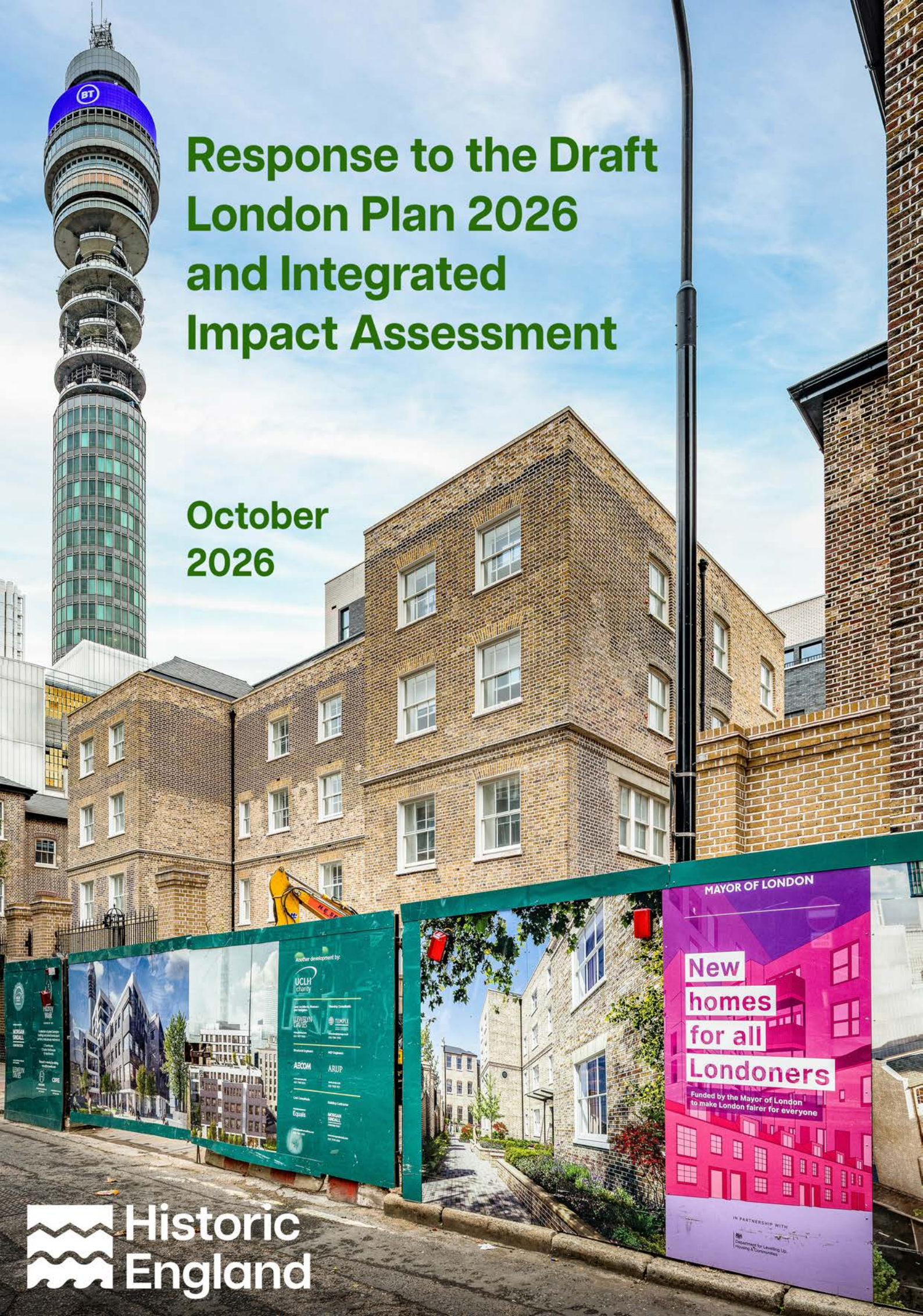
Response to the Draft London Plan 2026 and Integrated Impact Assessment

October 2026



Historic England

Historic England

Our ref: PL00796938
PL00802486

The Mayor of London
c/o London Plan Team
Greater London Authority

By email: londonplan@london.gov.uk

15 October 2026

Dear Mayor of London

Draft London Plan 2026, Integrated Impact Assessment and associated evidence base

Thank you for consulting Historic England on the Draft London Plan 2026 and associated Integrated Impact Assessment (IIA). As the Government's statutory adviser for the historic environment, we are keen to ensure that London's exceptional heritage is conserved and recognised as a driver of Good Growth and positive place-making. From its four World Heritage Sites to the distinct character of its many neighbourhoods, London's heritage is a core component of its identity as a world city, and its appeal to residents and visitors alike.

We are a statutory consultee on both the spatial development strategy for Greater London and its accompanying sustainability appraisal. Our comments are made in the context of legislative requirements for the historic environment and the National Planning Policy Framework 2026 (NPPF), which requires development plans to deliver a positive strategy for the conservation, enhancement and enjoyment of the historic environment.

Historic England broadly welcomes the direction of travel of the new Draft London Plan. Many of our comments on the plan (found in Table 1) relate to modest adjustments that we are requesting to policies and supporting text, for completeness, clarity or consistency with the NPPF. However, we have significant concerns about the approach to Tall Buildings (Policy MBUL3) that we believe necessitate changes to various aspects of the policy. We also believe that the plan has a greater part to play as a key component of the policy framework to protect London's World Heritage Sites.

For the most part it has been possible to suggest specific modifications to the plan (also included in Table 1) that we consider would address the issues that we have raised, helping to ensure that

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

the plan provides a positive strategy for the historic environment and can be found sound in relation to heritage matters.

Our detailed response is structured as follows, with comments progressing through the documents section by section:

- Table 1. Historic England's detailed response to the Draft London Plan 2026
- Table 2. Historic England's response to the Draft London Plan evidence base documents
- Table 3. Historic England's response to the Draft London Plan Integrated Impact Assessment (IIA)

Good Growth and Heritage

Through our research and publications, Historic England has consistently made the case that heritage is a core element of Good Growth. We firmly believe that good quality homes, jobs and public services can be delivered in ways that achieve appropriately high densities by responding positively to local context, character and heritage. We have explored both the challenge and the opportunity in London in our past research on Translating Good Growth for London's Historic Environment, and our recent research on Good Growth, Heritage and Housing.

We are keen to maintain an ongoing dialogue with the Greater London Authority about the ways in which London's historic environment can contribute to meeting the capital's need for new homes and jobs, using planning policies and supporting guidance to secure high-quality contextual development.

We acknowledge that this new London Plan is prepared in the context of acute housing need and challenging market conditions, as set out in Chapter 1 of the Draft London Plan. Furthermore, we recognise that the revised NPPF 2026 contains a framework for spatial development strategies and seeks to minimise duplication between different levels of the policy framework (i.e. the NPPF, spatial development strategies, local plans etc.). We are therefore seeking focused changes only to address potential soundness issues and/or where we consider these are important to clarify and refine the policy framework for London as a whole, while providing certainty to developers and clearly signposting relevant policies elsewhere.

We are pleased that the Draft London Plan promotes development that enhances local context by delivering buildings and spaces that respond positively to local distinctiveness (Policy MBUL6). We also welcome recognition of the role of heritage in high-quality design and place-making in London's most significant brownfield regeneration areas (Policy PV1).

We recognise the considerable work and innovation that has led to new policy approaches in the Draft London Plan. This includes new frameworks to address the complex question of how to

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

achieve dense but contextual development within the urban area (Policy MBUL2) and, where appropriate, through carefully managed Green Belt release in sustainable locations (Policy PV7).

We particularly welcome the refocusing of the plan towards mid-rise development. Examples of successful mid-rise places can be found in London's historic neighbourhoods, such as Marylebone and Hatton Garden. Street based, mid-rise development will often represent the optimal density for large sites in London, delivering compact, walkable neighbourhoods that are dense yet human in scale and relate well to their context. We do though consider that some adjustments are needed to the policies for optimising density, to more accurately reflect the status of different documents that form part of the planning framework, and to build in appropriate flexibility in relation to heritage assets and other environmental sensitivities.

There are several important areas where we believe that the London Plan could, or should, do more. These include the following broad themes:

1. While heritage is often a key consideration for tall building proposals in London, neither the plan-making nor the development management clauses of Policy MBUL3 address this matter. This is a key concern and a potential soundness issue. The evidence base for the proposed Metropolitan Scale Tall Building locations also lacks a robust assessment of the potential impacts of these areas on heritage assets. We believe there is an opportunity to address these issues through changes to various aspects of Policy MBUL3 (policy text, Box MBUL3, Table 2.2 and supporting text) as well as additional evidence referred to in point 3 below.

2. In a city with four World Heritage Sites (WHS), the London Plan has a critical role in assisting the UK Government to meet its obligations under the World Heritage Convention. We believe there is an important opportunity for the heritage policy (MBUL7) to incorporate clear development management criteria for WHS, to complement and clarify the requirements of the NPPF when dealing with development proposals that may impact London's WHS.

3. Bearing in mind the above, there is an opportunity for the London Plan to take a lead in demonstrating how Heritage Impact Assessment (HIA) can be used as an active tool in strategic planning for WHS. We strongly suggest that the Draft London Plan is subject to a strategic assessment of the potential implications (positive and negative) of its policies and proposals for London's WHS. This ought to be informed by UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context and should inform any refinements to policy that are needed to safeguard the significance and Outstanding Universal Value (OUV) of WHS. We suggest that, as a minimum, policies for Tall Buildings (MBUL3),

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

London's heritage (MBUL7) and Strategic and local views (PV8) are assessed, along with the draft London Views Management Framework which is subject to separate consultation. This would supplement the Draft London Plan IIA and so help to ensure the plan meets the requirement of NPPF Policy HE1(1)(b) of being informed by a proportionate heritage assessment.

4. We also believe there is an opportunity for a coherent vision for development on the banks of the River Thames, linking not just with the policy for waterways, but also with policies for brownfield regeneration. The Thames is London's largest and most important open space, central to the capital's history and identity, and critical to the quality of its future environment. Given the scale of growth envisaged, and the need to address climate change, this vision may be most impactful in East London where large areas of land to the north and south of the river are designated as Brownfield First Opportunity Areas (BFOA). While we broadly welcome the strategic growth visions for BFOAs in Annex E of the Draft London Plan, much more could be done to promote a joined-up approach. We would like to work with the GLA and other partners on what such a vision might look like, to ensure that the character and identity of this part of London informs growth, to deliver a riverscape that is authentic to East London and of equivalent quality to the exceptional arcadian stretches of West London or the Embankment in Central London.

Conclusion

Thanks again for consulting Historic England on this important planning document. We would be pleased to work with the Greater London Authority to refine the content of the Draft London Plan, including through a Statement of Common Ground in advance of the Examination in Public. If you have any questions, or would like to discuss anything further, please do not hesitate to contact me.

Finally, please note that this advice is based on the information provided and, for the avoidance of doubt, this does not limit our ability to offer further guidance or to raise an objection to specific proposals where Historic England considers it appropriate.

Yours sincerely

Kim Miller MRTPI IHBC
Principal Historic Environment Planning Adviser
kim.miller@historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Cover image:

Historic England Archive, DP622626.

