV), including its setting and key views, is sustained for future generations. Given the sensitivity of the WHS to the impact of development within the City of London, HRP has a strong interest in the preparation of this SPD. HRP welcomes the preparation of the SPD and supports its overarching aim of guiding development in a way that sustains and enhances the City's historic environment alongside continued growth. The document is clearly structured and provides a helpful framework for understanding how heritage considerations should be approached at different spatial scales. It also reflects, in broad terms, the direction of travel established through the emerging City Plan. However, HRP feels there are a number of areas where further clarification would strengthen its effectiveness and support more consistent application of the guidance in practice - in particular, greater clarity in relation to Principle 1, the selection and role of case studies, the relationship between principles, and the use of terminology throughout the document. Our response to the consultation that follows is therefore focused on these areas.	Noted	No change
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354	R13_18_002	Historic Royal Palaces	Principle 1: Sustaining Character Through Development HRP supports the underlying intent of Principle 1, particularly the recognition that development can play a constructive role in sustaining the City's character rather than creating tension with it. The emphasis on responding to the historic townscape, views and archaeological context is appropriate and aligns with national policy. However, the Principle relies on new terminology that is not clearly defined, which makes it difficult to understand how it should be applied in practice. The concept of 'specificity' is central to this principle but HRP is concerned that this term is not sufficiently explained, and it is therefore unclear how applicants and decisionmakers should interpret it, particularly in situations where there are competing considerations. Similarly, the suggestion that development reflecting certain 'traits', such as being commercial or cosmopolitan, is more likely to be sympathetic to heritage assets appears overly generic and risks undermining national policy which requires that the specific significance of individual assets is considered on a case-by-case basis, including where development would affect the setting of a heritage asset. More generally, the introduction of terms such as 'specificity' and 'traits', which do not reflect national policy and are not clearly defined within the SPD, creates a degree of ambiguity that could lead to inconsistent interpretation. HRP also notes the use of wording such as 'complimented' in relation to heritage assets, which may be open to interpretation and does not fully reflect the statutory duty to conserve listed buildings and their settings. Alongside this, there appears to be some tension between the principles themselves. In particular,	Principle One has been edited for clarity, particularly emphasising that there is no hierarchy between each of the traits. While new terminology has been used, further text has been added to make clear this intended to sit alongside but not replace the assessment tests as set out within the NPPF. Further additions have been made to the glossary.	Edit to section 1, principle 1
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			Principle 1's emphasis on commercial character and growth could be read as taking precedence over other principles concerned with conservation. This risks establishing an implicit hierarchy between principles, which would in effect introduce new policy, rather than providing guidance on how existing policy should be applied. HRP understands this is not CoL's intention and therefore suggests that this is addressed in the final draft of the SPD.		
355	R13_18_003	Historic Royal Palaces	Case Studies The inclusion of case studies within the SPD is welcomed, as they have the potential to demonstrate how the guidance should be applied in practice. However, it is important that the examples included are collectively appropriate and representative of good practice. In this context, HRP is concerned at the inclusion of the One Undershaft scheme as a 'fine example' of Principle 1. This scheme raised significant concerns for HRP in relation to its impact on the Tower of London World Heritage Site, including its effect on the skyline, the extent of cluster encroachment, and the implications for key views affecting the Outstanding Universal Value of the WHS. Presenting it as an unqualified example of good	The case studies have been revised	Edit to relevant section

			practice is difficult to reconcile with the SPD's emphasis on conserving heritage significance. It would therefore be helpful to revisit this example or, if CoL is resolved to retain it, to present it in a more balanced way that acknowledges the complexity of the issues involved.		
356	R13_18_004	Historic Royal Palaces	Principle 2: Influence and Relevance HRP supports the intent behind Principle 2, particularly the expectation that heritage assets should actively inform the design of development proposals rather than being treated as a purely reactive constraint. However, the terminology used, such as 'relevance', 'influence' and 'agency', is not standard within heritage planning policy and is not clearly defined within the SPD. As a result, it is not entirely clear how these concepts are expected to operate in practice or how applicants should demonstrate that they have been met. Providing further explanation, potentially supported by examples, would help ensure a consistent understanding, particularly in relation to how the significance of the Tower of London is expected to influence development proposals within its setting.	Both the case studies and additional clarifying text for terminology have been provided.	Edits to relevant sections
357	R13_18_005	Historic Royal Palaces	Principle 4: Heritage Impact Assessments HRP welcomes the emphasis on the importance of high-quality Heritage Statements and Impact Assessments. However, the SPD currently accepts a degree of flexibility in how Heritage Impact Assessments (HIAs) are prepared, which may lead to inconsistency in approach. For proposals affecting assets of the highest significance, including the Tower of London World Heritage Site, there	Additional references have been made within this section, highlighting specific guidance regarding World Heritage Sites.	Edit to relevant section

			would be merit in providing greater clarity. Heritage Statements should align clearly with established HIA methodologies, including maintaining a clear 'golden thread' from assessment through to design response and considering wider and cumulative external impacts. In this context, the SPD should reference the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) and make clear where the use of HIAs is expected.		
358	R13_18_006	Historic Royal Palaces	Principle 5: Historic Fabric In relation to para 2.10, HRP considers that the text should be amended to broaden the references to significance from just fabric and setting, to include specific reference to the attributes of the OUV of the ToL WHS when considering potential harm as a result of development.	As principle 5 solely considers fabric, further reference to the ToL has been made within principle 4.	Edit to section 2, principle 4
359	R13_18_007	Historic Royal Palaces	Principle 7: Inclusivity and Sustainability HRP supports the recognition that improvements to inclusivity and sustainability can represent public benefits. However, the suggestion that buildings risk becoming 'irrelevant' if they are inaccessible or inefficient introduces terminology that is not commonly used in heritage policy and may be open to interpretation. It may be more appropriate to frame this in terms of opportunities for sensitive adaptation, which better reflects established conservation practice and avoids creating unintended implications about the value of heritage assets.	The wording has been edited for clarity and emphasis that heritage asset's value is not contingent on their active use.	Edit to relevant wording

360	R13_18_008	Historic Royal Palaces	Principle 8: Deference and Setting HRP supports the intention behind Principle 8, particularly the emphasis on responding carefully to heritage assets and their settings. However, the concept of ‘deference’ is broadly defined and could be interpreted in different ways, particularly in the context of larger or taller schemes. Further clarity on how this principle should be applied in practice would be beneficial, and consideration should be given to aligning terminology more closely with that used in national policy. While the SPD reflects national policy in recognising that setting can evolve, it is important to emphasise that for the Tower of London, setting and visual dominance are fundamental components of its Outstanding Universal Value. This distinction could be more clearly articulated. There is also an opportunity to include a case study demonstrating how tall building design can respond appropriately to the Tower of London, which would be particularly helpful in illustrating how the principle can be applied in practice.	This principle has been edited for clarity, and the case studies updated.	Edit to relevant principle, case studies updated
361	R13_18_009	Historic Royal Palaces	Clarity of Terminology, Glossary and Definitions Across the SPD as a whole, there is a consistent reliance on new or non-standard terminology, including ‘specificity’, ‘traits’, ‘irrelevance’ and ‘deference’, which appear across multiple principles. While HRP understands these terms are intended to articulate a particular approach, the lack of clear definitions, and their divergence from established national policy terminology, creates a risk of inconsistent interpretation and application. This is compounded by the fact that some of these terms are not included in the glossary or are only partially defined. In addition, HRP recommends that key definitions are aligned with national policy. In	All terminology and glossary definitions have been reviewed and updated.	Terminology / glossary reviewed and updated

			particular, ‘public benefits’ should reflect the definition set out in the NPPG, and ‘setting’ should align with the definition in the NPPF. HRP also notes that the definition of conservation is unclear and appears twice within the glossary, which could lead to confusion. Other terms, such as ‘complimented’, may also be ambiguous or inappropriate in a heritage context where statutory duties require a clear emphasis on preservation and conservation. HRP recommends that a comprehensive review of terminology is undertaken, with unclear or non-standard terms either replaced with established national policy wording or clearly defined. HRP would		
362	R13_18_010	Historic Royal Palaces	Conclusion Overall, HRP supports the ambition of the SPD and its aim to ensure that the City’s historic environment continues to be conserved and enhanced alongside growth. With further refinement, particularly in relation to Principle 1, the selection and presentation of case studies, the relationship between principles, and the clarity of terminology, the SPD has the potential to become a clear and effective tool for applicants and decision-makers. HRP would welcome further engagement with CoL as the SPD progresses. If it would be helpful to discuss any of these points further, or if HRP can assist in finalising the SPD, please do not hesitate to get in touch.	Noted thank you	No change

