

City of London Corporation

Celebrating Heritage

Supplementary Planning Document | June 2026



Foreword

The City of London holds one of the richest built inheritances of any square mile on earth, from the footings of the Roman basilica to buildings finished within living memory. Most places that sit on that much history learn to guard it. We have decided to do something harder. We mean to grow it.

'Celebrate', that word in the title of this Supplementary Planning Document (SPD), is not decorative. We see merely keeping what we have as the floor, not the ceiling. Our heritage policy deliberately sets a higher bar than the national one, and a higher bar is one we then have to clear, scheme by scheme. This document sets out how - and I am pleased that it has been shaped by close collaboration with Historic England, who have provided valuable input on the principles herein.

Start with an awkward fact. The buildings we now protect were, almost without exception, the bold - often commercial - schemes of their own day. The City did not inherit its heritage from some gentler, less commercial age. It built it. No.1 Poultry was fought over when it went up. It is listed now. Growth is not the enemy of heritage here. Growth is where it came from.

So, here, heritage is not kept behind glass; it can be of glass, as much as of Roman tile, or Georgian stone. A listed building, a medieval street line, an ancient wall in the basement: in this City these things shape what comes next, not merely survive it. Done well, the old does not constrain the new. It authors it.

This is what celebrating heritage means in a working city. Not freezing it. Not apologising for the commerce around it. Cherishing what we were given, and adding to it well enough that one day it too is worth protecting.

We have always been a city that builds, and we will continue to build things worth inheriting in turn.



Tom Sleight, Chairman of the Planning and Transportation Committee



Historic England Foreword

The heritage in the City of London matters deeply to its workers, visitors and investors. Much of that heritage is nationally, even internationally, significant. Ensuring the City can grow and develop sustainably is an opportunity as much as a challenge, requiring ongoing cooperation and flexibility. Historic England welcomes the production of this Celebrating Heritage SPD which illustrates some of the best qualities of conservation. We commend the collaborative process undertaken by the City Corporation to create it and recognise the bold aspirations to innovate. In all these ways, the Celebrating Heritage SPD usefully codifies the City's vision for its remarkable heritage.

Conservation works best when there is collaboration to collectively imagine and create futures for buildings and sites that matter: meeting the needs of society today, enriching the lives of future generations, while protecting what matters most. The process of creating this SPD has been a great example of innovation and collaboration. Dialogue and philosophical exploration have underpinned the development of the themes of strata, street and spirit. Historic England will now watch with great interest to see how innovative elements of the SPD, such as the approach to intangible heritage, inform future proposals.

Historic England supports the City's aim to proactively manage change to heritage, and the desire for future growth to respond positively to the significance already there. We will continue to work with the City, and the development and heritage sectors, to create conditions for heritage success.



**Claudia Kenyatta CBE & Emma Squire CBE
(Co-CEOs)**

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I. Introduction

Purpose

I.1 This Supplementary Planning Document (SPD) provides guidance on how development 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, thus building on the principles of City Plan 2040 strategic policy S11:

- Celebrate and broaden access to the City's heritage (S11 (1), (3; f)),
- Put heritage at the heart of placemaking (S11 (3; a))
- Draw on the contribution made by the historic environment to the character and identity of a place (S11 (3; c),
- Sensitive adapt or retrofit heritage assets (S11 (3; b; d)).

I.2 The SPD sets out the City of London's expectations that the Square Mile's heritage assets should play an active role in placemaking. It applies to all relevant stages of the design and planning process from initial designs through to the final outcomes. This document additionally clarifies what may constitute 'public benefits' in certain circumstances.

I.3 The SPD builds on parts of 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 repeat or 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. The guidance within this SPD is entirely in support of and should be read in conjunction with all the protections afforded heritage assets as set out in the 1990 Planning Acts and NPPF, but for the sake of brevity the wording of these are not repeated. Full reference to relevant policy is made within the Bibliography. While guidelines and principles are introduced, these do not replace the tests set out within national policy.

Structure

I.4 The SPD is structured to provide guidance appropriate to the different scales at which planning in the City is undertaken, with a focus on guiding how new development, additions and interventions may be informed by the City's character and the significance of its assets. To that end this guidance will sit alongside but not replace or preclude the assessment as directed through the NPPF, and will be most useful during the design development stages of an application.

I.5 Each chapter addresses the different scales at which an application is considered, going from the macro and conceptual considerations which include broader townscape, placemaking and regional strategy, to interventions at an individual building scale, to considerations relating to below



ground assets and archaeology. These are named 'Spirit', 'Street' and 'Strata' respectively. While these chapters focus on discrete issues, it is likely that applications should draw on guidance across all the chapters in order to effectively deliver against the policy set out in the City Plan.

I.6 Part one of the SPD, 'Spirit', provides guidance on how strategic policy S11 can be implemented in relation to the wider townscape of the City. This section addresses how development might be designed to be sympathetic to the City's wider character and the historic environment which, in the main, substantiates this character, as well as to the wider metropolis of which it is part.

I.7 In part two of the SPD, 'Street', there is a more granular level of focus on how change should be approached in relation to individual heritage assets. It provides guidance on how policy S11 should be applied in relation to direct and indirect impacts on heritage assets, impacts to fabric and exploring issues of 'setting'.

I.8 Part three, 'Strata', relates to archaeology and sets out guidance for the application of policy S11 and policy HE2 'Ancient Monuments and Archaeology'.

Strategic Policy S11: Historic Environment

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

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

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

- I.9 Case studies have been included as examples of best practise relating to each specific principle. This includes cases where heritage harm has been identified, acknowledging that there can be situations where a scheme may be supported where harm has been sufficiently minimised and has clear and convincing justification. This SPD seeks to provide guidance specifically in these cases where policy is tested and it is paramount that the highest rigour and scrutiny is given during the design development process.
- I.10 The SPD seeks to recognise the dedicated professionals, both external and internal as well as statutory groups, working in planning and conservation who share a common goal of celebrating the City's heritage. Ensuring that heritage conservation remains an active part of how the city is managed requires a nuanced approach which is balanced against and navigates within wider aspirations for the city. This SPD aims to support these professionals by providing guidance, particularly where the application of policy or competing requirements are most challenging, in order to secure the best outcomes for heritage within a planning application.

Scope

- I.11 This SPD is intended to give guidance and clarity on how development could enact policy, with a particular focus on the design development stage rather than final assessment. In every case, the individual circumstances of the asset in question should be the principal factor in the development of proposals.

- I.12 It is intended this SPD will provide a useful point of reference for a wide range of practitioners, including developers, planners, architects and officers. As such in places technical design language is used in order to explain a specific concept or give a precise meaning. Definitions are provided within a glossary, particularly where conceptual language is used, and the precise application of particular term within this document is made clear.

Format

- I.13 The SPD guidance is expressed as a series of **principles** supported by explanatory text. Illustrative case studies are provided throughout as examples of best practice. The principles are distilled directly from policy S11 'Historic Environment', the London Plan and the **NPPF**. Some principles are split into sub categories or 'traits' as appropriate. There is no hierarchy to the principles as they are set out, and it is intended they are applied as relevant to each individual proposal.
- I.14 NB: The text within the SPD refers to the 2024 NPPF, noting a new draft was published for consultation on 16 December 2025.