Former Strand Union Workhouse (Middlesex Hospital Annex), Cleveland Street, W1
https://historicengland.org.uk/listing/the-list/list-entry/1242917

BT Communication Tower, Cleveland Street, W1
https://historicengland.org.uk/listing/the-list/list-entry/1350342

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Table 1. Historic England's detailed response to the Draft London Plan 2026

Page	Section	Type of comment	Comments	Suggested Modification
1 Overview of the Plan and Good Growth Objectives				
5-7	Table 1.1 Good Growth objectives	Clarification / soundness issue	London's culture and heritage are central to its character and identity. Integrating consideration of the historic environment with both nature and new development is important to delivering co-benefits, as outlined in a note prepared by Historic England for the GLA to accompany the London Local Nature Recovery Strategy. Consequently, while we welcome the reference in the first objective to making the most of 'place-based assets', we are concerned by the lack of any specific reference to culture or the historic environment. To support the plan's positive strategy for the historic environment, and more adequately reflect the policies that it contains, we request some adjustments to the Good Growth objectives. A reference to early and inclusive engagement with stakeholders, including local communities, would also be beneficial (as can be found in the adopted London Plan's objective GG1).	We request the following adjustments to the Good Growth objectives: First objective: 'Enable places to renew and evolve in a way that respects distinctive local culture, makes the most of place-based assets and opportunities and addresses both strategic and community needs.' Fourth objective 'Conserve and enhance the natural and historic environment to achieve characterful and distinctive places; environmental net gains; promote biodiversity and support recovery and renewal of natural systems.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
2 Making best use of land and achieving Good Growth				
MBUL1 Spatial Strategy				
13-28	MBUL1 Spatial Strategy	Clarification	Historic England broadly supports the proposed Spatial Strategy which seeks to make effective use of land from a range of sources including Brownfield Opportunity Areas, carefully controlled Green Belt release and Small Sites. We welcome the commitment in policy MBUL1 part A(2) to achieving intensification in a way that 'supports places to renew and evolve, responding positively to London's place assets…'. Place assets are described by paragraph 2.15 as including natural, cultural, historic, infrastructural and economic assets. We request a slight adjustment to part A(2) which reflects our comment above on the Good Growth objectives. Where we consider that changes are needed to the plan's approach to implementing the strategy we have commented on individual policies below.	We request an adjustment to part A(2) as follows: '(2) achieve intensification of land use across London in a way that contributes to meeting London's different needs, and supports places to renew and evolve, <u>while respecting distinctive local culture,</u> responding positively to London's place assets, and building on the success of economic clusters'
MBUL2 Making best use of land and achieving Good Growth				
28-37	MBUL2 Optimising the use of land and site capacity	Summary of comments on MBUL2	Historic England supports greater use of mid-rise building typologies on London's larger sites and sensitive intensification of the wider urban area. We	N/A

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			have explored this matter in our recent report on Good Growth, Heritage and Housing. However, we consider that several adjustments are needed to MBUL2 which are set out in our comments below. In reviewing the Draft London Plan's proposed framework for optimising the use of land, we are mindful of the policies in the NPPF 2026 for making effective use of land (Chapter 12), design (Chapter 14) and heritage (Chapter 20).	
28	MBUL2 Policy text Plan-making Part A(1)	Soundness issue / clarifications	It is unclear whether the 'strategies, design guides, design codes and/or masterplans' referred to in part A(1) can or should supersede MBUL2 unless they are part of the development plan (as outlined in NPPF 2026 L1) and therefore subject to formal consultation and scrutiny through an examination? We are therefore proposing amendments to Box MBUL2 to clearly distinguish between the development plan and supporting guidance (see comments in Box MBUL2 below). For related reasons, we suggest that part A(1) is broadened to refer to policies and site allocations in adopted plans. In addition to this, while site specific sensitivities such as the presence of heritage assets may not	We request adjustments to part A(1) as follows: (1) developing strategies, policies, site allocations, design guides, design codes and/or masterplans that set clear expectations on scale, height, and form of development (and other parameters as relevant) for areas where a more pro-active approach is required to promote development. These should have regard to the Optimisation Framework in Table 2.1 and seek to meet or exceed ~~ensure that~~ minimum net densities on sites over 0.25 ha ~~are met or exceeded~~, unless site specific

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			normally restrict development densities to levels lower than those in Table 2.1 (bearing in mind that the ranges start with relatively modest 3-5 storey development heights), it is important to allow LPAs some flexibility to determine this through detailed local evidence to inform their plans, consistent with NPPF DP2(1)(a). We therefore propose an adjustment to the final sentence of part A(1), to align with the similar allowance in development management part C(1). Building in this flexibility also helps to ensure that the policy does not undermine the ability of LPAs to meet their statutory duties in relation to certain heritage assets including conservation areas.	constraints limit the development potential of the site
28	MBUL2 Policy text Plan-making Part A(2) and A(3)	Comment	We support parts A(2) and (3) in that they promote more localised character studies and design codes to capture the detail of local areas. This will be particularly helpful in relation to Conservation Areas, where intensification may be possible, but where a bespoke approach will often be preferable, as outlined in our research on Good Growth, Heritage and Housing.	N/A

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
29	MBUL2 Policy text Development management Part C(1)	Soundness issue / clarification	For Part C to operate effectively, it needs to be clear that the text following the heading 'Optimisation Framework' on p30 forms part of Box MBUL2. Associated changes are therefore proposed to Box MBUL2 (see comments below). In line with the concept that adopted design codes, masterplans and site allocations have primacy in determining the optimisation of a specific site, it appears that the second and third sentences in part C(1) should only apply in situations where there are none. We therefore request several clarifications to part C(1). In addition to this, for the heights and densities in the framework to be supported the proposals would need to meet other policy requirements including those for heritage assets.	We request the following adjustments to part C(1): '(1) development should be informed by the relevant density and height ranges in the Optimisation Framework where applicable (see Box MBUL2). In such cases, (i) ~~r~~Residential development should achieve the minimum densities stated in the Optimisation Framework, unless site specific constraints limit the development potential of the site, and (ii) ~~. D~~development that complies with the Optimisation Framework should be supported in terms of height and density subject to conformity with other relevant policies'
29-30	MBUL2 Policy text Development management Part C(2)	Soundness issue	Listed buildings and conservation areas are both designated heritage assets, and both benefit from statutory projection, notably s66 and s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Under the Levelling Up and Regeneration Act there are similar provisions for other designated heritage	We request the following adjustments to part C(2): (2) development proposals on sites below 0.25ha that meet the requirements of the London Small Site Design Code (or a rearticulated small sites design code prepared by plan-making authorities where

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			assets that will be brought into force in due course, while the NPPF gives 'substantial weight' to conserving the significance of designated heritage assets (which includes non-designated heritage assets of archaeological interest equivalent to scheduled monuments as found in some of London's Tier 1 Archaeological Priority Areas). Our recent research on Good Growth, Heritage and Housing explores how intensification can be achieved in conservation areas through bespoke local design codes linked with Conservation Area Character Appraisals. Applying the London-wide Small Sites Design Code in such circumstances may sometimes be inconsistent with the statutory duties and associated policy requirements for designated heritage assets. Furthermore, many buildings are locally listed for their protection, and we do not think it would be appropriate to apply the design code in situations where it would undermine this protection. It is therefore important that part C(2) is adjusted to make allowances for such circumstances, while	applicable) are acceptable in-principle, unless the development would be inconsistent with policies for the historic environment.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			nevertheless promoting sensitive intensification in protected environments.	
30	Box MBUL2	Soundness issues	Box MBUL2 does not distinguish between the documents that comprise the development plan and those that do not have this status. This presents an issue as it appears to give any masterplan, guide or code equal status to the development plan in 'defining' site parameters for development. This is not appropriate as those plans may not have been through statutory consultation and examination. At present Box MBUL2 also does not clarify the status of any existing adopted masterplan, guidance or code that has not been 'prepared by LPAs in accordance with the approach of this Plan'. We are proposing several changes to Box MBUL2 to address this matter. Part a) or the supporting text could potentially be further amended to identify Small Sites Design Codes and Opportunity Area Planning Frameworks as documents that may form part of the development plan (e.g. if prepared and adopted as a	We request the following adjustments to Box MBUL2: 'Site optimisation for particular locations and sites is defined by the parameters set out in the following: a. Design policies, codes, masterplans and site allocations with design parameters, where these form part of the development plan ~~prepared by LPAs in accordance with the approach of this Plan~~. ~~This includes the London Small Site Design Code (or as refined by LPA in local design codes and pattern books)~~ ~~b. Opportunity Area Planning Frameworks (OAPFs) where they contain relevant density, height or other capacity guidance~~ b~~c~~. Local plan defined locations and policies for building of 30m and above in height (see MBUL3 Tall buildings)

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			Supplementary Plan) or may otherwise have the status of guidance.	c~~d~~. Policy PV7 for sites in the Green Belt. Site optimisation will also be informed by the following where in place: d. other adopted design guidance, masterplans and codes prepared by the LPA where they contain relevant density, height or other capacity guidance **~~The Optimisation Framework~~** Where a site is not covered by a) to c) ~~d)~~ above, the Optimisation Framework in Table 2.1 applies for sites over 0.25 ha…. … g. Develop a site-specific design response, taking into account d), e) and f) above.'
33	Implementation Optimisation Paragraph 2.27	Clarification	To ensure the existence of an OAPF or the fact that a site is being masterplanned does not automatically make it acceptable to exceed the heights and densities in the Optimisation Framework we request an adjustment to paragraph 2.27.	We request the following adjustments to paragraph 2.27: '2.27 Sites within OAPFs, designated tall building areas and areas being masterplanned may in appropriate circumstances support higher densities and

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				building heights than those in the Optimisation Framework for that location.'
33	Implementation Optimisation Paragraph 2.28	Clarification	As commercial and residential storeys vary in height, which over multiple storeys can create a considerable difference, we request an adjustment to paragraph 2.28 to reflect this.	We request the following adjustments to paragraph 2.28: '2.28 … The density range will not be relevant for non-residential sites or forms of non self-contained residential accommodation. For these sites the indicative height range and guidance on site coverage stated in the Optimisation Framework should guide site optimisation, adjusting this if necessary to reflect the different floor to ceiling heights of different uses.'
33	The London Context Map and character studies Paragraph 2.29	Clarification	To contextualise the changes that we have requested above to Policy MBUL2 and Box MBUL2 we suggest that additional text is added to paragraph 2.29.	We request the following adjustments to paragraph 2.29: '2.29… The mapping takes a typological approach to character, it does not differentiate between areas of the same setting which are more or less sensitive (such as the presence of heritage assets). Policy MBUL2 does not override statutory duties and policy considerations for

