

The Town and Country Planning (Local Planning) (England) Regulations 2012

Celebrating Heritage Supplementary Planning Document

Adoption Statement

June 2026



1. This Adoption Statement is published to meet the requirements of Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
1. The City of London Celebrating Heritage Supplementary Planning Document (SPD) was adopted on 22 June 2026 and will be implemented from the date of adoption of the City Plan 2040. The purpose of the SPD is to provide guidance on the application of policies relating to heritage within the City Plan 2040.
2. In accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 formal public consultation on the draft SPD was conducted between 16 March and 15 April 2026. Pursuant to section 23(1) of the Planning and Compulsory Purchase Act 2004, the City Corporation made modifications to the SPD following consultation. Appendix 1 to this statement sets out the modifications made to the SPD to take account of representations made during the consultation period and other matters the City Corporation considered relevant, including factual and clarification corrections.
3. An Equalities Assessment Screening was completed and a full screening is not considered necessary for the implementation of the SPD. A Strategic Environmental Assessment (SEA) screening was completed and concluded that a full SEA is not required.
4. In accordance with Regulations 14 and 35 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012, this Adoption Statement and the Celebrating Heritage SPD is published on the City Corporation website at <https://www.cityoflondon.gov.uk/services/planning/planning-policy/planning-guidance> and will be made available for inspection at the following locations for 3 months:
 - Guildhall North Wing Reception
 - Artizan Library
 - Barbican Library
 - Guildhall Library
 - Shoe Lane Library
5. A copy of this Adoption Statement will also be sent to all contacts registered on the City Corporation's Local Plan Consultation Database and to those that made representations during the consultation period.
6. Pursuant to Section 11(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012 any person with sufficient interest in the decision to adopt the SPD may apply to the High Court for permission to apply for judicial review of that decision. Any such application must be made promptly and, in any event, not later than three months after the date on which the SPD was adopted (by 21 September 2026).
7. If you have any questions or require further information, please email PlanningPolicyConsultations@cityoflondon.gov.uk.

Schedule of changes to Celebrating Heritage Supplementary Planning Document

Section	Change (<u>Additional, removed and amended wording</u>)	Reason for Change
Forewords	Foreword (City of London): Wording added from Chairman of the City of London's Planning and Transportation Committee. Foreword (Historic England): Wording added from Co-CEOs of Historic England.	Member support and provides context and vision.
Illustrations	Images: Throughout the document some new photos and visuals have been removed and added.	As a result of feedback during consultation.
Index/ Contents	Summary: The '<i>Index</i>' has been renamed '<i>Contents</i>', with the addition of Chapter 4 (Case Studies). Appendix 1 has been retitled from '<i>City of London Significance</i>' to '<i>City of London Character Statement</i>', and a new standalone chapter has been introduced. -Chapter: '<i>Index</i>' has been amended to '<i>Contents</i>' page with Case Studies added (Chapter 4). -Appendix 1: Amended from '<i>City of London Significance</i>' to '<i>City of London Character Statement</i>'. -Case Studies: New Chapter 4 created	Summary: The document structure has been updated to improve navigation and clarity so it is clearer as this is the draft SPD for adoption. New chapter added to consolidate and present case studies.
Preamble/ Introduction	Summary: The scope, purpose and structure of the SPD have been clarified, including its role in supporting the design development process and its relationship with statutory tests. The intended audience, use of technical language and signposting to the glossary have been refined, and the introductory material has been reorganised. References to relevant national policy, including public benefits, intangible heritage and community engagement, have been strengthened. The rationale for the selection of case studies has been clarified, and additional guidance has been included to emphasise the application of principles without establishing a hierarchy between them. Details of changes: -Chapter: '<i>Preamble</i>' has been amended to '<i>Introduction</i>' page (Page 1)	Summary: The SPD has been revised in light of consultation comments to provide greater clarity on its relationship with statutory duties, the NPPF, and relevant Local Plan policies, particularly Policy S11 of City Plan 2040. Please note many of the comments have come from liaising with Historic England who have provided input on wording, phrasing and emphasis. The scope of each chapter has also been clarified, together with the purpose and selection of the supporting case studies.