366	R13_21_001	SAVE Britain's Heritage	I write on behalf of SAVE Britain's Heritage to offer comments on the City of London Corporation's new draft Supplementary Planning Document (SPD), Celebrating Heritage. SAVE is an independent charity that campaigns for the reuse of threatened historic buildings, supporting sustainable growth and bringing new life to buildings which stand in the heart of their communities. SAVE has a long-standing interest in the conservation of the City's historic environment, and recently we have provided comments on the Draft City Plan 2040 in 2024 and 2026, and made written and oral submissions to the Heritage & Tall Buildings hearing in June 2025. We welcome supplementary guidance on the management of heritage assets in the City in principle, and consider that there are some valuable recommendations within this document. We particularly welcome the reference in para 2.17 (p.24) to the contribution that heritage assets can make towards both local and national decarbonisation responses. We do, however, have concerns about the inclusion of case studies which are not exemplary in their treatment of the historic environment, or do not include sufficient detail. We also have concerns about several sections of the SPD that place excessive weight on non-material considerations, or on undefined terms. In our view, the SPD in its current form is not in line with legislation and policy for the protection of the historic environment as set out in the Planning (Listed buildings and Conservation Areas) Act 1990 and National Planning Policy Framework (NPPF, 2024). Our detailed concerns and recommendations are set out below.	Each response noted individually below.	No change
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367	R13_21_002	SAVE Britain's Heritage	1. Case studies We do not consider One Undershaft (p.15) to be a suitable case study for a document concerned with sustaining and enhancing the heritage of the City, as the scheme has been highly controversial in heritage terms due to its harmful impact on both its neighbouring grade I-listed buildings and the Tower of London World Heritage Site. We therefore recommend that this case study is cut from the document. We also recommend the replacement or substantial reworking of the Lloyds Building case study (p.16). While the Lloyds Building is of very strong architectural significance, the case study does not present exemplary development practice for the historic environment, with reference to its interaction with existing historic spaces limited to the demolition of the 1920s Edwin Cooper building which it replaced, and its configuration within a medieval street pattern. We consider that this case study falls short of best practice as regards conservation and reuse, particularly given the City's emerging Retrofit First policy. We also recommend that the Holborn Gate case study (p.17) is cut from the document. We note that Historic England raised concerns about this development on views from the Inns of Court in Bloomsbury, as well as the scheme's demolition of 44 Southampton Buildings, a handsome Edwardian office building. We do not consider this scheme to be an exemplary reference point for either heritage-led design or Retrofit First principals, and consider that a more sensitive scheme could provide a better example. We recommend the addition of Smithfield Market as a case study. The sympathetic restoration of Smithfield's Victorian former market	The Case studies have been revised.	Edit to case studies
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			buildings to house the new London Museum exemplifies highquality, heritage-led regeneration in the City. The scheme, welcomed by both heritage organisations and the City Corporation, has been designed to conserve and enhance the market’s industrial character, setting a fine example of heritage assets being put “to viable uses consistent with their conservation” (NPPF 210). The new museum is expected to attract millions of visitors to the City, and is a brilliant example of a heritage-led scheme which supports the City’s growth objectives.		
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368	R13_21_003	SAVE Britain's Heritage	2. Use of the term “deference” in Principle Eight We have particular concerns about Principle Eight, regarding the term “deference”. We consider that the SPD places too much emphasis on this term, which is not defined in planning law, national policy, Historic England guidance, nor the glossary of the draft SPD. We note in particular para 2.30 (p.27), which states that: “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”. We consider that the phrase “likely not detract or distract from, or dominate, the heritage asset” is not in line with Historic England guidance, which states that: “for some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development” (Historic England Good Practice Advice in Planning Note 3 (Second Edition), 2017, p.14). We do not consider that the use of an undefined term such as deference to mitigate material causes of harm such as height, bulk and massing is appropriate. We also recommend the reworking of para 2.22 (p.26 – note that repeated paragraph numbering on pages 25 and 26 should be amended) to make clear the equal status of listed buildings’ fabric and settings, as set out in Section 66 of the Planning (Listed Buildings and	This principle has been edited for clarity, to give further definition to how the use of 'deference' could usefully feed into the design development process.	Edit to relevant principle
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			Conservation Areas) Act 1990, which notes “the desirability of preserving the building or its setting”.		
369	R13_21_004	SAVE Britain's Heritage	3. Assessment of significance Appendix 1 outlines the significance of the City of London, stating within a section under the heading “historic interest” that: “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.” We are concerned about the inclusion of the “tall building cluster” as part of this assessment of the City’s historic interest. While the City Cluster has become a widely recognisable aspect of London’s skyline, this does not mitigate the fact that its buildings cause harm to heritage assets and to the City’s broader skyline. We refer to the	This section has been reframed as an exploration of the City’s character rather than significance.	Reframing of section 1

		City of London Statement of Heritage Significance prepared for Historic England by Alan Baxter Associates (2021), which states that the cluster’s presence “cannot enhance the setting of any historic structure that was designed to rise prominently above the skyline of the City, such as St Paul's, the Tower and the City Churches”. We therefore consider that the inclusion of the Cluster in an assessment of the City’s historic interest is not appropriate and that this section should be cut from the document. Conclusion: We welcome the parts of the draft Celebrating Heritage SPD which support and incentivise the conservation and reuse of existing buildings. We do, however, consider that there are areas where the SPD falls short of its legislated duty to have special regard to the desirability of preserving listed buildings their settings. I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this document.		
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381	R13_23_001	Historic Buildings and Places	Comments: Thank you for your consultation request and for the briefing provided to the National Amenity Societies earlier this week. HB&P generally welcome the development of a SPD for the historic environment, in particular its inclusion of wider heritage issues, including local heritage and archaeology. HB&P provide the following comments: · Principle Five – The term ‘historic fabric’ is often misinterpreted and confused with ‘original’ fabric. This is a concern for multi-phase development and new C20 listings. The supporting text should be clear that the loss of any fabric that contributes to the special architectural and historic interest can cause harm. · Case studies – Some of these need to be reconsidered as the descriptions are too simplistic and potentially misleading. - o One Undershaft – It is not realistic that there will be that many more ‘tallest buildings’, so it doesn’t seem worth promoting as a cases study in a heritage context. Further, its impact on view corridors mentioned in the text is much tempered by the existing cluster of buildings around it. An example in the Fleet valley cluster where the built form often more clearly responds to the view corridors may be a better example for an SPD. Perhaps the stepped 120 Fleet Street development, which includes the beneficial separation of the Gd II* Daily Express building. Or a building of mid range height, which will be more relevant to the majority of future apparitions. - o Custom House – The text implies that approval was issued because of the provision of public access. This downplays the fact the initial application was refused for heritage reasons, not access. The refusal led the	Addition to Principle 5 text, to clarify nuanced contribution of fabric where later additions may remain of interest. Case studies have been updated, revising these to exclude undershaft. including reference made to the importance of thorough significance statement underpinning decision taking. Regarding Lloyd’s building, the listing of both buildings highlights the complexity of heritage in the city, which includes the dramatic interventions of the late twentieth century now, of interest in their own right. MONTCALM	Edit to relevant sections
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			developer to do a proper heritage assessment that fully recognise the heritage constraints which then informed a more sensitive scheme that did raise any objections from the main heritage consultees. - o Lloyd's Building – This appears to advocate the facadism of a listed building to create a tower, which goes against principle 1 and 2 as the facade is left without relevance or an active use and principle 5 re historic fabric). This example should be removed or substantially reworked. - o Montcalm Brewery – This application resulted in most heritage bodies raising concerns about the incompatibility of the roof top additions with the host buildings and because it altered almost a half of the buildings in the CA which fundamentally change the character of the CA. There is usually no objection to sensitive upward additions that respect the original build and the City must have a better examples of how to achieve that. We are happy to comment on the alterative case studies you may consider.		
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392	R13_25_001	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Letter of Response: Emerging City of London SPDs I write on behalf of the Dean and Chapter of St Paul's Cathedral to provide comment on several emerging Supplementary Planning Documents. Our commentary is targeted to those SPDs, and the sections of the SPDs, that are of most relevance to St Paul's. Most of this commentary relates to the emerging Celebrating Heritage SPD, whilst a few targeted comments are provided relating to the Offices and Planning Obligations SPDs. Our comments also build upon the informal commentary previously provided to the City as part of early consultation efforts. We thank the City for that initial early engagement. Please note, this letter should be read in conjunction with Appendix A: Specific Commentary on the Celebrating Heritage SPD.	Noted thank you	No change
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393	R13_25_002	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Comment: Celebrating Heritage SPD Overall Nature and Purpose of the SPD The SPD states that it is concerned with 'celebrating heritage' – not '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.' (pg. 4) By this, we understand that the SPD is not explicitly concerned with NPPF compliant heritage assessment and heritage management principles related to the significance of heritage assets. Instead, it seeks to be concerned with how new development proposals and designs can better respond to the historic environment more generally. This aim is most apparent in the 'Spirit' Section, which seems to concern townscape or urban character and how this is linked to the historic environment (see below). However, the 'Street' section of the SPD does talk about the policy expectations relating to assessing significance of assets. It also provides discussion and guidance related to heritage impacts and the nature of setting. If the intention is to create guidance to help the designers of new built form and landscapes respond better to the historic environment, this is welcome. However, we suggest that the intended audience for the SPD, and the way it is intended to be used, should be more clearly and carefully stated so that all participants are aware of the use and application of the SPD. This includes developers, design teams, as well the City's current and future officers, who will be required to apply the SPD principles. Are different parts of the SPD for	The audience for the SPD has been clarified at II.4. It is not the intention to direct specific practitioners such as developers versus officers away from one section over the other given the overlapping interests. The images have been update to support the text. Comments on methodology have been addressed below.	Edit to relevant sections
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			different practitioners within the built environment, responding to different policy areas and requirements? It seems to us that this is not clear in the current drafting. We therefore recommend that each section of the report should have an introductory 'box' explaining the expected application, audience, and use. We have some concern, elaborated on below and within Appendix A, that the SPD as currently drafted could cause or result in different assessment methodologies to be conflated. This could affect the way impacts to heritage significance are understood and ultimately may detrimentally affect the clarity of wider planning balance methods as presented to the decision-takers. Additionally, as a general point we query the purpose and intention of the images used in the Heritage SPD. These do not appear to have any explanatory or illustrative relationship with the text they are associated with. This may be a missed opportunity on the one hand, but our concern is that there is a risk that a reader will assume that the image is expressly (or implicitly) seeking to endorse practice or outcomes (whether good or not).		
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394	R13_25_003	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Overall Nature and Purpose of the 'Spirit' Section The 'Spirit' part of the SPD is focused on the overall character of the City, not on the heritage significance of specific heritage assets within it. It reads akin to a guide for contextual design, or as a description of relevant townscape character, seeking to relate this to the way such character is linked to the historic environment. Given this is a 'heritage' SPD, we have concern regarding the conflation of general urban character, and the specific assessment of heritage significance. We consider that this could give rise to unsound method and conclusions in terms of the recognition of and minimisation of impact to the significance of heritage assets. We have noted our concern with this conflation in our previous discussions regarding the early draft SPD, emerging planning policy, and as part of our regular casework. As noted above, the purpose of, and audience for, this section could be more clearly defined. The 'Spirit' section is also informed by a statement of 'City of London Significance' (Appendix 1). We consider that in many areas this reads similarly to an assessment of townscape character (albeit one emphasising history), not an assessment of heritage significance. We also have queries regarding the weight this assessment has in planning processes. How does the City consider it would be used, in light of the above? Hence, we would recommend the addition of an opening statement on the application and use (and/or definition of how the guidance should not be used). This is discussed in more detail in Appendix A.	emphasis has been added in 11.5, adding clarity that the SPD is intended to guide the development of new work, and therefore part of a process that sits alongside but does not replace or preclude the tests set out in the NPPF. Additional introductory text has been added to the appendix to clarify the evidence base's relationship to the SPD. This document is not intended to be a complete assessment of heritage significance within the City of London.	Edit to relevant sections
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395	R13_25_004	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Overall Nature and Purpose of the 'Street' Section Here, the SPD discusses heritage-specific processes that form part of planning applications. We therefore feel that, whilst useful, it sits uncomfortably with the previous 'Spirit' section, and the scope of the SPD outlined on pg. 4. We hope this could be made clearer and more specific, with some introductory framing as noted above. We feel that, in content and organisation, this section appears somewhat misaligned with existing policy and guidance related to heritage. There is some concern that it could be misconstrued as part of applications, especially given the references to the 'Spirit' section. We are also concerned it could confuse decision-makers, applicants, and other stakeholders in the planning process. We also ask if, with your agreement, this could be a good opportunity for the SPD to link to the St Paul's Cathedral Setting Study and the approach espoused for its use and application. In general, the 'Street' section also feels more focused more on the fabric and material expression of heritage assets. Historic fabric is undeniably very important to heritage significance. However, the contribution of setting to significance, and the experiential and cultural aspects of significance, feel underplayed within the SPD. Whilst there is talk of 'relevance' we also suggest that the cultural value of heritage assets in a use compatible with their significance is similarly underplayed. This is linked to how the asset is experienced and is of course salient for a structure such as St Paul's Cathedral and other City Churches, which have a use immutable to both fabric and setting. But the purpose and use of the City's other heritage assets more broadly, such as markets,	Further navigational text has been added, explaining the structure of each chapter and its intended scope. Further emphasis and nuance relating to the importance of setting has also been added throughout. Explicit reference to the setting study has been included. Explicit reference to the cultural importance of heritage assets has also been added under Principle 4. Further emphasis on setting has been added under principle 8.	Edit to relevant sections
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			banks, the exchange, railway stations – all are linked to cultural and heritage significance. ‘Sustainable heritage’ in terms of these assets therefore must consider ongoing sustainable use that compliments significance, and the role played by their setting, as a full part of effective long term heritage asset management. This is discussed in greater detail in Appendix A. At this stage, we have not provided comment on ‘Strata’ - archaeology in any detail. You will be aware that St Paul’s and the Cathedrals Measure places considerable importance on the value of the heritage management of archaeology. We aim to better activate archaeological narratives in the communication of and stories which can tell our collective history. However, archaeology is not just a matter of what lies below ground and we suggest there is more that can be said about ‘built’ archaeological heritage. Perhaps we can suggest a conversation with our Cathedral Archaeologist to enrich and inform the Strata section?		
396	R13_25_005	Surveyor to the Fabric of St Paul’s Cathedral For and on behalf of Caroe Architecture Ltd	Note on The Case Studies The SPD uses a series of Case Studies, including the approved but as yet unbuilt scheme for 1 Undershaft. Whilst we had no objection to this scheme from the Cathedral’s perspective, we understand that it was found to cause harm to other heritage assets. We therefore query if it is the right exemplar case study to be used within this SPD. We also query the relevance of unbuilt schemes as case studies (such as Holborn Gate, also included).	Noted	Case studies have been reviewed