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				heritage assets and flexibility will therefore be needed when applying the optimisation framework in some circumstances.
33	The London Context Map and character studies Paragraph 2.31	Clarification	We support the promotion of local character studies to guide growth and change. The approach to such assessments is set out in the Characterisation and Growth Strategy LPG. The LPG continues to be a helpful guide to boroughs and consultants to carry out this work in a consistent way. It would be helpful for the new London Plan to refer to the Characterisation and Growth Strategy LPG, to ensure it supports this and other policies (including, for example, Box MBUL3 1(I)).	We suggest the following additional supporting text: '2.31 LPAs can complement this through more detailed local studies … These studies can further inform planning for growth and identifying the varying sensitivity of different areas, but they should not seek to reduce ambition or deviate from the overall scale of ambition needed. The Characterisation and Growth Strategy London Plan Guidance provides information on how to carry out a borough or neighbourhood-wide character assessment.
35-36	Small sites design code Paragraph 2.37	Clarifications	We welcome the supporting text in paragraph 2.37 which describes circumstances in which more nuanced, local design codes may be appropriate. We strongly suggest the London Plan recognises that, in line with our research on Good Growth, Heritage and Housing, approaches to intensification in	We request the following adjustments to paragraph 2.37: '2.37 Where it is considered necessary, plan-making authorities may choose to issue a local design code for small sites and intensification that more directly applies particular design aspects for their plan area.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			conservation areas ought to be informed by evidence on the local character and significance of the place. Local nuance and flexibility are needed to ensure Councils can fulfil their statutory duty to preserve or enhance the character or appearance of the conservation area. For this reason, we also suggest that the reliance on LDOs to grant upfront planning permission is softened.	This may be because a local authority may wish to take into account locally specific characteristics and contexts that aren't addressed in the London Small Site Design Code. For example, local codes based on evidence about the character of the place will usually be the preferred approach for conservation areas. LPAs may also choose to code for a specific architectural style that relates to the specific character type in which it is located. Where an LPA produces a design code or guide, these should not be overly long or complicated or add undue burdens to development. Where a more detailed approach is sought, there may be a greater opportunity for development to ~~this should generally~~ be brought forward via an associated LDO.
MBUL3 Tall Buildings				
37-44	MBUL3 Tall Buildings **Please note that our comments on MBUL3 use the page numbers from the PDF version,**	Comment	Some aspects of the revised approach to tall buildings in the Draft London Plan are broadly welcome, such as the retention of a plan-led approach to tall buildings in most circumstances, and efforts to strengthen the framework for	Please see detailed comments and suggested modifications below.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	but identify parts of the policy (A, B etc.) as they are found in the online version of the plan.		considering proposals for tall buildings that are not plan-led. However, we have several concerns about the policy, and we consider that adjustments are needed to make the plan sound. In particular: - While heritage is very often a key consideration in relation to tall building proposals in London, neither the plan-making nor the development management clauses address this matter, nor do they signpost relevant policies elsewhere. While we appreciate there is a need to avoid duplicating NPPF heritage policies, as the NPPF contains no specific policy for tall buildings this is a major concern. - The proposed areas for Metropolitan scale tall buildings are not supported by adequate evidence on the potential impacts of these areas on heritage, including London's WHS. This in turn means that an opportunity to assist with avoiding or minimising such impacts has been missed.	

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
37	MBUL3 Policy text Plan-making Part A(1)	Soundness issue	A(1) requires LPAs to carry out an assessment to identify areas that are more or less sensitive to tall buildings (e.g. a tall building study). While this is broadly welcome, we think greater clarity is needed around key matters that this assessment should consider. This is to ensure that the plan meets the soundness tests of being both effective and consistent with national policy. Bearing in mind the significant and far-reaching heritage impacts that can arise as a result of poorly conceived tall building proposals, we believe it is critical that the London Plan ensures Policy HE1(1)(b) of the NPPF 2026 is applied to tall building studies. This requires plans to 'be informed by a proportionate heritage assessment'. That tall buildings should be plan-led and informed by a significance based assessment of heritage impacts is consistent with both Historic England's guidance on Tall Buildings and the GLA's Characterisation and Growth Strategy LPG. The latter states that studies should identify and sieve 'less' sensitive areas (paragraph 4.4.2) and, at step three, boroughs should 'undertake an area-specific, heritage-led assessment of significance' and	To address this issue, we are suggesting changes to Box MBUL3 and supporting text on 'implementation' that can be found with our comments below.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			determine the harm of tall buildings in these areas. This section goes on to encourage visual impact assessments and the use of 3D modelling. Tall building proposals in plans that are not founded on sufficient heritage evidence can result in site allocation policies (and associated development capacities) that are at odds with the requirements of heritage policies.	
37	MBUL3 Policy text Plan-making Part A(3)	Soundness issue	Part A(3) pre-judges the suitability of the Metropolitan tall building areas. These areas have not been subject to a proportionate heritage assessment consistent with the NPPF 2026. While the Metropolitan Scale Tall Building Study contains maps of 'heritage sensitivities' there is no associated analysis of potential impacts on heritage significance. Critically, the study contains no analysis of potential harm to the Outstanding Universal Value of London's World Heritage Sites. Nor does it recommend maximum heights that should not be exceeded to ensure that harm can be avoided or minimised.	We recommend that Part A(3) is amended to clarify that Metropolitan tall building clusters should only be incorporated into plans if they are found to be appropriate by the LPA. Subsequent amendments to Box MBUL3 are also proposed. '(3) incorporate the locations (within their areas) for metropolitan tall buildings identified in Table 2.2 and Figure 2.8 for buildings of 100m and above, if these are found to be appropriate by the LPA using the criteria in Box MBUL3'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
37	MBUL3 Policy text Plan-making Part A(4)	Soundness issue	A(4) states that plan-making authorities should define the boundaries of locations that are potentially appropriate for tall buildings and set 'appropriate or maximum heights'. This is a welcome change from the London Plan 2021 where maximum heights are referred to in supporting text, but not in the policy. However, our recent experience with borough plans is that 'appropriate heights' can be interpreted in several ways, including on occasion setting only a lower threshold e.g. 'above 20 storeys'. This approach can fail to address known heritage issues at plan-making stage, including potential impacts on World Heritage Sites. We consider it important, therefore, that the London Plan clarifies that 'appropriate' heights may be either a guide height, or a range, but should not be a lower threshold with no upper limit. Finally, as Part A of the policy is essentially suggesting the designation of areas that will form tall building clusters, we consider it important that plan-making authorities provide appropriate guidelines for the form of any clusters that they identify. For	To ensure that the London Plan is clear that 'appropriate heights' should not be provided in the form of lower threshold heights with no upper limit, we are suggesting changes to the supporting text in our comments below. To address this final matter, we suggest that part A(4) is amended as follows: '(4) define the boundary of the locations in parts (2) and (3) and set appropriate or maximum heights for these areas in local

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			example, to avoid harm to heritage assets and strategic views.	plans based on local evidence, along with guidelines on the form of any clusters.
37-39	MBUL3 Policy text Development management Part B	Clarification	The locational and design criteria for tall buildings in Part A of the development management section are not exhaustive as in many areas, including in relation to heritage, the policy appears to be relying on the decision-making policies in the NPPF or elsewhere in local plans. We believe this needs to be made clear. Notwithstanding this proposed change, we also consider it critical that the policy signals that development proposals should be accompanied by heritage impact assessment and townscape and visual impact assessment. Please see our associated comment on Part B(4).	We request the following clarification in Part B to avoid issues of interpretation: 'B Tall buildings should meet the locational and design criteria set out below as well as any other relevant requirements of national and local planning policies:'
38	MBUL3 Policy text Part B(1)	Soundness issues	To robustly promote a plan-led approach to tall buildings, we believe that the wording of part B(1) should be strengthened by using the same wording found in part B(2), i.e. that tall buildings 'should be limited' to locations defined in plans, as far as reasonably possible. In addition to this, while the reference to 'buildings of this height' in part B(1) may allude to tall buildings in general, rather than a specific height identified in a	We request the following adjustments to part B(1): '(1) tall buildings should be limited ~~directed~~ to the locations that the plan-making authority has identified in the local plan as potentially appropriate ~~in principle~~ for buildings of this height'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			plan, it is possible that this could be misinterpreted as meaning that a particular height is acceptable in principle. This would not be possible at plan-making stage as further detailed assessments will be required to inform specific heights.	This is consistent with part A(3) of the policy that requires LPAs to identify areas that *may* be appropriate for buildings over 30m.
38	MBUL3 Policy text Part B(2)	Clarification	Consistent with our comments above on the Metropolitan tall building areas, part B(2) needs to make it clear that the locations in Table 2.2 should only be the focus for buildings over 100m where these have been defined by LPAs in their plans.	We request the following adjustment to part B(2): '(2) development of 100m and above in height should be limited to the locations identified in Table 2.2~~,~~ that have been ~~as~~ defined by the plan-making authority in their local plan'
38	MBUL3 Policy text Part B(3)	Soundness issue	Historic England believes that Tall Buildings should be plan-led, as set out in our advice note on Tall Buildings. We acknowledge that this has not always proven possible in London. To help manage their impacts we encourage the GLA to set a high bar for proposals brought forward outside of the locations defined in plans. The first phrase of part 3 risks undermining the work of boroughs on emerging local plans. As the second phrase would, in any case, relate to any tall building coming forward outside of an identified location, we	We request the following adjustments to part B(3): '(3) ~~where a plan-making authority has not identified appropriate locations for tall buildings in their local plan, or~~ if a tall building is proposed outside of a location identified in a local plan ~~or in Table 2.2~~, the criteria 1(ii), ~~and~~ (iii) and (iv) (and for buildings over 100m all criteria ~~also criteria 2 (vi) and (vii)~~) in Box MBUL3 should be ~~considered~~ met when determining if the

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			suggest that the first phrase is deleted. The same applies to locations in Table 2.2 where, for reasons set out in our response above, we consider further work is required to define them. When applying the criteria in Box MBUL3, we strongly suggest that any tall building proposal that comes forward outside of locations identified in a local plan should be subject to criterion iv (townscape character) as well as ii and iii. Otherwise, the implication is that tall buildings may be accommodated in areas where they will cause significant adverse impacts on the townscape. Furthermore, if there will be scope for Metropolitan tall buildings to come forward outside of identified areas, then it would be critical that these are areas identified by the borough for significant growth and change.	location is acceptable in height terms. Robust justification is expected for any conflict with these criteria'
38	MBUL3 Policy text Part B(4)ii	Soundness issue	We welcome many of the development management criteria in part 4. However, bearing in mind the role of London's strategic and local views in protecting some of the most important aspects of London's visual character, as well as the significance of heritage assets (including World Heritage Sites) we	Suggested amendment to wording of part B(4)ii: 'ii. Make a positive contribution to the existing and emerging skyline where a building is prominent and avoid ~~not cause~~

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			consider that part ii needs to be amended to guard against harm to these views.	~~unacceptable~~ harm to local or strategic views.'
38	MBUL3 Policy text Part B(4) New clause	Soundness issue	Tall buildings can have far reaching impacts on the townscape, heritage and views. This is particularly so as the Draft London Plan raises the threshold for a building to be considered tall to 30m. A key issue with policy MBUL3 is that it fails to clearly signal that tall building proposals will usually need to be supported by a heritage impact assessment and a townscape and visual impact assessment. These assessments should commence early to inform both design work and appropriate pre-application engagement. It is important to note that the NPPF contains no specific policy for tall buildings, nor any specific requirements for townscape and visual impact assessment. A clear framework is therefore needed, particularly as borough plans currently rely to some extent on the content of adopted London Plan Policy D9. Furthermore, NPPF Policy DM2(2) states that 'Local validation lists should only include additional information requirements if there is a policy in the	We request that an additional criterion is added to Part B(4) as follows: '<u>xii. Be informed by Townscape and Visual Impact Assessment, and Heritage Impact Assessment, including assessment of cumulative impacts, that commence early to inform scheme design and enable constructive pre-application engagement</u>.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			development plan requiring a specific further assessment'. As the London Plan provides a framework for development of tall buildings, it is desirable that it sets the key information requirements.	
39	MBUL3 Policy text Part C	Soundness issue	We query part C, which may result in isolated tall buildings in places like town centres and at junctions. Should this be retained, the requirement that these should respond proportionately to the context is therefore welcome. However, it is not clear which of the criteria in Box MBUL3 should be met and this ought to be addressed. It is also important that part C recognises that where an existing tall building is harmful its presence should not justify additional tall buildings and its removal may be a positive step. This aligns with several adopted and emerging borough plans (e.g. Lambeth and Hounslow) as well as the London Plan Guidance (paragraph 4.4.7).	We suggest that part C is reconsidered and if retained we suggest this is amended as follows: 'C Isolated tall building should ~~only~~ be considered only in exceptional circumstances, where they clearly mark a place of particular functional or spatial significance and respond proportionately in height to their context or where they are replacing existing tall buildings. However, where an existing tall building (or group of tall buildings) has a significant negative impact on townscape, heritage or important views, its presence should not justify additional or replacement tall buildings in the same location.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				Further amendments are needed to clarify which of the requirements of Box MBUL3 would apply in these circumstances.
39	Box MBUL3 Tall building location criteria	Soundness issues	To address the issues outlined in our comments above, we request the following changes to Box MBUL3 to ensure that the plan is effective and consistent with national policy.	We request the following adjustments to Box MBUL3: 1. Tall buildings (30m and above in height) should be directed to areas that meet all of the following criteria: i. are identified for significant growth or change in a local character study, local plan or area strategy ii. have very good sustainable transport connectivity (generally assumed to be SAM 4 or above) iii. are less ~~not unduly~~ sensitive to the impacts of tall buildings~~,~~ of the envisaged scale, and assessed as potentially suitable taking account of local character and potential impacts on the significance of heritage assets, local and strategic views, and other relevant factors

