



Historic England

City Plan 2036
ADDRESS REDACTED

Our ref: PL00509022

By email: localplan@cityoflondon.gov.uk

10 May 2021

Dear Sir/Madam

Shaping the Future City – City of London Local Plan Regulation 19: Proposed Submission Draft Consultation

Thank you for the opportunity to comment on the above consultation document, and for recent opportunities to engage with the City Corporation on the key issues. As the Government's adviser on the historic environment, Historic England's role is to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan contains clear and unambiguous policies relating to the historic environment (NPPF, para 16), makes sufficient provision for the conservation and enhancement of the historic environment in the City of London through strategic policies (para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if it therefore sets out a positive strategy for its conservation and enjoyment (para 185).

An outline of our position in relation to the draft Plan is set out below, while detailed comments are included in Appendix A together with a schedule of proposed amendments at Appendix B relating to certain policies that we believe would address our concerns in those areas.

Summary

By any standard, the depth and concentration of heritage within the City of London is remarkable. Its quality and diversity is a compelling draw for visitors, workers and investors



alike, enriching the lives of the City's broad working and resident populations. The rich historic character, with its unique street pattern and collection of outstanding buildings, its wealth of archaeology and the green and restful spaces it offers support resilience and well-being, and is a crucial part of the City's unique offer, both now and in terms of how it and wider London will recover from the effects of the Covid-19 pandemic.

As indicated above, the NPPF requires that local plans should set out a positive strategy for the historic environment. However, we believe that fundamental shortcomings in the draft Plan risk encouraging development that will seriously harm the significance of the City's historic environment, including some of the country's most important heritage assets. In its current form we consider that the draft Plan should not be considered sound.

Overarching comments

While development pressure within the Square Mile has been significant for many years, its historic environment remains critical to its character and identity. As we indicated in our previous consultation response (dated 28 February 2019), there is much to welcome in the draft Plan in respect of its consideration of the historic environment.

However, when the draft plan was last subject to consultation, we raised some fundamental concerns with regard to its content. While these were relatively few in number, they were of such crucial importance that we considered the Plan did not offer effective mechanisms to adequately protect the City's historic environment. Furthermore, we explained that the draft policies relating to tall buildings and the future of the City Cluster did not adequately reflect national or strategic policy and were sufficiently ambiguous as to mean that tall buildings proposals were likely to continue to come forward in locations and at heights that would cause serious harm to the significance of key heritage assets.

We also observed that there were important gaps in the evidence base underpinning these policy areas, and the Plan as a whole as it relates to the historic environment. Notably, the lack of publicly available information regarding the modelling of potential tall buildings in specific locations and heights created uncertainty in terms of what would be considered acceptable and where.

While we note and welcome some amendments in the new consultation version of the Plan, these do not address our central concerns. We therefore consider the draft Plan continues to be deficient in a number of important ways. These are inter-related and each has implications for the others, but can be summarised as follows:

- We do not consider the Plan offers an adequate framework for the effective protection of the historic environment, including individual heritage assets that are among the most important in the country and of international importance. Set against the context of (what has been in recent years) a highly dynamic development environment, adverse impacts on heritage in the City in recent years have therefore had irreversible implications. **Without amendments to draft policies, there is a significant risk that further harm to the historic environment will occur through inappropriate tall building development.**
- There is ambiguity within the draft policies relating to tall buildings and the City Cluster key area of change. **These require greater clarity regarding locations and acceptable heights.**
- There is a lack of up-to-date evidence relating to the historic environment underpinning the draft Plan. In particular, there are shortcomings relating to the tall buildings and City Cluster policies in that there is no publicly available analysis of the potential impacts on the historic environment. **The City Corporation should include the *Statement of Significance* produced on behalf of Historic England within its evidence base, and enable public scrutiny of its modelling of potential tall building development.**
- As a result, we do not consider the draft plan complies with national planning policy (paragraphs 16, 20, 35 and 185 of the NPPF), or policies in the new London Plan (notably D9). Our position is therefore that the draft Plan **requires amendments to meet the tests of soundness as set out in the National Planning Policy Framework (NPPF).**

We have had a number of positive meetings with Corporation staff over recent months and look forward to further engagement and discussion on relevant issues including the *Statement of Significance* (also attached to this letter). While there remain a number of major issues, we remain of the view that these discussions offer a potential route to positive resolutions. We look forward to further engagement in order to seek agreement where possible and will actively pursue continued engagement; similarly, please do not hesitate to reach out to me or my colleagues including Emily Gee, Regional Director, London and South East, for further discussion.



Historic England

Please note that on the basis of the current draft Plan, we would wish to participate in the examination hearings.

Please also note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully

NAME REDACTED

Historic Environment Planning Adviser

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Appendix A

Evidence base

1. An overarching concern in relation to the local plan process is the evidence base on which it is based and from which policies should be derived. Paragraph 31 of the NPPF sets out that local plans should be underpinned by relevant and up-to-date evidence. In our view the local plan process for the City is undermined by a lack of up to date evidence in relation to the historic environment. In order to help address this concern and due to the exceptional historic environment within the area, Historic England commissioned a *Statement of Significance* covering the whole of the City of London, a copy of which has been submitted attached to this consultation response.
2. While we note the publication of a number of supporting papers in recent weeks that contain further detail of the City's historic environment (notably Topic Paper 3 – Tall Buildings and Protected Views), we continue to consider that the evidence base is not as comprehensive as it should be, given the ambitious growth targets and the remarkable heritage sensitivities. The shortcomings in the evidence is both in terms of it failing to provide a full understanding (taken with a sufficiently long view and covering the whole of the City) of the current situation and in examining and testing the potential impacts of future development.
3. We believe the *Statement of Significance* produced on our behalf is an important step towards addressing these gaps, not least in its identification and articulation of the City's existing character, the significance of its heritage and its analysis of the effects on this of recent development trends. It furthers understanding of how, where and why changes to the built environment within the City have affected heritage significance and provides a starting point to use this analysis in informing future policies that will better protect heritage assets and existing character. We would commend its use to you in underpinning the approach to heritage in the emerging Plan and to ensure that the historic environment is considered in a fully rounded manner. Likewise, we believe it will be an aid to all stakeholders involved in managing change to the City's historic environment. We look forward to further discussions with City Corporation colleagues as to how the document can be put to use in the local plan preparation process.
4. We have noted section 5 of Topic Paper 3 which includes detail of the extensive work undertaken by the City Corporation on 3D modelling of future development, and, in

particular, how the future shape and massing of the City Cluster may evolve through new tall building proposals. Further comments on both the tall buildings and City Cluster policies are set out below, but as we made clear in our Regulation 18 stage response we consider that the analysis of potential impacts achieved through the modelling exercise should be made available as part of the evidence base for the local plan process and be directly linked to policy. While the methodology set out in section 5 and used to inform draft policies would appear logical as far as it goes (please see comments in relation to Policy S12 Tall Buildings on its limitations), without being able to scrutinise its outputs it is not possible to reach a conclusion as to whether it has meaningfully informed policy or its likely effectiveness in conserving and enhancing the historic environment.

5. For example, the '*City Cluster aspirational profile*' included at page 56 of Topic Paper 3 clearly demonstrates the potential advantages of such an approach to understanding likely impacts of tall building developments in particular locations. However, as things stand there is no way of understanding how this exercise has directly informed the relevant draft policies elsewhere in the Plan. As a result, we are not in a position to be satisfied that the aspirational profile would adequately avoid harm to heritage, or indeed to make a judgement as to the degree of impact of its individual elements.
6. We are clear that the ultimate intention of the City Corporation in curating the shape and massing of the Cluster to date has been to understand how harmful impacts (on the setting of the Tower of London World Heritage Site in particular) can be avoided. However, as matters stand it is not possible to be clear whether any aspirational profile would achieve that important objective or justify the extent of support offered to potential tall building development in the Cluster by Policy S21 as currently drafted. We consider the 3D modelling data should form part of the publicly available evidence base, with all stakeholders able to test and understand the impacts of the aspirational profile. This would enable proper consideration of any impacts on the historic environment, including on heritage assets which are highly significant and in many cases sensitive to change such as Bevis Marks synagogue, landmark city churches, livery halls and the Monument.
7. Nevertheless, we remain keen to engage with the Corporation in analysing such impacts, for example in the backdrop and setting of the Tower of London (as we have done with the St Paul's 'cone'), and other landmark and highly significant buildings within the City.

8. To address these issues and to help satisfy the requirements of paras 31 and 35 of the NPPF, we consider that the Corporation should adopt the *Statement of Significance* referred to above as part of its evidence base and also seek to use its contents in further guidance on development likely to affect the historic environment. Additionally, while we acknowledge the potential challenges in presenting data from the 3D modelling exercise in a publicly accessible format, we consider it is critical that all stakeholders (including the Planning Inspectorate) are able to examine the process and evidence (as set out in the Planning Practice Guidance at para 038 Reference ID 61-038-20190315) and properly understand the potential impacts identified to be able to come to a view as whether the resultant policies are justified.

Strategic Policy S12 Tall Buildings

9. The amendments to the text of policy S12 are noted and welcomed. In particular, the inclusion of a reference to ‘*immediate and wider*’ settings at clause 2 and the protected vista and silhouette of the White Tower of the Tower of London at clause 6 are helpful. We are also pleased to note amendments to the supporting text at paras 6.5.1, 6.5.2 and 6.5.4. Nevertheless, our fundamental concerns as set out in the previous public consultation regarding ambiguity remain. Should the policy as currently drafted be adopted, we believe there will be further adverse impacts on the City’s historic environment, above and beyond those we have identified in our advice on specific cases in recent years.
10. Much of the current draft Plan relating to tall buildings and the City Cluster (or Eastern Cluster) continues the approach in the existing local plan. Since its adoption there have been a number of proposals that Historic England has objected to on the grounds of their impacts on the heritage assets of the greatest importance. We do not consider the existing plan is sufficiently clear in its approach to tall buildings, to prevent harmful development. We are therefore concerned that the draft Plan will not address this issue due to its continued ambiguity.
11. Our first concern relates to the identification of areas ‘inappropriate’ for tall buildings. While it is helpful that it is made clear that tall buildings will not be allowed in the areas specified in clause 6 of S12 (conservation areas, St Paul’s Heights areas etc), without further explanatory text beyond the statement that ‘*All of the City is sensitive to the development of tall buildings*’ at para 6.5.1 there is an inference that elsewhere may be appropriate and a potential risk of harmful proposals coming forward. We also

consider that this wording conflicts with policies elsewhere in the Plan, including S8 Design (the requirement that development is appropriate to its neighbours) and S13 Protected Views and its approach to the implementation of the Mayor of London's London View Management Framework – specifically the river prospect from viewing location 10.A Tower Bridge.

12. Policy D9.B1 of the now adopted London Plan indicates that where plans determine locations 'may be an appropriate form of development', this is subject to 'meeting the other requirements of the Plan'. As drafted, we therefore consider S12 to be ambiguous given it states that tall buildings will be 'encouraged on suitable sites having regard to' a number of listed factors. While we note the supporting text at para 6.5.4, we believe it should also be explicit in the policy that tall buildings should meet all the other relevant requirements in the Plan (and indeed the new London Plan) to achieve such support.
13. As indicated above, we agree that the areas specified in clause 6 of S12 are not appropriate locations for tall buildings. However, we believe that adopting an approach that only maps out inappropriate areas fails to take into account a number of ways new development potentially affects the historic environment. The approach to tall buildings on which both the current and draft City plans are based is derived from massing models and consequent visual impacts only, together with geometric protection of designated views rather than a more holistic consideration of the experience of place and of the significance of individual assets and their settings. As demonstrated by the *Statement of Significance*, such an approach fails to reflect effects on significance through the erosion of existing character, changes to the inter-relationship and inter-visibility of heritage assets as well as cumulative and incremental change.
14. In a related point to our comments in paras 1-8, we do not consider the available evidence to sufficiently justify the limited extent of areas that are inappropriate for tall buildings, as potential impacts beyond the identified areas have not been publicly tested or understood. As well as the requirements of the NPPF in respect of evidence already referred to, it should be noted that London Plan policy D1.A requires boroughs to undertake assessments to define the characteristics, qualities and values of areas to properly understand local capacity for growth.
15. We consider policy S12 does not meet other requirements set out by London Plan policy D9, notably D9.C. This is because it would not ensure that tall buildings reinforce the spatial hierarchy of the context of the City (in particular the visibility of St Paul's and the

Tower of London) or avoid harm to the significance of heritage assets and their settings (both within and beyond the boundaries of the City), or the Outstanding Universal Value of the World Heritage Site.

16. As a result, we consider Policy S12 to be unacceptably ambiguous and fails to comply with para 16 of the NPPF given that it would not be clear how decision makers should react to tall building proposals in certain foreseeable circumstances. We further consider it is not justified in the context of para 35 of the NPPF in that it would not appear to be based on appropriate evidence. We would be very keen to discuss further wording to resolve this situation.

Strategic Policy S21: City Cluster

17. The issues relating to ambiguity and the lack of a comprehensive evidence base also underlie our concerns in relation to S21 and future development within the City Cluster. We would however reiterate our support for tall building and high-density development being directed towards the Cluster as the most suitable area within the City. This is nonetheless subject to a more precise approach being adopted where potential impacts are better understood and the approach to the Cluster in the policy is sufficiently detailed to avoid harm to heritage. Given that policy S21 currently contains no guidance on potential building heights within the Cluster, we consider that the effects of future development are uncertain and given recent trends could create unacceptable impacts on the historic environment. We consider the ambiguity is exacerbated by the contrast between the definition of a tall building specified in policy S12 as 75m and the effective upper limit of 300m in all parts of the Cluster set by the aviation height limit for City Airport. The potential effects on the historic environment of the resultant height 'gap' of 225m could clearly vary depending on location between highly adverse and negligible, but as set out is unknown.
18. A plan-led approach to tall buildings offers the most effective and efficient method of delivering growth in a geographically small area with highly complex constraints and significant development pressure. As a result, we would expect to see a plan-led approach to tall buildings that effectively manages their effects in the City and provides clarity about what would be built where and at what heights. This would give valuable certainty to all parties involved in developing, considering and advising on proposals.

19. We note the text in Topic Paper 3 which refers to the 3D modelling undertaken as part of the Corporation's plan preparations and indicates the desire to 'define and sculpt the City profile' (p50) and 'gain a better understanding of the future capacity of the City Cluster' (also p50). Similarly, there is a reference on p55 to using the modelling to visualise development scenarios to enable the Corporation to 'establish an aspirational vision of the profile and extent of the future City Cluster in the draft City Plan 2036'. However, this aspirational vision is not identified in policy S21 or indeed elsewhere in the Plan or the available evidence base. Topic Paper 3 suggests a future profile to the Cluster that has been informed by the historic environment, yet we do not consider that potential effects have been reflected in policy S21. We therefore contend that the extent of support for new development in the policy, and tall buildings in particular, is not justified given there is no relevant evidence to support it.
20. We consider that the approach of clustering towers, in a consolidated form, and of curating the shape and massing of the Cluster so that the effects on the historic environment are actively managed, is most appropriate. This approach should ensure that the Cluster respects and steps down from the existing approved apex towards the key heritage assets of St Paul's Cathedral and the Tower of London World Heritage Site to respond to their specific and internationally important significance. This is not to say however that the Cathedral and the World Heritage Site are the only heritage assets or contributors to the historic character of the City that should be central to such an approach. A wide range of historic buildings, including Bevis Marks synagogue and the significant number of landmark historic churches within (and around) the Cluster, should also be considered in any robust modelling exercise. Effectively protecting their significance is a key public policy objective that supports the character not only of the City, but London as a whole, in the eyes of the world.
21. What is currently aspirational in the evidence base should therefore be rigorously and openly tested, and integrated into policy, as recommended for the Processional Route viewing cone towards St Paul's Cathedral. This will be key to identifying and avoiding potential harm to the historic environment through tall buildings, the setting of nationally and internationally important historic structures and the unique and rich local character.
22. While we acknowledge the particular circumstances in the City of London in relation to constraints and recent development pressure, we continue to consider that identifying appropriate and acceptable building heights would enable a properly plan-led approach

to future tall building development. Using the 3D modelling to identify appropriate height contours in relation to all relevant constraints, including the historic environment, on a more detailed map of the Cluster would be one method of achieving this.

23. An alternative would be to identify and formally allocate sites within the Cluster. Given the work undertaken in the form of 3D modelling and other preparatory analysis on future development patterns, we consider that allocation of specific sites (including for example the 'Renewal Opportunity Sites' in draft policy S21) would offer clarity and precision in the process. Once sites have been allocated, this will then enable analysis of the significance of potentially affected heritage assets (in the form of a Heritage Impact Assessment), the potential effects on significance of development in close proximity and the production of design parameters (including a height range) that would help ensure the avoidance of adverse impacts. We would be very pleased to further discuss the precise mechanism by which this could be achieved, but detail in both the *Statement of Significance* produced for Historic England and [HE Advice Note 3: Site Allocations and the Historic Environment](#) could provide the starting point. We would also suggest this approach would go some way to reflecting the requirements of London Plan policies D1 (Form, character and capacity for growth) and D3 (Optimising site capacity).
24. As currently drafted, we consider draft policy S21 does not comply with paragraphs 16 and 20 of the NPPF through its lack of clarity regarding building heights and would not therefore provide for effective conservation and enhancement of the historic environment. Furthermore, London Plan policy D9.B2 is clear that heights and locations of tall buildings should be explicitly defined (also section 3.9.2). While we note the text at section 1.4.13 of the draft City of London Plan that indicates it has been prepared in alignment with the 2021 London Plan, we consider policy S21 presents a clear conflict with D9.B2. We therefore consider that the policy does not meet the requirements of para 35 of the NPPF.