			If these projects are selected to illustrate and exemplify how the City approve of projects that are found to cause heritage harm, then this should be made clearer and suitably qualified, with an introductory framing. This explanation should note how the City requires the management of heritage assets - and the identification and reduction of heritage harm – to be undertaken to very high standards. Harm should of course ideally be avoided entirely.		
400	R13_25_009	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Appendix A: Specific Discussion of the Celebrating Heritage SPD The Traits & Urban Character (Principle 1 & Throughout) The Spirit Section discusses a series of 'traits', which are characteristics of the City at large. We have some concern about how these could be interpreted and used as part of planning applications. We would also note that, whilst there are commonalities, there are distinct character areas within the City of London. Some of these areas do not display the traits outlined in the SPD. Should new development be assessed against these 'traits' - in addition to the usual assessment of the significance of heritage assets required by the NPPF? If so, would this be undertaken as part of a townscape appraisal? What weight would such assessment have in the process, especially in relation to the assessment of heritage significance required by policy? As noted above, we suggest that the aims, expectations and methodologies to be applied should be articulated more fully and clearly.	Principle one has been reframed to make clear it relates more broadly to the City's character over individual heritage assets. The individual traits have also been edited. As clarified above the introduction has been clarified to indicate that the principles are not intended to replace the assessment process but provide further guidance during the design development, and particularly in the intersection between different disciplines	Edit to relevant sections

				within design, such as sustainability and conservation.	
401	R13_25_010	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Each of these traits would mean different things to different, specific heritage assets. The extent to which any trait is relevant to any heritage asset should be established through methodologically sound assessment of significance (ideally or expressly, in line with HE guidance). This may be especially important in relation to the assessment of conservation areas, such as that which encompasses the Cathedral. For example, one of these 'traits' is the importance of the commercial function of the City. This is true of its character and history – though has obviously evolved in terms of how it is expressed architecturally. Commercial character means different things for different heritage assets than it does to overall townscape character. We feel that, just because something is commercial, does not mean it is automatically always positive in terms of heritage significance for all assets in the City or indeed the City as a whole. We therefore also strongly disagree with the notion that a design or development proposal which is apparently following the traits would necessarily lead to development that would be 'unlikely to be harmful' (pg. 25).	Noted	No change

			To our understanding, the ‘Spirit’ Section acknowledges that ‘tension’ between the traits and the significance of any heritage assets should be resolved in favour of the heritage asset (pg. 25). However, we feel this should be made clearer and more explicit. Better defining the ‘Spirit’ section, including how it would be used and who by, would greatly assist in this process.		
402	R13_25_011	Surveyor to the Fabric of St Paul’s Cathedral For and on behalf of Caroe Architecture Ltd	Within Appendix 1, we note the phrase: ‘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.’ Our question about this is how you are expecting this to be read by the users of the SPD. In plain terms, a developer will likely read this sentiment as an almost automatic licence to develop tall buildings as an axiom of the character and purpose of the City of London and thus overriding the heritage significances of specific assets and the contribution made by their setting. We do not think this reading is correct in planning terms, nor helpful. Either this phrase should be removed or better qualified to ensure that there is due regard to the wide range of heritage protections which the SPD is seeking to elucidate, not undermine.	This text has been edited, to strengthen emphasis of retained historic character.	Edit to relevant sections

403	R13_25_012	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	The Relevance of Heritage Assets (Principle 2) Overall, we agree that relevance is important to the future of heritage assets. However, it is important that efforts to maintain the relevance of a heritage asset dovetail with its significance, rather than work against it. We feel this could be made more explicit within the SPD. This section also states '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...' We consider that heritage harm is not inevitable, and the starting point for any development should be a 'no harm' approach. This statement also downplays the effort that should be undertaken to avoid harm entirely as a requirement of the NPPF. We are very often pointing out in our casework that schemes are developed at the get-go with an assumption that there will be heritage harm. It would therefore be very helpful if the SPD could better articulate and stress the importance of developers seeking to avoid harm altogether in their design process, which would also assist officers and consultees.	Additional emphasis on significance has been added. A sentence has been edited to create appropriate emphasis for the avoidance of harm.	Edit to relevant sections
404	R13_25_013	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	The Role of Heritage Statements (Principle 4) The inclusion of a principle relating to the importance of well-crafted heritage statements is welcome. However, we query whether more detailed guidance should be cited, additional to HEAN12. This could include recent GLA guidance on assessing heritage impact, and the various very well tested and expertly crafted guidance and advice issued by Historic England more widely. The SPD also states that 'high quality heritage statements' will go beyond just dating a particular building element. We would note that this is an essential requirement to any heritage statement that fulfils	Additional useful guidance has been referenced. The city notes the emphasis on a description of historic development as falling short of a heritage statement, however it is felt this is beneficial to restate here given the frequency of	Edit to relevant sections

			paragraph 207 of the NPPF, which must provide an assessment of significance – not simply an appraisal of historical development. We suggest that the text should then make very clear the expectation of the City that, in any development and application, the heritage assessment has been used to inform the design (as per principle 2, whereby heritage assets should influence development).	applications which only reach this standard, and particularly acknowledging not all applicants are in a position to hire specialised consultants who are very familiar with the requirements of the NPPF. Emphasis linking this principle to principle 2 has been added in.	
405	R13_25_014	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Loss of Fabric and Patina of Age (Principles 5 and 6) Principle 5 States: 'Historic fabric is irreplaceable and its loss is very likely to result in harm.' Principle 6 talks about the 'patina of age', a related point. We think this is an important aim, but we are very wary about the way this area of conservation practice philosophy and principles are applied and overly simplified in this document. Do the City feel there is always implicit and great harm in repair and renewal, especially when such renewal is in the nature of the material and the very fabric itself? Similarly, we consider there should be greater clarification on 'authenticity' and 'integrity' in this context, to avoid confusion. We would be happy to offer a more detailed critique of this section but suggest this would best be done in a conversation/workshop. Perhaps the best addition to this section would be for the City to include advice and guidance to the effect that the conservation of historic	Additions to this section made, emphasising the use of accredited professionals. Explicit reference has been made to the cultural value of significance elsewhere, notwithstanding these two principles remain fabric focused. The City's position is that repairs do come with inherent risk to fabric and require particular careful consideration,	Edit to relevant sections

			buildings should be expressly in the hands of recognised competency of accredited conservation architects, surveyors and/or CARE accredited engineers. In addition, we would query whether factors other than historic fabric, such as the experiential and cultural aspects of significance, and the contribution setting makes to significance, are underplayed within the SPD.	hence its inclusion here.	
406	R13_25_015	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	Inclusivity and Sustainability (Principle 7) Discussion of inclusivity and sustainability is welcome. Both aspects have an important role to play within our historic environment. However, it is concerning that these considerations are seemingly initially presented as a way to outweigh harm. Whilst this can in certain circumstances be true, and it might be reasonable and justified, it would be helpful to frame the better provision of accessibility and sustainability in terms of the positive role they can play in conservation of the historic environment, rather than a justification of harm being the starting point. How can sustainability and inclusivity dovetail positively with heritage significance, maximising heritage and wider public benefits? We request that this axiomatic acceptance of harm as the starting point be removed from the drafting.	Further introductory text has been added, to reflect this nuance.	Edit to relevant sections