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				iv. have an existing or emerging townscape character that can in principle accommodate tall buildings (for example some locations where there are existing tall buildings, or areas subject to comprehensive planning through a framework or masterplan). 2. Metropolitan tall buildings (100m and above in height) should be directed to the metropolitan clusters identified in Table 2.2, subject to further assessment by the LPA under criterion iii to establish whether this is appropriate and to define their boundaries and appropriate/maximum heights. Outside of these identified locations, other locations for buildings of this scale should only be considered appropriate where all the following criteria have been met: v. points i – iv above vi. it forms part of an existing or planned cluster of tall buildings designated by the LPA.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				vii. it provides a proportionate response to the height and shape of the tall building cluster while allowing an appropriate transition in height to adjacent areas.
40	Implementation Paragraph 2.47	Clarification	The Draft London Plan does not currently provide clarity about where guidance can be found on the process for assessing local character, growth potential and areas suitable for tall buildings. It would therefore be helpful for the MBUL3 supporting text to clearly signpost the Characterisation and Growth Strategy London Plan Guidance.	We request additional text in paragraph 2.47: '2.47 Plan-making authorities are responsible for identifying the location of buildings between 30 and 100 metres. Information on the process to follow when identifying tall building locations can be found in the Characterisation and Growth Strategy London Plan Guidance...'
41	Implementation Paragraph 2.49	Clarification	To contextualise the changes that we have requested above to several policy clauses (A(1), A(3), B(4), Box MBUL3) we also request additional supporting text in paragraph 2.49.	We request additional text in paragraph 2.49: 2.49 The use of 3D modelling software can support in determining the potential impacts of tall building development, both at a plan-making and development proposal stage. This helps to understand the visibility of a building from its surroundings, and to determine appropriate locations and their heights. Where tall buildings may result in

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				harm to one or more designated heritage assets, the choice of locations and the appropriate or maximum heights in plans should be informed by a proportionate heritage impact assessment, and views assessment, supported by 3D modelling. Similarly, at planning application stage development proposals and decisions should be informed by detailed assessments of potential townscape, visual and heritage impacts. Assessments should take account of any cumulative impacts.
41	Implementation Paragraph 2.50	Clarification	To address and contextualise several of the issues we have raised above (MBUL3 A(4) and B) we request additional supporting text in paragraph 2.50.	We request additional text in paragraph 2.50: 2.50 Where the London Plan or a local plan has identified a location as appropriate for tall buildings, this does not mean that all buildings up to this height are automatically acceptable in the identified locations. Such proposals will still need to be assessed in the context of site circumstances and other development plan policies and national planning policies to ensure they do not lead to unacceptable impacts on the local area.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				Where a maximum height is identified this would set the upper limit. Where an appropriate height is identified, this may take the form of either a guide height or a range but should not be expressed as a lower threshold height with no upper limit.
41	Paragraph 2.51	Clarification	We request a clarification to paragraph 2.51 to ensure it's clear that the locations in Table 2.2 are a broad guide and not definitive.	2.51 The cluster-specific guidance in Table 2.2 broadly identifies ~~sets out~~ the area covered for each location.
41-43	Paragraph 2.52 and Table 2.2 Locations where metropolitan tall building may be appropriate	Soundness issues	While paragraph 2.52 establishes that Table 2.2 (below) does not identify all constraints on the metropolitan tall building areas relating to strategic views, we are concerned that important considerations are not acknowledged and that no attempt is therefore made to avoid or mitigate harm through guidance in the policy table. We suggest that in all cases where strategic views are relevant to the planning of a cluster, this should be acknowledged, and appropriate wording included in the 'cluster specific guidance' column. Where multiple views may be impacted this could use the form of words:	We request that all situations where the metropolitan tall building areas may impact on strategic views are identified on the basis of 3D modelling (including the modelling contained in the Metropolitan Scale Tall Building Study, Appendix B: Modelling of Potential Clusters in LVMF views). We request that a strategic HIA is carried out which follows published guidance from UNESCO; that potential impacts on the significance and OUV of WHS are identified; and that wording is included in the plan that seeks to avoid such impacts.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			'Building heights should avoid adverse impacts on strategic views including…' Furthermore, the evidence contained in the Metropolitan Scale Tall Building Study, Appendix B: Modelling of Potential Clusters in LVMF views appears to show that several of the metropolitan tall building areas have the potential to result in harm to the significance and OUV of World Heritage Sites. We are concerned that the evidence base does not include a proportionate assessment of the potential impacts of the metropolitan tall building areas on the significance of heritage assets. This becomes a critical concern in relation to London's World Heritage Sites. We therefore strongly suggest that a strategic HIA is carried out according to UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context. These issues are to some extent addressed by our proposed changes to MBUL3 parts A(3), A(4), B(2), B(4) and Box MBUL3. However, to ensure that the London Plan meets the soundness tests of being appropriate, effective and consistent with national policy we also suggest that the metropolitan tall	For example, in relation to location 2. City of London, the cluster specific guidance might say: 'This location refers to the City Cluster broadly defined by Bishopsgate in the west, Houndsditch to the north and Stoney Lane and Fenchurch Street to the east and south. Building heights should avoid adverse impacts on strategic views including the view from Waterloo Bridge downstream and should avoid harm to the significance and OUV of the Tower of London WHS.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			building areas are screened for a proportionate HIA to identify potential impacts on OUV. In circumstances where buildings over 100m would be incompatible with avoidance of harm to significance and OUV, this would indicate that the area should be ruled out and removed from Table 2.2. In circumstances where harm may be avoided by constraining building heights, this should be included in the cluster specific guidance in the policy table.	
41-43	Table 2.2 Locations where metropolitan tall buildings may be appropriate	Clarifications	In addition to our concerns about impacts on strategic views, and the significance and OUV of WHSs, we have several observations on specific metropolitan tall building areas identified in Table 2.2 and the associated evidence. We have commented on these separately in relation to the Metropolitan Tall Building Study in Table 2 of our response. As a general point, we consider that the spatial limits to many of the areas could be more clearly described, particularly where their relationship with an adopted or emerging plan lacks clarity.	We ask that changes are considered to better define the limits of the Metropolitan Tall Building areas in Table 2.2.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
MBUL6 High quality design for a growing, changing city				
56-59	MBUL6 Policy text	Comment	Historic England broadly supports Policy MBUL6. We particularly support development management part B(1) which sets out ways in which development should enhance local context. We believe that this will operate in a complementary way to NPPF Policy DP3(1) on design/context, and Draft London Plan Policy MBUL2(A)(2) which encourages plan-making authorities to prepare or update character studies.	N/A
56	MBUL6 Policy text Part A(1)	Clarification	Where plan-making part A(1) refers to the use of design codes and guidance, should this also refer to masterplans to improve alignment with NPPF DP2(1) and MBUL2 (A)(1)?	We suggest an adjustment to part A(1): 'promote good design that reflects growth and change needs via the use of masterplans, design codes and guidance in line with Policy MBUL2'
57	MBUL6 Policy text Part B(8)	Clarification	While external shading will in many situations offer a suitable approach to mitigating solar gain, including on existing buildings, it will not always be necessary or appropriate. This is likely to depend on type, location and orientation of the building and, in the case of heritage assets, any impacts on significance. Please see Historic England's advice note on Adapting Historic Buildings for Energy and Carbon Efficiency.	We request a minor clarification to part B(8): '(8) where appropriate incorporate high-quality external shading to windows to prevent unnecessary solar gain.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
MBUL7 London's heritage				
59-64	MBUL7 London's Heritage	Comment	London's heritage is world renowned and, consistent with NPPF Policy PM1(2)(e), the London Plan is an important opportunity to address strategic issues relating to the protection and enhancement of the historic environment. Historic England therefore supports the inclusion of a heritage policy in the London Plan and we broadly support Policy MBUL7. We are seeking clarifications to the policy to ensure that it meets the soundness tests of being appropriate and consistent with national policy. Importantly, we think there is an opportunity for the plan to contribute positively to the decision-making framework for WHS, providing a bridge between the NPPF and UNESCO's guidance on impact assessment. We therefore recommend an additional clause within this policy as set out below.	N/A
59	MBUL7 Policy text Plan-making Parts A and B	Comment	We strongly support part A which promotes the Greater London Historic Environment Record and London's Archaeological Priority Areas as an important resource to inform local plans, development proposals and decisions. The	N/A

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			application of a consistent approach across London provides greater clarity for developers. We also strongly support part B which encourages LPAs to prepare local heritage strategies informed by evidence and community involvement.	
59	MBUL7 Policy text Plan-making Part C	Soundness issue / clarification	We support part C which we interpret as meaning that borough plans, taken as a whole (i.e. including their policies for development and growth) should collectively conserve, promote and protect the OUV of WHS. We consider this complements NPPF Policy HE2(1) in the London context and will assist the United Kingdom to meet its obligations under the World Heritage Convention. We request adjustments to ensure clarity and consistency with national policy and the approach to protection and management of OUV. While it may also be helpful to clarify that significance and OUV include any contribution made by 'setting', this could perhaps be confirmed in paragraph 2.96 of supporting text to limit any duplication between the policy text itself and NPPF.	We request the following adjustments to part C: 'C. LPAs with one of London's four WHS, or any part of their setting including any buffer zone ~~and those boroughs where development within the setting of a World Heritage Site may affect its significance~~, should include policies in their Development Plans, which collectively conserve, promote, ~~and~~ actively protect and, where appropriate, enhance the significance and Outstanding Universal Value of WHS (which includes the authenticity and integrity of their attributes) as well as supporting their management~~)~~.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			We have suggested additional supporting text in our comments below.	
60	MBUL7 Policy text Plan-making Part D	Comment	We support part D which promotes up-to-date WHS Management Plans and Setting Studies as part of the evidence to support plan-making.	N/A
60	MBUL7 Policy text Plan-making Part E	Clarification	We support part E which promotes use of design codes and other planning tools to facilitate appropriate alterations to historic buildings. However, we suggest a slight adjustment as in some circumstances more flexible guidance will be preferable to a code. This approach aligns with our research on Good Growth, Heritage and Housing and our comments on Policy MBUL2.	We request an adjustment to part E: 'E. LPAs are encouraged to bring forward design codes, guidance, Local Listed Building Consent Orders and/or LDOs to streamline the planning process where this provides clarity and certainty about appropriate alterations or extension of historic buildings and/or the measures set out in Part G of this policy.'
60	MBUL7 Policy text Development management part F	Comment	We support part F which relates to archaeological assessment.	N/A
60	MBUL7 Policy text	Comment	We support part G which promotes measures to improve the energy performance of heritage assets in	N/A