	-Purpose Section: Additional reference to policy on public benefits (Para 1.1) -Purpose Section: Additional wording on relationship with statutory tests (Para 1.3) -Structure Section: Emphasis on use of guidance during design development process (Paras 1.4 to 1.8) -Scope Section: Case studies selection process (Para 1.9) -Format Section: Application of principles emphasising no hierarchy (Para 1.13) -Policy Section: Role of intangible heritage and community engagement added and paras 17-19 additional new wording (Paras 1.15-19).	Details of changes: -Chapter: Amended. -Purpose Section: Clarity on scope and clearer signposting to discussion and guidance of document -Structure Section: Context of guidance during design process -Scope Section: Providing clarity of how case studies have been chosen -Format Section: Further clarity on no particular hierarchy on the application of principles -Policy Section: New explanation provided on intangible heritage and community engagement as a result of consultation feedback.
Chapter One (Spirit)	Summary: This chapter has been revised to strengthen its focus on design, townscape and heritage-led development, with greater reference to the City's historic environment, the Central Activities Zone (CAZ), and its wider London context. It provides clearer guidance on the application of Principles One and Two, including the relationship between heritage traits, national and local planning policy, NPPF tests, and the role of heritage assets in informing design and reducing potential harm. The revisions also expand discussion of the City's character, conservation areas, residents and community engagement, health and wellbeing, intangible heritage, historic routes and place-making. Additional clarification has been provided on assessing heritage impacts, emphasising significance and the need to minimise harm. The chapter also strengthens references to the World Heritage Site, contested heritage and heritage interpretation, clarifies the future identification of late twentieth-century heritage assets, and removes case studies. Details of changes: -Introduction: Additional wording regarding what sections covers including addition of the role of Central Activities Zone (CAZ) (Paras 1.4 to 1.6)	Summary: The amendments improve the clarity and effectiveness of the SPD by strengthening its alignment with national and local planning policy, including the NPPF and CAZ. Please note many of the comments have come from liaising with Historic England who have provided input on wording, phrasing and emphasis. The additional changes provide greater certainty on how the principles should be applied in decision-making, reinforce the importance of heritage significance in assessing impacts. In addition ensure the guidance better reflects design, townscape, and placemaking considerations. Revisions also respond to consultation feedback seeking clearer policy context, stronger recognition of community and stakeholder

	-Principle One: Changes made to Principle 1 (a to d) to provide clarity of wording and objectives. This includes removal of reference to '<u>commercial</u>' use within (1d) -Principle One: Reference made to residents of the City (Para 1.7) -Change, Commerciality & Cosmopolitanism: Additional wording added (Paras 1.7-1.11) to provide context to the City's character. -Intangible Heritage: Additional wording added and some removed to define intangible heritage for City's context and information on engagement with communities (Paras 1.15 to 1.19). In addition reference to 'historic desire lines'. -Other details: A footnote has also been added to the City's Developer Engagement Guidance (2023) and Statement of Community Involvement (SCI). -Principle Two (Relevance): Further framing of the concept of relevance, and explanation of how influence of heritage assets can reduce likelihood of harm (Paras 1.22 to 1.23). -Principle Two (Relevance): Additional wording on heritage assets and relationship with the World Heritage Sites (Paras 1.24 to 1.26). Paragraph 1.25 wording from '<u>always</u>' to '<u>sometimes</u>' in relation to where a heritage asset has significantly influenced a new scheme -Principle Three (Heritage Interpretation and Contested Heritage): Amended wording on heritage assets and their histories (Para 1.27) and additional wording added to factor in a City Conservation Area and Bevis Mark Synagogue (Para 1.28). In addition amended wording to heritage interpretation to make it clearer (Para 1.34) -Case Studies: Removed.	engagement, and a more consistent approach to managing and interpreting the historic environment. Case studies have been removed to focus the guidance on principles and their application. Details of changes: -Introduction: Additional wording of chapter and CAZ for London context -Principle One: Clarity on scope, clearer objectives and further explanation in relation to the City's character. Details have been amended to provide further context for design '<i>traits</i>'. A common theme submitted in consultation responses. In addition reference made to residents of the City made within a consultation response. -Change, Commerciality & Cosmopolitanism: Context to City's character and improve flow of SPD. Clarity on guidance of section and SPD and improve flow of SPD. -Intangible Heritage: Changes made in response to consultation feedback and addition of wording such as '<i>historic desire lines</i>' to reflect City's historic context. -Other details: Link to other City of London documents for context. Principle Two (Relevance): -Text updated to make concept of relevance clear and influence of heritage assets in the City. Blurring of distinction between the significance of heritage assets (NPPF) and wider townscape/character considerations. Wording has been added that heritage
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		assets should actively inform and shape the design of new development, proportionate to their significance. - Recognition of impact on heritage assets through development on sites to the Tower of London World Heritage Site. The revised text sets out that heritage assets should actively inform and shape the design of new development, proportionate to their significance. It is expected the greater the demonstrable influence of heritage assets on a scheme, the lower the likelihood of harm to their significance, and the more likely the proposal will constitute heritage led placemaking. It is expected where harm cannot be avoided, it will be given considerable weight in the planning balance. However for World Heritage Sites, no harm is expected. -Principle 3 (Heritage Interpretation and Contested Heritage): Further clarity on heritage interpretation so it is clearer in SPD. Addition of Conservation Area as a result of consultation feedback addressing a comment. -Case Studies: Case studies throughout have been revised and amended in response to consultation responses, in order to ensure they as clearly as possible reflect the principles set out in the SPD.
Chapter Two (Street)	Summary: Strengthened references have been added to existing setting assessment studies and guidance (including St Paul's Cathedral and the Tower of London), sustainability guidance, and the relationship between Principle Eight and established setting assessment approaches. Additional clarity has been provided	Summary: To improve consistency with existing guidance and policy, provide greater clarity on the assessment of setting and heritage impacts, and support a more