Other comments

25. **Policy S8 Design.** This policy currently refers to conserving and enhancing the local and wider character of the City, but the effect on the setting of heritage assets generally is only covered explicitly in the specifically heritage policies elsewhere in the Plan. There should therefore be a closer link between the requirement for high quality design and avoiding harm to heritage assets. London Plan policy D3 (Optimising site capacity) requires that development respects existing character and both enhances and utilises

heritage assets. Clause 9 should therefore be explicit about any effects of new development on the setting of heritage assets, while a corresponding amendment to para 6.1.6 should explain the logic.

26. We note the amendment to clause 9 of this policy. While we consider this improves the likely effectiveness of the draft policy to an extent, we remain of the view that in order to ensure that potentially significant and far-reaching effects of tall buildings in the City on neighbouring areas are appropriately considered, a further reference to cross-boundary effects is necessary.
27. **Policy S11 Historic environment.** As drafted, clause 5 of the policy refers only to the local setting of the Tower of London World Heritage Site. While we note policy HE3 deals specifically with the WHS, we believe policy S11 should refer generally to the overall setting rather than being restricted to the local setting in order to be able to properly consider all potential impacts on its setting through new development. Although para 6.4.2 of the draft Plan acknowledges that the City provides part of the setting for the WHS, it would be more effective for this to be specifically acknowledged in 6.4.9 under the heading ‘how the policy works’.
28. **Policy HE1 Managing change to heritage assets.** We note the text at para 6.4.21 regarding supporting information, although we also note that this does not appear to be specific about what is actually expected in practice. Please see our comments at para 23 in relation to assessment methodologies.
29. With respect to para 6.4.18 and the setting of heritage assets when viewed from high level locations, we consider the text as drafted to be potentially inaccurate. While we would not dispute that there may be circumstances where such a view would be a material consideration, this would not be the case in relation to every development proposal with effects on the historic environment. The text should be qualified to reflect this.
30. **Policy HE3 Setting of the Tower of London World Heritage Site.** The supporting text refers at paragraph 6.4.29 to the ICOMOS publication ‘*Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*’, although we note there is no indication as how this should be applied or used. We consider that it should be made clearer that the ICOMOS methodology should be followed in relevant circumstances, not least as it appears in the London Plan SPG on World Heritage Sites



Conclusion

31. As set out above we consider that the current consultation draft of the local plan fails to comply with both national and regional policy in a number of critical ways. As such, we believe that it would not provide an effective mechanism for the conservation of the historic environment within the City of London and would be likely, in our view, to lead to unnecessary and avoidable harmful impacts on the historic environment over the Plan period. As currently drafted, we consider (in the context of paragraph 35 of the NPPF) that it is not justified, effective or consistent with national planning policy and is therefore not sound.
32. As already indicated, we have had a number of positive discussions with Corporation colleagues during the consultation period. Given the sensitivity of the City's historic environment and the importance of the local plan in ensuring its conservation, we look forward to continuing this engagement and our long-standing positive relationship to seek solutions to outstanding issues, including how the *Statement of Significance* can be best utilised.

Appendix B – Schedule of Recommended Amendments (please note that specific proposed amendments below do not address our concerns in their entirety)

Para 1.4.19 Local Evidence Base (ref paras 1-8 Appendix A)

Recommendations 1 - we consider there remains work to be done to ensure that there is a comprehensive evidence base in place in relation to the historic environment, and that it has informed and helped shape relevant policies such as S12 Tall buildings and S21 City Cluster.

S8 Design (ref paras 26 and 26 Appendix A)

Recommendation 2 - we recommend that Clause 9 of S8 is amended as follows:

‘... quality and depth of modelling and detail which conserves and enhances the local and wider character and appearance of the City, *including the setting of its heritage assets*, and is appropriate to its neighbours *through consideration of potential cross-boundary effects*.’

Recommendation 3 - para 6.1.6 (sentence two) should be amended as follows:

‘... while also respecting its surroundings and the unique character and *historic environment* of the City *and its neighbours*.’

S11 Historic environment (ref para 27 of Appendix A)

Recommendation 4 - clause 5 of policy S11 should be amended as follows:

‘... authenticity and integrity of the Tower of London World Heritage Site and its ~~local~~ setting’.

Recommendation 5 - para 6.4.9 should be amended as follows:

‘... Outstanding Universal Value (OUB). *The wider setting of the World Heritage Site covers areas both in the City of London and the London Borough of Tower Hamlets*.’

HE1 Managing change to heritage assets (ref paras 28 and 29 of Appendix A)



Recommendation 6 - para 6.4.21 should also include a reference to Historic England Good Practice Advice Note in Planning 3: The Setting of Heritage Assets which can be found [here](#).

Recommendation 7 - para 6.4.18 final sentence should be amended as follows:

‘... setting of an asset from high level locations *may* be a consideration’.

HE3 Setting of the Tower of London World Heritage Site (ref para 30 at Appendix A)

Recommendation 8 - para 6.4.29 final sentence should be amended as follows:

‘... impact of development of potential development on the OUV of properties *and the methodology set out should be applied in relation to all relevant development proposals*’.

S12 Tall buildings (ref paras 9-16 of Appendix A)

Recommendation 9 - clause 2 should be amended as follows:

‘... will be encouraged on suitable sites *where they comply with all relevant requirements elsewhere in this Plan and the 2021 London Plan, and* having regard to:’

Recommendation 10 – clause 2, bullet point 1 should be amended as follows:

‘... skyline and historic skyline features, *including the cumulative effects of multiple tall building proposals*’.

Recommendation 11 - clause 6 first sentence should be amended as follows

‘... tall buildings will be refused in ~~inappropriate areas, comprising~~ conservation areas, the St Paul’s Heights ...’

Recommendation 12 – para 6.5.1, third sentence should be amended as follows:

‘Areas outside of the City *are* also sensitive to the development ...’

Recommendation 13 – Figure 20 (p160) should be retitled to reflect its component areas with ‘areas inappropriate for new tall buildings’ deleted.



S21 City Cluster (ref paras 17-24 at Appendix A)

Recommendation 14 - as set out in Appendix A, we do not consider that policy S21 conforms with either the NPPF or the 2021 London Plan. In order to ensure that future development in the Cluster does not cause harm to the significance of the historic environment, greater clarity is required as to building heights and locations for potential tall buildings proposals. Paras 22 and 23 of Appendix A set out potential mechanisms for achieving this, but in any event we would be very keen to continue discussions on this subject in order to find a resolution.

City of London Statement of Heritage Significance Prepared for Historic England April 2021



Alan Baxter

City of London Statement of Heritage Significance Prepared for Historic England April 2021

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1 Purpose and methodology of this study

1. By any measure, the City of London is an exceptional place. Its rich and long history, its global economic reach and its internationally significant historic environment are unique in the UK. This report considers the last of these three aspects of the Square Mile. It was commissioned by Historic England to better understand the City's historic environment and assist in the development of the new local plan, City Plan 2036, by providing further up-to-date evidence in line with the requirements of National Planning Policy Framework (paras 31, 185) and the new London Plan (Policy HC1 A, B).
2. The aim of the report is to help ensure that a broad understanding of significance of the local historic environment, looking beyond individual heritage assets, is encapsulated within the emerging City Plan, and to this end Historic England envisages that the report will be a resource shared between stakeholders.
3. In pursuit of these objectives, this rapid study takes the form of a snapshot of the City's historic environment in early 2021, taking into consideration recent effects on its significance related to new development and pointing to potential ways in which development proposals might take account of the significance identified. It is primarily an act of synthesis, drawing on the extensive literature and wherever possible drawing on existing planning and management documents produced by the City of London and others. Additionally, a number of site visits were undertaken and historians and archaeologists were consulted. Discussions have also been held with representatives of the City of London, the GLA, St Paul's Cathedral and Historic Royal Palaces.
4. Mapping is included at the end of the report, drawn from GIS data supplied by Historic England, MOLA, City of London and data.gov.uk. Further supporting information is appended in a second volume, including details of methodology, literature review and consultation together with extracts from selected published and unpublished sources. References to relevant maps and supporting information are provided under the section headings below. Finally, a note on the Tower of London. Though by the vagaries of local government organisation the fortress is located within the London Borough of Tower Hamlets, it is included here because historically it was firmly part of the fabric of the City, not least as the lynchpin of the capital's medieval fortifications.

2 Character of the City's historic environment

5. As of August 2020, the City of London contained, within the space of 700 acres, as many as 27 conservation areas, 616 listed buildings, 50 scheduled monuments and five registered parks and gardens. At 27%, the percentage of Grade I and II* listed buildings is broadly four times the national average. Yet these statistics only hint at the City's richness and depth of interest, for it is established in national and regional policy and international charters that the significance of any historic environment is more than the significance of individual places and heritage assets, it is also the tangible and intangible sum of both their significance and their inter-relationship. This amounts to what might be termed its 'sense of place' (London Plan 2021, policy HC1(B), para 7.1.1). In the City, this is predominantly experienced at ground level, but also, in aspects such as topography and skyline, from beyond its boundaries and from the increasing number of elevated vantage points in and around it.
6. In considering this, a number of qualities have previously been identified to establish what makes the City's sense of place unique. Writing in 1976, Sir Nikolaus Pevsner noted that 'the traditional visual qualities of the City of London are intricacy, variety and surprise' (Lloyd, Freeman and Fawcett, 157). This is superbly explored further in Simon Bradley's

introduction to the Buildings of England volume *London 1: The City of London* (1997), which remains the single best overview and dissection of the subject. It is commended to everyone who must consider the management of the City's historic environment.

7. The central effect of diversity on the townscape of the City has also been recognised in official publications, such as the City of London Tall Buildings Evidence Base Paper (2010 update, here referred to as CoLTBEBP):

The evolution of the City has resulted in a townscape whose dominant characteristic is its great diversity. There is great variety in building type, age, materials, scale, bulk, height and architectural style which often results in the juxtaposition of widely differing buildings. The rich variety of built form means that urban character can contrast greatly within very local areas. (CoLTBEBP, 23)

8. As this paper will demonstrate, the concept of juxtaposition in the context of heritage significance must be qualified, because it does not automatically result in a positive relationship with historic buildings and places that maintains or enhances the setting and significance of individual historic buildings. For example, Adelaide House, London Bridge (GII) is an interesting building that nevertheless has a damaging effect on the adjacent church of St Magnus the Martyr (GI), dominating it and obscuring it in important views, such as that from London Bridge.
9. Further, the variety that writers have long identified in the City's urban form is not limitless, otherwise it would not be unique to the Square Mile. As Bradley and others have shown, it is defined by a series of characteristics which are analysed in turn below, and which together combine to form the City's distinctive sense of place that is outlined in a concluding summary (section 12). The individual elements discussed prior to that are:
 - Topography
 - Archaeology
 - Green space
 - Streets
 - Defences
 - Plots and blocks
 - Building types and architecture
 - Skyline
 - Use, activity and specialisation

3 Topography

See mapping: Romans Streets + Topography, C17 Street Pattern, Tall Buildings

See Supporting Information part E: Archaeology Notes

10. Understanding the City's character must begin with an appreciation of the topography from which it rises, and first and foremost its relationship to the River Thames – its reason for being and until relatively recently its lifeblood and principal highway, with the Tower of London guarding the seaward gateway. Because of the centrality of the Thames to the history of the City, surviving visual, functional and rights of way connections to the river are highly significant.
11. From the present riverbank – which has been reclaimed from the river – the land rises gently northward to the twin shallow hills of Ludgate Hill and Cornhill, the valleys between and to the west drained by the now culverted but once open River Walbrook and River Fleet. This landform contributes powerfully to the character and experience of the City's historic environment at a local level and from further afield, where it is viewed from the south and west rising from the foreground of the river to the skyline landmarks of St Paul's and the Eastern Cluster (now referred to as the City Cluster) crowning the two hills.

4 Archaeology

See mapping: Romans Streets + Topography, Roman Streets, C17 Street Pattern

See Supporting Information part E: Archaeology Notes

12. Topography is intrinsically linked to archaeology, because it was for the combination of the lowest crossing point on the Thames and defensible dry land that the Romans founded what became Londinium here by at least AD48 and determined its arrangement of defences and streets.
13. Archaeological investigation and analysis made possible by the exceptional degree and nature of redevelopment since the Second World War means that Londinium is one of the most closely studied cities in the Roman Empire. And, because of the paucity of documentary evidence, archaeology is the main source of our understanding of the Roman and medieval settlement.
14. In the process of redevelopment, most of the City's archaeology has been stripped out: as a result of 19th and early 20th century development, by the 1960s it has been estimated that over 50% of the pre-18th century archaeological deposits had been removed. Since then, redevelopment may have removed a further 30% (Sophie Jackson, pers. comms.).
15. Despite this, the archaeological potential of the City remains of international importance and continues to shed new light on the Roman world in Britain, as well as considerable detail of life in later periods. Some of the archaeology can be seen – such as elements of the walls and the amphitheatre beneath the Guildhall. Other sites have been incorporated positively into development, notably in recent years the Temple of Mithras in the Bloomberg building on Walbrook.

5 Green space

See mapping: Designations

See Supporting Information part J: Conservation Area Summaries

16. The City of London is perhaps the most densely developed urban area in the UK, and green space is characteristically scarce. Its nature and location are significant as evidence of its history and land use. An exceptionally large proportion consists of current and former churchyards, little pockets in the townscape that are a highly distinctive part of the City's unique townscape. These open spaces are often partly concealed and include architectural elements to create intimacy at a human scale; their number and location illustrate both the centrality of faith and the population density of the medieval City.
17. The City of London has been particularly successful in managing and maintaining the City churchyards, creating a network of green pockets that supply workers with a welcome refuge from the office whilst at the same providing a way to engage quite directly with the history of the City. The City of London's Street Scene Challenge, established 2002, has enriched spaces through sensitive, distinctive new design, as at St Pancras Church Garden or Fen Court. They are an exemplar to other cities.
18. Larger areas of green space are found around the periphery of the City, such as the Temple and Finsbury Circus. This is no coincidence: these are locations outside the former city walls. Conversely on the eastern fringe there is little green space, reflecting the intense use of this area for commerce, industry and workers housing from the C18 onwards, at the expense of green space for its inhabitants. The scale and nature of green space is therefore significant both as illustrations of the history land use on the City fringes and in defining the distinctive character of these areas that result from this history.

6 Streets

See mapping: Roman Street Pattern, C17 Street Pattern

See Supporting Information part E: Archaeology Notes; part J: Conservation Area Summaries

19. Streets make an exceptional contribution to the significance of the City's historic environment, both as evidence of its past and for their role in shaping our experience of the place. The streetscape can be considered in four phases, the early ones being more significant:

Roman

20. The primary south / north Roman route from the Thames crossing survives as Gracechurch Street - Bishopsgate. At Cornhill it meets the Roman road to the west, formed today by Cornhill – Cheapside – Newgate Street. Thus, the arterial streets of Londinium survived its abandonment in the C5 to have an important influence on the City's later development, and they have very high historic and archaeological interest.
21. The C19 re-alignment of London Bridge slightly upstream has done little to detract from the powerful historical influence and significance of this crossing point as the reason for the foundation of the settlement, and the only entry to London from south of the river under the C18.

Medieval

22. The City retains what is by far and away the largest medieval street pattern in Britain, which in and of its self is of national historical interest. Its irregular plan of narrow, winding streets

and numerous alleys, courts and lanes are a constant reminder of the City's history. They are fundamental to the distinctive character of the City, creating its intimacy and 'endlessly surprising juxtapositions and vistas' (Bradley and Pevsner, 26). Further, the history of medieval use can be traced in the street names even as their architectural character has altered; the delight and intrigue inherent in these ancient names is an everyday way in which workers and visitors engage with the history of the City.

23. From the C11 a processional route was formed between Westminster, the focus of the monarchy's power and authority, and St Paul's Cathedral, the mother church of London. This route from Whitehall, along Strand, Fleet Street and Ludgate Hill, is a defining feature of London, inherited from the medieval past. This overarching, enduring route has helped shape the design and continuing appreciation of St Paul's Cathedral. Views of St Paul's from the processional route along Fleet Street and Ludgate Hill make a defining contribution to the significance of St Paul's Cathedral and form a key part of its setting. Greater recent recognition of the significance and characteristics of this route is now acknowledged in the emerging City Plan Strategic Policy S13 (draft City Plan 2036, 136). It is a subject worthy of extensive study and a relevant one to modern development considerations in the City.
24. Even those medieval streets that are increasingly dominated by modern architecture – such as Leadenhall or Fenchurch Street – have high significance in their alignments and in their supporting alleys and courts.

Post medieval

25. Though the Great Fire destroyed much of the City's building stock, and Wren and others saw in this catastrophe an opportunity to replan and rationalise, there was no appetite amongst London's landowners and its business community for amending property ownership, so the old street pattern was retained.
26. Therefore, wider and straighter streets are later, and primarily the result of Victorian and C20 efforts to ease traffic congestion. They cross and recross the medieval street network, such as King William Street or Queen Victoria Street. The C19 streets created to converge on the Bank of England help to define the distinctive character of this part of the City as the high point of imperial prosperity, with finance, trade and civic power represented by the Bank, Royal Exchange and Mansion House.

Post war

27. As part of the reconstruction of the City after the Second World War, major new roads were driven through to manage and separate motor traffic. By virtue of their scale, alignment, construction and character, London Wall and Lower Thames Street have had a detrimental impact on the historic environment, causing the severance of historic streets, the demolition of historic buildings and harm to the setting of many others. Lower Thames Street has had the particularly damaging effect of slicing across the medieval network of streets and lanes that led down to the Thames, and has done much to detach the once pivotal riverfront from the rest of the City. The highways that isolate the Tower of London are another example of the harm caused by post-war transport planning. It was intended that these new roads would be accompanied by a network of elevated pedestrian 'pedways', but this was only partially realised and only fragments now survive on London Wall and Lower Thames Street.