407	R13_25_016	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	The Contribution of Setting to Significance (Principle 8) This section includes discussion around setting and the contribution it makes to significance. However, the content and form of this section is confusing, and does not appear to align with the usual heritage assessment methodology. We found this section to be problematic in its structure, expression and intention. This could confuse decision-makers, applicants, and other stakeholders in the planning process. It would be most important, if not essential, to anchor this section in clear methodology and process, with reference to existing guidance. To provide clarity, the section could be explicit in stating any applicant must start with the significance of the relevant heritage assets, and the contribution made by their setting to their significance. This should anchor back to existing policy, guidance, and advice. This section also does not mention HE advice on setting, such as GPA3. This is a serious oversight, and we suggest should be easily addressed. We acknowledge that there are other ways of assessing the contribution of setting to significance that may be valid. However, given the prevalence of GPA3, and its robustness, this feels unusual (especially as other Historic England guidance is mentioned elsewhere). We consider that this may be a good opportunity for the SPD to link to the St Paul's Cathedral Setting Study.	Further introductory text has been added, to indicate where this principle is designed to sit alongside and not to preclude the setting assessment process as set out within GPA3.	Edit to relevant sections
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408	R13_25_017	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	This section also does not mention HE advice on setting, such as GPA3. This is a serious oversight, and we suggest should be easily addressed. We acknowledge that there are other ways of assessing the contribution of setting to significance that may be valid. However, given the prevalence of GPA3, and its robustness, this feels unusual (especially as other Historic England guidance is mentioned elsewhere). We consider that this may be a good opportunity for the SPD to link to the St Paul's Cathedral Setting Study. This section also points to development that accords with the 'traits' set out earlier in the document as a way of avoiding harm. As noted above, there is a difference between general townscape or urban character, and the contribution of setting to heritage significance. Even development that accords with some of the 'traits' (and responds to 'the general character' of an area), could still entrench or exacerbate harmful elements with sensitive heritage settings. The only way to fully understand heritage impact is through specific heritage assessment, undertaken in-line with an appropriate methodology that centres on and around significance, as required by NPPF. We feel this should be made more clear in the SPD.	further clarity has been made indicating the traits relation to townscape considerations in the first instance.	Edit to relevant sections
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409	R13_25_018	Surveyor to the Fabric of St Paul's Cathedral For and on behalf of Caroe Architecture Ltd	The section also discusses 'deference'. Again, the importance of this deference, and the way in which it is understood, will be different for different assets. It will also be interpreted differently by many. The same is true for the concept of 'legibility'. In the specific case of St Paul's, we also would not want the SPD to give the impression that a scheme displaying any kind of deference automatically mitigates harm entirely. As noted above, we consider that the drafting of paragraph 2.22 is unclear. Our view is that solely following the traits outlined in the SPD at Principle 1 will not universally avoid or absolve heritage harm. Indeed, heritage specific assessment is needed to understand significance, the contribution made by setting, and actual heritage impacts. Understanding general character of the surroundings of a heritage asset is not enough. As such, we consider that there may be active conflict between some of the traits identified and the significance of a heritage asset. We think that in any such case, the significance of the asset, and the contribution made by its setting, should trump the weight given to character traits. We feel this reflects the aims of wider planning policy and guidance in respect of conserving the significance of heritage assets. Therefore, we consider that the lack of clarity in this section is unhelpful to applicants and decision makers. We feel that the use of language such as 'tension' in this section is not specific enough, neither is the term 'particular circumstances of the heritage asset'. The repeated sentiment within the paragraph, that following the traits is perceived to avoid heritage harm, also clouds the issue. We request that this section is revised for	Further nuance has been added to this section, to make clearer.	Edit to relevant sections
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			clarity and strengthened in favour of heritage significance.		
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431	R13_27_001	Marine Management Organisation	Dear City of London Planning Team, Apologies, I realise I've missed the 11am deadline today for this consultation. I hope you can still consider this response. MMO Marine Planning response to the City of London's Supplementary Planning Document (SPD) consultations on: • Air Quality SPD • Celebrating Heritage SPD • Offices SPD • Planning Obligations SPD Thank you for giving us the opportunity to comment on the above documents. Please find attached our standard response. I would just in addition recommend considering the Air Quality (AQ-1) and Heritage (HER-1) policies within the South East Marine Plan. We advise that you take note of any relevant policies within the South East Marine Plan documents in regard to areas within the Supplementary Planning Documents that may impact upon the marine environment. We recommend inclusion of the South East Marine Plan when discussing any themes with tidal or marine elements which extend up to Teddington Lock. Our policies can be referred to as a guide, demonstrating your regard to the marine plans, under the Marine and Coastal Access Act, 2009. It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.	Noted.	No change
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			Please let me know if you have any questions regarding implementation of the marine plan.		
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Many thanks again for the opportunity to comment.

All the best
Marie

435	R13_28_001	Avison Young on behalf of clients	Dear Sir/Madam, Representation to City of London “Offices SPD”, “Planning Obligations SPD” and “Celebrating Heritage SPD” dated March 2026 On behalf of clients, we write to provide our representations on the City of London’s Offices SPD, its Planning Obligations SPD and its Celebrating Heritage SPD, all dated March 2026. It should be noted that Avison Young represents a diverse range of clients operating in the City of London across range of sectors, such as office, leisure/ hotel and specialist residential, and includes developers, investors and other types of clients. In summary, whilst we are supportive of the aspirations of all documents, it is important that the objectives of the Offices SPD and Planning Obligations SPD in particular are balanced against the current and well-documented viability challenges facing development projects, including significantly increased construction costs (particularly for higher-rise buildings), the continued high cost of finance, higher yields and associated development risk. In this context, ensuring sufficient flexibility in relation to office projects, leisure projects and changes of use projects to complementary uses (including the application of planning obligations) is critical. With regard to the Celebrating Heritage SPD, we have only very minor comments on one of the principles within the document; otherwise, we offer our support for the adoption of the SPD. With regard to the Draft Offices SPD, we are supportive of the aspiration to protect and enhance the office stock within the City of London to ensure the City of London	n/a	No change
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			remains a competitive and attractive location for business. In this context, we recognise the strategic importance of office uses to the City of London's economic function and global role.		
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445	R13_28_011	Avison Young on behalf of clients	Representations to Heritage SPD We note that the majority of the SPD is helpful, balanced and pragmatic. However, we recommend that minor changes are made to the supporting text of Principle 5, as it risks being read as being over-deterministic, particularly when cross referenced and read alongside other principles (notably Principles 7 and 8) that explicitly allow for balanced judgement. Therefore, we recommend an additional sentence being added to Principle 5, as follows: 'Notwithstanding, in accordance with other principles in this SPD, is recognised that carefully considered and proportionate interventions to historic fabric may in some cases deliver wider public benefits, such as improved step-free access, enhanced permeability, or the long-term viability and active use of a heritage asset, and that these outcomes can form part of the overall judgement as to the acceptability of change.' Next Steps We would like to thank you for the opportunity to be involved in this consultation. We trust that the above comments are clear and helpful. We request that we are kept updated concerning any future consultation stages. Please do not hesitate to contact Hannah Velani or Laura Jenkinson at Avison Young should you require any additional details, or should you wish to discuss any of the above, at this stage. Yours sincerely Hannah Velani Associate Director	Text has been adjusted accordingly.	Change made- but need to say where and what changed
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447	R13_29_002	Newmark on behalf of CPA	We also support the overall direction of the draft Offices SPD and its clear recognition of the strategic importance of office floorspace. However, it will be essential that the SPD is applied with appropriate flexibility. Overly rigid change-of-use policies risk preventing justified alternative uses in secondary locations, delaying development and creating stranded assets. A balanced approach is needed to maintain the City's mix of uses, including hotels and serviced accommodation, which play an important role in its wider ecosystem. Similarly, we welcome the progress made in the Celebrating Heritage SPD and its ambition to integrate the City's historic environment positively within new development, provided this is applied proportionately and with regard to viability. Taken together, the draft SPDs form an important framework for shaping future development across the Square Mile. We would welcome continued engagement with officers as these documents are refined and implemented.	Noted.	No change
477	R13_29_032	Newmark on behalf of CPA	CPA REPRESENTATIONS TO THE CELEBRATING HERITAGE SPD The CPA welcomes the opportunity to respond to the formal consultation on the draft Celebrating Heritage SPD and believes that the document has evolved positively through the consultation process. We provided our initial observations on the scope and structure of this SPD in January, and we are pleased to note that many of the issues we previously raised have been carefully considered and addressed, resulting in a clearer and more focused document that is effective in describing the City's rich and layered history, and the role that contrast and juxtaposition play in the distinctly		n/a

			commercial and cosmopolitan character of the Square Mile. Subject to the limited refinements outlined below, we believe the SPD will provide a helpful and accessible source of guidance, supporting the effective management of heritage significance whilst aligning clearly with the City Plan 2040 and the City's wider growth ambitions.		
478	R13_29_033	Newmark on behalf of CPA	1. Relationship to the policy framework In our initial observations, we noted that all development proposals affecting the City's rich heritage must navigate a complex statutory and policy landscape, framed by the UK's international obligations under the World Heritage Convention and primary legislation protecting a range of designated heritage assets. The National Planning Policy Framework (NPPF), the London Plan and City Plan 2040 provide a number of detailed policies for the management of the historic environment, above and below ground. Against that background, we noted the potential for this SPD to avoid repeating and modifying approaches that are already adequately addressed in existing national, regional and local policy. We therefore welcome the way in which the consultation draft now positions the SPD as guidance that supports the application of the existing policy framework. The clearer emphasis on how positive heritage outcomes can be achieved through the existing framework and support the other important economic, social and environmental dimensions of sustainable development is particularly helpful.		n/a

479	R13_29_034	Newmark on behalf of CPA	2. Characterisation of the City We strongly endorse the SPD's emphasis on the commercial character of the City, and the recognition (at para. 1.1) that the historic and the modern are experienced in continuous juxtaposition. The relevance of this quality to the Square Mile is helpfully reinforced in the Glossary definition of the picturesque. We also welcome clarification of the traits which form the City's character, and their close relationship to 'significance' in planning terminology (para. 1.5). This addresses our previous comments and would allow practitioners who may be less familiar with the language of the SPD to interpret the document successfully in the context of national policy and practice guidance.		n/a
480	R13_29_035	Newmark on behalf of CPA	3. Case studies The introduction of the selected case studies is welcome, with their range and diversity helping to illustrate how heritage policies can be interpreted and applied successfully across a variety of development contexts. This will assist both applicants and decisionmakers in understanding how heritage can be positively integrated into new development in the City.		n/a
481	R13_29_036	Newmark on behalf of CPA	4. Intangible heritage Whilst we remain supportive in principle of including 'intangible heritage' within the draft SPD, we would welcome further clarification on how this indefinite and often elusive concept can be handled through the development management process with pragmatism and proportionality.	Further clarity added on how this principle would inform the consultation phase in a design development.	Edit to relevant sections