Policy

I.15 Policy S11, the key informative of this SPD, is illustrated overleaf. There are a variety of other development plan and national policies that this SPD has also been informed by. This includes the following key policies and guidelines:

The National Planning Policy Framework (December 2024)

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

London Plan (March 2021)

I.17 The London Plan is ‘the overall strategic plan for London.’ It was adopted in March 2021. The policies are heritage-related in Chapter 7, ‘Heritage and Culture.’ Policy HC1 on ‘Heritage conservation and growth’ notes that development proposals that affect heritage assets and their settings should ‘conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings’.

City Plan 2040

I.18 The strategic priorities of the City Plan 2040 sets out the environmental objectives for the Square Mile, which include celebrating, protecting and enhancing the City’s heritage assets. This objective, and the following policies, have informed this SPD:

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

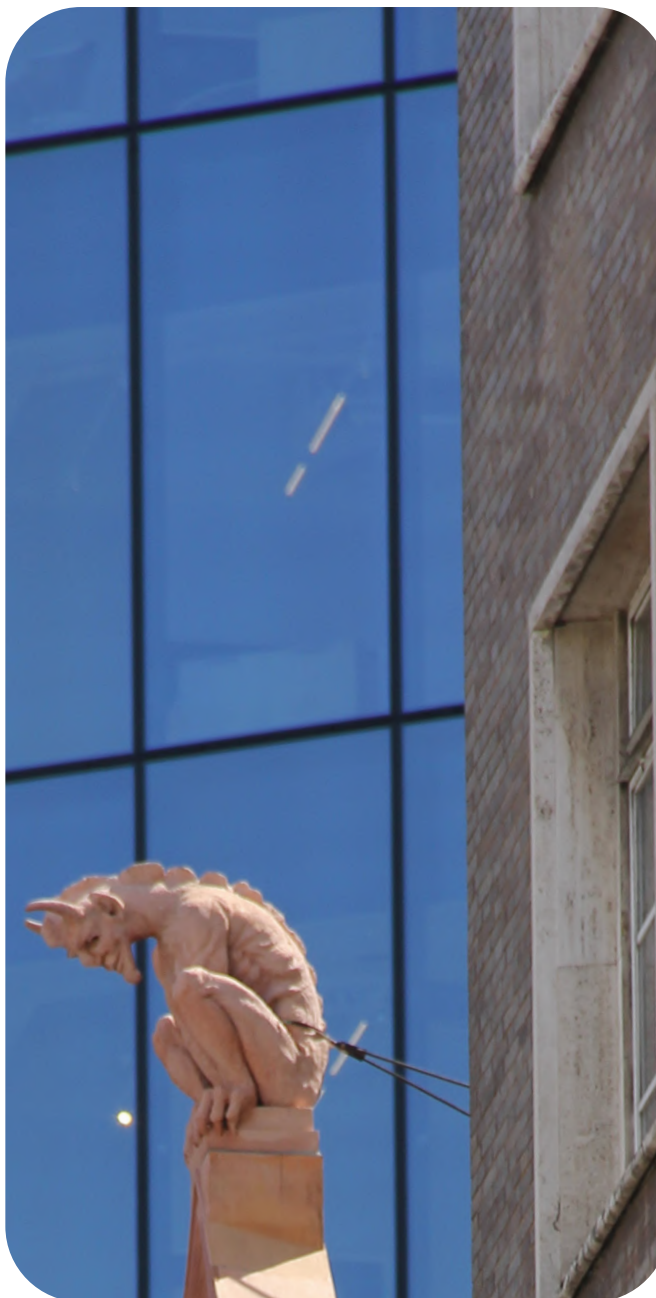
I.19 Additionally, the guidance in this SPD will inform how proposals respond to the following strategic skyline policies, noting that a more substantive Views document will be produced in due course to fully address their requirements.

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

1. Spirit

Introduction

- 1.1 The City of London is a place where ancient and modern are always meeting, a place of many layers that results in a unique, picturesque sense of drama and contrast. Architecturally, age and youth are rarely experienced apart from one another, but more often intermingled. This creates a complex spatial character, with the historic environment and the modern environment experienced in continuous juxtaposition.
- 1.2 There is an essential 'spirit of place' which arises from all of this, substantiated by the City's many heritage assets and their significances. This spirit of place is further animated by the City's intangible living traditions, and experienced within an evolving streetscape, where the City's multifaceted commercial function acts as a catalyst for change.
- 1.3 The City considers that, in the general sense, to sustain this spirit of place is to be sympathetic to the City's character – and because the City's character is so substantiated by its heritage, 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.
- 1.4 This section therefore provides guidance around design and townscape considerations and how development may successfully deliver proposals that are in keeping with this spirit of place.



- 1.5 As the City falls within the Central Activities Zone (CAZ), this section is also informed by the GLA's definition of the CAZ's wider character, set out within the CAZ SPD (2016). This document finds that "London has always been a market town - a place to trade and to share ideas" evolving to "develop distinctive commercial characteristics".
- 1.6 The GLA defines the character of the CAZ as comprising the following qualities:
 - Centrality;
 - Presence of the River Thames and its green spaces such as the Royal Parks and London Squares;
 - Connectivity to outer London and beyond through its network of roads, railways and waterways;
 - Density of commercial uses, intermixed with other key uses such as institutional, residential, and cultural;
 - National and internationally important institutions that have created distinctive places with distinguishing building types and spaces; and
 - Its ability to interweave new developments with the fabric of previous layers that result in a rich built fabric of considerable historic interest.



Principle One

The City's character can be sustained by development that has regard to some or all of the following traits:

- (a)** Specificity, resulting 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, or other City-specific qualities;
- (b)** Quality, which is enduring, and evident at all stages of inception, determination and execution;
- (c)** Coherence, conceptually and architecturally, regardless of scale or architectural style;
- (d)** Sustaining or, where possible, facilitating the City's living traditions and other intangible heritage.

Change, Commerciality & Cosmopolitanism.

- 1.7 While the City has been shaped by epoch-defining historic events such as the Boudican revolt (AD 61), the Great Fire of London (1666), the coming of the railways (early-mid C19), the Blitz (1940-41) and even the Covid-19 Pandemic (2020), an important catalyst for change at more incremental and consistent level is its multifaceted function as a commercial centre of banking, insurance, legal services and other specialist commercial functions. The City's built environment has constantly adapted to meet the needs of industry, residents, business



and changing social structures, spurred on by the imperative to remain nationally and globally competitive. This has been directed strategically through local government intervention but also as a result of individual enterprise.

- 1.8 The capacity of the City to adapt to maintain this commercial function, without overly diluting its tangible and intangible heritage, goes to the heart of how conservation in the City can operate. Whilst this is true of many places in Britain, the pressures bearing on the City are recognised as unique (financial, international, competitive, hierarchical). Equally the City's singular circumstances – as an international financial centre just over a square mile in size – have also intensified the demand for and pace of change in those parts of it where change was able or desirable to be accommodated.
- 1.9 This has resulted in the City's continuous renewal. The nature of this renewal, however, has not always been wholesale but most often incremental, the result of innumerable individual initiatives and tastes, illustrating fluctuations in sentiment and pragmatism and flavoured by shifts in styles and scales. All of this has added to the varied and layered experience at street and skyline level.
- 1.10 In such a place, what constitutes 'heritage' is not necessarily capped at a particular point, but continually augmented. For instance, the City's many twentieth century listed buildings were often controversial in their time but are now recognised as an important layer of the City's tangible heritage – some of these are already listed buildings, and many more will deserve designation in the future, particularly as they pass the thirty-year threshold. In this way, it is the marked quality of architecture that is the over-riding feature of the City, over and above any particular style or period. Importantly,

conserving the City's character therefore is not only about managing the City's existing layers but also about allowing for complementary new layers.