	on assessing heritage impacts, including less than substantial harm, the positive contribution and experiential nature of setting, cumulative impacts, and the use of defined assessment methodologies. The chapter also expands guidance on 'patina', conservation practice and best-practice standards, refines discussion of authenticity, integrity and significance. In addition strengthens references to inclusive access and sustainability, and clarifies that historic significance is not dependent on public access while removing potentially ambiguous terminology. Details of changes: -Street: Additional wording added regarding St Paul's Cathedral and its setting study and World Heritage Site at the Tower of London (Para 2.6) and using a defined matrix for determining level of impact within Heritage Statements (Para 2.10) including details of Custom House plan. -Principle Five (Fabric): Minor amendments to text included additional wording regarding fabric to building form (Para 2.11) and update to wording on 'authenticity', 'integrity' and 'significance' (Para 2.12). -Principle Six: Amended wording for Patina from <i>'its loss could be likely to result in harm'</i> to <i>'its loss could result in harm'</i>. -Principle Six (Patina and weathering): Further context provided regarding patina (Para 2.13). -Principle Six (Patina and weathering): Additional wording added regarding cleaning methods to assets and standards to follow for best practice in regard to patina (Paras 2.14 and 2.15) -Principle Seven: Section amended to provide further context to inclusive access to heritage assets and link with PPG and NPPF planning guidance and removal of word <i>'irrelevance'</i> (Paras 2.16 to 2.19) -Principle Seven: Additional wording added regarding sustainability and guidance documents (Para 2.20). -Principle Eight: Section amended with additional wording added and information on where setting makes a positive contribution to asset's significance and methodology in relation to World Heritage Site (Paras 2.22 to 2.27). -Principle Eight: Additional wording added to conserving and enhancing the significance of an asset and reference to guidance (Para 2.30) and consideration of cumulative scenario (Para 2.38).	sturdy and proportionate approach to design development and decision-making. Please note many of the comments have come from liaising with Historic England who have provided input on wording, phrasing and emphasis. Details of changes: -Street: Additional wording of chapter appropriate for City context and particular chapter. In terms of level of harm this addresses this through terminology. -Principle 5 (Fabric): Providing further clarity to paragraphs regarding fabric. -Principle 6: Clarity to wording. -Principle 6 (Patina and weathering): Further context and additional wording provided to patina as a result of consultation responses. -Principle 7: Clearer SPD wording and additional wording regarding sustainability to provide context to existing guidance and removal of 'irrelevance' as a result of consultation feedback. - Principle 8: Further context and additional wording provided to make clearer section and signposting guidance. Consultation feedback on importance of cumulative impacts included. - Principle 9: Further context and additional wording regarding NDHAS site's context.
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	- Principle Nine: Additional wording added regarding NDHAs <i><u>‘and linked to a site’s overall historic, architectural or artistic significance’</u></i> (Para 2.41).	
Chapter Three (Strata)	Summary: Chapter 3 has been updated to provide further emphasis on the feasibility and conservation implications of archaeological display and public access under Principle Ten. Additional clarification has been added to Principle Twelve regarding the contribution of setting to significance, the relationship between heritage assets, and the preservation in situ of remains of national significance in accordance with Policy HE2. Principle Fourteen has been revised to place greater emphasis on public engagement, access to archaeology, and the dissemination of archaeological findings. Principle Fifteen has been merged into Principle Fourteen. The chapter also provides clearer alignment between the SPD, Policy HE2 in City Plan 2040, and relevant adopted SPDs. Details of changes: -Principle Ten: Amended and additional wording added from <i>‘...development sites is a public benefit’</i> to <i>‘development sites can be a public benefit, particularly where permanent public display is both feasible and consistent with an asset’s conservation’</i>. -Principle Ten: Additional wording added <i>‘In some circumstances, exposing or revealing archaeological remains may not be feasible or beneficial. This will depend on the characteristics of the remains and the conditions needed for their conservation’</i> (Para 3.6). -Principle Twelve: Additional wording added <i>‘...and any contribution to significance made by their setting or that they make to the significance of other heritage assets’</i>. -Principle Twelve: Additional wording added <i>‘Typically, features of ‘national significance’ (whether or not of a type that can be designated as a Scheduled Monument) will be of the requisite significance to warrant preservation in-situ, in accordance with policy HE2’</i> (Para 3.11). -Principle Fourteen: Amended and additional wording added from <i>‘The wholesale archaeological loss of an ancient burial ground is likely to be harmful. This could be partially mitigated through enhanced study of the human remains thereby excavated’</i> to <i>‘Broadening engagement with any archaeological processes required by Policy HE2 will be strongly encouraged’</i>.	Summary: Amendments have been made to Principles 10, 12 and 14 to improve clarity, strengthen guidance on public benefit and Scheduled Monuments, align archaeological engagement requirements with Policy HE2, remove references to burial grounds, and broaden the ways in which public access to archaeology can be promoted. Please note many of the comments have come from liaising with Historic England who have provided input on wording, phrasing and emphasis. Details of changes: -Principle 10: Amended and additional wording provides further context to public benefit and recognition the revealing of assets may not always be possible. -Principle 12: Further clarity to wording and additional wording in regard to Scheduled Monuments context and additional wording as a result of consultation feedback (Para 3.11) -Principle 14: Policy clarified to focus more on engagement of archaeological processes required through new policy (HE2) as a result of consultation feedback. In addition removing reference to burial grounds. -Principle 15: Now set out as Principle 14 and case study moved to provide consistency.