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	Development management G		appropriate circumstances. This (along with paragraph 2.102) provides a helpful policy basis for measures described in Historic England's guidance on Adapting Historic Buildings for Energy and Carbon Efficiency.	
60	MBUL7 Policy text Development management New clause	New clause requested	There is an important opportunity for an additional development management clause on WHS to clarify how developers should approach schemes while providing a helpful bridge between the policy requirements of the NPPF and UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context. Central components of the UNESCO approach, which support achievement of NPPF policy objectives, are the need for HIA to commence early, inform the evolution of proposals, and include consideration of reasonable alternatives to avoid or reduce harm. An additional policy clause can provide clarity on these matters in a way that complements NPPF Policies HE5 and HE8(1). Further clarity can be provided in relation to the likely need for pre-application engagement (including with Historic England) in relation to WHS. This would	We request an additional development management clause as follows: 'Where there is potential for a development proposal to affect the significance and OUV of a WHS, the process of Heritage Impact Assessment and appropriate pre-application engagement (including where necessary with Historic England) should commence early and inform design work. Where the assessment process identifies potential harm, reasonable alternative proposals should be considered and assessed with the aim of avoiding this harm.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			complement NPPF DM1(1)a which relates to major development only, and DM1(2) which establishes only that pre-application engagement may sometimes be required in relation to heritage assets.	
60	Implementation Paragraph 2.96	Clarification	While we welcome the fact that paragraph 2.96 signposts the framework of heritage policies at national level, it would be helpful to clarify here the role of 'setting' in the planning process. It would also be helpful to highlight that up-to-date Setting Studies (whether or not for WHS) can inform both plan making and decision making. For example, the new St Paul's Cathedral Setting Study has broad stakeholder support and is referred to in the emerging City Plan 2040. In addition to this, there is an opportunity to signpost the published guidance from UNESCO for impact assessment to promote best practice for HIA of WHS.	We request the following adjustments to paragraph 2.96: '2.96 This policy builds on the framework of heritage policies at national level which should be appropriately applied in the London context, including providing a Heritage Impact Assessment where required. Particular regard should be given to London's WHS, with reference to published guidance from UNESCO. For the avoidance of doubt, protections for heritage assets include any contribution to significance or OUV made by their settings, including any WHS buffer zones. Where up-to-date Setting Studies are in place they may, therefore, provide a source of information to inform development plans, proposals and associated HIAs.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
60	Implementation Paragraph 2.97	Clarification	Paragraph 2.97 is welcome, but it would be helpful to draw attention to the criteria under which the Greater London Archaeological Advisory Service should be consulted, to assist in meeting NPPF HE5(1).	We request a clarification to paragraph 2.97: 'The Greater London Archaeological Advisory Service publishes its consultation criteria along with guidance on best practice for archaeological investigations affecting the capital's diverse range of sites…'
63	Implementation Paragraph 2.100	Clarification	The final sentence of this paragraph is a little unclear. Does it mean to promote use of 3D modelling when assessing the impacts of development proposals within views of WHS?	Suggested clarification for Paragraph 2.100: '2.100… These key views should be identified in World Heritage Site Management Plans and supported wherever possible by the use of accurate 3D digital modelling and other best practice techniques, including in assessments to inform both plan making and decision making.'
3 Delivering the homes and neighbourhoods Londoners need				
HN8 Housing design				
106-109	Policy HN8 and supporting text	Comment/ clarification	Historic buildings creatively repurposed for housing can reinforce local character, deliver new homes and conserve embodied carbon. See our recent research on Good Growth, Heritage and Housing.	Consider additional text to clarify to what extent the policy applies to conversion of existing buildings, and/or whether the requirements it contains would be moderated in such circumstances.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			It would be helpful if the supporting text to Policy HN8 could recognise the potential for conversion of existing buildings. It could also clarify to what extent the policy applies (or may be applied more flexibly) when there are existing and/or historic buildings on site.	
HN10 Burial space				
115-117	HN10 Burial space Implementation Paragraph 3.133	Clarification	We note the shift towards a sequential approach when identifying additional capacity for burial space. The supporting text at paragraphs 3.132-3.133 sets out a number of considerations when applying this approach. While the statement in paragraph 3.133 that 'Strategies for managing the historic environment may also be relevant' is to some extent helpful, this does not clearly indicate to applicants that their sites may be heritage assets and/or possess archaeological interest. In such cases, planning policies for the historic environment will form part of the decision-making framework for development proposals.	We request additional text in paragraph 3.133: '3.133 In considering these options, compatibility with environmental strategies (particularly those relating to nature recovery, green infrastructure, publicly accessible green space and the management of surface-water flood risk and water quality) should be carefully assessed. Policies and s~~S~~trategies for managing the historic environment may also be relevant. A burial ground may be a designated or non-designated heritage asset, may hold archaeological interest, and may form part of the setting of a heritage asset such as a church….'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
4 Growing London's economy in a way that benefits all				
GLE3 Data centres				
130	GLE3 Policy text Part D, Part E(1)	Clarification	Given that data centres can result in a wide range of environmental impacts, we suggest that part D is clarified to ensure applicants are aware that the 'suitable locations' referred to are those identified in local plans, and that their acceptability is subject to appropriate management of these impacts.	We suggest the following clarification for Part D: 'D. Development proposals for data centres in suitable locations identified in local plans should be supported ~~in principle~~ provided that their impacts can be adequately minimised and mitigated.' Similarly in part E(1) for development that is not plan-led: '(1) justify the proposed development location and demonstrate minimisation and mitigation of adverse impacts including on infrastructure capacity needed to support growth in the area'
GLE4 Night time economy				
134	GLE4 Policy text Part B(6)	Clarification	We support policy GLE4, in particular parts A(6) and B(4) which protect public houses where they have heritage, economic, social or cultural value. We suggest that part B(6) is clarified to align better with NPPF policies for heritage, design (e.g. DP3(1))	We request an adjustment to development management part B(6) as follows: '(6) accept the loss of a public house use where there is no realistic prospect of the building being used as a public house in the

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			and mitigation of climate change (CC2(1)(d)) by allowing the loss of the public house *use* in the specified circumstances, while still promoting the retention and re-use of the building in appropriate circumstances. Thus, part B(4) would promote retention of both use and building in appropriate circumstances; part B(5) would deal with situations where the building may be lost but the use retained, while part B(6) suggests circumstances where the use may be lost but where consideration should nevertheless be given to the retention of the building.	foreseeable future supported by compelling marketing evidence, while prioritising the retention of the building for an alternative use particularly where it has heritage or townscape value.'
GLE6 Visitor infrastructure				
138-139	GLE6 Policy text Plan-making Part B	Comment	London's visitor attractions include four World Heritage Sites, many of the nation's most iconic historic buildings such as St Paul's Cathedral, and a multiplicity of museums and cultural venues. We therefore support the requirement of GLE6 that local plans should promote a range of enhancements to visitor attractions including to the historic environment.	N/A

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
GLE9 Aviation				
145-147	GLE9 Policy text Development management Part E	Clarification	The proposed expansion of Heathrow Airport would result in total loss of some heritage assets and major impacts on the historic environment more broadly, including through direct land take, setting impacts, and indirect impacts associated with changes to infrastructure and local communities. The Draft Heathrow National Policy Statement is accompanied by an Appraisal of Sustainability that identifies a major adverse effect on the historic environment. Historic England's full response to the NPS can be found online. In line with our response to the NPS, we consider it important that promoters of aviation-related proposals apply the mitigation hierarchy (avoid, reduce, mitigate and compensate), while also seeking enhancement in appropriate circumstances.	We suggest additional text to part E as follows: '(1) assess and fully address their environmental and health impacts applying the mitigation hierarchy (avoid, minimise, mitigate, or as a last resort compensate) and where appropriate seeking enhancements'
GLE13 Aggregates and mineral resources				
158	Policy GLE13 Implementation Paragraph 4.111	Clarification	We note that the plan largely defers to the NPPF in terms of the policy framework for determining minerals applications. It is important to note that any minerals proposals in London may have significant implications for	We request additional text in paragraph 4.111: '… There is also a close relationship with MBUL5 Sustainable Transport to enable London's growth; GLE10 Safeguarded

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			archaeological remains. Policy MBUL7 will also therefore be relevant, particularly in relation to London's Archaeological Priority Areas.	Wharves, which will support additional supply from imports; ~~and~~ GLE11 Circular Economy which supports the supply for secondary and recycled aggregates; and environmental policies including MBUL7 London's heritage, for example in relation to archaeological remains.'
5 Creating a greener, healthier and resilient city				
165	Reasoned justification for chapter 5 Paragraph 5.8	Clarification	The River Thames is London's single greatest landscape feature, an important draw for visitors and a central component of the city's identity which forms part of the setting for many of London's most iconic views and heritage assets, including its four WHS. While our comments on the Thames are mainly in relation to Policies GHR9 and PV1, we also request an adjustment to paragraph 5.8 to emphasise the importance of the Thames.	We request the following adjustment to paragraph 5.8: 'The River Thames and London's waterways are also essential environmental and cultural assets that contribute to the city's identity…'
GHR1 Energy efficiency				
167	GHR1 Energy Efficiency Implementation Paragraph 5.15	Clarification	While we have no in principle objection to Policy GHR1, the relationship with Policy MBUL7 G which provides a decision-making framework for energy efficiency measures in relation to heritage assets is	We request additional text in paragraph 5.15 as follows: '5.15 Design decisions to meet this policy should be considered alongside other

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			not currently clear. It would therefore be helpful if the supporting text drew attention to this policy clause. Further information can be found in a range of Historic England guidance on Energy Efficiency and Retrofit in Historic Buildings.	relevant policies, such as GHR3… Where a major development includes heritage assets, applicants should apply policy MBUL7 G to the relevant buildings. In relation to all buildings of traditional construction, the approaches to improving energy efficiency should take account of building performance in order to avoid maladaptation. Applicants are encouraged to use the latest Historic England guidance.'
GHR3 Whole life-cycle carbon assessments				
170-171	GHR3 Whole life carbon	Comment	We support the broad aim of this policy to encourage reuse and retrofit of existing buildings by requiring whole life carbon assessments for referrable development.	N/A
GHR4 Heat risk				
173	GHR4 Policy text Development management Part A(2) Part B(1)	Clarification	While we have no in principle objection to Policy GHR4, we note that the high albedo materials promoted will often include pale colours or reflective surfaces that may be visually obtrusive, and so may not be appropriate in all contexts, particularly in sensitive historic environments.	We request an adjustment to parts A(2) and B(1) as follows: 'A(2) prioritising use of high albedo materials on buildings and public realm where appropriate to the character and context, particularly on roofs and other hard surfaces'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				'B(1) Limiting solar gains – reduce the amount of heat entering a building through optimising orientation; minimising unnecessary glazing; and providing external shading compatible with window design, high-albedo materials where appropriate, and blue and green infrastructure.'
GHR5 Flood risk and drainage				
176-177	GHR5 Policy text Plan-making Part A(2)	Clarification	We broadly support the use of permeable surfaces and SUDS although these can pose risks to the historic environment (including archaeological remains) if they are not carefully located and designed. We request an adjustment to GHR5 part A2 to ensure that plans and proposals find an appropriate balance between the site opportunities and constraints.	We request the following adjustment to Part A(2): 'A(2) plan for Sustainable Urban Drainage Systems (SuDs) at a neighbourhood scale (with reference to catchment-scale plans) in areas of significant planned change, using site allocations, spatial policies and other requirements to help secure their delivery in an integrated way that takes account of opportunities and constraints.'
176-177	GHR5 Policy text Development management Part B	Clarification	In line with our comments above we also request an adjustment to part B.	We request the following adjustment: 'B. Development proposals should not increase surface-water runoff; and should maximise opportunities to reduce surface-water flood risk in a manner that is