- 1.11 Accordingly, a specific style should not be prescribed for new development. Whether new work should be labelled 'contextual' or 'contemporary' matters less; insofar as the City has an overarching context, it consists of the traits sketched out by Principle One, and adhering to these is most likely to produce a building that successfully upholds the City's character. Whilst there may well be instances where it is evidently important, for new work to match its neighbours in materials or proportions, this approach will not be suitable in every case and adhering to the primary, conceptual contextual traits set out above may provide a more fruitful starting place for proposals.
- 1.12 Development which exhibits some or all of these traits, and/or which has regard to the analysis set out in full in appendix 1 is more likely to be characteristic of the City, and therefore more likely to accord with the aims of policy S11:3c. However, these traits are not intended to be prescriptive or limit the potential historic or architectural importance that a specific site may embody or effect.
- 1.13 It is therefore important that a holistic assessment of the site captures any material architectural, historic and archaeological qualities beyond the points of focus that the traits articulate above, including the contribution historic spaces make to the health and well-being of their communities.

Right: No.1 Poultry, completed in 1998 to designs by James Stirling, Michael Wilford and Associates. In 2016, the building was listed at grade II* for its special architectural and historic interest.



1.14 This overarching character or ‘spirit of place’ applies to the whole City. It is important to note that within the City’s 28 conservation areas there is an additional, specific ‘character and appearance’, which varies from area to area, which development proposals are required to preserve and where possible enhance, as set out within section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Intangible Heritage

1.15 As well as its built heritage, the City has an **intangible heritage**: the liveries and guilds, markets, public houses, places of worship and their congregations, the legal, banking and insurance sectors, the City Corporation itself, the living traditions and institutional memories of them all, and all of the pageantry, rituals and customs which flow from them. The City’s streets and spaces have continued to evolve, creating new layers of meaning and importance that reflect the City’s changing and diverse community. Often historic spaces host, protect and foster the continuance of these activities and cultural practises.

1.16 New development can affect the City’s tangible heritage; it can also affect the City’s intangible heritage, in the sense of the built environment of the City as a backdrop or setting for its more intangible living traditions as enacted by the City’s diverse communities.

1.17 The meetings, rituals, historic desire lines, processions, the particular ceremonies (religious and secular) – many of these take place in the streetscape, frequently spanning across multiple buildings and spaces. They have compelling value, through their longevity but also ability to prove adaptable to within the present-day City environment. Sustaining the City’s character

involves new work that embodies the character traits set out above – and it also involves ensuring that these aspects of intangible heritage can continue to take place and, where feasible, are better facilitated, commemorated or interpreted.

1.18 Intangible heritage may not always be immediately known or understood, and it is important that development prioritises community engagement within the research and consultation phases to ensure potential conflicts are identified and addressed as early as possible, and harm is minimised or avoided. Ensuring outcomes are grounded on thorough research, consultation and engagement with those that use a site will ensure appropriate outcomes are secured.

1.19 Appropriate engagement will avoid relying on assumptions about the communities that may use a space adopt an approach of discovery rather than re-using existing data. Although possessed of very long-established institutions and traditions, the City also has a particularly transient character, reflecting a daily flux which results in very different uses and occupations of a space occurring within a 24hr period and seasonally. Engagement should therefore proactively reflect this temporal quality to ensure all the communities which use a space are taken into consideration, and avoid prioritising these communities according to economic activity. This is essential to maintain a responsive approach to planning which best meets the needs of those for which the City is an important space.¹²

¹ Developer Engagement Guidance <https://www.cityoflondon.gov.uk/assets/Services-Environment/developer-engagement-guidance-2023.pdf>

² Statement of Community Involvement Statement of Community Involvement - City of London



Principle Two

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

Relevance

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

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

1.22 An important consequence of this wider role for heritage is for heritage assets to have increased 'relevance' to their localities. The concept and active process of relevance, as enacted by designers and decision makers, ensures that heritage assets are viewed positively, invested in and engaged with, and seen as active participants in the continuum of City life.

1.23 In turn, the ability of heritage assets to change, or to support change in line with the conservation of their significance, is crucial so that they continue to positively participate in the planning process. In the design of new development, the City's heritage assets should not merely be a reactive consideration – they should have agency, and actively influence the design of new development conceptually and/or architecturally. This is of course proportionate to their significance and scale – in this vein, less will be expected of a grade II listed K6 telephone kiosk, for instance, than the likes of St Paul's Cathedral. Fundamentally, for development to be enduring and successful it should be responsive to the heritage around it.

1.24 The degree to which heritage assets are influential within the design process of proposals has a proportional relationship to the concept of harm in the planning system. The more that heritage assets have influenced, visibly so, the design of a new development, the less likely it should be that that new development would cause harm to their significance and the more likely a development should represent heritage-led placemaking in line with policy S11, the London Plan and the NPPF. This would, though, need to be carefully tested through a Heritage Statement containing an impact assessment (see Principle Four).

1.25 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.

1.26 Clearly, the starting point for expressing influence should be the context and significance of the asset in question, and further guidance on how this could be achieved is detailed in part two, 'Street'.

Principle Three

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

Heritage Interpretation

- 1.27 Some heritage assets and their histories may not be broadly known or understood. In such cases, there are opportunities for development to facilitate broader access and understanding through the incorporation of elements to make these histories more visible. Sometimes referred to as 'heritage interpretation', there are a number of ways that this might be achieved.
- 1.28 As an example, the City's 2024 designation of the Creechurch Conservation Area incorporated buildings that are not, in of themselves, of special interest, but which occupy sites that are important in the history of the City's Jewish community (today manifested by Bevis Marks Synagogue) including the sites of the First and Great Synagogues. Whilst the former presences of these buildings are commemorated by plaques, there are opportunities for development of those sites (or even sites nearby) to better reveal and broaden access to this history.
- 1.29 Conservation should be an expansive, active process which fosters a sense of belonging for all City communities. Development should optimise opportunities to provide better interpretation – for instance through creative intervention, the sponsoring of new archival research, or more traditional inscriptions or artwork to signal the associations of a site with a particular person or event (S11; 3 (c and f)).

Hidden Histories

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

Contested Heritage

- 1.33 This approach encourages the appropriate re-contextualisation of historic places with links to contested heritage including slavery and the slave trade, recognising this process is important to understand any contested asset's true significance. Interventions of this kind should be driven by consultation with the communities affected, prioritising the well-being and safeguarding of participants, alongside detailed research into its history, provenance and significance, in line with the processes outlined in the NPPF, DCMS and Historic England guidance.



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



Right: the reflection pool at 25 Cannon Street offering a new perspective of St Paul's Cathedral.