7 Defences

See mapping: Designations

See Supporting Information part J: Tower of London WHS SOUV

28. Roman and medieval defences contribute to the distinctiveness of the City in three ways:
- i. **Walls.** The standing remains of the Roman and medieval city walls are nationally important monuments, recognised by their statutory designation as scheduled monuments. The alignment preserved in the street network continues to shape the streetscape, creating historically-resonant juxtapositions with the rambling medieval network within and the often less dense and more regular network without.
 - ii. **Gates.** The locations of the city gates still determine the principal entry points into the City centuries after the walls ceased to have any military purpose and gates themselves were pulled down. These factors, which are of high historical significance, are still imprinted on the layout of the City and influence local character, land use, transport planning and movement patterns.
 - iii. **Fortress.** The strong point of the defensive ring was the Tower of London, guarding the seaward flank of the City. One of the most famous structures in the UK, its international significance is recognised by its inscription as a World Heritage Site and expounded in the Statement of Outstanding Universal Value. It is the most complete example of a C11 fortress palace remaining in Europe and the setting for key historical events in European history, including the execution of three English queens. Key attributes include its landmark siting for protection and control of the City of London, as a symbol of Norman power and military architecture, and for its association with State institutions (*Tower of London WHS Management Plan, 2016, 5, 35*).

8 Plots and blocks

See mapping: Medieval City, C17 Street Pattern

See Supporting Information part F: A Tall Tale, the outline history of tall buildings in London; part J: Conservation Area Summaries

29. Medieval land organisation continues to exercise a powerful influence on the character of the City, in which a key component of its distinctive streetscape and historic architecture is the widespread survival of narrow plots. Individual medieval plots are now rarer and where they remain these are of the highest significance as illustrations and evidence of the medieval city. Many C19 and early C20 commercial buildings were constructed by amalgamating two or three plots. The way that buildings stand tight to the medieval street pattern on these plots, with few breaks and only small openings, gives a sculptural, enclosed shape to the streetscape that is highly characteristic and significant.
30. Following the Second World War, there was a step change in the scale of consolidation up to and including entire city blocks - stimulated by the destruction of one third of the land area of the City through bombing, by changes in business practices and by changes in planning policy, namely the introduction of plot ratio controls and daylighting codes (which aimed to improve natural lighting in offices by moving away from blocks which filled the whole site, hollowed out only by a mean central lightwell).

31. The process of combining plots continues. The City Corporation has previously acknowledged (in relation to tall buildings) that large floor plate buildings 'can have a profound impact on urban character by introducing a stridently larger scale of development in parts of the City which are defined by a dense urban grain and narrow plot widths' (CoLTBEBP, p.24). In doing so, it erodes the historic character of streets and our understanding of its historic land use, reduces interest and variety and thereby harms the historic environment.
32. As a result of this mis-match between large buildings and the intricate street pattern, the City now exhibits streets and alleys characterised by the continuous, unrelieved, inactive frontages of large blocks (e.g. Angel Lane, Bread Street, Goldsmith Street, Great Trinity Lane, Lawrence Lane, Milk Street, Moor Lane, Wood Street). This is despite efforts to add greater articulation and interest – achieved with a degree of success at, for example, the Bloomberg building, Queen Victoria Street (2017). No development has yet been wholly successful in bridging the difficult relationship between the intricate historic character of the City streets and the functional requirements of large floorplate offices.
33. A further issue is sometimes associated with more recent tall buildings, which may be set back from the street line to conform to a strong geometrical shape and form, or to meet a requirement to create new public space. These gaps and set backs are not normally consistent with – and can be harmful to – the historic character of the local streetscape (for example, 20 Fenchurch Street).
34. In the areas beyond the former city walls, land organisation was historically more varied and this shapes the distinctive local character of the historic environment in places such as Smithfield and Temple and adjoining districts like Spitalfields. In some instances this is the still powerful legacy of medieval religious houses and institutions.

9 Building types and architecture

See mapping: Medieval City, 1938 Land Use

See Supporting Information: part I: Schedule of Historic City Landmarks; part J: Conservation Area Summaries; part K: Tower of London WHS SOUV; part L: Guildhall Statement of Significance; part M The Monument Statement of Significance; part N: City Churches Notes

35. Despite the effects of bomb damage and post war redevelopment, the historic architecture of the City is both rich and varied, and includes sites and some typologies that are unique. Its diversity and characteristics are described in the introduction to the Buildings of England Volume on the *City of London* (1997) and in *Conservation Areas in the City, A General Introduction to their Character* (City of London, 1994). Four characteristics in particular are highlighted here for their importance to the City's distinctiveness:

Landmark City buildings

36. The list of historic architectural landmarks in the City is extensive and includes, inter alia, the Bank of England, the Mansion House, St Bartholomew's Hospital, the Monument and Liverpool Street Station. Together with the Tower of London (see paragraph 24iii), the following have an especially strong influence:
37. **St Paul's Cathedral.** One of the most famous buildings in the UK, central to the image of the nation, with historical and architectural interest is of international significance. Occupies the oldest site of Christian worship in London, founded in 604. The present Cathedral was the first purpose-built Protestant Cathedral in England, and it is widely considered the masterpiece of England's greatest architect, Sir Christopher Wren. It also embodies, in its architecture and fittings, the finest artistic qualities, from a high point in English

craftsmanship. Its famous silhouette of towers and dome has been a constant symbol of London, and of the country's defiance during the Second World. As the 'mother church' of London the Cathedral carries associations with great state occasions including the funerals of Wellington and Churchill.

38. **City churches:** The City of London has an exceptional density of churches, illustrative of the size and density of its medieval population, and unmatched in the UK. Even today there are few parts of the City which are more than a hundred metres from a church, yet at the end of the Middle Ages the number of churches and religious buildings, and their dominance in their setting, was far greater. The effects of the Reformation, fire, bombing and demolition have greatly reduced their number but the 39 that remain are of the highest architectural, historical and archaeological significance individually and, as importantly, collectively. They include substantial medieval survivors as well as the famous reconstructions by Wren and others, a collection without parallel in the UK.
39. Moreover, the full extent of religious heritage in the City is far greater than the Anglican parish churches alone. It also encompasses the exceptional medieval church of the Temple, the towers and other remains of half a dozen or so demolished parish churches, more than 50 historic churchyards, and another twelve buildings of other denominations and religions, including Roman Catholic, Welsh Presbyterian, the City Temple and the Dutch church at Austin Friars – a reminder of the contribution of foreign mercantile communities to the history of the City. Amongst these, the greatest heritage significance can be unquestionably ascribed to Bevis Marks, the oldest synagogue in the UK in continuous use. This remarkably intact survivor of 1701 speaks powerfully to the importance and influence of the capital's Jewish community in the economic and social history of the City.
40. As intended by Wren and realised in remarkable variety, the churches are of the greatest importance to the City as visual landmarks (see City of London Protected Views SPD, 2012), seen in views and glimpses from near and far. They are crucial visual anchorages, places where the continuities of City life can still be experienced and its time depth is most clearly revealed. Their contribution to the spiritual, cultural, musical and social life of the City is deep and wide-ranging, and another element that gives the City a richly unique character.
41. **Guildhall** is the most significant site of local governance in the UK, displaying exceptional civic architecture from the C14, C15, C18, C19 and C20 centuries, grouped around Guildhall Yard. The great hall itself is one of the largest medieval halls in Europe. The distinctive complex speaks of the City Corporation's rich history of governance and democracy, of national events and great people. This is further explored in the Statement of Significance from the site's Conservation Management Plan, reproduced in part L of Supporting Information. Incorporated in the architecture of Guildhall is the City's coat of arms, with its dragons and cross of St George, familiar also from the City's black, red and white street furniture. This recognisable and widespread sense of corporate identity is, in itself, another distinctive feature of the City, and a pervasive reminder of its history and unique governance and culture.
42. **Livery halls** are a widespread and distinctive aspect of the City's built heritage though not as visually prominent as the churches. Of the 110 livery companies of the City of London, about 40 have their own livery hall. The established pattern of their buildings comes from their medieval role as trade guilds: a Hall in which to meet and dine and a Court Room to rule over the regulation of their craft. As the earliest livery halls began in medieval courtyard houses, the established plan-form also involves a secluded courtyard and much of the interest of these complexes is recessed behind a relatively modest street frontage, contributing to the rich intricacy of the City's urban form.

43. **City markets.** The City Corporation has managed London's wholesale markets for hundreds of years. Of the historic sites, only Smithfield meat market remains operational for its original purpose. This historical and functional continuity is of deep historical and communal significance, more so because the other markets have moved out and their historic homes adapted to new uses. Nevertheless, as rebuilt by the City Architect Sir Horace Jones in the C19, these structures (Smithfield, Leadenhall, Billingsgate) retain a strong architectural and corporate group identity that handsomely illustrates the City's proud tradition of local government, and they continue to act as significant local landmarks.

Traditional financial and commercial architecture

44. Some financial and commercial buildings are well-known for their historical significance, as symbols of economic power and regulation or for their exceptional architectural qualities. Examples are the Bank of England, the Royal Exchange, Lutyen's former Midland Bank. These make significant contributions to the streetscape of the City, frequently designed as landmarks.
45. Less attention has been paid to the larger body of financial and commercial architecture, yet these offices, banks, trading houses, insurance offices, warehouses and other premises are those that do most to define the architectural character of the City's streets. Overwhelmingly these are 4-6 storey structures erected from the mid C19 to the outbreak of the Second World War, at the Imperial zenith of the City as a world centre of commerce. Four fifths of the city was rebuilt between 1855 and 1910 alone (Bradley). Within this era of reconstruction, two phases can be broadly discerned: the later C19 with the erection of banks, insurance companies, discount houses, etc., and the early C20, when less was built and the blocks are often the prestige London offices of provincial companies, or industries such as newspapers.
46. The disposition of these building types maps the land use specialisations that historically were so characteristic of the City (see map 6, 1938 Land Use and section 11, below). For example, the bespoke premises associated with printing, press and publishing on and off Fleet Street (such as newspaper offices, printing presses, paper warehouses).
47. Some of these buildings, especially banks and insurance offices, are by nationally significant architects, but a great many are by firms such as Tillott & Chamberlain and Herbert Ford that were based in the City and specialised in its architecture (some 177 architects in the Post Office London Directory for 1863 have E.C. addresses). In this way, the historic commercial architecture of the City is very much a distinctive local tradition.
48. A large number of these buildings are not listed and or in conservation areas, but regardless of this they contribute very strongly in their group value to the historic interest and the distinctive historic character of the City and its streetscape.

Post war buildings

49. No part of the UK has been more intensively redeveloped since the War than the City. Whilst it shares with other urban centres a history of wartime bomb damage and post-war comprehensive replanning, the rate of recent redevelopment – much of it on sites already rebuilt since 1945 – is exceptional. By one estimate 75% of the floorspace in the City has been created since 1986 (Forshaw, 2013, 17). The effect of associated plot amalgamation has already been discussed. The architectural legacy is startlingly varied, illustrating the stylistic evolution of the profession since 1945, from the neo-Georgian restoration of Temple (unique in the UK) and chaste late classicism to Corbusian replanning, Brutalism, post-modernism and the Hi-Tech, and on to the more plural modernism of today.

50. Collectively, these buildings illustrate the transformation of the City from devastation of the War into the preeminent global financial powerhouse of today. Individually, however, their quality is highly varied. Some buildings are recognised as amongst the very best examples of their era, architect or stylistic movement. These include Lloyds of London (Richard Rogers, 1986) and No. 1 Poultry (James Stirling, 1997), now listed at Grade I and II* respectively, illustrating how the best of the recent past can contribute to the City's C20 evolution. The Barbican Estate, begun in 1965, has been listed at Grade II. It is recognised for its architectural interest as a sophisticated and monumental expression of the British tradition of modernism, designed by one its leading practitioners (Chamberlin, Powell & Bon). Nevertheless, its scale and fortress like character towards surrounding streets is firmly at odds with the historic grain of the City (and the sites it replaced), and its three towers have a negative impact on the silhouette of St Paul's seen from the South Bank. Many other post-war buildings similarly fail to respond successfully to the dense grain and architectural traditions of the City.
51. For the first 40 years of the post-war era, planning was managed by the plot ratio controls. Their abolition has had a significant impact in some locations such as parts of the City Cluster because taller buildings are now able to rise sheer from the street edge, creating in places a canyon effect that is uncomfortably out of scale with the traditional townscape character of the City.

Façade and materials

52. The City was rebuilt in brick after the Great Fire, with Portland Stone reserved for churches and public buildings until its widespread adoption from the mid C19 onwards for commercial architecture. It is now the most striking and characteristic historic frontage material, employed in a range of architectural styles in combination with extensive carved detail. Overall, there is a visual richness in traditional City architecture that comes from high quality materials and frequently elaborate façade designs that vary in style and detail from one plot to the next.
53. Post-war development largely breaks from this tradition, characterised by the introduction of new materials such as curtain wall glazing, polished granite and other imported stones, and frequently by limited architectural enrichment. Some post-war buildings are effective in introducing variety through the use of materials that deliberately contrast with the backdrop of Portland stone, as seen at Bracken House or No. 1 Poultry, for example. Others, however, have a horizontal emphasis that is at odds with the vertical accents inherent in the architectural traditions of the City. A recent example of this by an internationally regarded architect on a particularly sensitive site is One New Change (Jean Nouvel, 2010).

10 Skyline

See mapping: Tall Buildings, Tall Buildings, Protected Views + Key Areas of Change

See Supporting Information part F: A Tall Tale, the outline history of tall buildings in London; part G: History of Post-War Tall Building and Skyline Policy; part H: Schedule of Demolished Tall Buildings

54. Note on sources: two papers reproduced Supporting Information provided a concise but comprehensive historical overview of this subject. These are Andrew Saint's *A Tall Tale: the outline history of tall buildings in London* (part F, English Heritage) and a *History of Post-war Tall Building and Skyline Policy* (part G, extracted from CoLTBEP).

Creation

55. Most tall buildings in London before the C19 were 'public in one sense or another and therefore symbolic of authority' (Saint). The medieval skyline of the City was dominated by the old St Paul's and crowded by the steeples and towers of the churches and religious houses, as well the Tower. This was recreated in a largely classical language after the Great Fire by Wren and others. The resultant panorama – of the majestic Portland Stone mass of St Pauls surrounded by delicate steeples and towers, rising above the brick and tile street buildings below, was universally admired, immortalised in paint by Canaletto and in words by Wordsworth.
56. Over the next two centuries a few public buildings included roofscape elements designed to adorn the skyline in the same spirit, such as the dome of the Old Bailey and the towers of Cannon Street Station.

Controls

57. During the C19 the widespread construction of taller buildings became structurally feasible, but it was held back by an absence of market demand and by regulation (Saint). From the 1840s until the 1950s a series of building acts limited heights to broadly 80-100 ft (4-6 storeys) because of the technological difficulties of fighting fires in tall buildings (Saint). As these controls coincided with a period in which more than four fifths of the City was rebuilt, they had the effect of creating a new roofscape, one that was captured by photography and survived more or less intact until the 1960s. St Pauls still rose above the surrounding buildings, together with towers and spires of the City churches, but the prominence of the Tower of London was reduced (the highest points – the corner turrets of the White Tower – rise to about 100 ft).
58. From the 1930s, when waivers to the building acts were increasingly issued, through to the 1950s when a plot ratio system was introduced, restrictions on buildings heights were loosened. In response new planning controls were incrementally developed to manage these intrusions, and in particular to conserve both the setting of St Paul's and the setting of the River Thames, and more recently that of the Tower of London. The first was the St Paul's Heights (1938). Identification and management of strategic London views followed in stages, and are now brought together under the GLA's *London View Management Framework* (LVMF). The most significant additional local views management control is the Monument Views Policy Area, and the most recent the processional route view of the west front of St Pauls. These are explained in the *LVMF SPG* (2012), the *City of London Protected Views SPD* (2012), and the emerging *City Plan 2036*.

The present strategy

59. Prior to the 1990s, the skyline had been breached by a scattering of post war tall buildings, mostly to the East and North. Approved on a case by case depending on the planning policy and controls of the time, they presented an incoherent picture when the skyline as a whole was viewed from, for example, Waterloo Bridge, where some invidious intrusions into the silhouette of St Paul's were apparent (such as Sudbury House). The results of this were universally lamented, as exemplified by Nikolaus Pevsner writing in the 1973 revision of the *Buildings of England*:

I had written in 1962 that the next few years were to change drastically the skyline of London. They have done it, and it is wholly to the detriment of London. Go to Waterloo Bridge or stand in Fleet Street, and look towards St Paul's. The dome now has to compete with more upstarts than one can count or easily recognise. These skyscrapers are not as high as those of America and they rarely come in Clusters. So the result is not dramatic; it does not remind one of New York or Chicago, but of some medium-sized city of the Middle West. That, in my opinion, is the greatest and saddest change' (Pevsner, 1973, p.113)

60. In the last 30 years two complimentary strategies have been adopted to at once address the failings and accommodate the insatiable demand for additional office space in the City, intensification that could only be met within the boundaries of the Corporation by going upwards.
61. The first is the demolition of many of the worst intruders into the setting of St Pauls, including Sudbury House and replacing them with lower buildings. In total, 8 post war office buildings have been replaced by lower development in pursuit of this strategy. The most egregious remaining offender is the Faraday Building, the GPO telephone exchange which was of those whose construction first stimulated policy to protect St Paul's. Its replacement with a lower structure would be a substantial enhancement of the setting of the cathedral, and would crown the achievements of a successful and progressive policy with few parallels in the UK.
62. The second strand has to been to concentrate very tall new office buildings in the so called 'City Cluster'. By a process of elimination, in order to avoid the St Pauls Heights, LVMF views and conservation areas, the Cluster is located on the eastern of the City's two hilltops (see Tall Buildings map).