482	R13_29_037	Newmark on behalf of CPA	5. Skyline As we noted in our initial observations, the City's skyline has been subject to extensive analysis and modelling over recent years, leading to the position reflected in City Plan 2040. We therefore welcome the decision to omit the fourth 'S' from the consultation draft. We continue to believe this topic is properly addressed with reference to strategic and local planning policy, and the London View Management Framework (LVMF).		n/a
483	R13_29_038	Newmark on behalf of CPA	6. Glossary We are pleased to see that the glossary now provides a definition for heritage assets that is consistent with the NPPF. This is a welcome change that should help to promote greater clarity and consistency. In our initial observations, we noted the potential for the SPD to create unnecessary confusion by slightly reframing terms which already benefit from existing statutory and policy definitions. Whilst the consultation draft represents a clear improvement in this regard, we have some outstanding concerns with the glossary definitions of 'conservation' and 'public benefit', which are key concepts in good decision-making.	Both definitions have been updated.	Edit to relevant sections

484	R13_29_039	Newmark on behalf of CPA	Conservation is defined in the draft document as follows: Conservation: Defined by Historic England in their Good Practice in Planning Advice Notes as ‘Managing Change’” This definition differs from that provided in the glossary to the NPPF, which describes ‘conservation’ in relation to heritage policy as: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. The Government’s Planning Practice Guidance (PPG) elaborates further and states: Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest. In the interests of clarity, we would suggest the Government’s definition is referenced directly within the SPD, to avoid any perception of divergence from national policy and guidance. We have a similar concern in relation to the glossary’s definition of ‘public benefit’, which could be interpreted as narrower than intended. As drafted, the glossary states: 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.	Both definitions have been updated.	Edit to relevant sections
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			Heritage benefits can be public benefits, and these are given particular weight in decision making.		
485	R13_29_040	Newmark on behalf of CPA	In the PPG, the Government provides a more expansive definition with reference to all objectives of the NPPF, whilst also making it explicit that public benefits do not need to be visible or accessible to the public in order to be public benefits. The PPG states: Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling	Both definitions have been updated.	Edit to relevant sections

			which secure its future as a designated heritage asset could be a public benefit. For clarity and consistency, we suggest that the Government's definition carried through into the SPD, reducing the scope for differing interpretations of the same concept.		
496	R13_31_001	N/A	I support this SPD.	n/a	No change

501	R13_32_002	Natural England	Dear Sir or Madam Celebrating Heritage Supplementary Planning Document for the City of London Thank you for your consultation request on the above dated and received by Natural England on 16th March 2026. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geo-diversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic	n/a	No change
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			Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk Yours faithfully Sharon Jenkins Consultations Team, Natural England		
504	R13_33_001	Council for British Archaeology	The CBA would encourage the inclusion of public participation in excavation or finds processing as part of this list of suggestions. While this can be harder to achieve within development settings, it has very clear public benefits in terms of education, skills development, and wellbeing and should be encouraged wherever	Emphasis has been added to principle 15 regarding the public participation of archaeology.	Edit to relevant sections

			possible. Including hands-on public participation in this section will make it clear that it should be considered as an option where possible. (p.35)		
505	R13_33_002	Council for British Archaeology	The CBA support the inclusion of local listing within this definition, as locally significant buildings can be overlooked in the development process unless clear guidance ensures they are considered. (p.38)	n/a	No change
506	R13_34_001	N/A	The heritage assets should be considered as an integral part of maintaining the wellbeing and health of the residents not just as something next door (p.11)	Further reference to well-being and health and the influence of heritage assets has been made under principle one.	Edit to relevant sections
507	R13_34_002	N/A	The routes to the building from stations etc, so often historic paths should be considered and mapped, to optimise heritage experienced and understand implications of new footfall (p.13)	Further emphasis on the experiential quality of historic desire lines has been added.	Edit to relevant sections
508	R13_35_001	N/A	The major omission in this document is the peculiar nature of church buildings as distinct heritage assets with peculiar challenges that are not sufficiently supported in the suggestions of this report. Church communities have access to unique heritage spaces that are often the only free quiet open cool/warm (compared to ambient space) that offer a range of cultural and social services often for free or low cost, as well as drawing large number of tourists. They face two distinct challenges firstly their needed to preserve fabric of listed buildings for which their should be a distinct easy to apply for City of London fund, and secondly and more particularly that they are running a huge range of activities on a	It is outside of the scope of the SPD to alter specific routes for funding however text has been added reflecting the specific contribution of churches.	Edit to relevant sections

			comms/marketing/event support budget which is threadbare. Dedicated funds and officers to help churches in particular increase comms and marketing to make people aware of free open space, events, concerts, social programmes etc would be transformative way of increasing access for all backgrounds to these unique heritage spaces that are not only heritage spaces but living community assets operating on shoestrings. (p.1)		
509	R13_36_001	Historic England	Thank you for consulting Historic England on the Draft Celebrating Heritage Supplementary Planning Document (SPD) for the City of London. As the Government's adviser for the historic environment, we are keen to ensure that conservation and enhancement of the historic environment are taken into account at all stages and levels of the planning process. We are pleased that the City of London Corporation proposes to publish new guidance explaining how, through sensitive new developments, the City can celebrate its heritage. We understand that the SPD is aimed primarily at individuals or organisations preparing applications for development. By promoting early and ongoing consideration of character and heritage during design development, the SPD has the potential to help ensure that positive discussions about heritage form a key part of the design process. The draft SPD is particularly innovative in its inclusion of advice on intangible heritage, which is an emerging area of policy and practice. Historic England would be keen to maintain an open dialogue with the City Corporation on all of this document, but particularly this element, to understand how, over time, this advice influences	Further amendments made following workshop and iterative edit.	Edit to relevant sections

			development proposals and whether aspects of the approach may be transferrable to other locations.		
510	R13_36_002	Historic England	We are broadly supportive of the ‘principles’ that anchor the advice in the SPD. In a number of cases, we consider that adjustments are needed to these to ensure that they sit comfortably within the national and local policy framework, and that they are sufficiently nuanced to be applicable to a range of circumstances. This is particularly the case in relation to Principle 8, where we believe that the concept of ‘setting’ ought to be clarified, and a clearer distinction made between heritage matters and consideration of character more broadly. A related issue is the lack of clarity around how the SPD would be applied to development proposals within conservation areas. These areas are designated by local planning authorities for their special architectural or historic interest and there are statutory duties and national policies for their conservation and enhancement. We would be pleased to discuss this matter further with the City of London Corporation to seek appropriate clarification within the document.	Further amendments made following workshop and iterative edit.	Edit to relevant sections

511	R13_36_003	Historic England	We also welcome many of the case studies. However, amongst these are a number of schemes that resulted in notable heritage harm. Some of these cases illustrate significant tensions between the core principles of the document and other planning considerations that influenced their approval, and as such are not clearly instructive for these purposes. We believe there are alternative case studies that would provide a better illustration of the way in which the City can celebrate its heritage, while delivering positive outcomes across a range of the core principles. Elsewhere, we are suggesting relatively minor adjustments to the document to better align with existing policy and guidance and to emphasise the importance of seeking solutions that avoid or minimise harm. We hope to continue to work with you in refining the document to ensure that it is as helpful to developers, consultees and decision makers as possible. If you have any queries about any of the matters raised in this response, or consider that a meeting would be helpful, please do not hesitate to contact me.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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512	R13_36_004	Historic England	Preamble II.1 sets out the parts of Policy S11 that this document is intended to elaborate on. Notably these do not include S11(2) which relates to ‘Conserving and enhancing heritage assets and their settings’ (or indeed to S11(5) which focuses on the Tower of London World Heritage Site, or heritage policy HE1). This is reflected in the statement at II.3 that the document ‘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’. On this basis, we consider that the first statement of II.1 could be clarified, for example: ‘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, and the significance of its heritage assets, into the planning and design of new development proposals...’ In addition to this, the document does contain some statements about how harm might be minimised or about what might constitute public benefits. The introduction could helpfully highlight this, for example by stating that it ‘contains some advice on how harm might be limited in certain circumstances, and on certain considerations that the City of London Corporation considers to be ‘public benefits’.’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
513	R13_36_005	Historic England	For the reasons above, we also consider that II.2 requires adjustment, for example: ‘The SPD sets out the City of London’s expectations on how the Square Mile’s heritage	Further amendments made following workshop and iterative edit.	Edit to relevant sections

			assets should be treated and how they play an active role in placemaking’.		
514	R13_36_006	Historic England	Again, for clarification, we suggest that II.3 is adjusted as follows: ‘The SPD builds on parts of policy S11 ‘Historic Environment’ (as above) and its overarching theme of ‘Celebrating Heritage’...’ There may be similar references to S11 elsewhere that could be beneficially adjusted.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
515	R13_36_007	Historic England	Following clarification of the role of the SPD, and in response to consultee comments, paragraphs II.5-II.7 may need to be adjusted accordingly.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
516	R13_36_008	Historic England	This refers to the case studies as best practice. As we have outlined in the introduction to this response, while we support some of the case studies, there are others about which we have concerns. We think that there is an opportunity to ensure that all case studies reflect best practice and received broad support from heritage stakeholders. We provide further comments and suggestions below in relation to the individual case studies.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
517	R13_36_009	Historic England	S11 excerpt This excerpt would need to show the policy wording contained in the adopted local plan (i.e. with any modifications made following examination).	Further amendments made following workshop and iterative edit.	Edit to relevant sections
518	R13_36_010	Historic England	Spirit To avoid any confusion between consideration of the City’s character in a general sense (including both the contribution made by heritage assets and other elements of its townscape and culture), and consideration of heritage assets specifically, we suggest an adjustment to paragraph 1.3 as follows: ‘The City considers that, in the general sense, to sustain	Further amendments made following workshop and iterative edit.	Edit to relevant sections

			this spirit of place character is to be sympathetic to the City's character heritage...' This will also help to limit the possibility of any inconsistencies between the SPD and the NPPF, or indeed City Plan heritage policies.		
519	R13_36_011	Historic England	For the same reason we suggest that the beginning of Principle One is adjusted as follows, while also ensuring it is clear that this is not a closed list of all townscape considerations: 'The City's character can be sustained, and its heritage complemented, by development that has regard to some or all of the following, <u>amongst other things</u>.' We urge caution in relation to part (d). Firstly, the suggestion that the City's character can be sustained by development that is 'manifestly commercial in function' would seem to interact with the planning use class of proposals (something that is not an aspect of S11), and also does not recognise the critical role of other functions/activities (such as residential and spiritual) in the City's character and heritage. We therefore suggest that part d is reconsidered. Picking up on our point in the introduction about conservation areas, we suggest that additional supporting text is added beneath Principle One to make clear that as conservation areas are designated areas that possess special architectural and/or historic interest, they would not be considered primarily under Principle One, but in relation to the statutory duties and national policies for their conservation and enhancement.	Further amendments made following workshop and iterative edit.	Edit to relevant sections