2. Street

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



Principle Four

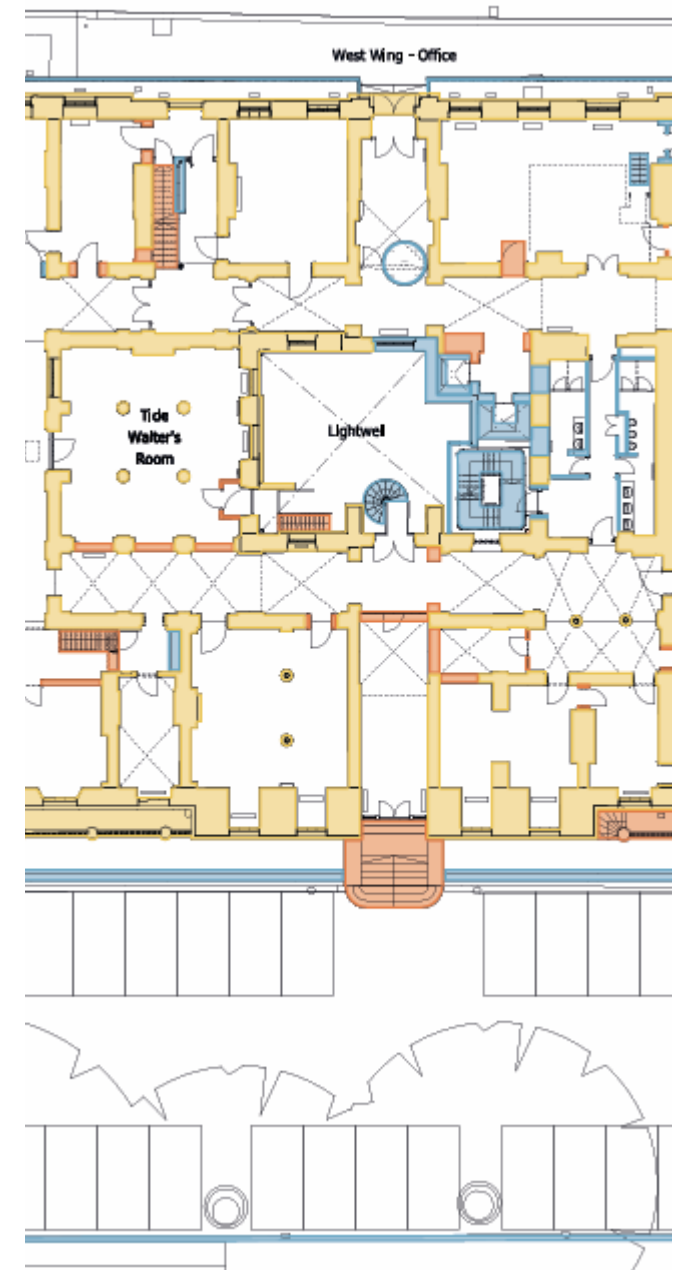
High-quality Heritage Statements facilitate the decision-making process and are an essential step in ensuring proposals celebrate the City's heritage from inception.

- 2.4 Key to any application with the potential to affect the significance of a heritage asset is ensuring the significance of these assets are appropriately understood and expressed in the supporting information of applications. Commissioning high quality research into an asset, in order to articulate its heritage significance, should form the baseline from which proposals are developed, creating the golden thread which underpins a design's evolution.
- 2.5 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 and aid the implementation of Principle Two.
- 2.6 Some buildings, including St Paul’s Cathedral and Tower of London already possess detailed significance assessments, including the St Paul’s Setting Study. Applications should make use of these detailed studies where they exist. Applications effecting the Tower of London should use the UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022).

- 2.7 This research, normally presented in the form of a Heritage Statement, can be undertaken in a variety of ways and formats. Visual materials such as archival photographs and plans, historic mapping and colour-coded phasing plans are particularly useful communicative tools to efficiently set out the relative contribution of a building's fabric to its significance. Within the City of London, the London Archive is a particularly useful resource and includes an extensive repository of archival photographs.
- 2.8 Applicants should make use of best practice guidance from Historic England and the GLA, 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. In order to understand the particular sensitivity of a building it is often useful to undertake a comparative study, situating the building within the body of work of a particular architect, or assessed as part of a particular style or movement, or in reference to a particular building typology. 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.
- 2.9 Importantly, high quality heritage statements will go beyond dating of a particular building's phases, to express what aspects make a particular contribution to significance and what that significance encompasses. This research should be proportional to the sensitivity of the fabric effected and the degree to which there is potential to harm or enhance an aspect of an asset's significance,

including any contribution made by its setting. Where appropriate, Heritage Statements should be informed by engagement with key stakeholders and communities. While lengthy text analysis of the history of the site can be useful, this is not solely the most effective way to capture a building's significance in order to assist decision making.

- 2.10 Using a defined matrix for determining levels of impact within Heritage Statements can assist officers in their decision making. Where a level of harm or beneficial impacts are identified, qualifying terminology such as 'low', 'moderate', 'high' and 'substantial' should be explained. In general, the term 'negligible' should be avoided as it lacks clarity on the extent to which a change impacts the ability to appreciate an element of an asset's significance.



Right: Detail from the phasing plan of Custom House, showing the relative dates of elements of fabric (c.Monatgu Evans)

Principle Five

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

Fabric

2.11 The NPPF is clear that heritage assets are an irreplaceable resource (para 202). Whether, for instance, a section of original roof structure in a listed building, or an unlisted historic building in a conservation area, their constituent fabric is finite. Fabric embodies the asset, its design and morphology; it is a direct physical connection to the past and is often of a standard or type of materials or craft skill which cannot now be directly replicated. For all these reasons, fabric possesses inarguable authenticity and time-depth which, once lost, cannot be put back and so is inherently sensitive to change, particularly where past alteration has been avoided. The contribution of fabric can be nuanced, with later additions also potentially of interest, even if they reflect a change to the original building form.

2.12 The significance 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 their authenticity and integrity, as well as contributions made by their settings. As a general rule, the City considers that in many cases fabric is likely to be a major contributor to a heritage asset's significance and proposals which result in the loss of historic fabric are very likely to cause harm, to varying degrees.



Principle Six

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

Patina and weathering

2.13 Patina upon fabric is the accretive product of time and cannot quite be replicated. Patina is the weathering, mottling, aging finish of the passage of time upon fabric; it is elusive to define and dependent on the material in question and its location. It is similarly difficult to be conclusive about whether its loss would always be harmful, but in general is positive in so far as it underscores the sheer passage of time through which a building has persisted. It is a nuanced quality, which should not be confused with the simple accumulation of grime through neglect. Patina might be described as the timeworn quality of a heritage asset – the quality of not being new. It enables an appreciation of a heritage asset's significance by communicating its age.

2.14 The cleaning of heritage assets, whilst sometimes necessary to maintain facades, should pursue a minimally invasive approach and in general should only be supported where materials and methods are accepted conservation practice. Consideration and mitigation against the loss of detail through abrasive methods and more generally the impact of stripping away mosses and greenery should be thought through. In most cases, a test panel should be undertaken to ensure an appropriate result. Applicants will be required to demonstrate that they have follow relevant guidance from the Institute

of Historic Building Conservation which specifies appropriate cleaning tools and methodologies depending on the material in question. Where the cleaning of fabric is consented, conditions may refer to the appropriate British Standard code to control the methods used. It is important appropriately qualified contractors are selected to undertake these works, and in all instances accredited conservation architects, surveyors and/or CARE accredited engineers should be used as appropriate.

2.15 The addition of washes to fake or replicate patina once lost is unlikely to mitigate or compensate for harm.



Principle Seven

Increasing the inclusive access and/or sustainability of heritage assets can be a form of public benefit.