The effect of the Cluster on the historic environment

63. As a search of social media and the internet reveals, the Cluster has rapidly become the preeminent international image of the City (sometimes but not always juxtaposed against St Paul's or the Tower), promoting and proclaiming its global reach and dynamic economic success. The positive townscape aspects of the Cluster can be in part attributed to the City Corporation's conception of the development as a cohesive, carefully sculpted addition to the skyline – that is, that it would be designed:
64. *The buildings of the Cluster are relatively closely spaced and in many views the lower members of the Cluster appear round its periphery and the taller buildings to the centre, so that the buildings step up towards the centre, which makes the Cluster a distinct and striking feature of the City's skyline. (CoLTBEBP, p.25)*
65. And by coincidence, the Cluster is located close to the intersection of the arterial routes of Roman Londinium. As these remain major roads in and out of London today, the manner in which the Cluster now terminates vistas on Brixton Hill, the A10 and A11 is an example of how aspects of the Cluster can be seen to make a broadly positive contribution to the wider cityscape of London. Nevertheless, these characteristics do not mean that the Cluster sustains or enhances the significance of individual buildings and monuments. Its presence cannot enhance the setting of any historic structure that was designed to rise prominently above the skyline of the City, such as St Paul's, the Tower and the City Churches.
66. In this context, shaping the Cluster is also fundamental to managing its impact so that harm to the historic environment and the setting of major historic structures is minimised. By reducing the visual domination of the Cluster as it gets closer to those parts of the historic environment whose setting London and City planning policy seeks to protect, in particular St Paul's, the Tower of London and the River Thames, actively curating the Cluster is a means of mediating with the complex, multi-faceted historic environment from which it rises.
67. Notwithstanding these efforts, the height and scale of the Cluster and its constituent buildings are such that their affect is widespread and never limited to one view point or one juxtaposition. Given the complexity, richness and three dimensionality of the City's historic environment, it is inevitable that they have caused a degree of harm to its significance.

68. In the immediate vicinity, the character of the Cluster area has been transformed, including the setting of listed buildings. As the Designations, Protected Views + Key Areas of Change map demonstrates, the greatest concentration of listed buildings in the City is immediately west of the Cluster, so the impact on the setting of the City's total stock of listed buildings is disproportionately high. These include Grade I buildings of exceptional national interest, including the Royal Exchange, which were designed as landmarks to be seen against the skyline.
69. Wider afield, the principal and most significant effect is that St Paul's has ceased to be the dominant and unrivalled focal point of the skyline that Wren intended. Likewise, the designed presence of the Tower, the City Churches and other historic landmarks is considerably diminished. Whatever the architectural and urban design merits of individual buildings and the wider townscape effects of the Cluster, these are changes that have harmed the historic environment of the City.

Setting of St Paul's Cathedral and the western part of the City

70. Though St Paul's is no longer the dominant presence on the City skyline it once was, the policies introduced to manage the setting of St Paul's have, by and large, proved successful in protecting its silhouette in strategic London views, and its skyline prominence in a more localised area. There is a clear separation between the Cathedral and the Cluster. Some harm to the setting of the Cathedral has been caused by taller buildings appearing to the north in its backdrop due to the limited spatial extent of the Heights policy in this area, and any further such intrusions would add to the harm.
71. Policy has historically focussed on conserving the setting of the Cathedral from views along or across the river from the south and from the west, and on longer views from the high ground encircling the centre of London (Greenwich, Hampstead, Richmond Park, and so on). However, views from the north and the east can be highly significant too. An example is the long vista up Cannon Street towards the Cathedral's south west tower, positioned by Wren to close the view (Oliver Caroe, pers. comms.). Another has been restored with great success by Foster + Partners' new Bloomberg building, where reinstatement of Watling Street frames a view of the cathedral's dome.
72. Conserving the setting of the Cathedral when viewed from the east requires consideration of the backdrop to the west of St Paul's. Here there is an extensive area of the City that remains at a lower and more historical scale. Through the middle of this threads the Processional Route along Fleet Street, Ludgate Hill and Ludgate Circus to the western silhouette of the Cathedral. On and around this route, the historic townscape character and the setting of historic landmarks such as St Paul's, but also city churches, are much better preserved than in many parts of the City.
73. For the international and national historical interest of the Processional Route, the deep associations of this area with the law and the press, the exceptional scarcity of post-war interventions on Fleet Street, and for the contribution to the western setting of the Cathedral, the critical historical mass of the western parts of the City is of high significance.

Setting of the Tower of London World Heritage Site

74. The Management Plan and Statement of Outstanding Universal Value (SOUV) for the Tower of London World Heritage Site address at length both the significance and the condition of the monument's setting, which is divided into three concentric parts: the immediate, local and wider setting. The wider setting has no defined boundary. It:
 75. *comprises buildings and areas beyond the local setting that are inter-visible with the Tower, or which could (if redeveloped) have an effect on its setting. The wider setting is therefore not fixed, and is proportionate to the scale of development in the vicinity of the Tower - the taller the development, the further its visual impact will extend* (Tower of London WHS Management Plan, 22).
 76. The SOUV concludes that the 'most significant challenges to the property lie in managing the environs of the Tower of London so as to protect its Outstanding Universal Value and setting' (Tower of London WHS Management Plan, 39):
 77. *The Tower's landmark siting and visual dominance on the edge of the River Thames, and the impression of great height it once gave, all key aspects of its significance, have to some extent been eroded by tall new buildings in the eastern part of the City of London, some of which predate inscription. Some of these have, to a degree, had an adverse impact on the views into, within and out of the property.*
 78. *The Tower's physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. Such development could limit the ability to perceive the Tower as being slightly apart from the City, or have an adverse impact on its skyline as viewed from the river.*
 79. The issues identified in the WHS Management Plan concern not only views of the Tower from outside, but increasingly views from inside the monument, where the growing number of tall buildings are intruding into the sense of enclosure of the Inner Ward, isolated from the modern world, that is a significant component of its spirit of place.
 80. In understanding the extent of harm to the setting and significance of historic places, a number of considerations contribute, including prominence, proximity, design and assertiveness as well as absolute height. Because of the spatial perception of depth, many of these are qualities that cannot be captured in two dimensional images. These factors are why the shape the City envisage for the Cluster when the concept was formulated, rising up to a central apex, is important to the management of the World Heritage Site's wider setting.

Setting of the River Thames

81. For decades, policy has sought to protect the setting of the River Thames in recognition of its townscape and historical significance. In the words of London Plan 2021:
 82. *The River Thames is a strategically-important and iconic feature of London. It is a focal point for London's identity reflecting its heritage, natural and landscape values as well as cultural opportunities.* (London Plan 2021, para 9.14.5)
 83. Resultant policy has been largely successful in managing building height and scale along the river within the City. 20 Fenchurch Street (the 'Walkie-Talkie'), however, is harmful as a visually dominant outlier that intrudes into this zone and has an overbearing presence on the river area.

84. Tower Bridge is an internationally famous structure where the significance of the River Thames and the setting of the Tower of London converge. The historical and architectural interest of the bridge is underscored by a review of the pictorial representation of London on the internet and social media. Along with the Palace of Westminster, Tower Bridge is the more common image of the city. See for example the home page of Visit London, the capital's official tourist agency (<https://www.visitlondon.com/>). The photograph there perfectly illustrates the importance of the iconic form of the structure of the silhouetted against the sky, with skyspace between the towers, to the understanding and experience of the bridge's significance.
85. London Bridge is sometimes overlooked because of the modest architectural significance of the present C20 structure, but, notwithstanding minor changes in alignment, this crossing is of far greater historical significance than any other, stretching all the way back via the celebrated medieval bridge to the foundation of Londinium. For this reason its setting, its visibility and its connections to the City and to the southern approaches are highly significant.

11 Uses, activity and specialisation

See mapping: 1938 Land Use

See Supporting Information part J: Conservation Area Summaries

86. Exceptionally for the historic core a major European capital, there are no state and fewer public buildings in the City, because of the development of Westminster as the focus of crown and state authority from C11.
87. There are also, today, only a few thousand residents, mostly concentrated in the comprehensively planned residential enclaves created after the War at the Barbican, Golden Lane Estate and on the eastern fringe – which give these areas their own distinctive urban character and architectural appearance.
88. Until the C19, however, the City was densely populated (128,000 residents in 1801). It was in that century that it was 'transformed, from a residential area with specialist commercial and financial functions, to a financial and commercial enclave with a dwindling residue of inhabitants' (Bradley and Pevsner, 101). Several complementary processes were responsible, such as the emergence of railway commuting that made it possible to break the bond between home and workplace, enabling housing to make way for the expansion of the architecture of commerce and transaction. This transformation resulted in an urban environment that is characterised by an intensity of street activity compared with residential areas of London, and, for example, large numbers of historic pubs to serve the workforce.
89. So, for all its present association with finance, until well into the C20 the City was home to a wide range of economic activities that were frequently organised into distinct areas with their own strongly defined character (see 1938 Land Use map). This may be felt most strongly today at Smithfield Market or in the legal district straddling the west end of Fleet Street, but elsewhere, as a consequence of profound economic changes since the War, many of these clusters have declined and disappeared, and with that their architectural distinctiveness has weakened. For example, the warehouses that once lined the riverfront and occupied much of the eastern fringe. Consequently, wherever examples of buildings and streetscape survive that illustrate these historical specialisations, such as those of the newspaper industry around Fleet Street, they are highly significant.

12 Conclusion: the City's sense of place, the experience of it, and the consideration of it

90. Whilst the preceding paragraphs have clearly demonstrated that the historic environment of the City has a polymorphic character that exercises a powerful influence on the local architectural and historic environment, this study concludes that previous analysis was correct in identifying a type of historic townscape that creates a sense of place distinctive to the City of London - one that is experienced at a local level, from within its streets.

Within the City

91. This sense of place is derived from a combination of tight urban and architectural grain that is experienced dynamically and in three dimensions:
- i. rambling and narrow medieval streets, quiet alleys and courts, winding up and down the topography. This medieval street pattern, by far the most extensive in the UK, is exceptionally important in its own right and because it exercises a powerful influence on the City's character.
 - ii. narrow historic plots occupied predominantly by financial commercial premises, with a building line tight to the pavement creating a sense of enclosure, a prevailing height of 4-6 storeys and varying façade architecture employing masonry with a vertical emphasis and extensive detailing in a range of styles. Many of these buildings were erected during the zenith of imperial power to the designs of architects based in the City itself, encapsulating the convergence of international influence and local tradition that is central to the City's identity. Their height was restricted by building acts, creating what we now recognise as the historic vertical dimensions of City streets.
 - iii. the high concentration of historic landmarks such as the City churches, many designed to be seen against the skyline, from both up close and afar.
92. Above all, the City's sense of place is experienced dynamically as 'endless surprising juxtapositions and vistas' (Bradley and Pevsner, 26). In any one location it is formed of a combination of these multiple facets, and these change at every corner. But, and this is of considerable importance to understanding the management of the City's historic environment, these juxtapositions do not automatically have a benign impact on the setting of historic buildings and places, particularly where development is of a scale or height inconsistent with the sense of place described above and the historic architectural hierarchy of the City that is described in this report.
93. Therefore, the significance of the City's historic environment can only be properly understood and assessed as the historical and visual interrelationship between all these components. It is vulnerable to harm through the loss, erosion or concealment of any one of these facets, and new juxtapositions which do not respond positively to the setting of its many historic buildings and places.
94. Many parts of the City exhibiting these characteristics are designated heritage assets such as conservation areas, but by no means all are. Regardless, for the reasons set out in this report, they should be considered as part of the historic environment as it is defined in the NPPF and the London Plan 2021.

From outside the City

95. From outside its boundaries, the historic character of the City is most powerfully and most famously experienced in views from the south banks of the Thames and from the riverside and river crossings to the west.

96. Here, the City's sense of place has undergone a fundamental change. Whilst planning policy has been successful in conserving the silhouette and foreground of St Paul's in specific views and locations, the scale and height of the City Cluster – which will grow considerably with schemes under construction or consented – has overturned the historic hierarchy of the skyline, in which St Paul's, and to a lesser extent the churches, the Tower and other historic landmarks, were deliberately dominant and designed to be seen against the sky. Because of the proximity of the Cluster to the Tower, this change is experienced most acutely in the World Heritage Site. The future height, footprint and shape of the Cluster could further accentuate these changes.
97. In the western part of the City skyline, historic character is much better preserved, on a scale that retains a critical mass; this is highly significant both in terms of the sense of place here and its group value with the contiguous townscape of Westminster to the west, and for its contribution to the setting of St Paul's.

Applying an understanding of significance

98. In conclusion, therefore, to conform with NPPF (paras 184, 188, 189), London Plan 2021 (policy HC1-C, HC2, D9-C, para 7.1.7) and draft City Plan 2036 (policy DE2-2, S11, HE1, HE2, HE3, S12, para 6.4.21), all new development in the City should be assessed not just for its impact on individual heritage assets – based on a full understanding of their significance in all its aspects – but also in terms of its relationship with the City's distinctive sense of place, which is an amalgamation of the relationships between the different elements of the historic environment.
99. This can be achieved within the framework of advice already set out in Historic England's *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3*. GPA3 recommends a five-step approach to assessing the contribution of setting to significance, and making decisions accordingly. It contains advice which should be applied at each of these five stages. Below, are a series of supplementary questions and prompts specific to the City of London, derived from the conclusions of this report, which might usefully be applied in addition to the development and assessment of schemes within the City.

Step 1: Identify which heritage assets and their settings are affected

City specific:

- Do the proposals affect unlisted historic buildings, such as C19 and early C20 financial and commercial architecture, either directly (their alteration or demolition) or indirectly (their setting)?
- What is the nature and history of the street and plot pattern in the area affected by the proposals?
- What is the archaeological potential of the proposal site, for example to reveal evidence of Roman and pre-fire London?

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

City specific:

- Is the contribution to the significance of heritage assets which are designed to be prominent and visible fully analysed and articulated?

- Does this analysis take full account of the LVMF, the City of London Protected Views SPD, the London's World Heritage Sites Guidance on Settings SPD and the Tower of London World Heritage Site Management Plan?
- Does this analysis look beyond the narrow parameters of the LVMF, local views and the St Paul's Heights to fully consider and articulate the wider significance of the City's historic environment, including the interrelationships between heritage assets (visual, historical, functional, cultural, archaeological)?

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

City specific:

- Do the proposals enable better understanding and awareness of the archaeological development of the area?
- Do the proposals retain or, where they have been amalgamated, reinstate historic plot divisions?
- Does the provision of any public space work with or against the spirit and grain of the historic street pattern and building line, and the historic townscape character of the site and its surroundings?
- Does the ground plan add to or diminish the sculptural townscape qualities, intimacy and street level activity associated with the City and its medieval street plan?
- Does the modelling of the façades engage with the strong and pervasive architectural tradition for intricacy of scale and articulation through detail and vertical division?
- Do the proposals affect the setting of heritage assets and the wider skyline of the City, taking into consideration the full and rounded assessment of their significance advised in Step 2?
- Do the proposals obstruct, compete with or dominate heritage assets and their setting, taking into account a full understanding of their significance and interrelationships as advised in Step 2?
- Where relevant, are the proposals consistent with the Statement of Outstanding Universal Value and the relevant Aims, Objectives and Actions of the Tower of London World Heritage Site Management Plan, and the Tower of London Local Setting Study?

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

City specific:

- Consider ways in which the proposals would enhance street activity through active frontages at a human scale. both in function and in design.
- Build to the streetline, avoiding recesses and set backs, which are contrary to the established historic character of City streets.
- Apply this not just to elevations to principal streets but also to side streets, alleys and yards to avoid sterile environments, inactive frontages and domination by servicing facilities.
- Avoid horizontal architectural emphasis and long unbroken facades, which are contrary to the historic architectural traditions of the City that contribute strongly to its specific sense of place and character.
- Respect and reflect historic plot divisions in elevation, plan and roofscape.

- Where opportunities arise, proposal should reinstate the pattern of historic plot boundaries where these have been lost or merged.
- Consider how the archaeology of the site might be incorporated, interpreted and celebrated. This might include a strategic approach to surviving fragments of archaeology in and around the proposed site that might be affected by development, and, seeking, as planning gain, funding for the analysis, display and dissemination of archaeological finds or investigations from any earlier redevelopment of the site, particularly where these earlier results have not previously been disseminated.