520	R13_36_012	Historic England	In planning policy for heritage, the concept of significance is used in relation to heritage assets, as defined by the NPPF. The City is a large and diverse area and the traits described in Appendix 1 relate to a wider range of considerations than historic significance alone. Consequently, to avoid confusion between conservation and enhancement of the significance of heritage assets, and questions of townscape and character more broadly, we suggest that 1.5 is amended as follows: 1.5 These traits, which could also be described as ‘significance’ in planning terminology, are further elaborated in Appendix 1.’ Accordingly, we suggest that some adjustments are made to Appendix 1. We have commented on this separately towards the end of this response.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
521	R13_36_013	Historic England	Any consideration of harm to an individual heritage asset will depend on the significance of the particular asset. The suggestion that development which exhibits the ‘traits’ included in Appendix 1 will be more likely to be sympathetic to individual heritage assets (i.e. not cause them harm) risks not being in conformity with the NPPF, or with associated policies in the emerging City Plan. We recommend that paragraph 1.6 is amended, e.g. ‘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 S113c and NPPF paragraph 210c.’ We suggest that the second sentence is amended as follows: ‘However, these traits are not intended to be prescriptive or limit the potential historic or architectural <u>townscape</u> importance that a specific site may embody or effect [affect?].’	Further amendments made following workshop and iterative edit.	Edit to relevant sections

			We suggest that the third sentence is therefore removed to avoid confusion with the consideration of heritage impacts under NPPF 212-221 and Policy HE1.		
522	R13_36_014	Historic England	1.7-1.11 The consideration of intangible heritage, and associated promotion of community engagement to inform development is welcome. It would be helpful if the City Corporation could monitor how proposals respond to this principle, to inform emerging ideas about approaches to intangible heritage.	Further amendments made following workshop and iterative edit.	Edit to relevant sections

523	R13_36_015	Historic England	Within paragraph 1.16 there is an acknowledgement that in some cases it would be important for new work to match its neighbours in materials or proportions. This is then followed by a statement which appears to counter this point, in a way that might undermine certain negotiations on planning and design. We suggest that this could be addressed by amending this statement as follows: 'Whilst there may well be instances where it is evidently important, say, for new work to match its neighbours in materials or proportions, <u>this would be determined on a case by case basis, taking account of local character and the significance of any heritage assets affected</u> this is a more secondary form of contextual design compared with adhering to the primary, conceptual contextual traits set out above'	Further amendments made following workshop and iterative edit.	Edit to relevant sections
524	R13_36_016	Historic England	While we broadly agree with Principle Two, the success of this strategy in avoiding harm to a heritage asset will ultimately depend on whether their significance is conserved. We suggest a slight adjustment to paragraph 1.20 to clarify this: '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 <u>their significance</u> them, and the more likely a development should represent heritage-led placemaking in line with policy S11, the London Plan and the NPPF. <u>This would, though, need to be carefully tested through a Heritage Statement containing an impact assessment (see Principle Four).</u>'	Further amendments made following workshop and iterative edit.	Edit to relevant sections

525	R13_36_017	Historic England	While we generally agree that broadening access to the City's history and heritage can be a form of public benefit that should be encouraged, this may not be possible in all cases. We therefore suggest a slight adjustment to Principle Three. 'Broadening access to the City's heritage and history <u>can be</u> is a form of public benefit.'	Further amendments made following workshop and iterative edit.	Edit to relevant sections
526	R13_36_018	Historic England	1.28 Historic England has produced a checklist to help local authorities deal with contested heritage decisions, which can be found online: https://historicengland.org.uk/advice/planning/planning-system/contested-heritage-listed-building-decisions/ .	Further amendments made following workshop and iterative edit.	Edit to relevant sections

527	R13_36_019	Historic England	We are concerned about the inclusion of One Undershaft as an example of best practice. Historic England objected to this scheme, raising concerns about heritage protection, design, and open space. ICOMOS International's July 2025 Technical Review of the State of Conservation of the Tower of London WHS also highlighted serious concerns about this consented scheme. As the SPD is intended to show how development can celebrate the City's heritage, we strongly suggest that it would be preferable to include a case study for Principle One which has broad support, and where there is greater consensus about its merits in relation to both townscape character and heritage. We would be happy to have a further discussion with you about potential case studies.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
528	R13_36_020	Historic England	While we have no objection to the inclusion of the Lloyd's building as a case study, the fact that the scheme was completed some 40 years ago make it less relevant as an example of best practice within current planning frameworks. We do have some concern about the way the case study refers to the loss of 'a fine 1930s building by Edwin Cooper' as this could be perceived as suggesting that such a loss would necessarily be acceptable. We suggest that this is removed or that the framing is reconsidered.	Further amendments made following workshop and iterative edit.	Edit to relevant sections

529	R13_36_021	Historic England	Holborn Gate Please note that Historic England raised concerns about this development on heritage grounds. Consequently, we think there are likely to be better examples to illustrate Principle Two, which relates to avoiding or minimising harm to heritage assets. We believe that the Bloomberg Building and London Mithraeum could offer a particularly positive example to illustrate a number of the principles, including potentially Principles One, Two and Fifteen.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
530	R13_36_022	Historic England	Beckford Statue While noting a very low level of heritage harm, Historic England commended this proposal as a thoughtful response to the questions raised by contested heritage.	Further amendments made following workshop and iterative edit.	Edit to relevant sections

531	R13_36_023	Historic England	Street Minor correction suggested: ‘.. 53 scheduled ancient monuments...’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
532	R13_36_024	Historic England	We suggest a number of minor adjustments to this paragraph to avoid any confusion between the concepts of heritage significance and character more broadly: ‘Development which accords with the first and second principles of this SPD, and <u>which is informed by</u> along with careful consideration of the assets significance <u>of heritage assets</u> , is <u>more usually</u> likely to minimise the possibility of harm by putting the City’s character, so largely derived from its <u>and</u> 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.’	Further amendments made following workshop and iterative edit.	Edit to relevant sections

533	R13_36_025	Historic England	We are pleased that the SPD recommends applicants consider our guidance on Statements of Heritage Significance. It would also be helpful if the SPD could highlight our complementary guidance: The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3, either here or (perhaps preferably) in relation to Principle Eight. In addition to this, as there is potential for development within the City to affect the Outstanding Universal Value of the Tower of London World Heritage Site, we request that applicants are advised to use the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) to inform and assess their proposals. The GLA's recently revised Planning Practice Note: Heritage Impact Assessments and the setting of heritage assets (2nd edition 2026) makes the same recommendation (paragraph 21). For example: '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. <u>In cases where there is potential for development to affect the Outstanding Universal Value of the Tower of London World Heritage Site, UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) should be used to inform and assess proposals</u>'.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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534	R13_36_026	Historic England	2.8 At present this paragraph focuses largely on ‘fabric’ and we therefore suggest an adjustment to rebalance this, as follows: ‘... 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, <u>including any contribution made by its setting...</u>’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
535	R13_36_027	Historic England	Paragraph 2.10 uses the terms ‘authenticity and integrity’. In planning these terms are most commonly used when referring to World Heritage Sites. We are therefore concerned that this paragraph could be misinterpreted as relating specifically to World Heritage Sites. UNESCO has clear definitions for integrity and authenticity (with which the definitions included in the Glossary align), which relate to attributes that convey Outstanding Universal Value. For clarity, and to avoid confusion with specific guidelines for World Heritage Sites, we therefore suggest the following adjustments. ‘The <u>significance</u> 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 <u>any contribution made by</u> 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	Further amendments made following workshop and iterative edit.	Edit to relevant sections

			proposals which result in the loss of historic fabric are very likely to cause harm, to varying degrees.'		
536	R13_36_028	Historic England	2.12 In relation to guidance on cleaning buildings, the SPD refers to the Institute of Historic Buildings. Does this mean to say the Institute of Historic Building Conservation (IHBC)?	Further amendments made following workshop and iterative edit.	Edit to relevant sections

537	R13_36_029	Historic England	2.15 The concept of ‘relevance’ contained in Appendix 2 and paragraph 2.15 appears to interact with the concept of ‘significance’ in a way that we are concerned may not be consistent with national policy. We therefore suggest that the specific definition in the Appendix is removed. While relevance as a general term may be helpful, we are concerned that ‘irrelevance’ is a negative term whose implications are not clear, and this could prove unhelpful in planning negotiations. We therefore suggest that 2.15 is clarified, for example: ‘2.15 Buildings and spaces which are inaccessible or wasteful carry a high risk of <u>vacancy or redundancy</u> 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 , <u>Access to a heritage asset does not, though, equate to historic significance</u>, as is made clear in Planning Practice Guidance on the historic environment which states <u>that</u> 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).’ Please also see our comments on the terms ‘relevance’ and ‘irrelevance’ which appear in the Appendix.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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538	R13_36_030	Historic England	2.17 Historic England promotes sensitive adaptation and retrofit of historic buildings and has published guidance on Adapting Historic Buildings for Energy and Carbon Efficiency (updated 2026).	Further amendments made following workshop and iterative edit.	Edit to relevant sections
539	R13_36_031	Historic England	Principle Seven Could this principle be reframed to ensure that it does not appear to promote harm? For example: ‘Increasing the inclusivity and/or sustainability of heritage assets can be <u>a form of public benefit, and while it will be important to seek to achieve this in ways that are consistent with an asset’s conservation, where this is not possible it can be</u> an especially clear and convincing justification for harm.,and can be a form of public benefit’	Further amendments made following workshop and iterative edit.	Edit to relevant sections