- 2.16 When seeking to sensitively adapt or retrofit heritage assets, it is important to achieve this in ways that are consistent with an asset's conservation. Nevertheless inclusive access and sustainability can be an important part of making an especially clear and convincing justification for harm.
- 2.17 Buildings and spaces which are inaccessible or make wasteful demands upon resources are more likely to become vacant or redundant. Those which are inclusive and efficient, correspondingly, have the best chance to remain actively used within the City and, relevant to the broadest spectrum of user groups.
- 2.18 As defined within the PPG, the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access. However, we aspire to access being both inclusive and readily available.
- 2.19 As part of the balancing exercise outlined within the NPPF, applicants should use guidance from Historic England such as 'Easy Access to Historic Buildings' 2015, and other relevant best practice as a reference points

2.20 Sustainability in the context of heritage assets should include positive approaches to the extent to which heritage assets can share and contribute towards the common goal of decarbonisation and greater efficiencies as part of the City's – and the UK's – response to the challenges of the changing climate. Similarly, it is now widely accepted 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) and Historic England guidance on 'Adapting Historic Buildings for Energy and Carbon Efficiency' should be consulted a source of best practice and proactive advice to this end.

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

Right: the 'sesame' platform lift discreetly installed within the steps of St Mary-le-Bow, (grade I listed)



Principle Eight

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

Design affecting appearance or setting of heritage assets

2.22 There will be instances where proposals for works to a heritage asset do not involve the loss of historic fabric but do result in visible new elements either attached to the asset or within reasonable close proximity of it, which could impact upon an asset's visual character, significance and the overall contribution of setting. This principle seeks to embed into the design process appropriate consideration of an asset's setting, so that design development responds positively. Appropriate methodology to determine the contribution of setting is set out in Historic England guidance 'Historic Environment Good Practice Advice in Planning: The Setting of Heritage Assets.'

2.23 Where setting makes a positive contribution to an asset's significance, this should demonstrably inform an iterative design development process, during pre-application and be documented at submission stage, as set out in the above Historic England guidance. A methodology for this process is further defined by UNESCO in relation to World Heritage Sites, such as the Tower of London, and should be used by applicants. By following these established processes, all possible impacts should be identified at an early stage. However, such assessments are also required in cases where harm through setting impacts only come to light in the final assessment of a scheme.

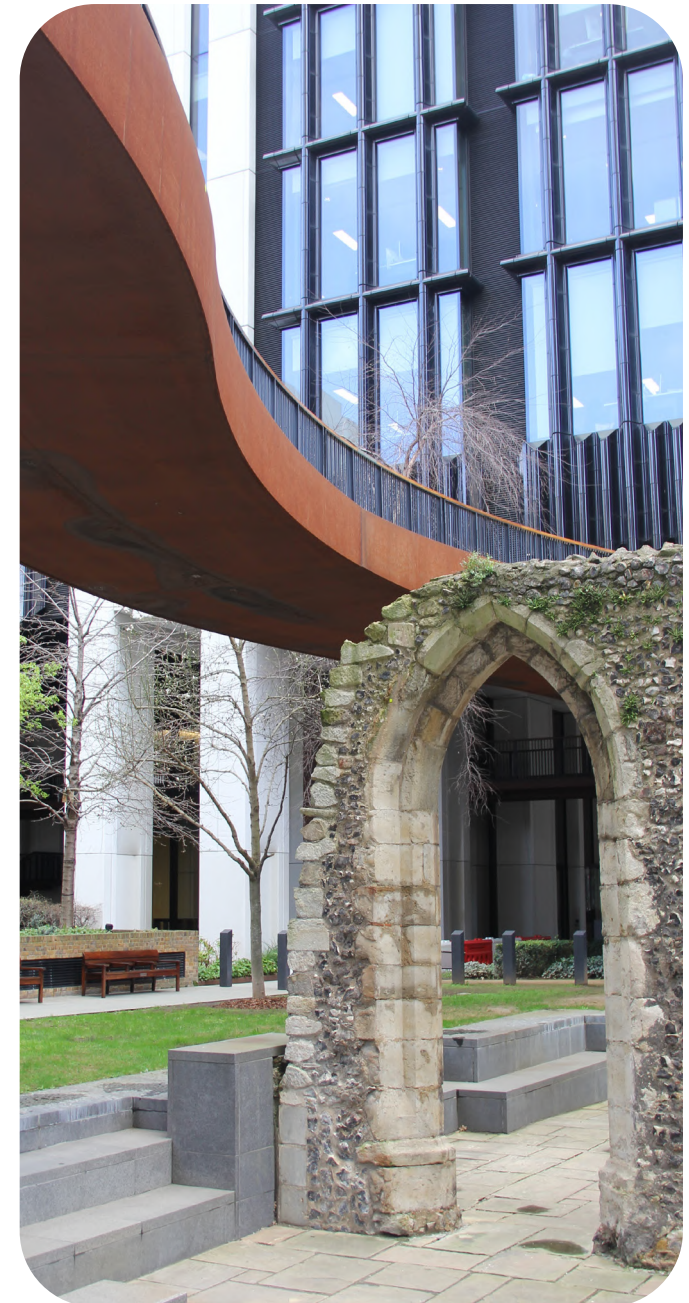
2.24 Importantly this principle stands alongside, but separate from, the final assessment tests as outlined in the NPPF, instead aimed at promoting an overall approach to an iterative design development process.

2.25 Visibility of new proposals does not necessarily equate to harm. Rather, it is usually the relationship between the new proposals and the heritage asset that can result in harm, where it conflicts with or undermines the significance of the heritage asset. New work should have regard to this, and to that end should exhibit the influence of the heritage asset, reflecting the aspirations of Principle Two set out above.

2.26 More widely, at the level of townscape, new work could have regard to the character traits set out in Principle One of this document (and if there is tension between these overarching traits and the particular circumstances of the heritage asset in question, this should be resolved in favour of the latter). Where this is the case, new work is unlikely to be harmful and has the best chance of succeeding as a new chapter in the life of the heritage asset.

2.27 Parameters such as:

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



- 2.28 All provide appropriate points of reference or counterpoint that new work could use to ensure proposals respond successfully to their surroundings. It is important that this identity is expressed at all the scales at which it is appreciated. This includes the macro scale of overall mass and skyline presence, but also in the micro detailing of jointing, fixings and finish.
- 2.29 Importantly, new development does not have to replicate the appearance or aesthetics of a host heritage asset in facsimile to be successful, but should seek to sustain a specificity and identity of place. To this end, this document seeks to support the use of an appropriate design workflow that iteratively responds to its heritage context, rather than prescribe one single aesthetic approach.
- 2.30 While heritage assets themselves are irreplaceable, the NPPF sets out how their settings, or 'the surroundings in which a heritage asset is experienced', 'may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'. In other words, the setting of a heritage asset can be capable of variation while conserving and enhancing the significance of an asset. Historic England sets out useful guidance within 'The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning' Note 3, setting out how setting assessments are appropriately undertaken.
- 2.31 While harm can arise to heritage assets, when change within their settings is of a harmful character, such impacts are generally more open to interpretation than the clear-cut loss of irreplaceable fabric. High quality heritage statements that make

clear the relative contribution of setting to an appreciation of an asset's significance will assist decision-makers when making this judgement in line with principle four.

- 2.32 Importantly, setting is not only about experiencing a heritage asset from fixed viewpoints: it is kinetic, and 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. An assessment of setting should always use values which are clearly linked back to an understanding of an asset's significance, and as such is always a bespoke and relative exercise.
- 2.33 Elements of setting can make a particularly clear and enchanting contribution to the significance of a heritage asset – for instance, the Fleet Street views of St Paul's Cathedral. Instances like these are typically clear and long-established and make an obvious contribution to significance. In such cases, the very *visibility* of a proposal, as well as its visual character, will be key considerations for the City.
- 2.34 The contribution of setting to significance can also be neutral, with setting in such instances simply forming the 'surroundings in which the heritage asset is experienced'. In such instances, as set out in the second principle of this document, there is an opportunity for heritage assets to be at the heart of placemaking by clearly and legibly influencing the design of new developments around them.