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				consistent with an integrated water management approach that takes account of opportunities and constraints.'
GHR6 Trees, biodiversity and geodiversity				
182	GHR6 Trees, biodiversity and geodiversity Implementation Paragraph 5.62	Clarification	We broadly support Policy GHR6. While paragraph 5.62 identifies factors to be considered when identifying opportunities to increase London's canopy cover, it does not recognise the significant risk that tree roots can pose to heritage assets, in particular archaeological remains, if trees are not appropriately selected and located.	We request additional text in paragraph 5.62: 'Particular care is needed when selecting and siting new trees in areas containing heritage assets and in areas with potential for buried archaeological remains, in order to avoid or minimise harm.'
GHR7 Green Infrastructure and Urban Greening Factor				
185-186	GHR7 Policy text Plan-making Part A	Soundness issue	While we support the promotion of Green Infrastructure, the plan-making clauses of the Draft London Plan are missing a key concept (included in the London Plan 2021 Policy G1 A and B) that the benefits of green infrastructure will be maximised by promoting multi-functionality, integration and cross-boundary working. Many natural environments are either historic places or include heritage assets. Better outcomes can therefore be achieved by planning and managing	We request additional text in part A as follows: 'A. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits, including through cross-borough collaboration. Plan-making authorities, in local plans and area-based strategies should:'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			them in an integrated way for nature, heritage and access. Further information can be found in our note on Historic Environment Considerations for London's Local Nature Recovery Strategy provided for the GLA and published alongside the LNRS.	
GHR9 Clean and healthy waterways				
193-194	GHR9 Policy title	Clarification	The River Thames makes an extraordinary contribution to the character and identity of the city and its appeal to Londoners and visitors. We therefore welcome references in Policy GHR9 to heritage, character, identity, inclusivity, visibility and accessibility. However, the policy title fails to capture the importance of the Thames, or the breadth of matters that the policy seeks to address. We are therefore concerned that these may be overlooked in drawing up plans and proposals.	We request that the title of GHR9 and associated cross references throughout the plan are amended to more appropriately capture the broad aims of the policy: 'GHR9 Sustainable River Thames and ~~Clean and healthy~~ waterways'
193-194	GHR9 Policy text Plan-making Part A	Soundness issues	While we strongly support development management part B(3) which seeks to conserve and enhance the distinct open character and heritage of waterways and their settings, we are concerned that the plan-making clauses in the policy fail to adequately address the following important matters:	We request an adjustment to Part A: 'A. Local Plans should recognise the strategic importance and distinctiveness of London's waterways, in particular the River Thames, and seek to enhance their cleanliness, health, ~~and~~ accessibility ~~of~~

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			- The strategic importance of the Thames and Waterways - The interface between Marine and Terrestrial Planning - The need to work across borough boundaries Unlike the London Plan 2021 (figure 9.7), the Draft London Plan does not identify the Thames Policy Areas. What are the implications of not identifying these in the strategic plan for London? We believe that adjustments are needed to ensure that the policy meets the soundness tests of being positive, appropriate, effective and consistent with national policy.	~~London's waterways~~ and the role they play in London's wider identity and good growth by:…' We also request a new clause in part A: 'A(2)(iii) co-operating with other authorities, including neighbouring boroughs and those across the river, to ensure an integrated approach to both terrestrial and marine planning through local plans and initiatives including the Joint Thames Strategies." We request that consideration is given to including a map that identifies the Thames Policy Areas.
6 Place visions and place-based approaches				
210	Places sub key diagram	Clarification	London's Brownfield First Opportunity Areas cover large areas of the city, with a particular concentration found in East London and on the banks of the River Thames. We believe this spatial pattern presents a particular opportunity for a coherent vision and joined up approach to development in East London, that both responds to and capitalises on the river.	We suggest that the area covered by the BFOAs is shaded on the map, rather than relying solely on numbered circles to identify broad locations. Please also see our comments on Annex F

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
PV1 Brownfield First Opportunity Areas (BFOAs)				
213-214	PV1 Policy text Plan-making and development management Part B(6)	Clarification	We support the continued prioritisation of Brownfield First Opportunity Areas, with Policy MBUL2 providing a framework for optimising density. We particularly support the requirement in part B(4) that high-quality design should recognise the role of heritage, culture and local identity in place-making. However, we consider that the reference to an 'edge' in part B(6) is ambiguous and would benefit from clarification to establish what it is about the edge condition that would be undesirable. We also request additional text to ensure that the strategic opportunity for integrated development in BFOAs is recognised, particularly along the River Thames. See also our comments on Annex E.	We suggest an adjustment to part B(6): '(6) Integration with surrounding neighbourhoods should be secured, avoiding ~~edges and~~ severance and unresolved edges that fail to respond to the context, enhancing physical and social connections and contributing to the regeneration and long-term resilience of adjacent communities. Where BFOAs are adjacent to one another, or have a visual relationship across the River Thames, opportunities to create cohesive character, or to carefully manage transitions in character, should be sought.'
PV2 Central Activities Zone (CAZ)				
215-217	PV2 Policy text Plan-making and development management Part A(6)	Clarification	We broadly support Policy PV2, in particular part A(3) which seeks to sustain and enhance the world-renowned heritage of the CAZ, the River Thames, strategic views and WHS (amongst other things). The CAZ transformational gateways are associated with London's key historic railway termini and	We request the following adjustment to part A(6): '(6) Realise the growth and place-making potential of the CAZ transformational gateways associated with national rail termini (including at Euston, Liverpool

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			represent not just opportunities for growth but also important opportunities for positive place-making and regeneration. Not to identify this would be a missed opportunity.	Street, Paddington, Victoria and Waterloo), for development that supports CAZ strategic functions.'
216	PV2 Policy text Plan-making and development management Part A(11)	Soundness issue	We are concerned that part A(11) appears to provide blanket support for redevelopment of office space, which we understand to mean demolition and replacement. We are concerned that this could result in the loss of good quality buildings, potentially including heritage assets, that contribute to the character of London's distinctive places. Consistent with national policies for climate change including NPPF CC2(1)(d), as well as policies elsewhere in the plan, opportunities for appropriate reuse of existing buildings should be prioritised.	We request an amendment to part A(11) as follows: '(11) Support the ~~redevelopment and~~ reuse, refurbishment and sensitive extension, or where demonstrated to be necessary and appropriate the redevelopment, of office space to improve the quantity, quality and energy-efficiency of the stock; and, where it can be demonstrated that it is not viable to ~~redevelop or refurbish as~~ retain office~~s~~ use, manage changes of use to other CAZ strategic function uses in line with strategic and local policies for core CAZ areas and to a mix of uses including housing in mixed CAZ areas.
217	PV2 Policy text Development management	Clarification	Consistent with our comment above it would also be helpful if part C(2) were adjusted to align with the proposed wording without appearing to promote unjustified demolition/redevelopment.	We request that part C(2) is adjusted: '(2) it can be demonstrated in exceptional circumstances that the property is obsolete and is unviable to refurbish or where

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	Part C(2)			necessary and appropriate redevelop for the existing use or for alternative CAZ strategic functions under any circumstances.'
PV3 Town centres and high streets				
221-224	PV3 Policy text Plan-making and development management Part A(4)	Soundness issue	Many of London's town centres and high streets have historic origins and are therefore designated as conservation areas and/or contain listed and locally listed buildings. There are therefore aspects of Policy PV3 that we welcome, such as part A(1) which identifies town centres and high streets as a focus for Londoners' sense of place and local identity. However, we are concerned that part A(4) promotes redevelopment without explaining in what circumstances this might be appropriate.	We request adjustments to part A(4): '(4) Support the ~~redevelopment and~~ change of use of surplus commercial space to other uses including housing and social infrastructure, whilst retaining active ground floor frontages for town centre uses. Where a building detracts or makes a limited contribution to local character, heritage or sustainability its redevelopment may be considered to enhance the town centre or high street'
223	PV3 Policy text Plan-making Part B(3)(ii)	Clarification	For the reasons above we also request a clarification to part B(3)(ii).	We request an adjustment to B(3)(ii): '(ii) extend upwards or ~~redevelop~~ reconfigure upper floors ~~at~~ to achieve higher densities above town centre uses'
PV5 Industrial land supporting housing growth				
229-231	PV5 Policy text	Clarification	Many industrial / former industrial areas contain substantial buildings of townscape character or	We request a new part D as follows:

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	Development management New clause		heritage significance that can be beneficially repurposed for housing or commercial uses, contributing to the vitality of these places and their appeal to residents and workers. Examples of adaptive re-use such as Enterprise House in Hayes can be found in our research on Good Growth, Heritage and Housing. We therefore request an additional clause in Policy PV5 to draw attention to this important place-making opportunity.	'Where an area contains buildings of townscape character or historic interest, their retention and adaptive re-use should be prioritised as part of positive place-making.'
PV6 Metropolitan Open Land (MOL)				
232-234	PV6 Policy text Plan-making Part C(2)(ii)	Possible soundness issue	We support much of policy PV6, in particular C(I)(i) which allows new Metropolitan Open Land to be designated where it comprises 'extensive green spaces, with natural or historic features or landscapes that contribute to the city's character, setting, biodiversity and/or access to nature'. We also support part E which could help to ensure that in areas of strategic Green Belt release, valuable green space performing MOL functions could be reserved and protected from development. However, part C(2)(ii) appears to allow for the release of an area of MOL where it is not publicly accessible,	Reconsider whether part C(2)(ii) is an appropriate criterion for the release of MOL. As the final words in part C(2)(i) relate to potential for this land to be AGS (Accessible Green Space), it may be possible to combine the two clauses as follows: '(ii) The area does not meet the criteria for designating new MOL and is not in a walkable AoD for AGS, or where it is in a walkable AoD for AGS there is no reasonable prospect of public access being

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			regardless of whether it meets C(1)(ii) or (iii), and therefore poses a risk to areas that perform these functions. Is there evidence of how much MOL this could affect? While we support the extension of public access, we are concerned that a clause that would enable loss of areas of undeveloped land that are currently MOL but are not publicly accessible could have knock on effects for heritage (including archaeological remains), local and strategic views. We suggest that this should only be the case where the land also does not meet functions C(2)(ii) and (iii).	granted without enabling development. Where enabling development is accepted to be necessary, this should be proportionate in scale to the costs associated with enhancing the quality and accessibility of retained areas of MOL.'
PV7 Sustainable development and enhancement of the Green Belt				
235-244	PV7 Sustainable development and enhancement of the Green Belt	Comment	We support the overall aim of Policy PV7 which seeks to ensure that any strategic release of Green Belt land is in a sustainable location and is carefully managed through landscape-led design that optimises density. However, we believe several adjustments and clarifications are needed which we set out in our comments below.	N/A
236	PV7 Policy text Plan-making	Soundness issue / clarification	The Green Belt BLGs present significant opportunities, and risks, for historic landscapes, built heritage (including assets on the Heritage at Risk	We request that part B(2) is adjusted as follows:

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	Part B(2)		Register) and archaeological remains (including within London's Archaeological Priority Areas) associated with development of large areas of predominantly undeveloped land. It is important that site selection and definition of boundaries is informed by a strategic assessment of the opportunities and environmental sensitivities of the BLGs, consistent with the Government's Planning Practice Guidance and Historic England's guidance on site allocations in Local Plans.	'(2) review Green Belt boundaries in a manner that facilitates delivery of the expected capacity for those locations in line with the London Plan strategic objectives set out in policy MBUL1 Spatial strategy, including through subsequent site allocations to cover these areas. Site selection and boundaries should be informed by an assessment of the opportunities and environmental sensitivities of the BLG.'
236	PV7 Policy text Plan-making Part C	Soundness issue / clarification	Part C requires local plans to use the evidence-based approaches in the plan to identify Green Belt enhancement opportunities. However, the Green Belt Enhancement Opportunities methodology report fails to recognise opportunities for enhancement of the historic environment. While we note that some of the opportunities in the report's Appendix do feature heritage, we consider that the broader opportunity should be signposted, consistent with the requirement of NPPF HE1(1) that plans should 'deliver a positive strategy for the conservation, enhancement and enjoyment of the	We request the following adjustment to part C: 'C. Local plans should ~~use~~ build on the evidence-based approaches set out in this plan to identify Green Belt enhancement opportunities and associated green infrastructure priorities which developments can help to deliver.'