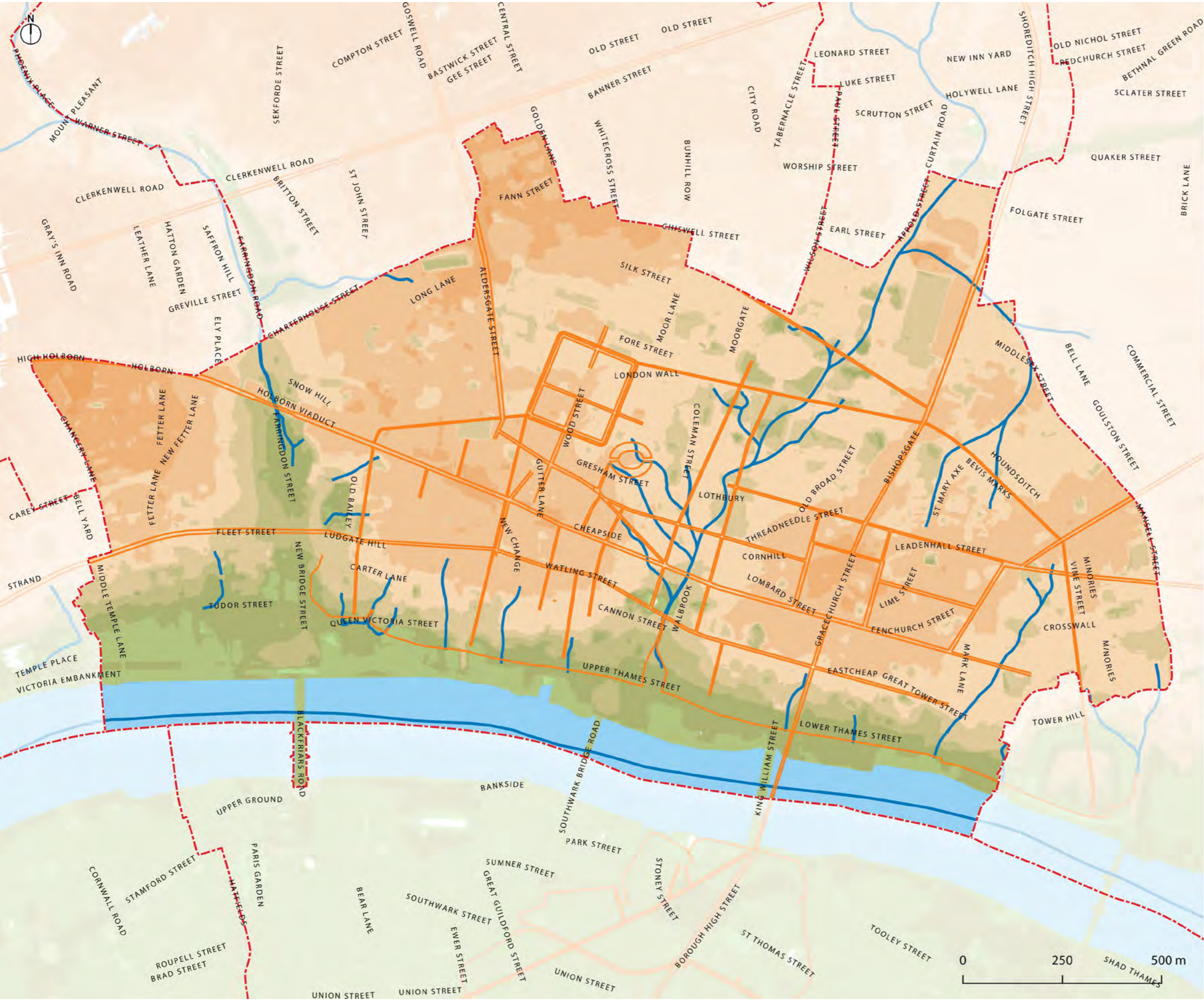
Step 5: Make and document the decision and monitor outcomes

City specific:

- In line with London Plan 2021 policies HC1 and DI, ensure that the grey literature generated by development within the City – which is exceptional in the UK in its depth and density by virtue of the intensity and nature of post war development - is collated, curated and made accessible in ways that improve understanding and interpretation of the City to the widest possible audiences, and makes it is easily accessible to inform future plan making and development proposals.

13 Mapping

See over the page



- Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)
- Roman infrastructure
(© MOLA)
- Roman water
(© MOLA)
- Modern Tidal Water
(Source: Ordnance Survey
OpenMap Local)
- Modern contours
(Source: Environment Agency)

- 0 - 2.5m
- 2.5 - 5m
- 5 - 7.5m
- 7.5 - 10m
- 10 - 12.5m
- 12.5 - 15m
- 15 - 17.5m
- 17.5 - 20m
- 20 - 22.5m

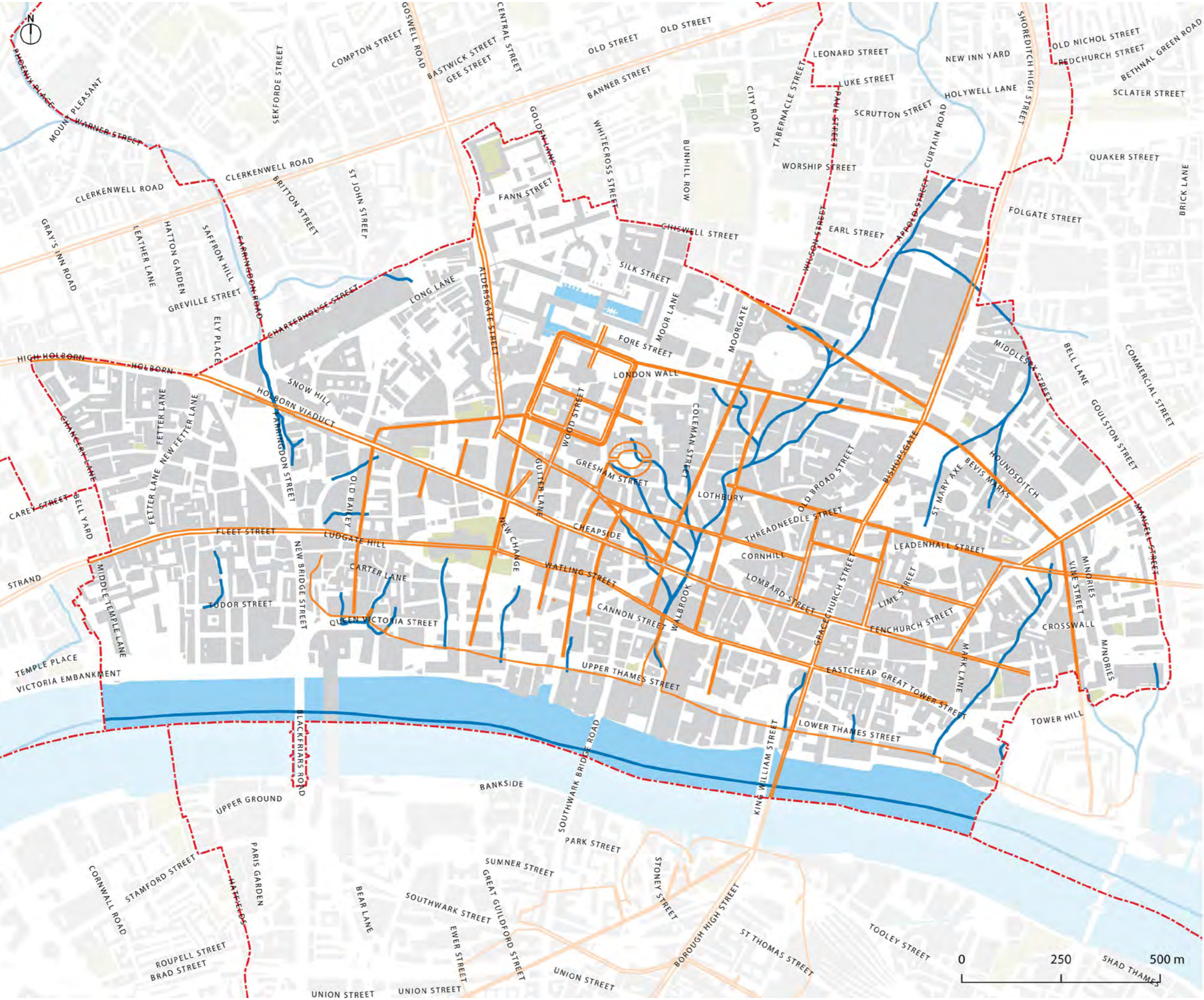
CITY OF LONDON STATEMENT OF
HERITAGE SIGNIFICANCE
HISTORIC ENGLAND STUDY

ROMAN STREETS + TOPOGRAPHY:
ROMAN STREETS AND
WATERCOURSES OVERLAID
OVER MODERN TOPOGRAPHY

1733/260 Map 1

MARCH 2021

Alan Baxter



- Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)
- Roman infrastructure
(© MOLA)
- Roman water
(© MOLA)

CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE HISTORIC ENGLAND STUDY	
ROMAN STREET PATTERN: ROMAN INFRASTRUCTURE OVERLAID OVER MODERN STREET PATTERN	
1733/260 Map 2	
MARCH 2021	Alan Baxter



Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)

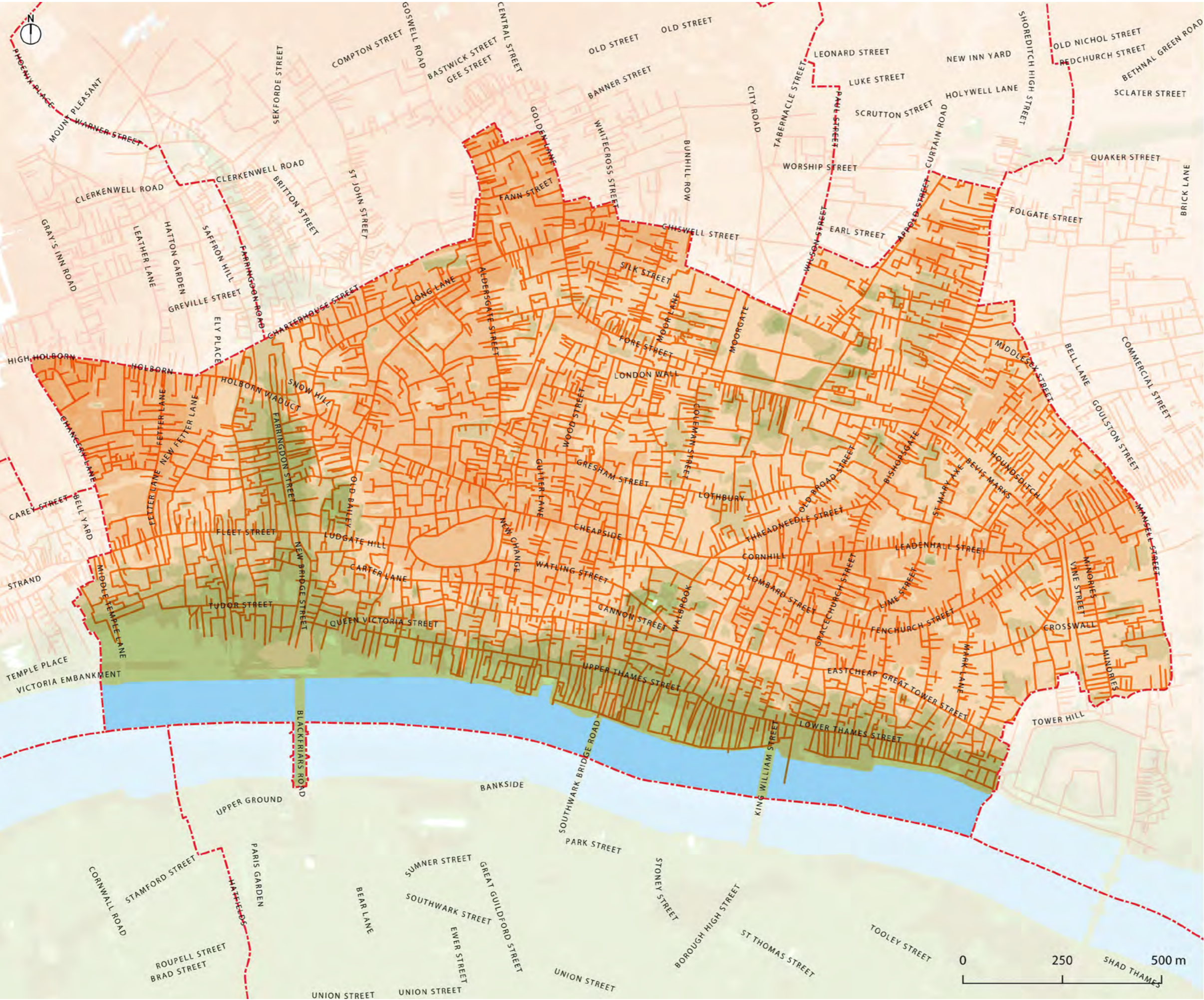
**CITY OF LONDON STATEMENT OF
HERITAGE SIGNIFICANCE**
HISTORIC ENGLAND STUDY

1270-1300 MEDIEVAL MAP:
BRITISH HISTORIC TOWN ATLAS

1733/260 Map 3

MARCH 2021

Alan Baxter



Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)

1676 streets (© MOLA,
digitised from Ogilby Morgan)

Modern Tidal Water
(Source: Ordnance Survey
OpenMap Local)

Modern contours
(Source: Environment Agency)

0 - 2.5m

2.5 - 5m

5 - 7.5m

7.5 - 10m

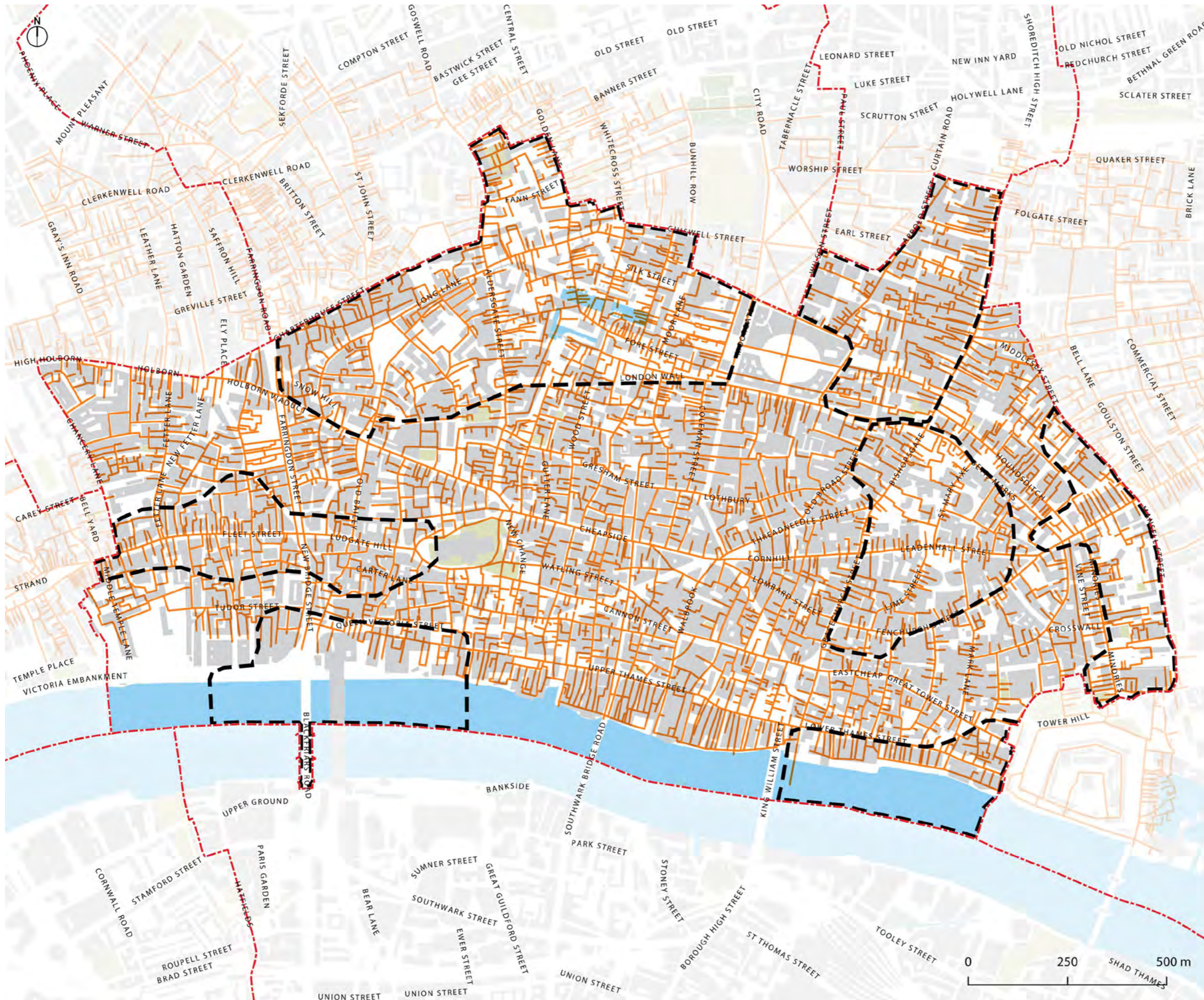
10 - 12.5m

12.5 - 15m

15 - 17.5m

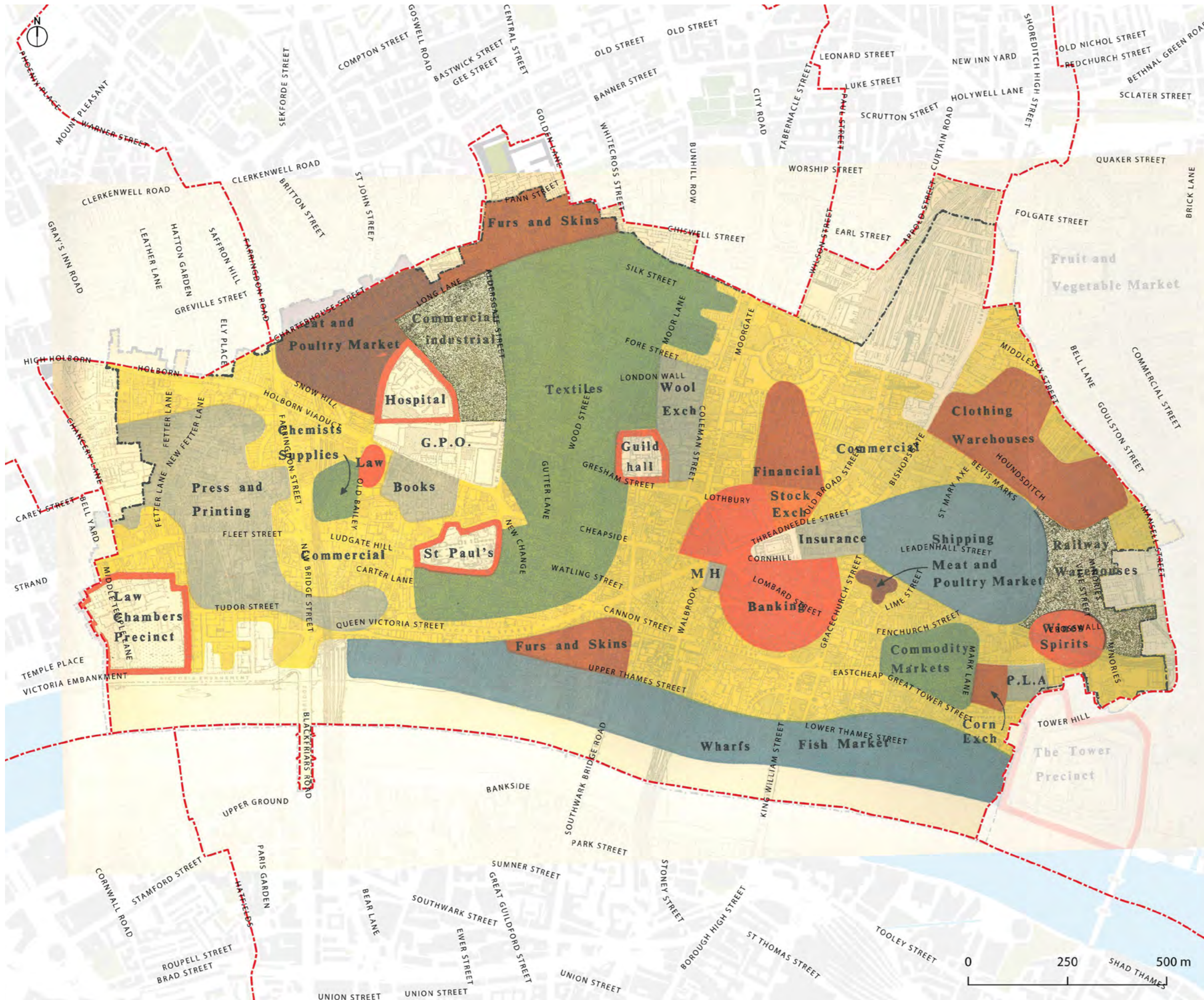
17.5 - 20m

20 - 22.5m



-  Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)
-  Key areas of change
(Source: draft City Plan 2036:
Shaping the Future City.
Digitised by Alan Baxter)
-  1676 streets (© MOLA,
digitised from Ogilby Morgan)

CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE HISTORIC ENGLAND STUDY	
C17 STREETS + KEY AREAS OF CHANGE	
1733/260 Map 5	
MARCH 2021	Alan Baxter



Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)

CITY OF LONDON STATEMENT OF
HERITAGE SIGNIFICANCE
HISTORIC ENGLAND STUDY


1938 LAND USE MAP:
HOLDEN AND HOLDFORD, 1947


1733/260 Map 6

MARCH 2021

Alan Baxter

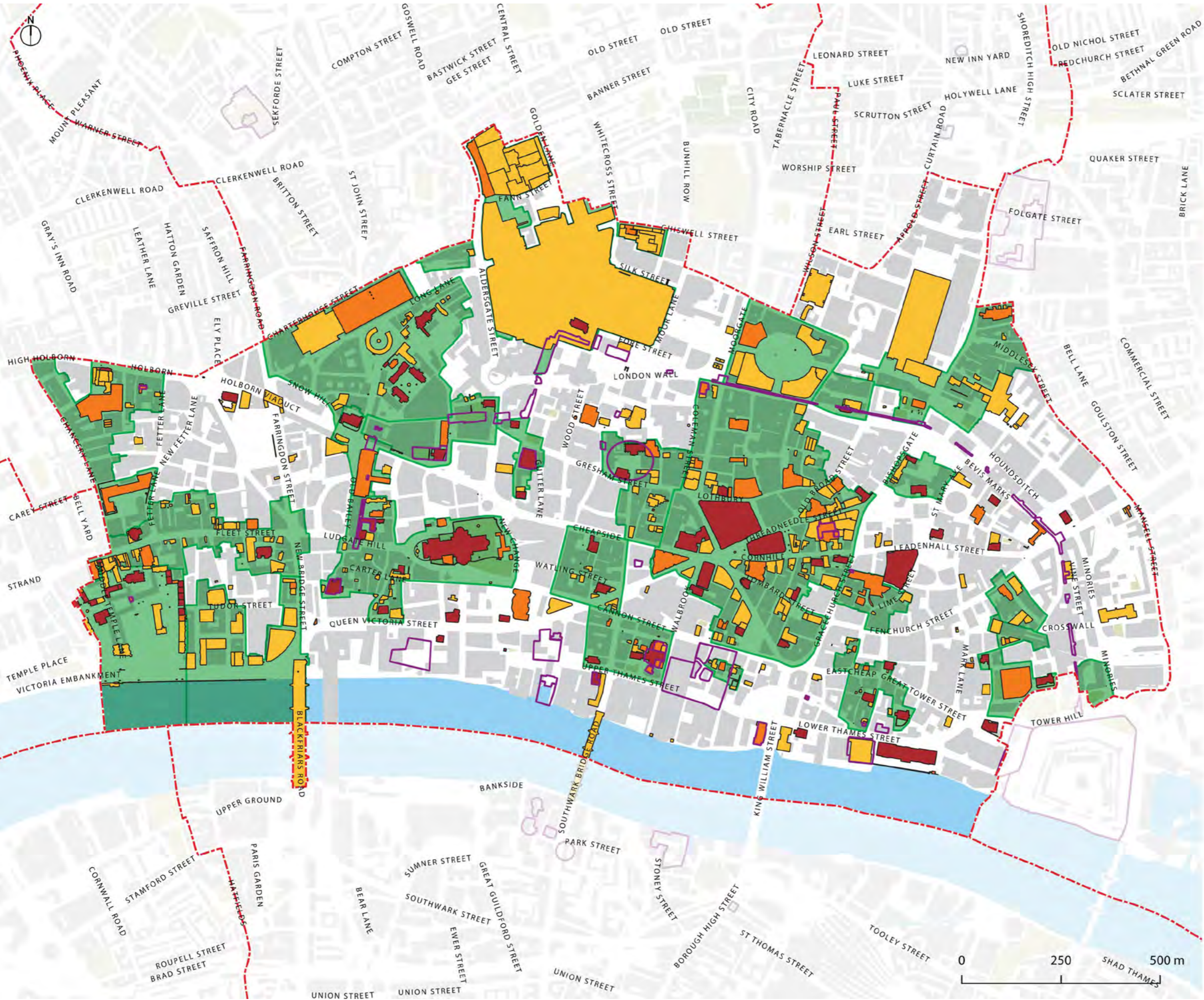


 Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)

 Conservation areas
(Source: City of London)

London Bomb maps
(© The London Topographical Society)

CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE HISTORIC ENGLAND STUDY	
BOMB DAMAGE AND CONSERVATION AREAS	
1733/260 Map 7	
MARCH 2021	Alan Baxter



- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
- Scheduled monuments
(Source: Historic England)
- Conservation areas
(Source: City of London)
- Listed buildings
(Source: City of London)
 - Grade I listed
 - Grade II* listed
 - Grade II listed

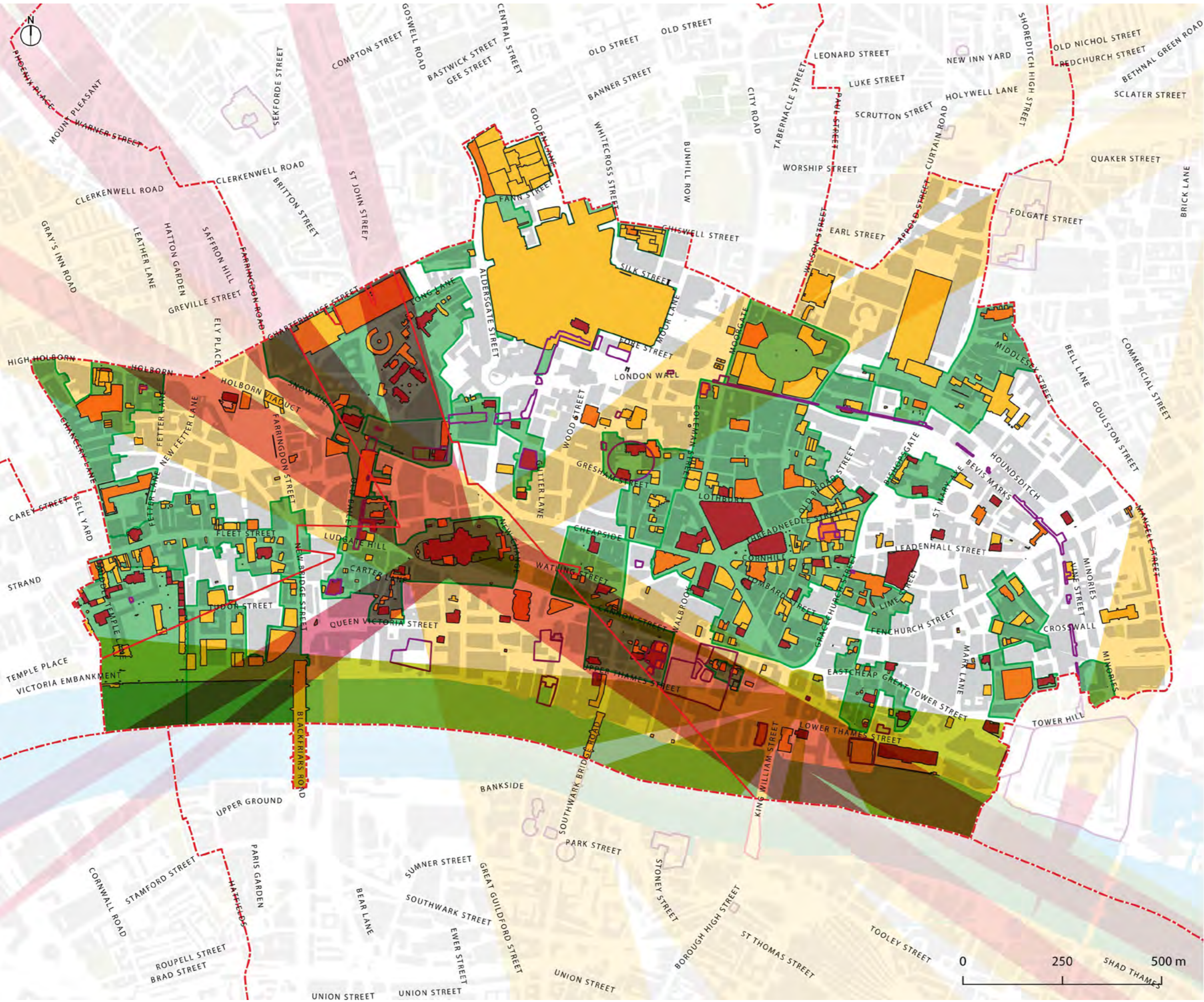
CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE
HISTORIC ENGLAND STUDY

DESIGNATIONS:
LISTED BUILDINGS,
SCHEDULED MONUMENTS AND
CONSERVATION AREAS

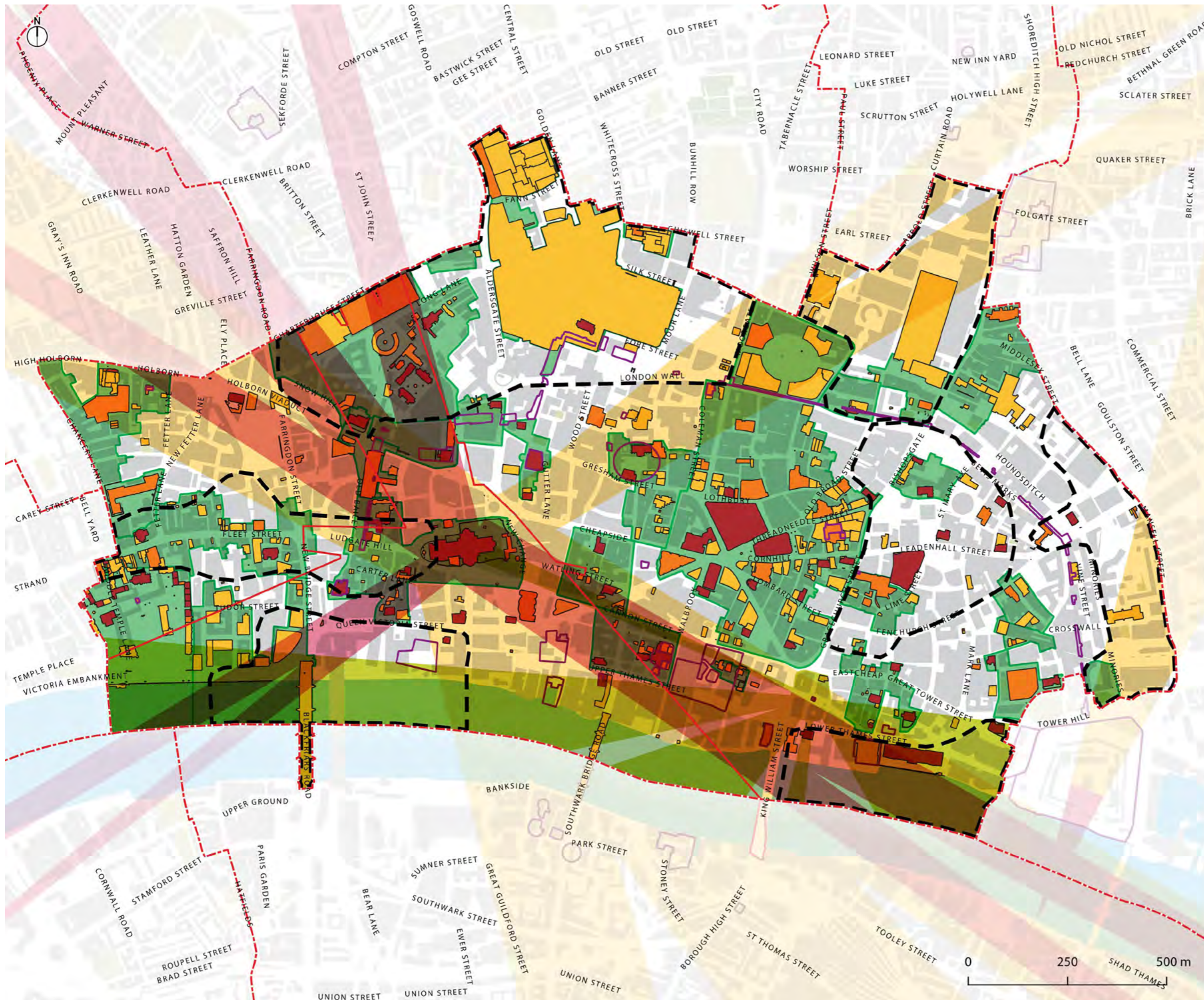
1733/260 Map 8

MARCH 2021

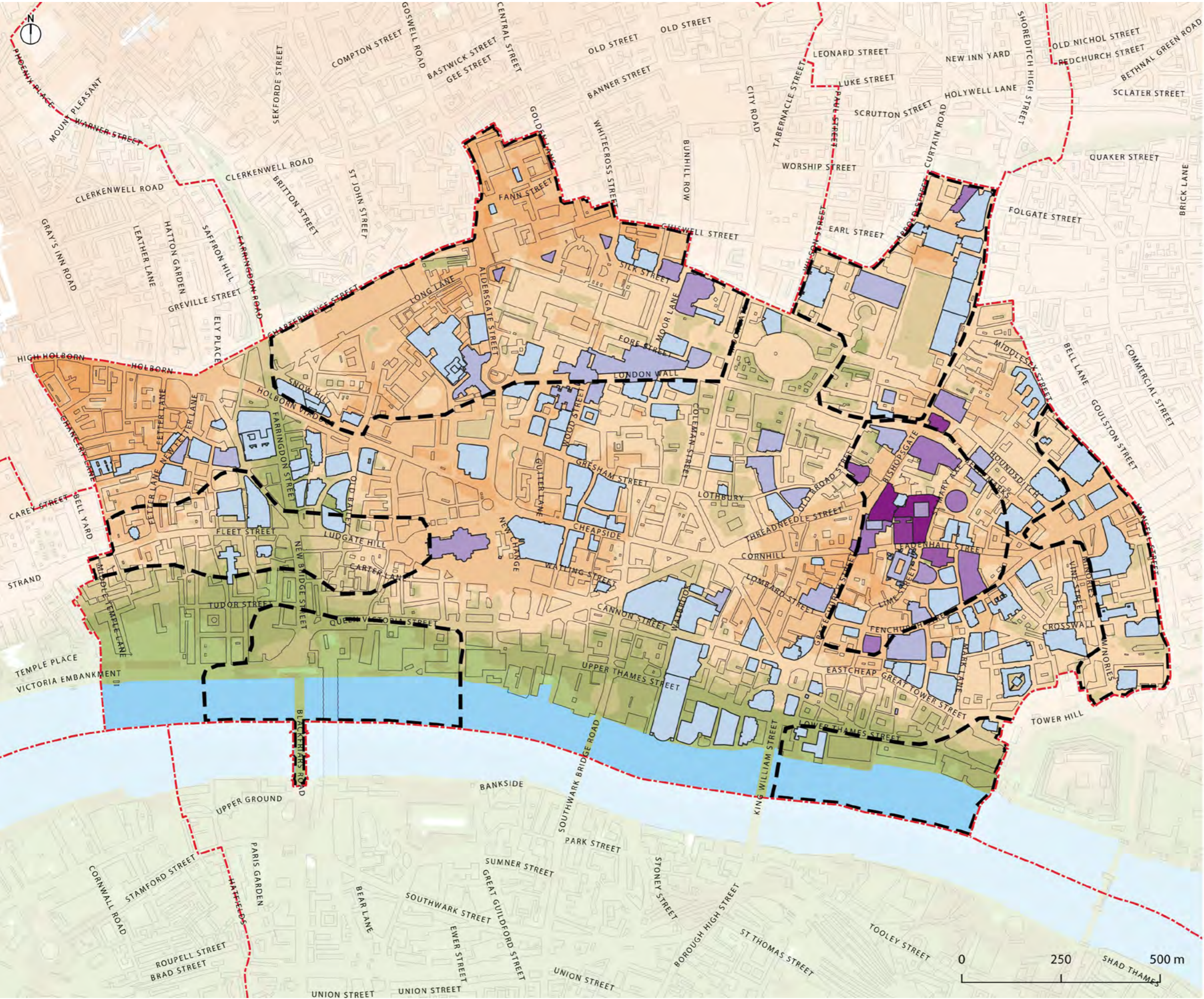
Alan Baxter





- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
- St Pauls Heights Policy Area
(Source: City of London)
- LVMF Landmark Viewing Corridors (Source: GLA)
- LVMF Background Wider Setting Consultation Area
(Source: City of London)
- Monument Views and Setting
(Source: City of London)
- Scheduled monuments
(Source: Historic England)
- Conservation areas
(Source: City of London)
- Listed buildings
(Source: City of London)
- Grade I listed
- Grade II* listed
- Grade II listed







- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
- Key areas of change
(Source: draft City Plan 2036: Shaping the Future City. Digitised by Alan Baxter)
- St Pauls Heights Policy Area
(Source: City of London)
- LVMF Landmark Viewing Corridors (Source: GLA)
- LVMF Background Wider Setting Consultation Area
(Source: City of London)
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(Source: City of London)
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 - Grade II* listed
 - Grade II listed












 Borough boundaries
(Source: Ordnance Survey
Boundary Line 2020)

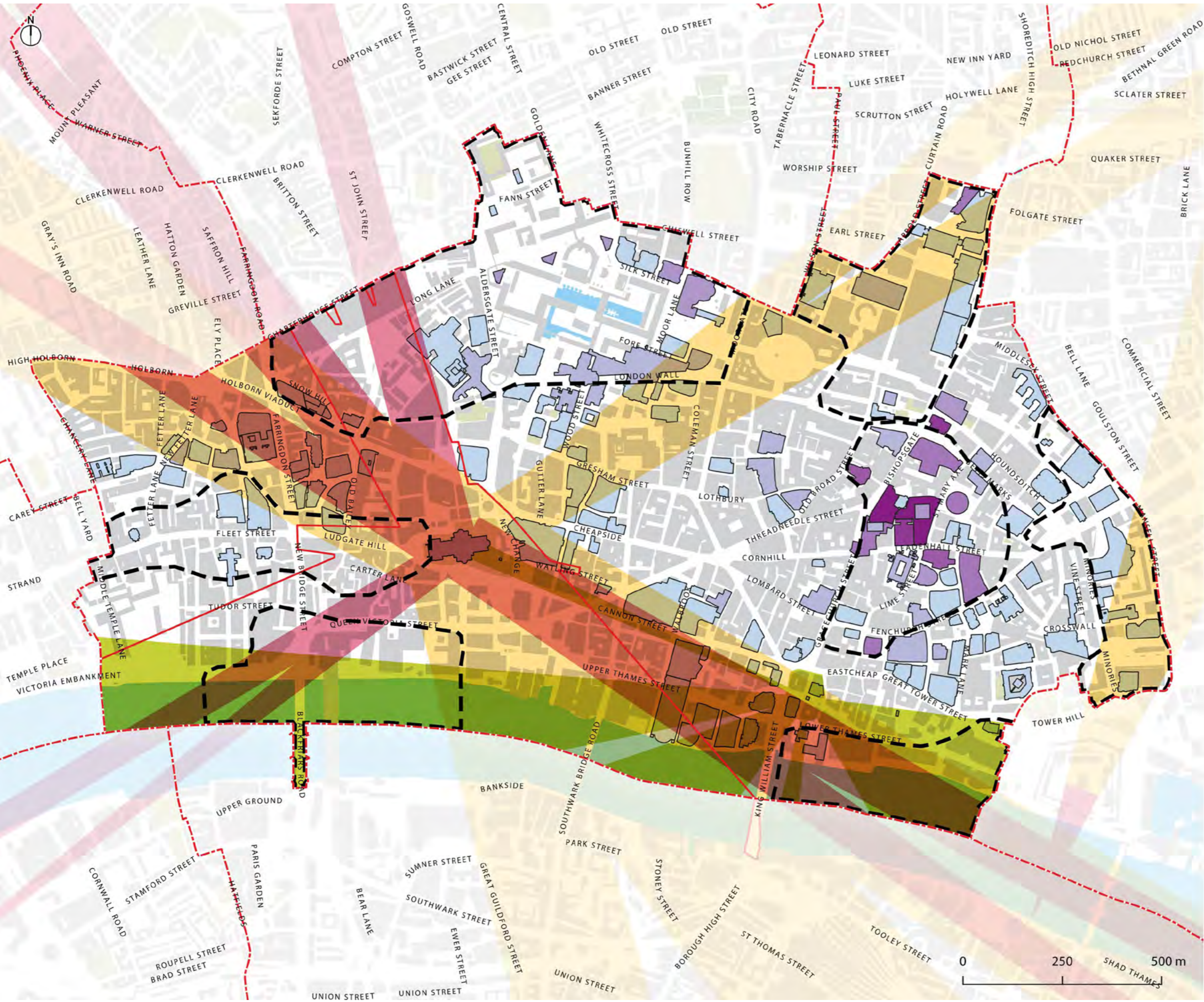
 Key areas of change
(Source: draft City Plan 2036:
Shaping the Future City.
Digitised by Alan Baxter)

Buildings above 50m AOD
(Source: City of London,
data updated April 2019)

-  32 - 70m above ground level
-  70 - 107m above ground level
-  107 - 145m above ground level
-  145 - 182m above ground level
-  182 - 220m above ground level
-  220 - 257m above ground level
-  257 - 295m above ground level

Modern contours
(Source: Environment Agency)

-  0 - 2.5m
-  2.5 - 5m
-  5 - 7.5m
-  7.5 - 10m
-  10 - 12.5m
-  12.5 - 15m
-  15 - 17.5m
-  17.5 - 20m
-  20 - 22.5m



- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
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- Buildings above 50m AOD
(Source: City of London, data updated April 2019)
- 32 - 70m above ground level
 - 70 - 107m above ground level
 - 107 - 145m above ground level
 - 145 - 182m above ground level
 - 182 - 220m above ground level
 - 220 - 257m above ground level
 - 257 - 295m above ground level

Alan Baxter

Prepared by [REDACTED]

Reviewed by [REDACTED]

Draft v1 issued December 2020

Draft v2 issued March 2021

Final version issued 12 April 2021

T:\1733\1733-260\10 Reports\Main Report Live Version

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City of London Local Plan

Publication Stage Representation Form

Ref:

(for official use
only)

Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

Part A Personal Details

Part B Your representations(s). Please fill in a separate sheet for each representation you wish to make.

Privacy Notice

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's website and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

The Planning Inspectorate has published a privacy statement for local plan examinations which is available at: [Planning Inspectorate Privacy Notice](#)

Part A

1. Personal Details*

**If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: NAME REDACTED

Last name: NAME REDACTED

Address Line 1: ADDRESS REDACTED

Line 2: ADDRESS REDACTED

Line 3: ADDRESS REDACTED

Line 4: ADDRESS REDACTED

Post code: ADDRESS REDACTED

Telephone number: [REDACTED]

Email address where relevant: [REDACTED]

2. Agents details where relevant:

First name

Last name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation: Woodland Trust

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Policy OS4: Trees

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant

Yes

☒

No

☐

4.2 Sound

Yes

☒

No

☐

4.3 Complies with the duty to co-operate

Yes

☒

No

☐

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please to set out your comments here

The Woodland Trust welcomes this policy to increase the number of trees and their overall canopy within the City of London.

We strongly welcome the requirement to retain and integrate existing trees into new developments, and to require replacement for trees that are unavoidably lost.

We recommend further strengthening this policy by

1. Adding a target for canopy cover, in support of the emerging requirement for biodiversity net gain (to complement Policy OS3: Biodiversity).

Reason: Setting a canopy cover target for development sites would make a positive contribution to achieving the City's target of net zero carbon by 2040 as well as increasing climate resilience. The Woodland Trust supports the Committee on Climate Change's recommended increase in UK canopy cover from its current 13% of land area to 19% by 2050 to tackle this country's biodiversity and climate crises, to be achieved by setting a target of 30% canopy cover for development sites. More information can be found in the Trust's 2020 publication [The Emergency Tree Plan](#). A more modest target may be appropriate in the dense environment of the Square Mile: any target, however small, will help drive delivery of the policy in practice.

2. Setting a greater than 1:1 replacement ratio for trees lost to development.

Reason: Replacing one mature tree with a younger tree will inevitably lead to a temporary loss in canopy cover and biodiversity value. Achieving equal value falls short of achieving net gain. Setting a greater than 1:1 replacement ratio for trees lost to development will make a positive contribution to the emerging requirement for biodiversity net gain. By setting a more ambitious target, the Local Plan increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that initiatives intended to deliver such gain may fall short in practice.

We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.

3. Specifying a diverse range of **native** tree species, ideally from UK & Ireland sourced and grown stock, for biosecurity.

Native tree species provide the best habitats for the native flora and fauna that depend on them. In urban areas, the contribution of individual trees to ecosystems is significant, and it is important to select species that will add greatest environmental value, while still being suitable for the urban realm.

We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We propose the following revised wording of the policy [changes in bold]

Policy OS4: Trees

The City Corporation will seek to increase the number of trees and their overall canopy cover **by at least 10%**, by :

- Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate;
- Protecting trees which are subject to Tree Preservation Orders (TPO) and designating new TPOs where necessary to protect trees of high amenity value;
- Other than in exceptional circumstances, only permitting the removal of

existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement **with a minimum of two trees for each one lost, in order to achieve biodiversity net gain**;

- Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works; and
- Promoting tree planting to provide a diverse range of **native** tree species, **preferably from UK & Ireland sourced and grown stock**, including large-canopy trees wherever practicable.

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

☒

Yes, I wish to participate in hearing session(s)

☐

Please note *that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Signature:   Woodland Trust

Date: 10 May 2021

THE CITY PLAN 2036

RESPONSE FROM THE GOLDEN LANE ESTATE RESIDENTS' ASSOCIATION

INTRODUCTION

The Golden Lane Estate Residents' Association is the recognised constituted residents' association for all residents of the Estate. The main concerns in regards to the Draft Local Plan are to maintain residential amenity and to see an adequate supply of social and affordable housing in the City of London boundary.

A. SPATIAL STRATEGY

1. *Ensuring that the City is sustainable and transitions to a zero carbon and zero emission City by 2040, delivering further urban greening and improving air quality;*
This is not an ambitious enough target.
2. *Delivering sustainable growth following the Covid-19 pandemic, including a minimum of 2 million m2 net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone;*
How does this correspond with the announcement on national radio by the Chair of the Policy and Resources Committee that the City would be converting office buildings to housing?
3. *Delivering at least 2,482 additional homes within the City by 2035/36 to meet housing need and continuing to deliver new housing on City Corporation estates and other appropriate sites outside of the City;*
We would like to see a commitment to new social housing within the City's boundary rather than being developed in other boroughs. The target appears to be for a maximum of 177 units per year which is extremely unambitious.

B. STRATEGIC POLICY SI

11. *Protecting and enhancing existing community facilities and providing new facilities where required; and*
12. *Protecting and enhancing existing sport, play space and recreation facilities and encouraging the provision of further publicly accessible facilities, including publicly accessible facilities, within major developments and public realm improvements.*
With the Golden Lane Estate Community Centre initially being proposed for conversion to offices and the Leisure Centre's viability being questioned post-COVID this section needs to be strengthened.

4.1.16 Developers are encouraged to use established assessment methodologies, such as Well Certification under the Well Building Standard, to ensure that development contributes towards a healthy city. The Well Building Standard is an There are several accreditation systems that attempts to measure the health and well-being elements of building design, construction and operation and how these building features impact on health and wellbeing. Compliance requirements for the standard fit into seven key areas; air, water, nourishment, light, fitness, comfort and mind. Each category is scored out of 10 and, depending on the total achieved, silver, gold or platinum certification is achieved.

A key element in this aspect is density of development. While the City is a densely built-up urban centre it needs to be recognised that very dense and high-rise developments are inappropriate next to residential developments. This has been demonstrated most recently by the COLPAI development which, while a good thing in itself, is a gross over-development of a small site.

4.1.17 Major commercial developments should seek to reach outwards into the community by providing relevant services and facilities which can benefit wider health and contribute to ambitions to reduce single use plastics and other waste, with health impacts such as publicly available drinking water, through the use of public drinking fountains, as well as providing defibrillators and publicly accessible toilets, for example through membership of the Community Toilet Scheme. Signage at the front of buildings should be displayed to make the public aware of the availability of these facilities.

4.1.18 Major commercial developments are also encouraged to provide space which can be used for community needs such as public health facilities, community, cultural or sporting activities. The adequate provision of floorspace for these activities is vital for the health and well-being of the City's communities. Such space could be made available at an affordable rent and be accessible from street level independently from commercial operations.

This is welcome but we would like the terms “seek out” and “encouraged” replaced with required. It is an unfortunate fact that in the current regime for financing local authorities they are often unable to provide these sort of facilities themselves so a requirement on developers to do so is the only way that they will come into being.

4.1.19 Changes to the Use Classes Order introduced in September 2020 have included certain health and medical services such as clinics, health centres, creches, day nurseries and day centres within the new Use Class E. This means that such uses could be converted to a range of other Class E commercial, business and service uses without planning permission. Given the limited opportunities to replace such facilities in the City, conditions may be attached to permissions for new public health facilities to ensure that the impacts of any proposed later conversion to another use can be considered through the planning application process. Conditions will not be applied to private healthcare facilities.

Given that the limited number of facilities in the City and the fact that public facilities are unlikely to be converted to other uses we would question why private healthcare facilities are to be exempt. There should also be a policy that conversion of existing facilities of all sorts would be resisted.

C. POLICY HLIC2: AIR QUALITY

Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions;

This potentially means that no schools, nurseries, medical facilities and residential development are built in the City at all. Targets for air quality need to be brought forward to make this type of development acceptable.

D. POLICY HLIC3: NOISE AND LIGHT POLLUTION

Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near the development.

Residents near the COLPAI development have seen that there are no adequate measures being put in place and this policy needs to be strengthened. We would suggest a policy of requiring Section 106 payments to cover mitigation such as double glazing if appropriate.

E. POLICY HLIC5: LOCATION AND PROTECTION OF SOCIAL AND COMMUNITY FACILITIES

Existing social and community facilities will be protected in situ unless:

- *replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or*
- *necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or*
- *it has been demonstrated through active marketing, at reasonable terms for public, social and community floorspace, that there is no demand for the existing facility or another similar social or community use on the site.*

This policy needs to be strengthened as there are few social and community facilities in the City at present and their loss should be strongly resisted.

F. POLICY HLIC8: PLAY AREAS AND FACILITIES

4.1.53 Public realm spaces improvements and the creation of new open spaces should be designed imaginatively to serve the needs of workers but also offer informal play opportunities. Where the opportunity arises, the The City Corporation plans to provide will enable appropriate sensory play areas in the City for children, and young people and adults with special educational needs and disabilities.

Public realm spaces are for residents as well as workers and this should be generally recognised in this document.

G. 4.3 HOUSING

4.3.7 The ~~draft~~ London Plan's strategic framework 2017 includes Policy SD5 which indicates that residential development is inappropriate in the commercial core of the City of London. Within this context it requires the City of London to deliver 146 1,460 new homes each year during the period 2019/20 – 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. In Policy S3 the City's housing requirement is expressed as a total of 2,482 dwellings for the Plan period to 2036, which represents the 10-year London Plan target of 1,460 dwellings plus the combined annual average of 146 dwellings for the seven years post 2028/29 (1,022 dwellings). The housing requirement beyond 2028/29 will be kept under review and may need to be altered to ensure general conformity with any subsequent review of the London Plan. The ~~draft~~ London Plan 2017 also included a target that ~~an annual average of 74~~ 740 units should be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period.

This section is confusing. The Plan proposes a maximum of 177 units per year but if the London Plan requirement is in fact 1460 units per year this in no way attempts to meet the requirement.

4.3.13 The City Corporation will continue to support the delivery of new market and affordable housing on its own housing estates and other appropriate land holdings outside the Square Mile in fulfilment of its ambition to deliver a significant number of new homes and contribute towards the delivery of new housing to meet London's wider housing needs.

The existing housing estates in the City are already very dense developments and new building in their boundaries would be inappropriate. The City needs a strategy for identifying suitable sites. If the demand for new office space tails off due to COVID the the City should identify opportunities from its own properties.

4.3.17 The City of London is an expensive area to live in. The SHMA ONS data shows that the affordability ratio of lower quartile house prices to lower quartile residential earnings in 2013 2016 was 13.44 17.51, above the London average of 13.32 and the England average of 6.91, the seventh highest in London and significantly above the national average of 6.45, or the inner London average of 10.00. The City of London SHMA shows that Rental prices in the City were also significantly above the London-wide average or the average for inner London, indicating a significant problem of affordability. Overall, the SHMA suggests a need for an additional 69 affordable dwellings per year to meet affordable housing needs.

Affordable housing is often defined at 80% of market rates which, in the City, are unaffordable for most people. We believe that the term 'affordable housing' be replaced by 'social housing'. We have seen recent luxury housing developments such as Blake Tower and the Denizon that have made little or no provision of social or affordable housing based on questionable viability assessments. The City's requirements need to be toughened.