2.35 In relation to these more neutral cases, the City's key consideration will not typically be the visibility of a development in relation to heritage assets, but usually the character of such development. Accordingly, development should have regard to the character traits outlined in Principle One and the aims of Principle Two. What matters is not whether the proposal is visible in relation to a heritage asset; it is whether or not the proposal is sufficiently in dialogue with the heritage asset and, where appropriate, the extent to which that dialogue is deferential.

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

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

2.38 Absolute characteristics such as relative height, scale or massing will often have an important bearing. When a deferential approach can be worked into these absolute characteristics, this can reduce the likelihood that the resultant proposal will detract or distract from, or dominate, the heritage asset. Moreover, deferential design should not reduce

the legibility of the heritage asset; indeed, it should enhance it, and where possible should signpost its particular significance. It is important, of course, that this deference is judiciously worked into the overall architectural diagram and does not appear tokenistic, or as an afterthought. In particular, the City Corporation will seek to ensure development does not impair, reduce or erode an appreciation of the traits in the Principle One. Consideration of the cumulative scenario remains important, and in line with Historic England guidance remains a key part of the final assessment tests.

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



Principle Nine

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

Non-Designated Heritage Assets (NDHAs)

- 2.40 The City Corporation will assess relevant buildings and spaces against the criteria in relevant Historic England guidance, including guidance on Local Listing and relevant Listing and Selection guides, and with consideration of the character traits set out in the first principle.¹
- 2.41 For this category to be meaningful, there must be a high bar to qualifying for Non-Designated Heritage Assets (NDHAs) status. It will not be lightly bestowed, and linked to a site's overall historic, architectural, archaeological or artistic significance.
- 2.42 Similarly, there will be an expectation that, where identified NDHAs are on development sites, proposals for those sites will be informed by consideration of the NDHAs.

Right: Writers' House, an unlisted Victorian former warehouse building on Haydon Street. The west flank wall of the building, shown here, incorporates medieval fabric from the lost Abbey of the Holy Trinity of the Minoreesses, or Poor Clares. In 2023, Writers' House was identified as an NDHA



1 Listing Selection Guides | Historic England

3. Strata

Principle Ten

Revealing archaeological remains, designated and non-designated, to public view and experience on development sites can be a public benefit, particularly where permanent public display is both feasible and consistent with an asset's conservation.

- 3.1 The City has a substantial and significant presence underground: ancient footings, abandoned masonry, paleoenvironmental remains, Roman, medieval and post-medieval burial grounds, ancient quays and wharfs, Roman plasterwork, Georgian wells and more – and all the ephemera of life in between, reflecting 2,000 years of intense occupation.
- 3.2 There is an extraordinary breadth of evidence both above and below ground, surviving to extraordinary depth: the City's archaeology can still survive beneath modern basements, being present up to 6m below current ground level. And the whole is a record of the evolution of Britain's most important urban centre.
- 3.3 The archaeology of the City, in a national context, is unique in its extent, diversity and importance. Most powerfully of all, though, it records, and directly connects us with, past City communities: their property, in the form of found, lost, or discarded ephemera, and their properties, in the traces of

their footprints, handprints, thumbprints – and, not uncommonly, their physical remains.

- 3.4 Archaeology can often enrich the historical record – discoveries can plug gaps in knowledge, or square off, or round out, or even reshape, the conclusions of historians. But, almost as importantly, there is a palpability, a freshness, a directness, about archaeology. Newfound features or remains capture the imagination like no historical record quite can. Despite its ancientness, archaeology can be thrillingly immediate.
- 3.5 A discarded oyster shell, a fragment of plaster, a ring glinting in the mud – such discoveries require no explanation, at first, but shrink the gap between the times of their owners and our own time. In this, archaeology is an unparalleled public learning opportunity. While there will of course be considerable opportunities for the more scholarly work of advancing archaeology and history as specialist disciplines, in the City's archaeology are powerful opportunities for the public to meet past City communities – and for development to put heritage at the heart of placemaking in accordance with the aims of S11.
- 3.6 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.



Principle Eleven

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

3.7 As well as 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 (a) in the first principle of this document, all in accordance with the aims of S11.

Principle Twelve

The ‘significance’ of archaeological 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 , 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

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

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

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

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

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

Principle Thirteen

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

3.13 Then there is the question of the scale or ‘substantiveness’ of the archaeological features. This may not always be simply a matter of extent or quantum and is closely linked to the question of significance. For example, preserving in situ, by dint of great effort, expanses of comparatively featureless wall footings (depending on their significance) 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 more meaningful.

Principle Fourteen

Broadening engagement with any archaeological processes required by Policy HE2 will be strongly encouraged.

3.14 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.

4. Case Studies

Various Sites– Principle One

Principle One identifies the design traits which can make a scheme most expressive of the City of London's overall character. These traits can be found, to varying degrees, in many existing buildings within the City and in several recent planning permissions. Selected examples are given below for reference.

It should be noted that some of these were subject to controversy and debate at the time of their gestation; however they are all considered useful examples of how the traits might be applied in practice and particularly where a site has to meet competing or complex policy demands. It will be noted that some of the examples have subsequently been considered to possess special architectural and historic interest and are now listed buildings.

Specificity (trait (a)) dictated the form of 122 Leadenhall Street (or the 'Cheesegrater', Richard Rogers, 2008), with the tower's slanting profile responding to St Paul's Cathedral in the views from Fleet Street (which also exemplifies the deferential approach proposed by Principle Eight later in this SPD). Specificity has also informed 100 Fetter Lane (Fletcher Priest, 2024) which incorporates the fine grain of the medieval street pattern in its footprint and a reinvented public house, the Wild Swan, embossed with glazed motifs of the locality's history. Specificity is also strongly embodied in the recently permitted (2025) scheme for 85 Gracechurch Street (Woods Bagot), with its public hall derived from its medieval plot and the subsequent warren of nineteenth century terraces and market streets which create narrow, unfolding and sheltered pathways through the city centre.

Quality and coherence are strongly present in Holland House (Berlage, 1916, grade II* listed), Bracken House (Albert Richardson, 1959, and Michael Hopkins and Partners, 1988, grade II* listed), The Lloyd's Building (Richard Rogers, 1986, grade I listed) and No. 1 Poultry (James Stirling, Michael Wilford and Associates, 1998, grade II* listed). Though very different in their styles, forms and functions, they are sustained and compelling demonstrations of traits (b) and (c). Some examples of recently consented (2025) projects which strongly embody these traits include 99 Bishopsgate (RSHP), and 130 Fenchurch Street (Wilkinson\Eyre).

Trait (d) is exemplified by the recently permitted proposals for Carpenters' Hall (AHMM, 2025), which sought to protect the knowledge and skills of the Carpentry trade through a dedicated learning centre and celebrated through the timber expression of the external elements.