540	R13_36_032	Historic England	Principle Eight Principle Eight and its supporting text present a complex picture which may be challenging for applicants to interpret and apply. It also contains phrases that may not be consistent with national policy, or which would benefit from linking more clearly with other published guidance, for example Historic England's guidance on The Setting of Heritage Assets. To ensure that there is a clear distinction between consideration of setting/significance in planning policy for heritage assets, and consideration of townscape character more broadly, we think that this section would benefit from some re-ordering along with some adjustments to the text. -Acknowledge that setting is a broad concept and that the success of 'deference' in avoiding harm would ultimately depend on the extent to which significance can be conserved, in accordance with statutory and policy tests. -Signpost Historic England's guidance on The Setting of Heritage Assets. -Clarify whether the advice here represents a process or way of thinking for developers, rather than a decision-making framework that might compete with the Local Plan. In addition, some specific wording changes that could be helpful, both to align with national and local policy and to clarify the role of Principle Eight are suggested below: Principle Eight: '<u>In some circumstances</u>, displaying deference towards heritage assets can be an particularly effective way for development to minimise, or avoid, the possibility of harm.' Sub-heading: 'Design affecting the visual character or the	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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		setting of heritage assets <u>or the character of the City more broadly</u>' 2.19: This paragraph currently focuses on changes that would be considered extensions and alterations, referring to new buildings only in relation to conservation areas. We think it is important that the document recognises that development further afield can affect the significance that a heritage asset derives from its setting (e.g. by obscuring or competing with the asset). 2.21 (on p25): this would benefit from clarification for consistency with national policy, e.g. 'Rather, it is usually the <u>relationship between the character of new proposals and the heritage asset</u> that can result in harm, chiefly where it conflicts with or undermines the visual character (as it contributes to significance) of the heritage asset.' We also suggest 2.21 refers to 'reflecting the aspirations of' rather than 'complying with' Principal Two as the definitive policies tests are contained in the plan and NPPF rather than the SPD. 2.22: We suggest that the words 'More widely' are followed by 'at the level of the townscape'. 2.21 (on p26): this includes a final phrase that could potentially be misused to justify harmful change within a setting. We suggest the following clarifications: 'In other words, the setting of a heritage asset is not finite or irreplaceable, but often inconstant and, potentially, <u>often capable of infinite variation provided while conserving and enhancing the significance of an asset is not harmed</u>'. 2.28: this suggests a 'clear contrast' in materials would be appropriate in all cases, which infers a definitive		
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			approach and also therefore conflicts with paragraph 1.16. We suggest this is amended to say ‘though in <u>some circumstances</u> it is important that clear contrast between the proposals and asset in question is maintained’. 2.29: Here we suggest that the words ‘even prominent’ are removed as there are many situations where this would be a factor resulting in harm and it is therefore unhelpful to appear to encourage it. 2.30: We are concerned that this paragraph contains advice that implies more detailed matters such as materiality are unlikely to result in harm to significance, but this would depend on the circumstances of the case (for example, inappropriate re-cladding). We request that it is amended as follows: ‘2.30 Absolute characteristics such as relative height, scale or massing will <u>often usually</u> have an <u>important greater</u> bearing on impacts <u>than detailed design considerations</u>. When a deferential approach can be worked into these absolute characteristics, these <u>can reduce the likelihood that</u> the resultant proposal will likely not detract or distract from, or dominate, the heritage asset in question.’ We would be pleased to discuss these suggestions for Principle Eight further with the City Corporation.		
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541	R13_36_033	Historic England	Principle Nine We support the principle that non-designated heritage assets should inform the design and/or public offer of development. It is, however, unclear from the supporting text whether the City intends to prepare a local list of non-designated heritage assets? We would support this, and we believe it would show positive commitment to those aspects of the City's heritage that are demonstrably significant but do not meet the high bar for designation. If it is the City's intention to prepare a local list, then we suggest that paragraph 2.32 is amended to clarify that the City will carry out an assessment process using an appropriate set of criteria (rather than referring to Listing Selection Guides, for example). Accordingly, and because the word 'designation' might result in confusion here, we suggest that paragraph 2.33 is amended as follows: 'For this designation NDHA status to be meaningful, there assets must meet rigorous criteria be a high bar to qualifying for Non-Designated Heritage Assets (NDHAs) status. It will not be lightly bestowed.'	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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542	R13_36_034	Historic England	Historic England considers Custom House to be a good example of the sensitive re-use of a historic building and its environs.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
543	R13_36_035	Historic England	Historic England welcomes the inclusion of St Bartholomew's as a positive scheme for heritage.	Further amendments made following workshop and iterative edit.	Edit to relevant sections

544	R13_36_036	Historic England	Montcalm Brewery Please note that Historic England raised concerns about this scheme. A better case study for Principle Eight might be the re-representation and upwards extension of St Martin's-Le-Grand. Although we considered this scheme to result in some harm, we also acknowledged the efforts made to minimise the visual prominence of the roof extension, while concurrently securing heritage benefits.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
545	R13_36_037	Historic England	Strata Principle 10 We are a little unclear about whether this refers to the visibility of archaeological remains during construction and associated fieldwork, or as part of a permanent display. The latter is more likely to be a public benefit but will not always be feasible or desirable (for example, some burial places or waterlogged archaeology), as is recognised in Policy HE2. This will depend on the characteristics of the asset and the conditions needed for its conservation. It would therefore be helpful if Principle Ten were clarified, for example: <u>'The revelation of archaeological remains, designated and non-designated, to public view and experience on development sites is sometimes a public benefit, for example where permanent public display is both feasible and consistent with an asset's conservation.'</u> It may then be helpful to have additional supporting text as follows: 'In some circumstances, exposing or revealing	Further amendments made following workshop and iterative edit.	Edit to relevant sections

			archaeological remains may not be feasible or beneficial. This will depend on the characteristics of the remains and the conditions needed for their conservation.’ In addition, could the Strata section clarify how this SPD will relate to the adopted Archaeology and Development Guidance SPD?		
546	R13_36_038	Historic England	Principle 11 If this refers to the remains rather than their study, we suggest a slight adjustment to this principle: ‘ <u>Archaeological remains</u> can, where appropriate, beneficially inform the design and/or the public offer of development.’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
547	R13_36_039	Historic England	Principle 12 We suggest that Principle Twelve is adjusted to recognise the contribution of setting to significance in some cases: ‘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, <u>and the City’s particular history and archaeological record, and any contribution to significance made by their setting, or that they make to the significance of other heritage assets.</u> ’	Further amendments made following workshop and iterative edit.	Edit to relevant sections

548	R13_36_040	Historic England	3.11 + 3.12 We are concerned that this text sets a higher bar for retention in situ than the policy to which it is attached. We suggest that the text is adjusted to ensure that the SPD does not give advice that is inconsistent with policy, and also to recognised that not all nationally significant remains are capable of scheduling: ‘3.11 Typically, features of <u>‘national significance’ (whether or not of a type that can be designated as a Scheduled Monument)</u> will be 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.’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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549	R13_36_041	Historic England	3.13 We suggest an adjustment to paragraph 3.13 so as not to appear to rule out consideration of wall footings in all cases, as this could prove unhelpful in planning and design negotiations: ‘...For example, preserving in situ, by dint of great effort, expanses of comparatively featureless wall footings (<u>depending on their significance</u>), 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.’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
550	R13_36_042	Historic England	Principle Fourteen A burial ground forms not just human remains but also part of the landscape and evolution of the City. The situation described by Principle Fourteen is more likely to represent ‘total loss’ and would therefore always be harmful. If this principle is simply a statement of fact, intended to raise awareness, then it might be better that Principle Fourteen is omitted, with the supporting text remaining in support of Principle Thirteen. If so, then we suggest that paragraph 3.16 is amended as follows: ‘3.16... Whilst this has allowed for the study of the assemblage of humans 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 <u>and their retention should therefore be sought in accordance with Policy HE2.</u>’	Further amendments made following workshop and iterative edit.	Edit to relevant sections

551	R13_36_043	Historic England	Principle Fifteen We are concerned that Principle Fifteen could be used to suggest that the field evaluation required in association with a scheme could be used to justify other harmful impacts of the scheme, which would not be consistent with NPPF paragraph 218. As we understand Principle Fifteen to be primarily intended to promote public engagement with archaeology, which we welcome, we suggest that it is adjusted as follows: ‘Broadening engagement with <u>any archaeological processes required by Policy HE2 will be strongly encouraged</u> is a form of public benefit.’	Further amendments made following workshop and iterative edit.	Edit to relevant sections
552	R13_36_044	Historic England	Case Study: 85 Gracechurch Street The focus of this case study on archaeology is acknowledged. However, there are likely to be examples where similar aims have been achieved and where there is not the same level of tension between this and other principles in the SPD (as well as other national and local policies). If the case study is retained then it would be helpful if it could conclude with a similar statement to other case studies to clarify its scope, e.g. ‘<u>This is considered a good example of Principle Fifteen.</u>’	Further amendments made following workshop and iterative edit.	Edit to relevant sections

553	R13_36_045	Historic England	As discussed in our comments on paragraph 1.5, the broad statement contained here describes many aspects of the character of the City as a place, but not all of these relate to the significance of the heritage assets that it contains. To assist developers by limiting any confusion between the concept of significance as applied to heritage assets in national planning policy, and questions of townscape and character more broadly, we request a number of adjustments to Appendix 1. Firstly, it would be helpful if the title could be adjusted. This could perhaps be changed to City of London Character Statement. It may also be appropriate to remove the reference to the Topic Paper, as we understand this statement may be evolving through consultation? The introductory paragraph could beneficially be adjusted, perhaps to reflect the way in which the history and characteristics described here contribute to the unique 'spirit of place' alluded to in section 1, and on which the Appendix elaborates? The sub headings could also therefore be reconsidered, for example: Brief History of the City, and Architecture and Townscape?	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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554	R13_36_046	Historic England	Appendix 2 The concept of ‘relevance’ and ‘irrelevance’ contained here seem to interact with the concept of historic significance in a way that we think may not be consistent with national policy. While the idea of relevance may be useful as a general term, we are concerned by these definitions and suggest they are removed. Our requested changes to paragraph 2.15 also relate to this. We suggest that the definition of conservation contained here is replaced with that found in the NPPF, which is as follows: ‘Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.’ Note that on our website we describe contested heritage more simply as follows: ‘By ‘contested heritage’ we mean historic objects, structures, buildings or places where the associated stories or meanings have become challenged.’ Heritage Statements – the UNESCO guidance could also be referred to here, along with the GLA’s recently updated Practice Note. For ‘setting’, we consider it would be helpful to have the full NPPF definition, which is as follows: ‘Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and 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.’ Conservation appears a second time at the end of the Glossary and can therefore be removed.	Further amendments made following workshop and iterative edit.	Edit to relevant sections
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555	R13_37_001	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	Draft Celebrating Heritage SPD – comments from the City Deanery, Church of England Thank you for consulting the Deanery earlier in the year. We have now had an opportunity to review the draft document and, on behalf of the Deanery and the City Churches, we have the following comments on the draft Celebrating Heritage SPD that is out for consultation: 1. We welcome the continuation of dialogue with stakeholders from the Local Plan process, and the desire to make the planning process in the City more efficient and effective .	Noted	No change
556	R13_37_002	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	2. We welcome the intent behind the draft Celebrating Heritage SPD – to assist applicants and others engaged in the planning system in preparing and considering planning and listed building consent applications .	Noted	No change