	-Principle Fourteen: Additional wording added: <i>‘For all archaeological work, public engagement is highly important. Broadening public access to archaeology is one of the City’s priorities. This could take the form of site tours (particularly for under-represented groups) during excavations, or the enhanced promotion of the findings of a project. Prompt and high-quality publication, archiving and dissemination of the findings of a project is similarly essential’.</i> (Para 3.14). -Principle Fifteen: Removed and merged into Principle Fourteen (See above) and Case Study of 85 Gracechurch Street embedded in Case Studies section (See below).	
Case Studies	Summary: A new chapter has been added to consolidate and expand the SPD's case study material. Existing case studies have been revised and accompanying text rewritten to clarify their relevance to the SPD principles and the reasons for their selection. Additional case studies have also been introduced across Principles Two, Three, Four, Five and Seven, including both completed schemes and developments within the planning pipeline. The chapter further demonstrates how Principle One can be applied through a series of design traits, illustrated by contemporary examples from across the City. Details of changes: -Various Sites - Principle One: Text added setting out how Principle One can be linked with various sites, set out as design <i>‘traits’</i> (a to d) and specifically refers to current iconic buildings such as 122 Leadenhall Street (or the <i>‘Cheesegrater’</i>) for <i>‘trait a’</i>. -Principles Two, Three, Four, Five, and Seven: Five case studies have been added across these five principles for schemes delivered and in the planning pipeline.	Summary: The case studies have been updated to demonstrate the relationship more clearly between archaeological considerations, design outcomes, and the delivery of public benefits, ensuring that these links are clearly articulated and evidenced. Please note many of the comments have come from liaising with Historic England who have provided input on wording, phrasing and emphasis. Details of changes: -Various Sites – Principle One: Appropriate to set out schemes and their design <i>‘traits’</i> of what the City would like to see in terms of using examples of developments which have considered heritage. -Principles Two, Three, Four, Five, and Seven: The case studies are now more visible and linked to five of the principles set out within the SPD.
Appendices	Summary: The appendices have been updated to improve clarity and consolidate the SPD. Appendix 1 has been revised through the removal of specific descriptive	Summary: The appendices have been updated for clarity.

	wording relating to the City's architectural character and modern development. Appendix 2 (Glossary) has been updated, and Appendix 3 (References) has been removed. Details of changes: -Appendix 1 – City of London Significance (Architectural Calibre): Removal of following wording: ‘...<i>but none of these ancient rivals can match the quality of modern developments the City also possesses..</i>’ and ‘<i>Numerous vistas and glimpses in which decorative detail and façade design are specifically framed and set off</i>’. -Appendix 2 – Glossary: Section has been updated. -Appendix 3 – References: Section has been removed.	Details of changes: -Appendix 1 – City of London Significance (Architectural Calibre): Information removed as not deemed appropriate of inclusion. - Appendix 2 – Glossary: Updated so it is in alphabetical order. -Appendix 3 – References: References embedded within document.
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