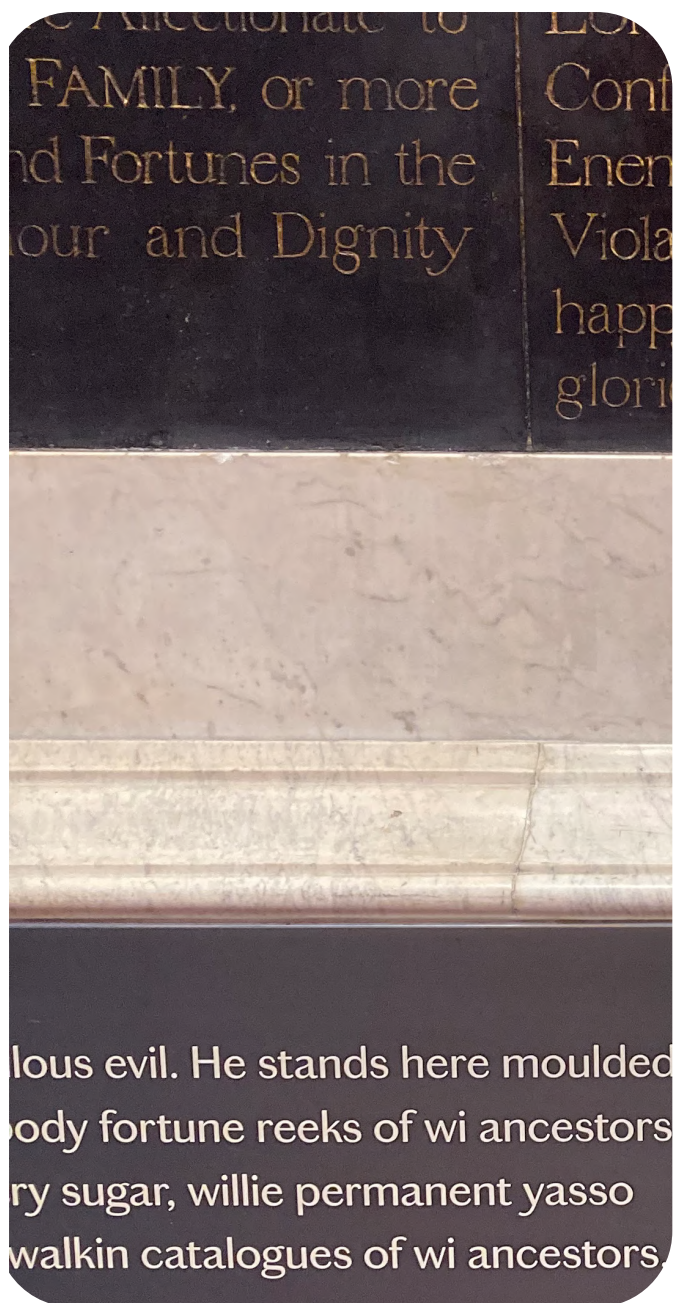
Holborn Gate (Principle Two)

In 2025, planning permission was granted for the redevelopment of a site on High Holborn to provide a new ten storey building and pocket park (MAKE Architects). The site is surrounded by the Chancery Lane Conservation Area, notable for its profusion of architectural periods and styles, its richness of detailing and materials and its transitions in scale and expression between the grander thoroughfare of Holborn to the smaller and more intimate streets and courts at its heart.

The character and appearance of the conservation area directly and extensively influenced the proposals. To Holborn the building would adopt a grand, civic character, with a clock tower to its NE corner and large, radiused corner to its NW as a homage to the round nave of the first Templar church on the site; to its southern and eastern parts it would step down towards the more intimate courts of Staple Inn.

As well as this, the proposed building would have a great generosity of detail and material varying across all elevations; it would wear upon its sleeve, so to speak, the surrounding Conservation Area's richness and influence. In this, the project is considered to exemplify the intent of Principle Two.





Beckford Statue (Principle Three)

A statue of William Beckford is located in the Guildhall, commemorating an address he made to King George III in 1770. As part of the 'Revealing the City's Past' project, an additional piece of interpretation was commissioned to contextualise the statue and make clear William Beckford's links to slavery. The project resulted in a plaque fixed to the base of the plinth of the statue, and includes a commissioned poem and historical research. It was the project of engagement with intergenerational and accessibility panels, independent experts and arts and heritage charity Culture&. The project represents a shift in narrative, with a range of Black voices now permanently foregrounded within the Guildhall and also represented online in further exhibition and interpretation. The content is fully accessible and engaging for those who might have additional needs, focusing on both the in-person and online experience. Listed Building Consent was granted for the works in 2023 and the works were completed in 2025. The project is considered to exemplify the aims of Principle Three.

North Block, St Bartholomew's Hospital (Principles Four and Five)

The North Block of St Bartholomew's Hospital (James Gibbs, c.1732) is the ceremonial centrepiece of an elegant early Georgian Square which forms the heart of the hospital. In 2025, planning permission and listed building consent were granted for the conversion of the North Block to a museum, function venue and archive store, securing a viable new future for the previously under-utilised and irregularly maintained building. The proposals were supported by meticulous heritage statements, which informed investigative works, which in turn provided clear rationale and justification for all interventions. Whilst some harm was found to arise as a result of the works, this was minimised, convincingly justified and outweighed by the heritage benefits of the proposals – in particular the restoration of original fabric and plan form. In their meticulous approach to understanding significance and dealing with historic fabric, the proposals exemplify Principles Four and Five.

Custom House (Principles Four, Five and Seven)

In 2025, planning permission and listed building consent were granted for the conversion of the iconic, grade I listed Custom House to a hotel (Orms Architects) and for the comprehensive reimagining of its associated quayside and wider public realm. While the works entailed some heritage harm to the significance of the building, such as from interventions to make the building step-free and more sustainable in its energy consumption, these harms were clearly and convincingly justified, and were outweighed by the benefits of the scheme, which included public access to the interior as part of a highly compelling cultural offer. The proposals benefitted from effective collaboration with key heritage sector consultees, including Historic England and the Georgian Group. Importantly the harms were reduced through the design's development, aided by a robust heritage statement which clearly articulate the various contributions to significance of the fabric, including relative consideration of its later phases and setting. In their meticulous approach to historic fabric and focus on sustainability and inclusion the proposals exemplify Principles Five and Seven.



Former Whitbread Brewery (Principles Two and Five)

The Former Whitbread Brewery is a self-contained collection of brewery buildings, offices and former residential accommodation for Brewery employees, variously listed and collectively within the Brewery Conservation Area.

In 2025, planning permission and listed building consent were granted for the expansion of the hotel within a striking contemporary roof extension (EPR Architects). The proposals evoke the former Brewery's industrial character and function, hitherto lost to view, through their irregular roof pitches and disposition, metalwork materials and fenestration, expressing themselves as a series of light industrial structures, seen behind, and disposed at a clear remove from, the more formal ranges to Chiswell Street. Works to the shopfronts along Chiswell Street improved activation and animation, while internally features of heritage interest were revealed such as vaulted ceilings, iron pillars and skylights which had been concealed in previous unsympathetic refurbishments.

During the application process, there were a range of opinions, some expressing objection or concern, about the scheme's impacts on the heritage assets within the former Brewery complex. This range of views were carefully weighed in the balance as part of the consideration of the applications, which were unanimously approved by the City's Planning Applications Sub-Committee.

The proposals show how new additions to historic places can be of a charismatic character whilst drawing upon the history of a place. In the way they clearly bear the influence of, and defer appropriately to, the heritage assets of the former Brewery complex, exemplifying Principles Two and Eight.



85 Gracechurch Street (Principles Ten to Fourteen)

The archaeological principles in this SPD are exemplified in this award-winning project at the heart of the City Cluster, on the site of the Roman Forum-Basilica – then, as now, the centre of the City and London's commercial life. In 2023, planning permission was granted for an office tower with a public hall and viewing terrace and Roman-Forum Basilica exhibition at fifth floor level.