557	R13_37_003	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	3. We have significant reservations about the wording of Principle 1, which we cannot support. We request that clause (d) is struck: • As presently drafted, a development proposal could satisfy Principle 1 if it has regard for just one of the four clauses. • However, we would expect all proposals to have regard for both clauses (a) and (b) in order to comply with National policy and the new Policies in the City Plan 2040 . • Clause (d) is wholly unacceptable. Commerce is one of many aspects of the City that contribute to the character of its historic environment; an important one but by no means the only one. Other important elements, including faith, defence, administration, the law, living, the river, topography, Roman town planning, etc. also make a major contribution. A high proportion of the City's surviving heritage – including a high percentage of its listed buildings – is derived from these characteristics. It is therefore not acceptable nor consistent with Policy for a Principle to be worded such that a development proposal would be considered by the City to sustain the character and compliment the heritage of the City for the sole reason of being 'manifestly commercial in function, or related to or supporting this function', without any other regard for potential impacts of design, location, height, archaeology, etc. • For the same reason, the wording of para 1.4 is not considered acceptable. The City Plan 2040 and its evidence base referred to in para 1.5 make clear that the character of the City is derived from many qualities, traits and influences, some of which we have listed above. Para 1.6 refers to all of these as potential	Principle one has been reframed to make clear it relates more broadly to the City's character over individual heritage assets. The individual traits have also been edited. As clarified above the introduction to this section has also been clarified.	Edit to relevant sections
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			development considerations, subject to site specific analysis. This is consistent with legislation and national policy on heritage significance / special interest. • It is therefore not acceptable for this advice to be preceded, in para 1.4, by singling out ‘commercial and cosmopolitan character’ as ‘abiding’ traits that could successfully sustain the character and spirit of place in the City. This pre-emptive special emphasis is not consistent with the advice in 1.5 and 1.6 and legislation and policy and should be removed.		
558	R13_37_004	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	4. We recommend that Principle 8 and supporting text is either removed or substantially redrafted. The section provides advice for development that affects the historic environment in ways other than direct physical change to fabric – character, appearance and setting. We are concerned that as presently worded the advice does not provide clarity, and may cause confusion or unintended consequences. We also object to the both the wording of Principle 8 itself and the relevant discussion of this from paras 2.27 onwards: deference is one possible approach to design in a historic context but it is certainly not the only one. This Principle is therefore unnecessarily	Noted. We have given this careful consideration and have worked hard with Historic England on refining the section in question.	Edit to relevant sections

			prescriptive and at odds with best practice, the advice contained in the supporting text and elsewhere in the SPD, and illustrated in the document (for example, whatever their various merits, neither One Undershaft nor the Lloyds Building could be described as deferential.) Our understanding of the policy in the new City Plan and this draft SPD is that, put simply, in order to avoid harm to significance, new development must respond positively to the character of the historic environment on which it will have an effect, which is achieved by design that is derived in a meaningful way from a proportionate understanding of its character and significance. The provision of detailed guidance to amplify these principles – over and above what is elsewhere set out in the SPD - may be an instance where the law of diminishing returns applies.		
559	R13_37_005	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	5. We welcome the inclusion of case studies as an aid to understanding how the Principles might be applied in practice, but we have concerns about the selection of some , in particular, the choice of One Undershaft (p15). Whatever the merits or otherwise of this development in townscape or architectural terms, we object to its inclusion in an SPD about heritage as an example of Principle 1. Traits described in the text – for example provision of new public space – are not heritage considerations and we contend that the building’s architectural form and detail, rather than exhibiting City-specific architectural or other characteristics that are informed by a close understanding of the site and place, is generic.	Further clarity has been given to Principle 8, regarding its application and use as part of the design process, reiterating it its not intended as a prescriptive approach.	Edit to relevant sections

560	R13_37_006	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	6. The definition of setting in the Appendix appears to be partial transcription of that given in Annex 2 of the NPPF. For the avoidance of any doubt or ambiguity about meaning, and for consistency with the NPPF, this should be replaced with the full NPPF definition, which is: <i>Setting of a heritage asset:</i> <i>The surroundings in which a heritage asset is experienced. Its extent is not fixed and 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.</i>	Full definition now included.	Edit to relevant sections
561	R13_37_007	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	7. We suggest some judicious editing may sharpen the document and the clarity of its messages. In this respect, section 3 Strata is a model for other parts of the report.	Edits for clarity have been made throughout.	Edit to relevant sections
562	R13_37_008	Alan Baxter on behalf of the Deanery and the City Churches (Church of England)	8. We recommend that the illustrations for the final version are comprehensively reviewed to ensure that they are all relevant to the text which they accompany (for example but not limited to that on p 22, which is recent fabric). I trust that these comments are helpful and clear but if you need further clarification or discussion we would of course be ready to assist. And we look forward to more detailed conversations about the forthcoming replacement.	Illustrations have been updated throughout.	Edit to relevant sections

563	R13_38_001	Georgian Group	Thank you for consulting the Georgian Group on the draft Celebrating Heritage SPD. The Group recognises that the purpose of the document is to provide further guidance and clarity on the implementation of policies contained within the emerging City Plan 2040. In our response to the Regulation 19 consultation on the City Plan 2040, the Group highlighted the need to carefully balance the City of London's growth ambitions with the conservation of its exceptional historic environment. With this principle in mind, the Group offers the following comments to assist in refining the SPD and ensuring that the City's heritage assets are properly conserved.	Noted, thank you	Edit to relevant sections
564	R13_38_002	Georgian Group	he effectiveness of the SPD will depend significantly on the quality and appropriateness of the case studies and illustrations selected. We support the concerns raised by other consultees regarding several of the examples included and limits its comments to schemes where it has had direct involvement. The inclusion of Montcalm Brewery (24/00863/FULL) as a case study raises concerns. The application attracted heritage concerns from the National Amenity Societies, Historic England and the relevant Conservation Area Advisory Committee. Islington Council also reminded the City Corporation of its statutory duty to consider impacts on the setting of the listed brewery building. The use of this scheme as an example of "deference" calls into question how the term is being applied within the SPD. The Group does not consider the proposed development to demonstrate a sufficiently respectful relationship with the existing brewery complex in terms of scale, dominance or setting.	These have been revised to take into account this feedback and that of others.	Edit to relevant sections

565	R13_38_003	Georgian Group	The case study also highlights a broader issue within the City, namely that development proposals rarely affect a single heritage asset in isolation. Due to the density and complexity of the historic environment, cumulative impacts are often considerable and should be more explicitly acknowledged within the SPD, consistent with Historic England guidance on the setting of heritage assets. 6 Fitzroy Square, London W1T 5DX 020 7529 8920 office@georgiangroup.org.uk www.georgiangroup.org.uk Registered Charity No. 209934 Patron His Majesty King Charles III Vice-Patron The Duchess of Argyll Chairman Paul Zisman Director Dr Anya Lucas FSA This point is particularly relevant given the potential impact of neighbouring proposals, including no.1 Silk Street. The image of Montcalm Brewery presented within the SPD could change significantly if adjacent schemes are approved, undermining the credibility and practical application of the principle of deference. There is a risk that continued reliance on this approach could result in heritage assets becoming progressively engulfed by competing large-scale development.	Not a consideration for this document.	No change
566	R13_38_004	Georgian Group	The inclusion of Custom House as a case study is welcomed. However, we consider that there is a missed opportunity to provide further context regarding the evolution of the scheme and decision-making process, as set out below. 2. Inclusion of National Amenity Societies As the SPD is intended to guide and influence applicants, and to provide an exemplar for other local authorities, the Group considers that greater recognition should be given to the role of the National Amenity Societies within the planning and design process. There is a clear opportunity to reflect this within the Custom House case	Referenced in Custom House case study	Edit to case studies

			study. While the accompanying text acknowledges the contribution of Historic England, it does not recognise the extensive involvement of the Georgian Group and other National Amenity Societies throughout the evolution of the scheme. Reference to this collaborative process would provide a more accurate account of how heritage outcomes were achieved. The SPD would also benefit from a short section outlining the role National Amenity Societies can play in assisting applicants, local authorities and design teams in developing proposals affecting designated heritage assets.		
567	R13_38_005	Georgian Group	A stated purpose of the Celebrating Heritage SPD is to provide accessible guidance to applicants navigating the planning process within the City of London. To fulfil this purpose, the document should rely on clear established terminology supported by legislation, national policy and Historic England guidance. This is particularly important given that applications affecting heritage assets are assessed by statutory consultees and may, where applications are called-in, ultimately be determined by the Mayor of London or the Secretary of State. Language intended to guide applicants towards successful heritage-led development should therefore be grounded in recognised planning and conservation terminology. The introduction of the term “deference” within Principle Eight raises concerns in this regard. Principle Eight states that “displaying deference towards heritage assets can be a particularly effective way for development to minimise, or avoid, the possibility of harm”, while paragraph 2.28 explains that “deference can take many forms, depending on the circumstances”. However, the SPD provides no clear definition of the term, nor is it a recognised concept within legislation, the	refined following these and others' comments.	Edit to relevant section

			NPPF or Historic England guidance. Its introduction therefore risks creating ambiguity rather than clarity within the decision-making process. Given the reliance placed on Principle One throughout the SPD, it is important that the principles themselves are robust and unambiguous. We recommend that Principle One(d) is omitted. The inclusion of commercial function as a defining characteristic risks creating an unnecessary avenue through which harmful development could be justified on economic grounds. Wider public benefits and commercial considerations are already material considerations within the planning process and do not need to be embedded as a heritage principle within the SPD.		
568	R13_38_006	Georgian Group	The Group welcomes the intention of the SPD to provide further clarity on heritage policies within City Plan 2040. However, revisions are required to ensure the document delivers clear and robust guidance in line with the comments set out above. In particular, we consider that the role and contribution of the National Amenity Societies should be more clearly acknowledged within the document, especially given the City Corporation's stated ambition for the SPD to act as an exemplar for other local authorities. Please keep us informed of any future revisions to the SPD. We would be happy to provide further advice if helpful.	Noted	No change

Appendix 2- What We Heard document, Autumn 2025

<https://www.cityoflondon.gov.uk/assets/Services-Environment/SPD-Autumn-Engagement-What-We-Heard.pdf>