SUMMARY

This draft plan does little to:

- Create a coherent policy for new social and affordable housing so that the targets in the London Plan are met.
- Say how housing is to be developed in the City boundaries rather than dumped on neighbouring boroughs as the current policy appears to be.
- Say how the cultural and night-life ambitions are to be integrated with the needs of residents. Apart from the Barbican Centre the City is not really a cultural destination and most nightlife is dependant on City workers rather than as a destination in its own right.
- Examine how the City economy may change following the COVID pandemic and changes to patterns of work. There just seems to be a hope that things will return to normal without any analysis.
- Say what will happen to redundant office buildings if patterns of work do change.
- The ambitions for zero carbon are compromised unless the whole building life cycle is taken into account and:
 - It is required that developers must submit robust justification for demolishing rather than refurbishing and retrofitting an existing building.
 - Developers will be required to undertake a Whole Life Carbon assessment for all developments of 10 dwellings or 1000sqm and greater in size.
 - It is encouraged that solar panels be fitted to flat roofs.
 - The City has a proactive policy of greening the environment.

The City is not a democratically mandated local authority and can only become so through an increase in population and the business vote being done away with. At present the key committees that provide the services to the resident population such as Planning and Children's and Communities are dominated by members who are not elected by residents and have no incentive to act in their interests. This has led to many unsuitable buildings being constructed adjacent to housing developments and work that needs planning to City Estates being carried out in inappropriate ways. There needs to be a fundamental rebalancing of who the City is for and whether the pressures to build outweigh all other considerations.



City of London Local Plan

Publication Stage Representation Form

Ref:

(for official use
only)

Name of the Local Plan to which this representation relates: City of London City Plan 2036

Please return to the City of London Corporation by 6pm on 10 May 2021

This form is in two parts:

Part A Personal Details

Part B Your representations(s). Please fill in a separate sheet for each representation you wish to make.

Privacy Notice

To ensure an open and fair public examination, it is important that the appointed Inspector and all other participants in the examination process know who has made representations on the draft City Plan 2036. All comments received, including the names of those making representations, will be made available in line with requirements in the Town and Country Planning (Local Planning) (England) Regulations 2012, including being published on the City Corporation's website and being made available to the appointed Planning Inspector. In some cases, to administer and run virtual events by means of video or telephone conference, the Planning Inspectorate may need to know the email address and/or telephone number of those making representations. All other personal information will remain confidential and will be managed in line with the City Corporation's Privacy Notice, which is available at: [Built Environment Privacy Notice](#)

The Planning Inspectorate has published a privacy statement for local plan examinations which is available at: [Planning Inspectorate Privacy Notice](#)

Part A

1. Personal Details*

** If you appoint an agent, please complete only the Title, Name and Organisation (if applicable) but complete the full contact details of the agent.*

First name: NAME REDACTED

Last name: NAME REDACTED

Address Line 1: ADDRESS REDACTED

Line 2: ADDRESS REDACTED

Line 3: ADDRESS REDACTED

Line 4:

Post code: ADDRESS REDACTED

Telephone number:

REDACTED

Email address where relevant:

REDACTED

2. Agents details where relevant: N/A

First

name

Last

name

Address Line 1:

Line 2:

Line 3:

Line 4:

Post code:

Telephone number:

Email address where relevant:

Job Title where relevant:

Organisation where relevant:

Part B – Please use a separate sheet for each representation

Name or organisation: Arts Council England

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

S6: Culture, Visitors and the Night-Time Economy

Policies Map (A or B)

4. Do you consider the Local Plan is:

4.1 Legally compliant

Yes

☒

No

☐

4.2 Sound

Yes

☒

No

☐

4.3 Complies with the duty to co-operate

Yes

☒

No

☐

Please add a x as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please to set out your comments here

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see general comments and suggestions on Strategic Policy S6: Culture, Visitors and the Night-Time Economy section points.(Please note that these are highlighted in red);

pg. 86 5.3.4,

Add Cultural and creative activity can also significantly contribute to well-being, tackle social injustice and improve well-being.

Reference:

<https://www.artscouncil.org.uk/make-case-art-and-culture/why-art-and-culture-matters>

pg. 87, 5.3.8

Developers will be required to submit Cultural Plans (developed in partnership with relevant stakeholders, communities, local and cultural organisations/institutions) as part of planning applications for major developments. These should set out how the development will contribute towards enriching and enhancing the City's creative and cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures. Consideration should be given to operational and management requirements of new venues such as clubs and venues in new developments prior to approval. Links to Policy CV4, 5.3.35, Agent of Change principle, etc.

[the publication london plan 2020 - clean version 0.pdf](#)

pg. 88, para 5

Review and maintain where appropriate the City's existing collection of public art and culturally significant objects and pursuing opportunities for repatriation and restitution or commissioning of new, high quality pieces in appropriate locations; also relates to Policy CV1 pg. 89

Reference:

[Restitution and repatriation – Collections Trust](#)

[Culture& | Black Lives Matter Charter for the UK heritage sector \(cultureand.org\)](#)

pg. 89, 2nd paragraph

Support the development of creative enterprise through digital infrastructure and **a range of flexible, accessible and affordable workspace that meet the needs of business/freelancers of all sizes and stages of growth.**

Reference : [the publication london plan 2020 - clean version 0.pdf](#) - 2.7.7 pg 96

pg. 88, 5.3.6

The City Corporation's Cultural Strategy highlights that commerce and creativity thrive side by side and sets out a vision to position the City as a world capital for commerce and culture. The Strategy embraces a definition of culture that is broad and inclusive; it recognises that culture exists both in the buildings and heritage of the City's institutions and in the streets and informal spaces in between **and in its people & communities.** Culture is ~~seen as being~~ for everyone and is a driver of social mobility.

5.3.10.

There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities, theatres, museums, churches, and specialist retail premises such as the Silver Vaults in Chancery Lane. **Consideration should also be given to the relevance of statues and landmarks in cultural heritage and the role that it plays in London's attractiveness and inclusivity dialogue. Where appropriate alternative options for re-siting or reinterpretation should be considered. This also links to policy CV1 of plan, pg. 89**

pg. 95, Policy CV5,

- encouraging the provision of new artworks **from diverse artists** in appropriate locations in the City on public and private land;

Reference: [Essential read: Inclusivity & Relevance | Arts Council England](#)

5.3.43

Section 106 to be considered to fund other cultural infrastructure, skills development, etc..

Reference: [the publication london plan 2020 - clean version 0.pdf](#) – pg 272, D

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested

modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please add a x appropriate

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

☐

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

Date: 10th May 2021



PD11284 GF/LB

Email: [REDACTED]

ADDRESS REDACTED

10 May 2021

City of London Corporation

ADDRESS REDACTED

Sent via email to: localplan@cityoflondon.gov.uk

Dear Sir / Madam,

CITY PLAN 2036 PROPOSED SUBMISSION DRAFT – MARCH 2021

REPRESENTATIONS IN RESPECT OF CUSTOM HOUSE, 20 LOWER THAMES STREET, EC3R 6EE

These representations are submitted by Montagu Evans LLP on behalf of our client, Cannon Capital Developments Limited, in respect of the current consultation exercise on the Proposed Submission Draft of the City Plan 2036 ("the Draft Plan"). Our client is the long lessee of Custom House, 20 Lower Thames Street, EC3R 6EE ("the Property").

We understand the Draft Plan is intended to set out the City Corporation's ("CoL's") vision, strategy and objectives for planning up to 2036, together with policies that will guide future decisions on planning applications. Once adopted, the Draft Plan will replace the current City of London Local Plan adopted in January 2015 and form part of the statutory development plan.

The first stage of consultation on the Draft Plan was the Issues and Options document, which was consulted on in Autumn 2016. A second stage of consultation took place on a full draft version of the Draft Plan between November 2018 and February 2019. CoL is now publishing a further iteration of the Draft Plan for a further stage of consultation, referred to as the Regulation 19 consultation.

BACKGROUND AND CONTEXT TO THESE REPRESENTATIONS

The Property is an office building (Use Class E) and is currently occupied by Her Majesty's Revenue and Customs (HMRC). It is a Grade I listed building situated adjacent the River Thames.

The Property was built as a Government office building for the management and collection of custom duty and has provided that function since the early 19th century. However, a progressive decentralisation of HMRC facilities means that the Property is due to be vacated by the end of Q2 2021. The layout of the Property is bespoke to HMRC and it will be surplus to their requirements from that date.

In August 2020 we submitted an application for planning permission (ref. 20/00631/FULMAJ) and listed building consent (ref. 20/00632/LBC) on behalf of Cannon Capital Developments Limited for the conversion of the Property to a hotel-led mixed-use scheme, including retail and leisure facilities. The description of development for the proposals is:

“Change of use from office (Use Class E) to hotel (Use Class C1) with flexible ground floor and roof level retail floorspace (Use Classes E & Sui Generis (Drinking Establishment)), leisure facilities (Use Class E) and ancillary riverfront public realm; associated works of demolition, alteration, extension and refurbishment including i.) demolition and re-building behind the retained facade of the East Block ii.) demolition of East Block roof and part demolition and alteration of existing West and Centre Block roof to erect 2 x two storey extensions above the East and West Blocks to provide hotel rooms at 4th floor and 2 x restaurant/bar and terraces at 5th floor; iii.) demolition of Centre Block external stairs and replacement with new river terraces, stairs and step free ramped access across Centre, and parts of West and East Block; (south elevation); iv) alterations to and raising of the flood defence wall; v.) facade alterations and associated works to create a terrace at first floor level on the Centre Block (south elevation); vi.) removal of railings on Lower Thames Street elevation and alterations to main Centre Block entrance on Lower Thames Street to accommodate access; vii.) associated works to the river wall viii) and other external alterations including elevational alterations; hard and soft landscaping; alterations to service ramp; provision of on site cycle parking and servicing; creation of a coach and taxi vehicular drop off on Lower Thames Street”. (“the Development”)

The Development has evolved through extensive pre-application discussions with CoL's Planning, Design and Highways officers, officers at the GLA, Historic England, other key statutory bodies and members of the public. The application is currently at an advanced stage of determination with officers at CoL.

In light of the above, we have reviewed the sections of the Draft Plan most relevant to the redevelopment of the Property and set out our position in the sections below.

POOL OF LONDON

The Property falls within the designated policy area of **“Strategic Policy S19: Pool of London Key Area of Change”** as set out in the Draft Plan. Emerging Strategic Policy S19 is worded as follows (*including tracked changes made by CoL*):

*“The Pool of London Key Area of Change will be ~~regenerated~~**renewed** through the refurbishment and redevelopment of building stock and the delivery of significant public realm improvements:*

1. *Enabling office-led **mixed commercial use** redevelopment or refurbishment ~~of the existing building stock~~, including the provision of retail, cultural and leisure uses which are complementary to, and do not detract from, the primary business function of the City **and which enhance heritage assets.***
2. *Requiring ~~and encouraging~~ increased vibrancy and active frontages at ground floor level, through the provision of **retail and** publicly accessible ~~retail~~, leisure and cultural uses on the river frontage. ~~New publicly accessible roof terraces and spaces will be required, where they offer good river views and do not impact adversely on the amenity of occupiers or nearby residents.~~*
3. *Encouraging the provision of cultural events, arts and play in public spaces along the riverside, **and ensuring their delivery through Cultural Plans.** ~~where they enhance public areas.~~*

4. **Preserving and enhancing the area's significant heritage assets and historic significance including protected views, as well as encouraging more diverse communities to appreciate and understand the area through creative interpretation.**
5. Improving transport connections and pedestrian links by:
 - a. improving existing and creating new crossing points and improving wayfinding over Lower Thames Street;
 - b. **improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street;**
 - c. improving signage to and from the Pool of London to the Tower of London;
 - d. improving the servicing of buildings, ~~through~~ **encouraging** the development of shared servicing bays and access points and collaborative management; **and**
 - e. ~~restricting preventing~~ vehicular access **onto** the riverside walk ~~and with the removing of private~~ car parking areas upon redevelopment.
6. Enhancing public realm and public spaces by:
 - a. enhancing the Riverside Walk to create a continuous ~~riverside park and~~ publicly accessible walkway free of cars between London Bridge and Tower Bridge ~~and ensuring that pedestrian routes~~ which is ~~are~~ accessible to all;
 - b. identifying opportunities for pollution reduction measures and additional greening and planting within the public realm and ~~requiring greening of~~ buildings on redevelopment; **and**
 - c. seeking additional public space and play facilities".

On behalf of our client, we are supportive of the intention to refurbish and redevelop existing building stock alongside the delivery of significant public realm improvements within the Pool of London, and the Development accords with the overarching objectives of emerging Strategic Policy S19.

In respect of paragraph 1 of emerging Strategic Policy S19, we note that the current wording supports proposals which 'enhance' heritage assets. To ensure consistency with the Town and Country Planning Act and the NPPF, we suggest that the wording of paragraph 1 is reworded to read "... **and which preserve or enhance heritage assets**". This suggested wording also applies to paragraph 4 of emerging Strategic Policy S19, which we suggest is re-worded as follows (our suggested change in red):

"Preserving ~~and or~~ enhancing the area's significant heritage assets and historic significance including protected views, as well as encouraging more diverse communities to appreciate and understand the area through creative interpretation".

Paragraph 2 of emerging Strategic Policy S19 seeks the provision of retail and publically accessible, leisure and cultural uses specifically on the river frontage. We consider this policy requirement should be less prescriptive and omit specific reference to 'river' frontages. In our view, a variety of active frontages of various orientations will better achieve the Pool of London aspirations, and as such we request the following amendment is made (our suggested change in red):

"Requiring increased vibrancy and active frontages at ground floor level, through the provision of retail and publicly accessible, leisure and cultural uses on the ~~river~~ frontage".

We support the addition of paragraph 5b to state "...b. improving links to the riverside by enhancing permeability and connectivity between London Bridge, Monument Street and Lower Thames Street" and the Development would accord

with this requirement by providing enhanced public access from Lower Thames Street down to the River Thames, alongside a significant improvement to the existing Thames Path.

In terms of paragraph 6c, which seeks additional public space and play facilities to enhance the public realm, we suggest a qualification is attached to this requirement, and that the sentence is re-worded as follows (*our suggested change in red*):

*“ c. seeking additional public space and play facilities, **where appropriate**”.*

Whilst we support the overarching vision of emerging Strategic Policy S19, we consider it would be helpful for the policy to recognise that some of the individual requirements might be aspirational and/or inappropriate and/or impracticable for specific sites within the Pool of London (and constituent developments). As such it should not require all individual developments within the Pool of London to provide all these uses/objectives listed within the emerging policy. A reference to this effect should be added to the emerging policy wording for the avoidance of doubt.

LOSS OF OFFICE ACCOMMODATION

Emerging Policy OF2 of the Draft Plan relates to the protection of existing office floorspace. It is worded as follows (*including tracked changes made by CoL*):

1. *“The loss of existing office floorspace will be resisted unless it can be demonstrated that:*
 - a. *there is no demand in the office market, supported by marketing evidence covering a period of no less than ~~18~~ 12 months; **and***
 - b. *refurbishment or re-provision of **some or all of the** office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; ~~and~~ or*
 - c. ***a mixed use commercial redevelopment providing a reduced amount of better quality office space has been considered and its viability evaluated the loss of office floorspace is limited to ground or below ground levels and proposed new uses would be complementary to continued office use on upper floors; or***
 - d. ***the loss of office floorspace is within or near identified residential areas and would result in the provision of additional housing, particularly Build to Rent or Co-living accommodation.***
2. *Where the above criteria have been met, the loss of office floorspace may be permitted provided that:*
 - a. *the proposed development would not compromise the potential for office development on sites within the vicinity and would have demonstrable wider benefits ~~for the business City, for other objectives of this Plan; and~~*
 - b. ***the potential for re-providing a reduced amount of office floorspace within the development has been considered**”.*

The proposed wording of part 1 of this emerging policy currently requires the loss of existing office floorspace to be justified through the submission of 12 months marketing evidence **and** demonstration that refurbishment or re-provision of some or all of the office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment. This is draconian.

We consider that the policy should be re-worded to allow for the loss of office to be demonstrated to be acceptable via satisfying either a) (12 months marketing) OR b) (unviable in the long term) OR c) or d).

It is clear that if an applicant can, to the reasonable satisfaction of the City of London, demonstrate office use is unviable in the long term, it would be unnecessary to demonstrate that there is no market demand for the space. Indeed, following

this logic could mean such a requirement is unreasonable. Equally, if no market demand has been proven over 12 months marketing, it would not be necessary or reasonable to require an applicant to demonstrate their office is unviable in the long term via a viability assessment.

The policy as worded currently therefore creates significant risk of delaying the conversion of unviable office space and with it, may seriously compromise the City's ability to quickly and effectively adapt to the changing City economy and aspirations for diversification of uses.

We suggest part a. of paragraph 1 is re-worded as follows (*our suggested change in red*):

- a. *there is no demand in the office market, supported by marketing evidence covering a period of no less than ~~18~~ 12 months; ~~and-or~~*

In terms of paragraph 2 of emerging Policy OF2, we would also suggest that the opening part of this paragraph is reworded as follows (*our suggested change in red*):

2. *Where the above criteria have been met, the loss of office floorspace ~~may~~ shall be permitted provided that:*

The incorporation of 'shall' into this sentence makes it clear that if the requirements of paragraph 1 are met, then parts a) and b) of paragraph 2 will apply. We also consider that part b) of paragraph 2 appears somewhat unnecessary once paragraph 1 of the policy has been satisfied. Therefore we question whether this aspect of emerging Policy OF2 is required.

SUMMARY

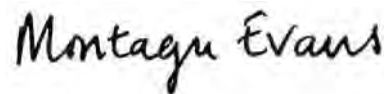
On behalf of Cannon Capital Developments Limited, we are generally supportive of the proposed policy direction for the Pool of London, of which the Property forms an important part. However, we have some reservations with the wording of emerging Policies S19 and OF2. We consider these policies should be amended as set out above.

Our client wishes to maintain their position as an important stakeholder in the redevelopment of this part of the City of London and we would welcome the opportunity to discuss the content of these representations further with officers. We are also keen to be involved in the forthcoming examination process.

In the meantime, should you wish to discuss any of the above please do not hesitate to contact either NAME

██████████ in the first instance.

Yours sincerely,



MONTAGU EVANS LLP