Subsequent archaeological investigation revealed the presence of substantive, highly significant remains of the first Forum-Basilica below the site. The scheme was then reworked to preserve these in situ, revealing them to public view in the form of a free new public exhibition accessed from the public hall at ground floor level. In 2025, planning permission for the revised proposals was unanimously granted by the City's planning and transportation committee, and the project is now being built. In the way it combines revealed Roman remains and the provision of c.33,000 square metres of contemporary commercial space, the scheme exemplifies how the City's ancient history can help to inform and sustain its economic and cultural objectives.

N.B. Whilst there was consensus about the archaeological significance of the scheme, there were a range of opinions, some expressing concern, about the scheme's impacts on heritage assets, including the Leadenhall Market Conservation Area (in which the site is located) and the Church of St Michael Cornhill. This range of views were carefully weighed in the balance as part of the consideration of the planning application.



Appendix 1 City of London Character Statement

The following Statement articulates the particular architectural and historic interest of the City to arrive at a series of defining characteristics. Within them, the City's character is further broken down into a series of themes. The development principles within the SPD are drawn specifically in reference to these characteristics seeking to ensure they remain legible, distinct and appreciable whilst allowing for new development. This work draws on the Evidence base of the Local Plan 2040.

Historic

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

COMMERCE. Although not the first Roman city (Colchester) in Britannia, Londinium quickly became the most important, particularly for trade with the continent; the City of London has remained a commercial centre to the present day. It has been hugely influential on an international level, a place in which practices of high finance, insurance, banking and associated disciplines

were pioneered, were evolved and refined, and came to an ascendancy in the C19/C20. Subsequently London is known to be the home of major international companies, including the East India Company, Lloyd's of London and latterly Goldman Sachs and Bloomberg. Uniquely, the City can claim to be the birthplace of a number of professions, perhaps the most important being that of insurance. This trait is physically expressed by the institutional architecture of the Royal Exchange, Bank of England and the London Stock Exchange. In addition, the density of historic guilds and their Livery Halls, which set the trade standards and 'Hallmarks', create a unique townscape within the European and International context. The relative abundance and close proximity of commercial and financial buildings establishes the sense of dense financial architectural ecosystem, emphasised by the tight knit spatial relationship between relevant building types.

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

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

COSMOPOLITANISM. The City was founded as an outpost of an empire; over intervening centuries it

gradually becoming the centre of what was the British Empire in the 19th century. More than any other part of Britain, the City has had from the beginning of its existence an international reach and reputation expressed through the flow of trade and commerce the benefits of which flowed back to the Capital. The City has distinctive associations with certain communities – Liveries, Jewish community, international groups of professionals from Lombardic bankers to Hanse (Baltic) merchants. The creation of a tall building cluster has also come to be representative of a city with a global reach, with the skyline in particular often used as an avatar for the City and the Capital. The variety of building types specific to certain communities, when appreciated as a group, creates a diversity which also amplifies the sense of the cosmopolitan City.

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

an architectural 'theatre' of interrelated use. Additionally St Paul's Cathedral provides a home to services of national significance.

Architectural/Artistic:

On a national and possibly even international level, the City is a unique example of a City of Classical origin which retains its original purpose as a commercial centre. The evolutions of commerce and high finance mean that the City's street pattern, buildings and skyline are subject to continual development pressure; the scarce land available means the result is a highly idiosyncratic urban entity, with development compressed, clustered and grown from barely a square mile in the heart of London. Unique to London is the appreciable retention of both historic street pattern, but also the subsequent responsive curation of its tall building cluster - developed with reference to the City's historic interest so that street pattern remains equally a strong part of its architectural identity. This is apparent at various scales. London and the City's tall building cluster in particular are perceived in numerous long distant views, with the surrounding hills and parklands creating a verdant backdrop which offsets the pronounced urbanity of the City, typified by the Cluster. These views have been represented in numerous paintings, engravings and photographs, creating specific attendant artistic and historic interest. The important contribution of these views is often reflected through their identification within the London Views Management Framework (LVMF). The City's riverside location is also of profound historic importance, beyond the creation of a pleasing waterside foreground. The River Thames itself can be understood as a physical manifestation the trade routes which caused the city to thrive. Equally the river provides an experiential route via which the unfolding vistas of the city are seen in context with neighbouring boroughs such as the City of Westminster and London Borough of Southwark.

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

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

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

ARCHITECTURAL CALIBRE The City's historic and modern architecture is generally of the highest quality,

with a consistent level of quality of facades, materials and design rivalled only by a few other British cities, from the completeness and success of the post-war Barbican to the sophisticated glass façade systems of 22 Bishopsgate. As with the insistent variety, the sheer calibre of the City's built form testifies to its historic and ongoing commercial success, itself a source of significance. Where appreciable, the planned response to an existing historic setting, particularly where newer buildings such as at New Street Square seek to reinforce historic street patterns. The creation of architectural set pieces such as at the Barbican Estate, Finsbury Circus and Bank Junction, with individual buildings contributing to a wider townscape composition appreciated from beyond the city's limits.

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

as key influences and presences upon the skyline , and the unique collection of Wren steeples in their local and wider riparian setting.



Appendix 2 Glossary

This section defines terms and technical language used within the SPD. Where these terms are conceptual, the specific meaning as intended within this document is made clear.

Definitions

Agency:

In this document agency refers to the active participation of heritage assets in the design development process, in that an understanding of their significance has directly and iteratively informed the development of proposals for a site.

Authenticity:

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

City of London:

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

Commercial:

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

Conservation:

The process of managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Contested Heritage:

By 'contested heritage' is meant historic objects, structures, buildings or places where the associated stories or meanings have become challenged. Decision takers are directed in the

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

Deference:

Here this is defined, in relation to the design of a proposal, as a legible and generous recognition of the presence of a relevant heritage asset.

Harm:

In this context 'harm' means an adverse impact on an aspect of an asset's significance, or ability to appreciate that significance.

Heritage Asset:

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

Heritage Impact Assessment:

Text analysis which determines the impact of the scheme upon the ability to appreciate an asset's significance.

Heritage Interpretation:

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

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

Heritage Statement:

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

Historic Environment:

The historic environment comprises all heritage assets—designated and non designated—including buildings, monuments, sites, places, areas and landscapes, together with their settings, which are valued for their heritage interest.

Influence:

In this document influence refers to the design process where proposals clearly respond to the significance of heritage assets within their surroundings.

Integrity:

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

Intangible Heritage:

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

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

NPPF:

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

Picturesque:

Here this refers to an aesthetic category associated with the striking juxtaposition of natural, irregular or contrasting forms harmonised by composition.

Principle:

Key guidelines which applicants and officers can use to assist in the design, pre-application, determination and implementation process.

Public Benefit:

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 which secure its future as a designated heritage asset could be a public benefit. Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Relevance:

In this context 'relevance' encapsulates the important place that heritage assets occupy and the implications for the design and decision making process in particular. This is alongside and in addition to the important assessment tests as set out within the National Planning Policy. Here the term 'relevance' signposts the relative importance of heritage assets within the design development process which considers many different disciplines and regulatory lenses. This places them at the heart of how the City should be planned for and designed.

This relevance should be clear expressed at all stages of the application process as well as in the final design.

Scale:

The relative proportion or perception of a building or element in relation to human dimensions, its surroundings, or other parts of the streetscape or wider locality.

Setting:

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.

Specificity:

A high-quality, detailed and intentional approach to design which possesses clear coherence at all scales, a relational approach which is in dialogue with local context either through concept, scale, massing, materials or detail.

Traits:

Specific characteristics identified as part of the City of London's architectural or historic character.



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