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			historic environment'. Information on how heritage can be managed alongside nature recovery can be found in Historic Environment Considerations for London's Local Nature Recovery Strategy. We therefore request a slight adjustment to part C and associated supporting text (see comments on paragraph 6.49 below)	
236	PV7 Policy text Development management Part D	Soundness issue / clarification	As currently drafted, it appears that part D would only apply to land that is designated as Green Belt. We understand that the intension of the policy is that these important criteria should continue to apply once land has been released, and we therefore request a clarification to ensure that this is clear.	We request that part D is adjusted as follows: 'D. Development proposals in the Green Belt (or on land released for development) should demonstrate that:'
237-238	Box PV7A: Greenbelt sustainable locations Introduction and part 1	Soundness issue / clarification	Similarly, it should be clear that Box PVA7A Greenbelt sustainable locations applies to land that is either in the Green Belt or has been released for development. Local plans can identify land for Green Belt release, if these promote 'a sustainable pattern of development overall' (consistent with NPPF GB4(1)(d)(i)). However, part 1 as drafted suggests that a 'masterplan' can achieve the same, regardless of whether it has the	We request the following adjustments to Box PV7A: 'Major development proposals in the Green Belt (or on land released for development) should only be regarded as being within a sustainable location for the development type proposed where at least one of the following sustainable location tests are met, as relevant:

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			status of a development plan. This does not appear to be consistent with the NPPF.	1. The site is identified as such within an adopted Local Plan or Supplementary Plan that releases the land from the Green Belt and allocates it for development in a way~~,~~ ~~site allocation and/or masterplan~~ that is consistent with this Plan.'
238	Box PV7B: Greenbelt sustainable design criteria Part 1 Part 3	Soundness issue / clarification	In relation to Box PV7B part 1, in line with our comments on Policy PV7 part B(2), it is important that site allocations are informed by a strategic assessment of the opportunities and environmental sensitivities of the BLGs, including the presence of heritage assets. While we generally support Box PV7B part 3 which relates to landscape-led design, areas identified for Green Belt release may not be surrounded by countryside and it is equally important that they integrate with the adjacent urban context. Consistent with NPPF DP3(1) which requires development proposals to respond to their context, we request an adjustment to part 3.	We request the following adjustment to Box PV7 parts 1 and 3: '1. Land use optimisation. Major proposals in the Green Belt should be underpinned by land-use, transport, phasing and design strategies that optimise land by prioritising the best-connected areas, take account of the opportunities and environmental sensitivities of the area, and contribute towards the creation of cohesive, mixed-use, vision-based places. '3. Landscape-led sustainable design. Any major residential schemes within an identified BLG (or land released for development) … should demonstrate a landscape-led approach which delivers high quality AGS within the BLG and integrates

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				the development with the surrounding ~~countryside~~ urban and rural context and its key features.'
239	Table 6.3 London's Green Belt specific sustainable design criteria	Soundness issue / clarification	We support the ambition of Table 6.3 to make better use of suburban land. However, consistent with our comments on the Optimisation Framework in Policy MBUL2, and with flexibilities built into that policy, we request new introductory text to Table 6.3 to better align with NPPF Policy DP3(1) which requires proposals to respond to their context.	We request new introductory text to Table 6.3 as follows: 'Development proposals should be an appropriate design response to the context and align with the sustainable design criteria below, or deliver an appropriate arrangement of plots and building heights with similar overall ambition, unless site specific constraints limit the development potential of the site.'
242	Policy PV7 Implementation Paragraph 6.49	Clarification	Linked with our comment on Policy PV7 part C, we consider it is important to identify the opportunities for enhancement of the historic environment in association with other opportunities to enhance Green Belt land.	We request additional supporting text in paragraph 6.49: '6.49 All boroughs containing Green Belt land are required to plan positively for its enhancement, and should draw on the approaches set out in policies GHR6Trees, biodiversity and geodiversity, GHR7Green Infrastructure and Urban Greening, and GHR8 Publicly accessible greenspace to improve its multi-functional value.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
				Opportunities to enhance the historic environment including archaeological remains and Heritage at Risk should also be explored…'
PV8 Strategic and local views				
244-245	Policy PV8	Comment	Overall, Historic England strongly supports Policy PV8, but there are areas that would benefit from refinement. We also broadly welcome the review of the draft London View Management Framework LPG which we will respond to in due course.	N/A
245	PV8 Policy text Part F	Soundness issue	We are concerned that while the adopted London Plan 2021 contains a clause (Policy HC4 Part B) stating that development in the foreground, middle ground and background should not be intrusive, unsightly or prominent, in the Draft London Plan this requirement is embedded in a clause relating to 'major' development. While we acknowledge that the specific requirement for TVIA may need to be more focused, we suggest re-ordering part F, with a number of associated adjustments, to ensure that consideration of impacts is not restricted to major development (as defined in NPPF Annex B).	We request the following adjustment to Policy PV8 part F: 'F. ~~Where major d~~Development ~~is visible~~ in the foreground, middle ground or background of a designated view, ~~applicants should submit a Townscape and Visual Impact Assessment (TVIA) as part of the planning application. This assessment should demonstrate that the proposal is~~ should not be intrusive, unsightly or prominent to the detriment of the view and should ~~that it~~ conserve~~s~~ and, where

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			An important clarification is also needed to ensure it is clear that, when assessing impacts on OUV, the TVIA is not a substitute for a Heritage Impact Assessment (HIA) required by either the NPPF or Policy MBUL7. This is particularly so as we are requesting a new development management clause in MBUL7 to clarify and supplement the NPPF requirements in relation to World Heritage Sites.	possible, enhances the viewers' ability to recognise and to appreciate the Strategically-Important Landmarks and WHS (and the significance and OUV) in these views. For major developments, or in other cases as required by the LPA, this should be demonstrated using a Townscape and Visual Impact Assessment (TVIA), as well as any Heritage Impact Assessment required by the NPPF or MBUL7.'
246	PV8 Policy text Development management Parts H and I	Comment	We are conscious of changes to the approach and terminology for view protection in parts H and I, which are linked with the methodology for the new draft London View Management Framework (LVMF). We are in the early stages of reviewing the draft LVMF and therefore reserve our position on these changes.	N/A
246	PV8 Policy text Part I	Soundness issue	Part I relates to Protected Silhouettes and seeks to prevent development exceeding the 'current skyline profile'. All Protected Silhouettes related to heritage assets that (according to the NPPF) are of the highest significance. It should, therefore, be noted that in some Protected Silhouettes there are existing	We request the following adjustment to Policy PV8 part I: I. Development should not exceed the current skyline profile, at any point along the defined Kinetic Assessment path of a Protected Silhouette indicated in the LVMF. Where existing buildings currently detract

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			structures that detract from the Strategically Important Landmark or WHS. Accordingly, we consider that part I should promote the enhancement of these silhouettes through opportunities to remove detracting features (i.e. where the 'current skyline' is compromised). This aligns with the requirement of Policy HE1(1) of the NPPF that plans should contain a 'positive strategy for the conservation, enhancement and enjoyment of the historic environment', and also of HE2(1)(a) that development plans should identify opportunities for development affecting WHS to enhance or better reveal their significance. It also ensures that Protected Silhouettes benefit from a similar provision to Protected Views in the final sentence of part H(4).	from the silhouette of a Strategically Important Landmark or WHS, opportunities to lessen this impact should be considered wherever possible.
Annex E Brownfield First Opportunity Area strategic growth visions				
283-302	Annex E Brownfield First Opportunity Area strategic growth visions	Comment	We broadly welcome the strategic growth visions. We wish to draw attention to the fact that a significant number of these refer to the River Thames as a key consideration. While many of the Opportunity Areas line the banks of the river, the visions are presented for individual	N/A

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			areas and there is no coherent vision for the landscape as a whole. We would like to work with the GLA on what such a vision might look like to ensure that the character and identity of this part of London informs growth, to deliver a riverscape that is authentic to East London, and of equivalent quality to the exceptional arcadian stretches of West London or the Embankment in Central London. Given the pressure of climate change, and the scale of the opportunity, this is a long-term project that cannot start too soon. We would welcome the opportunity of working with the GLA, communities, developers, the boroughs and other key agencies.	

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Table 2. Historic England's response to the Draft London Plan evidence base documents

Table 2 contains brief observations on several aspects of the evidence base. These comments do not constitute a comprehensive review of the evidence. We have focused on those areas where there is an important relationship between our comments on the Draft London Plan itself and the content (methodology or findings) of the supporting evidence.

Page	Section	Type of comment	Comments	Suggested Modification
Metropolitan Scale Tall Building Study, Draft Report June 2026				
	Metropolitan Scale Tall Building Study	Comment	Our comments on the Metropolitan Scale Tall Building study should be read in association with our comments on Policy MBUL3, in particular Table 2.2 where we have noted: - a need for potential impacts on strategic views to be more consistently identified - a need for a strategic HIA following UNESCO's guidance to inform cluster specific guidelines - a need for the limits to Metropolitan Tall Building locations to be more clearly described in Table 2.2, informed by this evidence	Please see our comments and suggested changes to Policy MBUL3 and associated Box MBUL3 and Table 2.2, which are in Table 1 of this response. We have not repeated these comments for specific clusters as we consider further assessment work is needed to supplement the evidence base and ensure consistency. We would be pleased to discuss this further with the GLA.
38	Sensitivities to Metropolitan Scale Tall Buildings	Clarification	We welcome the identification of heritage assets and LVMF views as sensitivities. However, we note that neither Scheduled	Review/amend text as appropriate

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			Monuments nor local views are included in the list.	
57-60	4.4 Sensitivities in LVMF Views	Comment	Is the assessment of potential impacts on LVMF views comprehensive and why has it not consistently informed the cluster specific guidance in Table 2.2 of the Draft London Plan? We are concerned that while the table identifies potential impacts on strategic views which include WHS, there is no associated assessment of the potential impacts of development on the significance and OUV of WHS.	Review relationship between evidence base and Draft London Plan Table 2.2 (please see our associated comments on Policy MBUL3 in Table 1). We strongly suggest that a strategic HIA is carried out according to UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context to inform the London Plan including the cluster specific guidance in Table 2.2.
84-87	06. Croydon Town Centre	Comment	The assessment refers to Croydon Local Plan revised June 2024, but we understand that the Local Plan Examination is ongoing.	Review/amend as appropriate
136-139	19. Old Street	Comment	Is the conclusion that there is potential for a cluster of 5+ metropolitan scale tall buildings to emerge correct on the basis of the evidence?	Review/amend as appropriate
144-147	21. Stratford	Comment	Is the proposed cluster consistent with the emerging plan which identifies areas for tall buildings of up to 100m?	Review/amend as appropriate

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
London Context Map Appendix (Methodology Report)				
n/a	London Context Map Appendix	General comment	Historic England provided source data to inform the London Context Map. The dataset uses the London Historic Character Thesaurus as a terminology for recording character in London. This terminology was employed by Land Use Consultants (for Historic England) to create a London-wide character map, generally known as the *Greater London Historic Landscape Characterisation Map January 2025 (GLHLC)*. This dataset has been provided to the GLA to simplify and refine as part of the evidence base for the London Plan. We understand that the data table supporting the London Context Map contains embedded data from the GLHLC. The GLHLC is a large dataset that represents a snapshot in time and so should be carefully caveated.	We would be pleased to work with the GLA to establish how embedded data from the GLHLC could be further refined or, in future, revised by public authorities to best reflect the current context in their areas. Please also see our comments below on recommended caveats in the Optimisation Framework Methodology Report.
The Optimisation Framework Methodology Report				
6	What the Optimisation Framework is	Clarification	We welcome the confirmation that the Optimisation Framework 'takes a more nuanced approach which provides clear	We request additional text on p6 to caveat the London Context Map, for example:

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			strategic parameters while allowing for site-specific design responses to be carried out as part of the process'. Consistent with our comments above on the London Context Map, we consider it important that the Methodology Report is clear that the mapped dataset does not contain absolute definitions of character. It will always be necessary to respond to the context of the site, consistent with NPPF Policy DP3(1).	'The Optimisation Framework uses the London Context Map as a design input. This is a large dataset that represents a snapshot in time and should not be taken as an absolute representation of character in London. LPAs are encouraged to refine the map through their own detailed character assessments. On individual schemes it will always be necessary for a site-specific design response to take account of the context, consistent with NPPF Policy DP3.'
London Green Belt Enhancement Opportunities, Final Report June 2026				
n/a	London Green Belt Enhancement Opportunities, Final Report	Comment	Well-designed projects can deliver co-benefits by improving biodiversity while enhancing heritage assets and contributing to local distinctiveness and sense of place. Further advice on this matter can be found in a note on Historic Environment Considerations for London's Local Nature Recovery Strategy, provided by Historic England for the GLA and published alongside the LNRS. It is therefore disappointing that the methodology for the London Green Belt Enhancement Opportunities report does not	We have requested adjustments to London Plan Policy PV7 and paragraph 6.49 of supporting text to address this matter (see Table 1 of our response).

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			recognise the significant opportunities (and risks) for heritage presented by proposed Green Belt release and associated strategic enhancement.	

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Table 3. Historic England's response to the Draft London Plan Integrated Impact Assessment (IIA)

Table 3 contains brief observations on the Draft London Plan Integrated Impact Assessment. These comments do not constitute a comprehensive review of the IIA but focus on key areas where there is an important relationship between our comments on the Draft London Plan itself and the content (methodology or findings) of the supporting evidence.

Page	Section	Type of comment	Comments	Suggested Modification
Chapter 2 Methodology				
27-28	Consult on the scope and level of detail of the IIA Paragraph 2.19	Comment	We are pleased to note that certain positive changes have been made to the IIA framework in response to Historic England's comments on the Scoping Report.	N/A
Chapter 3 Sustainability context				
45	Other national policies, plans and programmes Historic Environment Paragraph 3.28	Clarification	Please note that Historic England's previous corporate plan has been superseded by the Historic England Strategic Plan 2026-2031. We understand that the National Design Guide will also shortly be replaced by the Planning Practice Guidance for Design and Placemaking.	Replace Historic England Corporate Plan 2023-2026 (2023) with Strategic Plan 2026.
Chapter 4 Key sustainability issues and IIA framework				
67	Successful placemaking	Comment	We welcome recognition in paragraph 4.55 that:	As indicated in our response to the Draft London Plan (Table 1), we believe the plan should do more to protect London's WHS. We recommend a high

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	Likely evolution of the baseline in the absence of the new London Plan		'4.55 Development pressures in London will continue even in the absence of a new London Plan. While existing legislation - such as the Planning (Listed Buildings and Conservation Areas) Act 1990 – alongside the NPPF and Local Plans, will continue to provide a level of protection for heritage assets, **London's historic environment requires a more strategic and coordinated approach. Its unique historic character, including World Heritage Sites, plays a significant role in London's identity as a world city.** Without a new London Plan the protection of heritage assets may become less consistent and may fail to adequately consider their wider setting and cumulative impacts.'	level HIA of the plan following UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context. We also request associated changes to policies, including in particular: - MBUL3 Tall Buildings, Table 2.2 Locations where metropolitan tall building may be appropriate, approach to avoiding harm. - MBUL7 London's heritage, new development management clause for WHS impact assessment and pre-application engagement.
Chapter 5 Integrated Impact Assessment findings for the spatial strategy options				
101 107	Table 5.1 Likely IIA effects of the spatial strategy options IIA objective 9: Historic environment Paragraph 5.27	Clarification	Table 5.1 presents a very negative picture for heritage, with the spatial strategy scoring '--?' across all options. While the assessment against objective 9 in paragraph 5.27 recognises that there may be 'opportunities to conserve and enhance	Consider amending Table 5.1 to better reflect the fact that development, urban regeneration or enhancements secured through planning obligations may also have positive effects on the historic environment. As outlined in our comments on the Draft London Plan (Table 1) Policy PV7, the Green Belt

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			London's distinctive heritage assets and their settings' this is not reflected in the table. As all options may include positive and negative effects, we acknowledge that this is unlikely to affect the selection of a preferred option.	enhancement opportunities ought to include opportunities to restore or enhance historic features including assets on the Heritage at Risk Register.
Chapter 6 Integrated Impact Assessment findings for the draft London Plan				
122-123	Policy MBUL2 Optimising the use of land and site capacity	Further assessment needed	The IIA does not assess the effects of Policy MBUL2 on the historic environment. We consider this to be a limitation of the report. As we have set out in our response to the Draft London Plan, we believe that greater flexibility needs to be built into the policy and supporting Box MBUL2 to ensure that the London Plan will not conflict with statutory duties and national planning policies for heritage. The Small Sites Design Code, as currently presented and linked with Policy MBUL2, may result in harm to the historic environment which, if considered across London as a whole, could be significant.	In our response to the Draft London Plan (Table 1) we have suggested specific modifications which are intended to resolve these issues. We suggest that the assessment is expanded to include IIA objective 9: Historic environment.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
124-125	Policy MBUL3 Tall buildings	Further assessment needed	The analysis in paragraph 6.35 suggests that Policy MBUL3 will have a minor positive effect in relation to IIA objective 9: Historic environment. However, the Tall Buildings policy does not contain clauses to secure the conservation and enhancement of the significance of heritage assets and the OUV of WHS (other than insofar as they might form part of a strategic view). Nor does it signal that these are likely to be important matters when considering tall building proposals. The analysis overstates the effectiveness of the policy and fails to recognise that the Metropolitan Tall Building locations may result in harm to WHS.	Please see our detailed comments and requested changes to Policy MBUL3 of the Draft London Plan (Table 1). We request that the IIA assessment of Policy MBUL3 is reviewed and amended.
129-130	Policy MBUL6 High quality design for a growing, changing city	Clarification	The analysis suggests that Policy MBUL6 is unlikely to have an effect on objective 9. On balance we hope that this policy will have a positive effect on the historic environment as it promotes developments that enhance local context.	Consider adding an assessment for objective 9.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
130-132	Policy MBUL7 London's heritage	Comment	While we generally agree that Policy MBUL7 will have a significant positive effect on heritage, we believe there is an opportunity for the policy to do more. This is particularly in the context of London's four WHS and the need to secure their conservation through development management.	Please see our comments on Draft London Plan (Table 1) Policy MBUL7.
165-167	Policy GLE9 Aviation	Comment	Please note that the Appraisal of Sustainability for the National Policy Statement (NPS) associated with proposed expansion of Heathrow airport has assessed a major adverse effect on the historic environment. The NPS would provide the main policy framework for decision making on any associated Nationally Significant Infrastructure Project.	Consider scoping in assessment of Policy GLE9 against objective 9.
192-193	Policy PV1 Brownfield First Opportunity Areas (BFOAs)	Comment	While we don't disagree with the conclusion of the IIA that Policy PV1 may have a minor positive effect in relation to objective 9, we wish to highlight the following text: 'Directing new development to brownfield sites provides the opportunity to regenerate waterfront sites and to incorporate protection from effects of climate change related events.'	The IIA has drawn attention to an important opportunity for which the Draft London Plan does not present a clear vision. In our covering letter (point 4), we discuss the opportunity associated with BFOAs and the Thames. We have also provided comments and suggested changes in Table 1 for Policies GHR9

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			We very much agree with this analysis. However, the policy itself does not recognise the strategic opportunity presented by the BFOAs for cohesive, character-led place shaping on the banks of the Thames.	Clean and Healthy Waterways, and Policy PV1 BFOAs.
193-196	Policy PV2 Central Activities Zone (CAZ)	Clarification	While there is much to welcome in Policy PV2, we have raised concerns about several clauses that promote 'redevelopment' of buildings, without clarifying the circumstances in which this would be appropriate. We are concerned this could have adverse impacts on local character and heritage.	Please see our comments on Draft London Plan (Table 1) Policy PV2 and consider whether clauses promoting redevelopment could be better reflected in the IIA for objective 9.
198-200	Policy PV3 Town centres and high streets	Clarification	We have raised similar concerns about the promotion of redevelopment by Policy PV3 as by PV2.	Please see our comments on Draft London Plan (Table 1) Policy PV3 and consider whether clauses promoting redevelopment could be better reflected in the IIA for objective 9.
203-205	Policy PV6 Metropolitan Open Land (MOL)	Further assessment needed	We acknowledge that protection of MOL has associated benefits for London's heritage. However, we have raised concerns about Policy PV6 part C(2)(ii), which appears to allow for the release of an area of MOL where it is not publicly accessible, regardless of whether it meets C(1)(ii) or (iii). This therefore poses a risk	We request that the IIA assessment of Policy PV6 is reviewed and amended.

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
			to areas that perform these functions. Is there evidence of how much MOL this could affect?	
207-210	Policy PV7 Sustainable development and enhancement of the green belt	Further assessment needed	We do not agree with the IIA assessment that Policy PV7 is unlikely to have an effect on the historic environment. This appears to contradict the assessment in Appendix F that Green Belt BLGs could have significant adverse (though uncertain) effects on heritage. The Green Belt BLGs present considerable opportunities and risks for historic landscapes, built heritage (including assets on the Heritage at Risk Register) and archaeological remains (including within London's Archaeological Priority Areas) associated with development of large areas of predominantly undeveloped land. This should be recognised in the IIA for Policy PV7.	We request that the IIA assessment of Policy PV7 is reviewed and amended. In our response to the Draft London Plan (Table 1) we have suggested additional text to ensure it is clear that there are also enhancement opportunities for heritage in the Green Belt.
Appendix F Integrated Impact Assessment findings for the Green Belt Broad Locations for Growth				
443-482	Tables F.1, F.2 and F.3	Comment	Tables F.1, F.2 and F.3 identify potential significant adverse (but uncertain) impacts on	In our comments on the Draft London Plan (Table 1) Policy PV7 we have requested changes to the policy to identify the need for an assessment of

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Page	Section	Type of comment	Comments	Suggested Modification
	IIA findings for the Green Belt Broad Locations for Growth		the historic environment associated with development in the BLGs. The associated assessments identify potential for harm, or for enhancement to the historic environment, as well as other environmental issues. It is important that the policy framework in the Draft London Plan responds to these matters with the aim of avoiding, minimising or mitigating harm and seeking appropriate enhancements. This will help to ensure that the plan represents a positive strategy for heritage.	opportunities and environmental sensitivities to inform site selection. We have also requested changes to the policy and supporting text to recognise that there may be enhancement opportunities for heritage.

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy