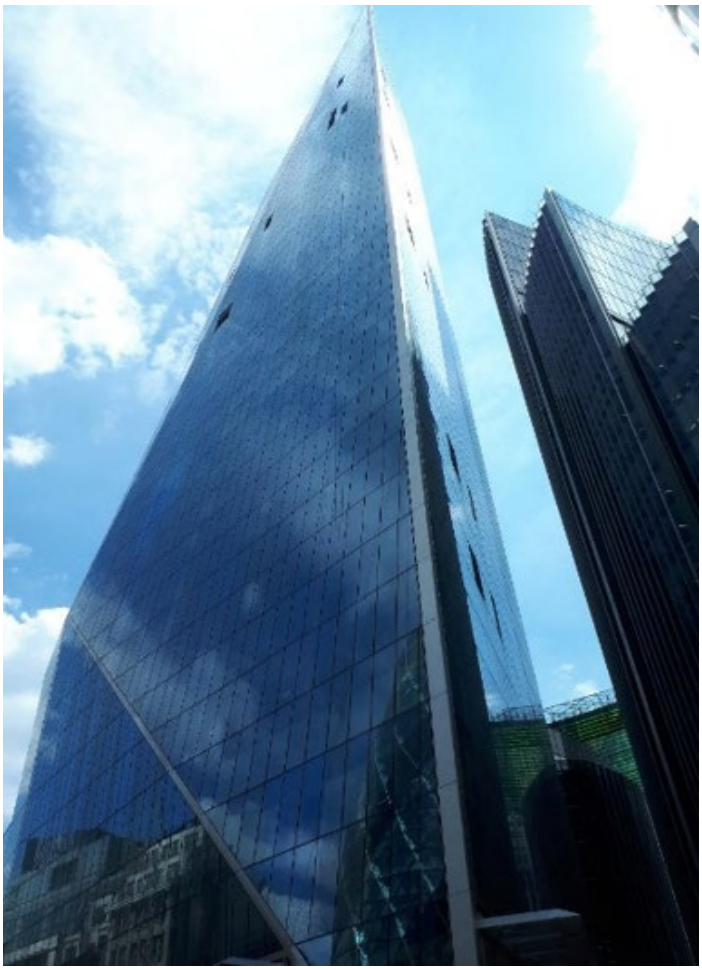
City of London Local Plan
City Plan 2036
Proposed Submission Draft
Topic Paper 3 – TALL BUILDINGS AND PROTECTED VIEWS



Published by the Department of the Built Environment
March 2021

CITY OF LONDON

Contents

1. Policy Context

National Planning Policy Framework

1.1The national policy context is provided by the National Planning Policy Framework (NPPF) published 2012, updated in 2019, and the National Planning Practice Guidance (PPG). There is no specific guidance in the NPPF on tall buildings, although the NPPF, Chapter 12: Achieving well-designed places, indicates that the creation of high quality buildings and places is fundamental to the planning and development process. Good design is a key aspect of sustainable development. Local Plans are required to set out a clear design vision and expectations.

The National Planning Practice Guidance does not specifically address tall buildings, but indicates that guidance on design should be read alongside the National Design Guide published by MHCLG in October 2019. The National Design Guide indicates:

"69 Well-designed tall buildings play a positive urban design role in the built form. They act as landmarks, emphasising important places and making a positive contribution to views and the skyline."

70 Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character."

Historic England – Tall Buildings (Advice Note 4)

Historic England's Tall Buildings advice Note 4 was published in December 2015. The advice note recommends that local planning authorities take a plan-led approach to the management of tall buildings . Paragraph 3.1 indicates: "It is therefore important that the appropriate scale and form of development is assessed as part of the formulation of the local plan. Techniques such as characterisation and building height studies provide evidence to support a local height definition for tall buildings and the identification of appropriate locations in local plans."

The Advice Note recommends the use of an urban design framework to:

a) identify those elements that create local character and other important features and constraints, including:

- Natural topography
- Urban grain
- Significant views of skylines
- Scale and height
- Streetscape and character assessment (including the history of the place)
- Materials
- Landmark and historic buildings and areas and their settiings, including backdrops, and important local views, prospects and panoramas.

b) identify opportunities where tall buildings might enhance the overall townscape.
c) identify sites where the removal of past mistakes might also achieve such an enhancement.

London Plan

The Mayor published the new London Plan 2021 on 2 March 2021.

London Plan Policy D9 Tall Buildings sets out the policy approach to tall buildings across London. The policy requires that:

- Local Plans should define what is considered a tall building for specific localities, based on local context.
- Boroughs should determine in Local Plans where tall buildings may be an appropriate form of development.
- Development proposals should be considered against: visual impacts, functional impacts, environmental impacts and cumulative impacts.
- Free to enter publicly accessible areas should be incorporated into tall buildings where appropriate.

In identifying locations where tall buildings may be an appropriate form of development, boroughs should undertake a sieving exercise, assessing potential visual and cumulative impacts to consider where tall buildings could have a role in contributing to the emerging character and vision for a place; determine the maximum height that could be acceptable and identify these locations on maps in the Local Plan.

Publication London Plan Policies HC3 Strategic and Local Views and HC4 London View Management Framework, set out the Mayor's approach to the

protection of strategically important views and landmarks, including protection of a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity and attributes of Outstanding Universal Value. Detailed guidance on the management of desginated strategic views is set out in the Mayor's London View Management Framework Supplementary Planning Guidance, adopted in March 2012.

The London Plan designates 3 types of Strategic Views, London Panoramas, River Prospects and Townscape Views (including Linear Views). The views that are relevant to sites in the City are:

- London Panoramas – views of St Paul's Cathedral from Alexandra Palace, Parliament Hill, Kenwood, Primrose Hill, Greenwich Park and Blackheath Point.
- Linear Views – views of St. Paul's Cathedral from Westminster Pier and from King Henry's Mound, Richmond Park.
- Townscape Views – view of the Tower of London from the Queen's Walk at City Hall. Includes a "protected silhouette" of the White Tower. In addition, the background of the view from St. James' Park to Horse Guards Road could be relevant to some tall building proposals in the City.
- River Prospects - views from Tower Bridge, London Bridge, Southwark Bridge, Millennium Bridge, South Bank (Gabriel's Wharf), Waterloo Bridge and Hungerford Bridge.

The London Plan identifies 3 Strategically Important Landmarks in the designated views: St Paul's Cathedral, the Palace of Westminster and the Tower of London.

Separately from the London Plan, the Mayor of London Order 2008 defines those categories of development which are referable to the Mayor. Referral development includes, in the City of London, buildings more than 25m high adjacent to the River Thames (defined as within the designated Thames Policy Area in the City of London Local Plan) and buildings more than 150m high elsewhere in the City of London.

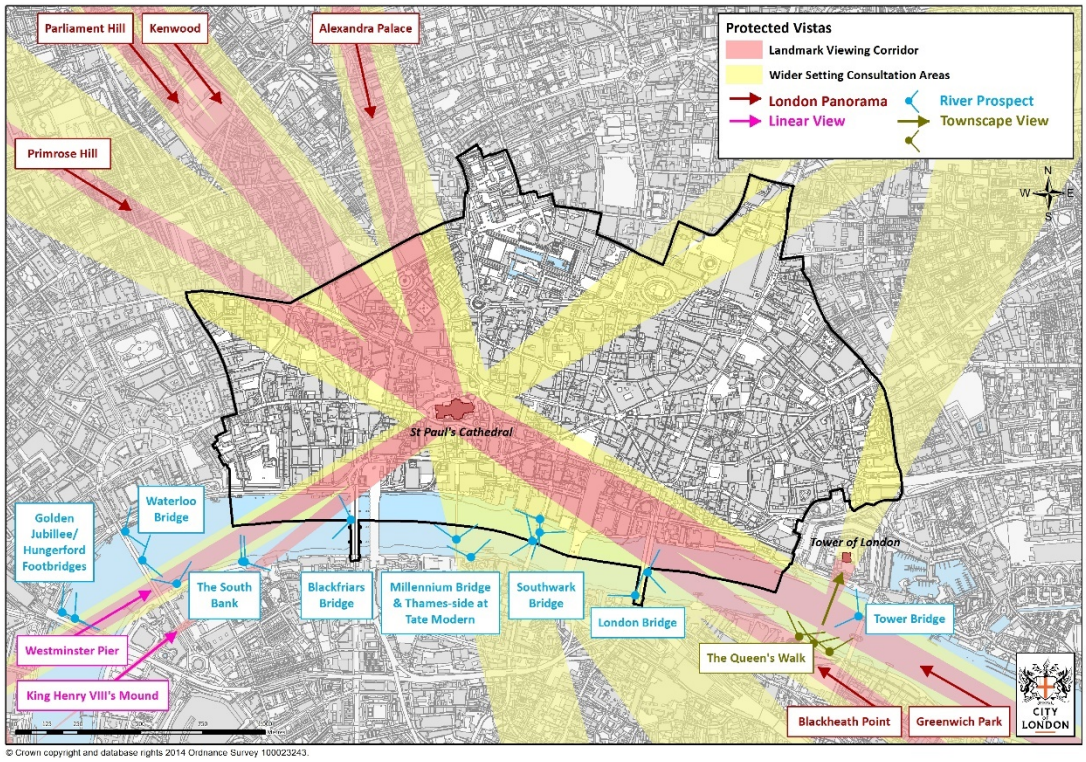


Figure 1: City of London LVMF Views

City of London Tall Buildings Policy

Tall buildings policy in the City of London dates back to prior to the 1948 Town and Country Planning Act. The following brief description of the development of policy in the City provides a valuable context to Core Strategic Policy S14 in the adopted 2015 Local Plan and Strategic Policy S12 in City Plan 2036.

London Building Acts

Prior to the 1948 planning system the height of buildings were for several centuries controlled by the Building Acts. Their main aims were fire prevention and structural stability, and height was largely restricted to the length of the Fire Brigade's ladders. This ensured relatively low rise development until the early 20th century, with only St Paul's Cathedral, the numerous church towers and spires and a few civic buildings rising above the roof-line. A new Act in 1930 raised the maximum height of building from 80 feet to 100 feet. The London County Council, which administered the Acts, increasingly granted waivers permitting some structures higher than this limit. From 1933 controls under the Building Acts were supplemented by the City's Town Planning Schemes, which included controls on building heights to similar limits.

St. Paul's Heights (1938)

Following the 1930 London Building Act, several tall buildings were constructed, notably Unilever House, the Faraday Building and Vintry House. These blocked cherished views of St Paul's and gave rise to public concern. The City Corporation and the Dean and Chapter asked W. Godfrey Allen, Surveyor to the Fabric of St Paul's Cathedral, to put forward measures to preserve important views of the Cathedral. The Surveyor proposed building height limits to maintain views of St Paul's from the south bank of the Thames, the Thames Bridges from London Bridge to Hungerford Bridge, as well as views along streets, including Fleet Street and Farringdon Road. The system was expressed as a grid, showing a maximum building height in each 50 foot square.

The height limitations were endorsed by the City Corporation in 1938 and became known as "St Paul's Heights". They carried no statutory force and for several decades were applied through informal agreement with developers. Since 1981 and 1984 they have been incorporated into successive statutory development plans for the City.

Reconstruction in the City of London (1947)

The City Corporation appointed Dr C. H. Holden and Prof. (later Lord) W. G. Holford to prepare a plan for the post-war reconstruction of the City, completed in 1947. The plan contained policies that directly and indirectly affected building height, including 'height and cover' clauses, which limited the height of buildings according to the width of adjoining streets, plot ratio controls and daylighting standards. Generally, the plan envisaged that the future height of development in the City would continue the existing pattern. The Plan was approved by the City Corporation, although when the Town & Country Planning Act came into force in 1948 responsibility for preparing the development plan transferred to the London County Council.

County of London Plan (1951 & 1962)

The London County Council (LCC) prepared a development plan for its area, which included the City of London. The plan was adopted in 1951 and reviewed in 1962.

The County of London Plan contained a number of policies that influenced the location of tall buildings, the most significant being plot ratio. The main aims of plot ratio control were limiting the physical bulk of buildings and constraining the density of employment with the intention of preventing congestion in the immediate surroundings of the building and the wider

transport system. Varying plot ratios were set out in supplementary guidance, notably "A Plan to Combat Congestion in Central London" 1957. In the City the zones ranged from 2:1 to 5½:1, although most of the area was zoned at 3:1 and 5:1. Plot ratio controls limited the total floorspace on a site but did not constrain the form of development and so did not restrict the height of buildings.

The County of London Plan designated Comprehensive Development Areas where there had been extensive war damage and streets and buildings were radically replanned. The plan contained many proposals for road construction and widening. New roads were proposed in the north of the City and near the Thames to carry east-west traffic through the City. Street width standards were applied and many City streets were proposed for widening. Much of this widening was achieved when buildings were redeveloped, with frontages being set back from previous building lines. These measures had significant effects on the appearance and character of many streets and on building heights, as accommodating floorspace on residual sites after road widening led to taller buildings.

The plan did not contain explicit policies for tall buildings. Nevertheless, many such buildings were proposed and constructed during the life of the plan, and the locations of these were considered according to informal guidelines. Within the City tall buildings were not permitted in sensitive areas such as the setting of St Paul's Cathedral or near the River Thames, with the result that they were mainly confined to the north and east of the City.

The County of London Plan remained in force in the City until superseded by London boroughs' local plans. In the City these were the Smithfield District Plan, adopted in 1981, and the City of London Local Plan 1989.

Greater London Development Plan (1976)

The Greater London Council (GLC), established in 1963, superseded the London County Council. It had a duty to prepare a Greater London Development Plan (GLDP) to provide a strategic framework for the London boroughs' plans. The GLDP was approved in 1976.

The GLDP was the first plan to include a policy for tall building proposals. It divided London into three categories: "areas in which high buildings are inappropriate"; "areas which are particularly sensitive to the impact of high buildings"; and "areas where a more flexible or positive approach is possible". The GLDP included an 'urban landscape diagram' that showed the

City falling within the first two categories, but not the last. The plan set out criteria for the consideration of proposals for tall buildings in each of the categories of area. The GLDP was required by legislation to define 'areas of special character': several of these areas were in the City, including 'Thames and Thames-side', 'the City', 'Tower of London area', and 'Royal Courts of Justice, Inns of Court, etc'. The plan referred to important long-distance views, which included those of St Paul's Cathedral from Greenwich, Primrose Hill and Hampstead. The areas of special character and long-distance views were shown on the urban landscape diagram and were important determinants of the location of the tall building categories. The GLDP continued plot ratio controls, although referring to the need eventually to replace them.

The GLDP did not replace the LCC's County of London Plan, and the two plans were in force concurrently. The GLC was abolished in 1986 and GLDP remained in force until the issue of the Secretary of State for the Environment's Strategic Planning Guidance for London 1989.

Smithfield District Plan (1981)

The Smithfield District Plan (SDP) was a local plan prepared by the City of London Corporation for the Smithfield area and adopted in 1981. The SDP incorporated the St Paul's Heights policy, adding two additional protected views from Myddleton Square/Amwell Street and St John Street in Islington, and continued the plot ratio standard. It did not envisage tall buildings in the Smithfield area, but contained a proposal for the construction of a new road north of Little Britain, the achievement of which resulted in the construction of an associated tall building at the western end of London Wall.

The SDP was superseded by the adoption of the City's Unitary Development Plan in 1994.

City of London Local Plan (1989)

The City of London Local Plan covered the entire City except the area covered by the Smithfield District Plan and was adopted in 1989. The plan included a policy for tall buildings and several other policies indirectly affecting tall development.

The policy for tall buildings conformed with the GLDP, interpreting its requirements for the City's local context. It defined protected views and conservation areas as inappropriate for tall buildings. The remainder of the City was considered sensitive to the impact of tall buildings and the plan set out criteria for consideration of proposals in these areas.

The Local Plan included a policy for St. Paul's Heights giving it formal status. It introduced a policy for the protection of views of and from the Monument, defining a local setting where the height of surrounding buildings should not compromise the dominance of the Monument, and a number of view corridors seen from its gallery. The plan included a policy for the protection of the setting of St Paul's on the skyline, which in addition referred to the backdrop to the St Paul's Heights views and the strategic views included in the GLDP as well as the view from Richmond Park, which was protected by statutory direction. It continued the plot ratio standard, replacing the varying zones with a 5:1 ratio applying across the whole of the City.

The Local Plan contained policies to guide development in conservation areas, which were first designated in 1971.

The Local Plan remained in force until the adoption of the Unitary Development Plan in 1994.

City of London Unitary Development Plan (UDP) (1994)

The City became a unitary authority with a duty to prepare a UDP on the abolition of the GLC in 1986. The Secretary of State for the Environment issued 'Strategic Planning Guidance for London Planning Authorities' in 1989 to provide a framework for the London boroughs' UDPs.

In 1991 "supplementary guidance for London on the protection of strategic views" (RPG3a) was issued by the Secretary of State. This required the protection of long-distance views that crossed borough boundaries and included eight views of St Paul's Cathedral from Richmond Park, Primrose Hill, Parliament Hill, Kenwood, Alexandra Palace, Westminster Pier, Greenwich Park and Blackheath Point. These views were protected by defined view corridors and wider settings and backdrops to the views.

The City of London's UDP policy for tall buildings largely continued that of the Local Plan, identifying conservation areas and protected views as inappropriate locations for tall buildings and the rest of the City as being sensitive to their impact. It also included more detailed criteria for considering proposals within the sensitive areas.

The UDP continued the Local Plan's policies for St Paul's Heights and Monument views and included a policy for the protection of strategic views

of St Paul's in accordance with Strategic Guidance. A further policy sought the protection of views of buildings, townscape and skylines, and an appendix listed historic skyline landmarks within and near the City. A significant change was the exclusion of a policy for plot ratio, control of the bulk and volume of buildings instead being achieved through the general policies for building design.

The 1994 UDP was replaced by the UDP 2002.

City of London Unitary Development Plan (2002)

The Secretary of State for the Environment issued revised Strategic Guidance for London in 1996 (RPG 3). In 1997 "strategic planning guidance for the River Thames" was published; among its policies was a requirement for all riparian local authorities to define a 'Thames Policy Area'. The City Corporation commenced a review of the 1994 UDP, and the new UDP was adopted in 2002.

The policy for tall buildings in the 2002 UDP continued to recognise protected views and conservation areas as being inappropriate for tall buildings and the remainder of the City as sensitive to such development.

The policy recognised that the areas not covered by protected views and conservation areas had potential for the construction of new tall buildings, and that these areas comprised an "eastern cluster" and a "north central area". It set out criteria for assessing proposals in these areas.

The 2002 UDP included policies for St Paul's Heights, strategic views, Monument views and townscape views, as well as the listed historic skyline landmarks, carried forward from the 1994 UDP. In accordance with the requirement of strategic guidance the UDP designated a 'Thames Policy Area', and set out policies for this area, including one requiring a high standard of design appropriate to riverside locations.

The UDP 2002 was accompanied by supplementary planning guidance (SPG), including "St Paul's and Monument views" and "Riverside appraisal of the Thames policy area". These gave detailed guidance on the operation of the relevant policies in the UDP.

In 2007 several UDP policies lapsed, including that for strategic views which was not saved due to the need to avoid unnecessary duplication. The Government's guidance on strategic views had become the responsibility of

the Mayor of London and new London-wide strategic views policy had been set out in the adopted London Plan.

City of London Core Strategy 2011

The City of London Core Strategy was adopted in 2011. It was the first of the new style of Local Development Frameworks for the City of London brought in by the 2004 Planning & Compulsory Purchase Act.

The policy approach to protected views and tall buildings in the Core Strategy was an evolution of the policies in the 2002 UDP. Policy CS13: Protected Views sought to protect and enhance significant City and London views of important buildings, townscape and skylines. The policy implemented the Mayor's strategic guidance on views protection. It continued the long-standing protection of local views of St Paul's Cathedral, through the St Paul's Heights code and sought to secure an appropriate setting of and backdrop to the Tower of London World Heritage Site which adjoins the City.

The policy was supplemented by the City of London Protected Views Supplementary Planning Document adopted in 2012. This supplementary guidance remains in force.

Policy CS14: Tall Buildings identified those areas of the City that were considered to be inappropriate for further tall building development, defined as conservation areas, the St Paul's heights area, the St Paul's protected vista viewing corridors, and Monument views and setting. All other areas of the City were identified as being sensitive to tall building development, with development only acceptable having consideration to the potential effects on the City skyline, the character and amenity of their surroundings including the relationship with existing tall buildings, the significance of heritage assets and their suroundings and the effect on historic skyline features. The Eastern Cluster area of the City was identified as an area where tall buildings would be permitted on suitable sites, but the north central area identified in the 2002 UDP was not carried forward.

Protected Views Supplementary Planning Document 2012

The SPD provides supplementary guidance on the implementation of the Core Strategic Policy CS13. which has been carried forward into the 2015 Local Plan, as set out below.

The SPD provides a comprehensive summary of the policy requirements for the St Paul's Heights, LVMF Strategic Views, Monument Views and the Tower of London World Heritage Site. It also includes information on the

application of the St Paul's Depths, protected under the St Paul's Preservation Act 1935. Chapter 6 of the SPD provides a listing of the key City Landmarks and Skyline Features that are protected under Core Strategic Policy CS13.

City of London Local Plan 2015

The 2015 Local Plan sets out more detailed development management policies to support the strategic policies in the 2011 Core Strategy. These strategic policies were incorporated into the Local Plan, with only minor alteration, to provide a single development plan document for the City.

Core Strategic Policies CS13 and CS14 were carried forward into the 2015 Local Plan with no amendment. The supporting text to the Protected Views policy was amended to clarify the approach to development in the City of London which has the potential to impact on the Tower of London, emphasising the importance of the Protected Vista for the Tower of London in the Mayor's LVMF and the need for development in the Wider Setting Consultation Area in the background of this Protected Vista to preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value.

The 2015 City of London Local Plan remains in force.

2. Approach to Tall Building Development

The previous section has outlined the current policy framework, national, London-wide and City of London, for the protection of important strategic and local views and the requirements for the delivery of tall buildings. London Plan policy and Historic England guidance emphasise the need for local planning authorities to take a plan-led approach to the delivery of tall buildings, identifying those areas where tall buildings are appropriate or inappropriate. The description of the development of tall building policy in the City of London highlights the long-standing sieve-map approach in the City to identify those areas of the City where tall building development would be inappropriate, clarifying that outside of these areas, all other parts of the City are sensitive to tall building development. Although tall buildings may be permitted on sites not identified as inappropriate, a criteria based approach is used to assess the impact of new tall building proposals at a strategic and local level to determine whether such proposals can be supported.

The identification of areas which are inappropriate for tall buildings and assessment of the impact of tall building proposals outside of these areas is informed by adopted planning policy, adopted supplementary planning guidance and annual monitoring of development proposals and trends. The following section summarises the key elements of this framework, but does not seek to repeat policy and monitoring guidance. This summary should be read in conjunction with the published documents referred to.

Proposed Submission Draft City Plan 2036

Tall buildings and protected views policies are set out in Proposed Submission Draft City Plan 2036 Policies S12: Tall Buildings and S13: Protected Views:

Strategic Policy S12: Tall Buildings

1. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD).

2. Tall buildings of world class architecture and sustainable and accessible design will be encouraged on suitable sites, having regard to:

- the potential effect on the City skyline, the wider London skyline and historic skyline features;

- the character and amenity of their surroundings, including the relationship with existing tall buildings;

- the impact on the significance of heritage assets and their immediate and wider settings;

- the provision of a high-quality public realm at street level; and

- the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.

3. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.

4. New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities within the building and its curtilage, including at upper levels, available at no charge.

5. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.

6. New tall buildings will be refused in inappropriate areas comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; the protected vista and White Tower protected silhouette of the Tower of London; and Monument views and setting; all as defined on the Policies Map.

Strategic Policy S13: Protected Views
The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:

- implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.

- protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features.
- securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).

The approach to tall buildings and protected views in Proposed Submission Draft City Plan 2036 is an evolution of the long standing approach as set out in the adopted City of London Local Plan 2015 and previous adopted local plan and strategic planning documents.

Evidence underpinning the City Corporation's continuing approach to tall buildings and protected views is set out in a series of monitoring and land use reports which have been published since the adoption of the Core Strategy in 2011, and in the adopted Protected Views SPD 2012. The content of these key evidence documents and how they support policy are described briefly below.

Published Evidence in Support of Tall Buildings Policy S12

City of London Tall Buildings Study, December 2020

This study provides an assessment of tall buildings in the City of London at 31st March 2020, including.

- a summary of national, regional and local planning policies and guidance for the development of tall buildings;
- the key policy considerations for the development of tall buildings in the City of London, including The identification of inappropriate areas for tall buildings, by reference to:
    - St Paul's Heights
    - London View Management Framework
    - Monument views
    - Heritage assets
    - Tall buildings in conservation areas
- A timeline of the development of tall buildings in the City of London, covering the pre-1970 period, 1970-1989, 1990-1999, 2000-2009, 2010- 2020; and tall buildings in the planning pipline at 31st March 2020.

- The spatial distribution of tall buildings in the City, with tall buildings identified according to whether they fall in the Eastern City Cluster area, the area defined as inappropriate for tall buildings and the area defined as sensitive to tall building development.

Development Status / Height	Areas inappropriate for new tall buildings	Areas sensitive to tall buildings (exc. Eastern Cluster	Eastern Cluster	City TOTAL
Completed	N/A	N/A	N/A	N/A
75-150m AOD	12	29	10	51
150m+AOD	0	2	6	8
TOTAL	12	31	16	59
Under Construction	N/A	N/A	N/A	N/A
75-150 AOD	0	2	0	2
150m+AOD	0	0	4	4
TOTAL	0	2	4	6
Permitted Not Commenced	N/A	N/A	N/A	N/A
75-150m AOD	0	1	2	3
150m+AOD	0	0	3	3
TOTAL	0	1	5	6

Table 1: Number of tall buildings 75m+ AOD by area, development status and height at 31st March 2020

The Tall Buildings Study Appendices, provide further detail on the policy framework for tall building development, the timelime for the development of tall buildings policy in the City of London and a schedule of all tall buildings over 75m AOD (including address, location by reference to the 2015 Local Plan Key City Places, height above ground and AOD, number of floors, year of completion, land use and architect).

Together the Tall Buildings Study report and appendices provide a comprehensive evidence base explaining the rationale for the identification of Areas Inappropriate for Tall Buildings in City Plan 2036, the distribution of tall buildings in the City of London and their development timeline.

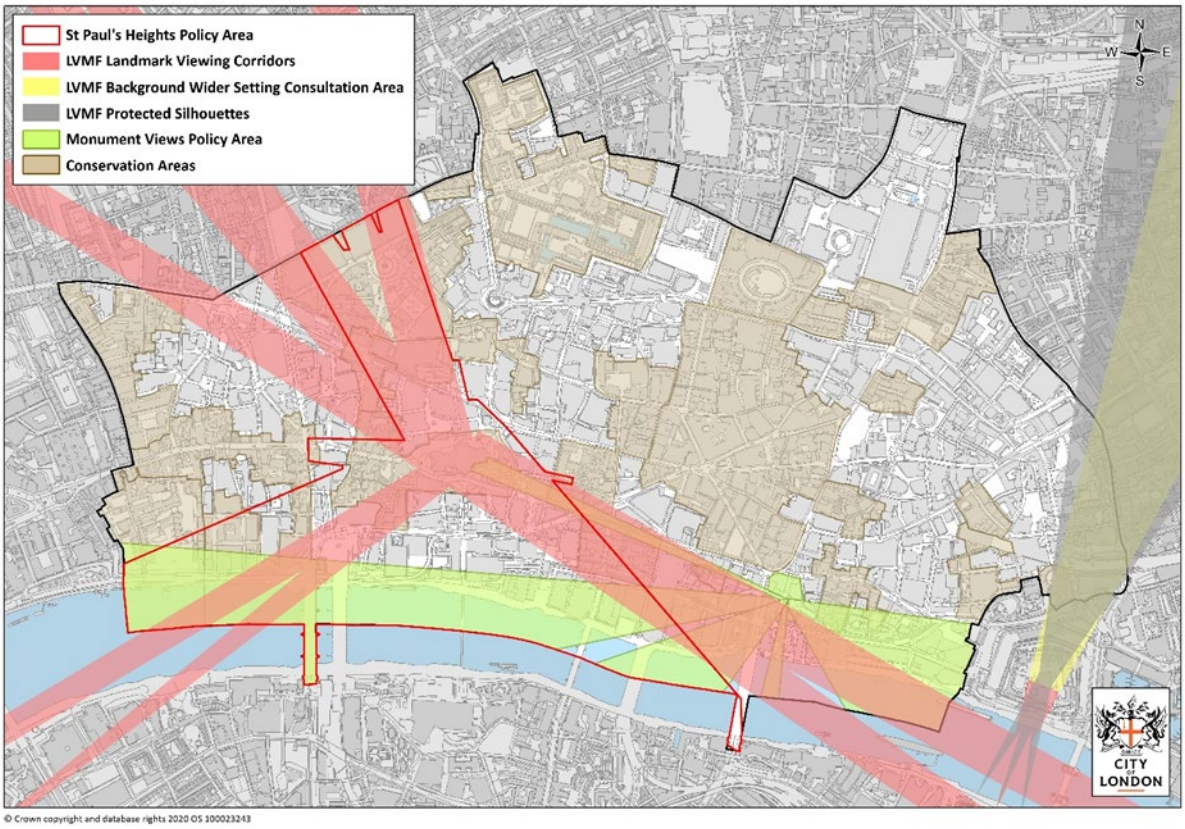


Figure 2: Components of the areas inappropriate for tall buildings

Microclimate Impacts of Tall Buildings

Tall buildings can have a significant impact on the environment and amenity of nearby development, streets and public realm, A key consideration in the assessment of new development is therefore the impact of tall buildings on wind conditions, daylight and sunlight, solar glare and solar convergence.

The City Corporation has adopted a series of Planning Advice Notes which provide further guidance on the need to assess the microclimatic impacts of tall buildings and the detailed methodology which should be used. This information is published in City Corporation guidance on:

- Thermal Comfort
- Wind Microclimate
- Solar Convergence
- Solar Glare
- Sunlight

Published Evidence in Support of Policy S13: Protected Views

St Paul's Heights Study, April 2015

The St Paul's Heights Study 2015 is an update of the St Paul's Height's Study published in 1978. The 1978 Study was a technical document which looked at the formation and intentions of the St Paul's Heights Code, but also at the impacts that the Code has had on identified views of the Cathedral. The 2015 Study updates the 1978 Study evaluating changes to the identified views since 1978 as well as considering new views, including LVMF River Prospect viewpoints and Monument View 5.

The Study:

- Summarises the history of the development of the St Paul's Heights Code introduced in 1938;
- Maps the St Paul's Heights Policy Area, identifying indicative viewing points and areas;
- Sets out technical data on the form of the Heights Code, identifying key features of the Cathedral that are protected in the Code, the dimensions of the Cathedral, the format for the view planes, the St Paul's Heights Grid, cliff edges and set-backs – the St Paul's Heights Area and Grid are available on the City Corporation's interactive maps on its website;
- Identifies and maps buildings which infringe the Height limits, categorising these in terms of infringments by historic City churches, greater infringments (over 5m above the Heights) and lesser infringments (under 5m above the Heights). It also identifies previous breaches that have been removed following the demolition of pre-existing buildings;
- Assesses the St Paul's Heights from each of the 30 viewpoints used to assess the Heights in the original 1930s calculations, with additional viewpoints added in the 1978 Study and viewpoints added since that Study. For each viewpoint, photographs from the 1978 Study are compared with the situation in 2015, with a description of the current view and how it compares with the view in 1978.

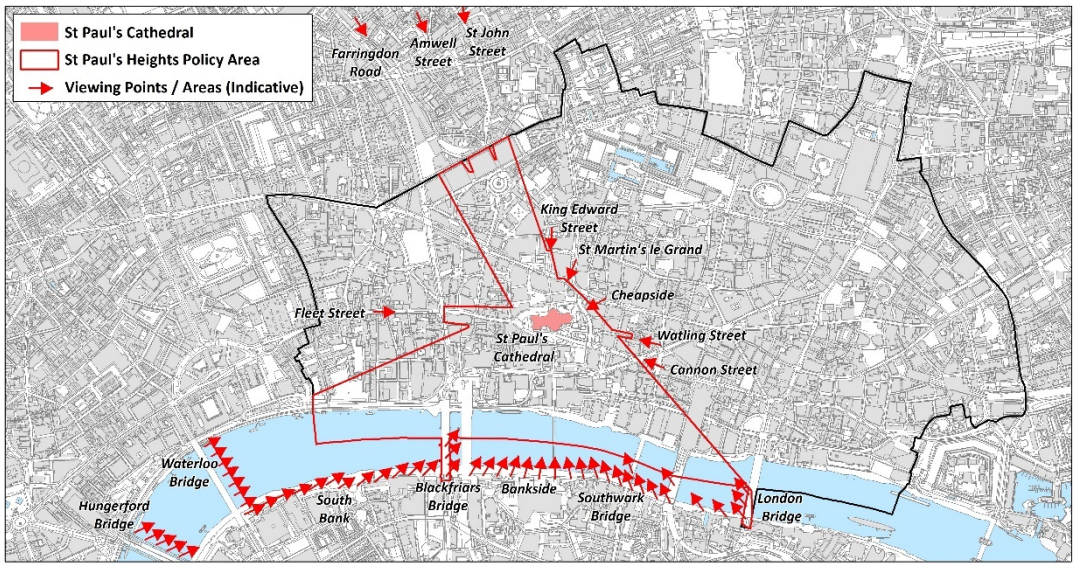


Figure 3: St Paul's Heights Policy Area

Monument Views Study, December 2020

This Study provides an assessment of the key features and view protection considerations of the Monument Views. It provides a summary of the history of the Grade I listed Monument, identifying the key components of the Monument, its height and the key view protection areas identified in adopted planning policy and the Protected Views Supplementary Planning Document.

Five viewing areas from the Monument are identified and, for each view, the report:

- Lists key features in the view
- Provides a photograph of each view, identifying the key features
- Provides a map of the policy area for each view highlighting key features in the view
- Details how each key feature contributes to the overall quality of the view.

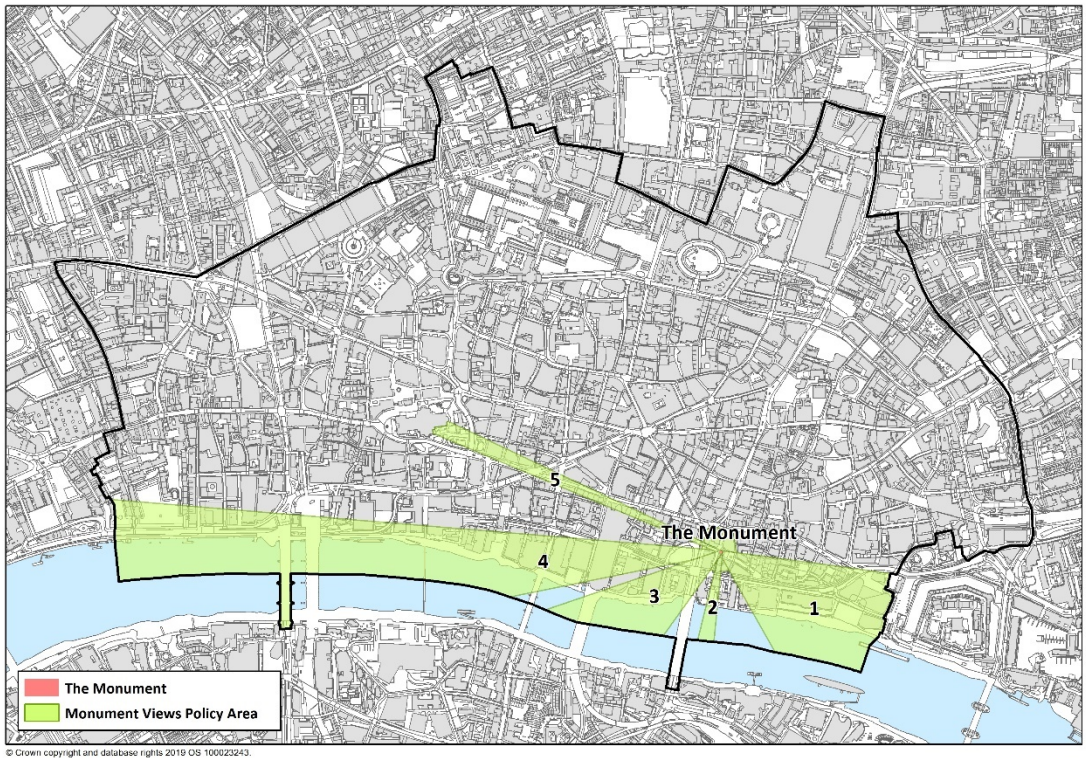


Figure 4: Monument Views Policy Area

Local Plan Monitoring Report: Protected Views, December 2020

This report is part of a series of annual monitoring reports prepared by the City Corporation to monitor progress and implementation of adopted Local Plan policy in the City of London. The report includes data up to 31st March 2020.

The report monitors the number of development schemes completed in the 2019/20 year, those under construction at 31st March 2020 and those permitted but not commenced at 31st March 2020, in terms of:

- Number of schemes
- Number of schemes complying with or exceeding St Paul's Heights
- Number of schemes complying with or exceeding LVMF Protected Vista Landmark Viewing Corridors, Protected Vista Wider Setting Consultaiton Areas, River Prospects/Townscape Views.
- Number of schemes within the Monument Views and Setting
- Number of schemes within the Tower of London World Heritage Site Local Setting Area.

The report also provides a listing of schemes completed during the period 1st April 2011 and 31st March 2020 within the Protected Views policy areas.

3. Urban Characterisation

The Historic England Tall Building Advice Note recommends the use of an urban design framework to guide the planning of locations for tall buildings, identifying those elements that create local character and other important features and constraints.

The approach to tall building development in the City of London has evolved over many years and takes account of the City of London's distinctive character in identifying those areas and locations where tall building development would be inappropriate and those areas that are sensitive to tall building development and where a criteria-based approach should be taken to the consideration of tall building proposals.

The character of the City of London derives from its long history and its long-standing role as a major international financial centre. These factors have resulted in a townscape of great complexity and diversity. It is important to identify the elements of this townscape that need to be considered in the development of a policy for tall buildings.

Historical development

One of the most distinctive features of the City's townscape is its pattern of streets and spaces. The City was first settled following the Roman occupation in 43AD and during the Roman period the City wall and gates were established; these were an important influence on the City's later development. While the original alignment of London Bridge and several of the City's streets can be traced back to the Roman period, most of the City's street pattern originates from the reoccupation of the City in Saxon times and its subsequent medieval development. This resulted in a dense and intricate network of streets, lanes and alleys which form the basis of much of the street pattern that survives today and is a significant component of the City's characteristic urban grain. The Saxon and medieval periods saw the establishment of the City's many parishes, each with its church and churchyard. Many of these churchyards exist today, providing valuable open spaces, while several medieval church towers are features in the skyline.

Much of the medieval City was destroyed in the Great Fire of 1666. The reconstruction of the City was carried out on the original plots and the medieval pattern of streets and spaces was very largely maintained. While

some widening of existing streets was carried out, only a few new roads were built, such as King Street and Queen Street linking the Guildhall to the river. A succession of Building Acts sought to prevent further fires through prescriptive controls on design which imposed limits on the height of buildings.

The most significant building rebuilt after the fire is St Paul's Cathedral. With a height of 111.6m (above ground level) it remained the tallest building in the City of London until 1970. Of the 87 pre-fire churches, 51 were rebuilt. The churches had spires and towers which rose above the general rooftops and created a skyline unique in Europe and greatly admired. The church steeples continue to provide characteristic features in local views and the wider skyline. The Monument, built to commemorate the origin of the Great Fire, with a height of 67m also rose above the roofline.

During this period, the City remained primarily a centre of commerce, with a variety of trades, industries, warehousing and exchange, much of it related to river-borne trade, while retaining a large residential population. This mixture of activities was reflected in the form of development, with a great variety of building types and sizes of plots. The density of development intensified as gardens and other open land were increasingly used for building, giving the City's townscape an increasingly close-grained texture.

The overall form of building and townscape set by the post-fire reconstruction was maintained throughout the eighteenth century, but during the nineteenth century radical changes to the City's urban fabric were made. These included the construction of new roads, including Moorgate, Princes Street and King William Street, built in the 1830s to connect the newly reconstructed London Bridge; Queen Victoria Street, built in the 1870s to link to the new Victoria Embankment; and Holborn Viaduct, which carried the road from Newgate Street to Holborn over the valley of the River Fleet. Elsewhere, many existing streets were widened and realigned. The first railway was built at Fenchurch Street in 1840-42, and many lines and stations followed until the construction of Liverpool Street Station in 1874. The first underground line from Paddington to Farringdon opened in 1863 and was extended to Moorgate in 1865. More "cut and cover" lines followed, while the first deep "tube" line opened in 1890.

These transport improvements led to a growth in commuting to the City to work, and the City became an increasingly specialised commercial enclave. The residential population fell from 128,000 in 1801 to 30,000 in 1891, while

most of the City was redeveloped for commercial buildings, mainly offices and banks. There was also a significant amount of warehousing and some industry, although the Port of London had expanded to the docklands in the east. There was a high rate of redevelopment driven by the City's primacy as a world centre of commerce. The wealth of the City's institutions was expressed through the style and materials of the buildings commissioned. The scale and height of buildings generally increased throughout the period, a trend encouraged by the increasing use of lifts, although the building acts continued to ensure height controls. Secular buildings included elements that were designed to rise above the roof-line, creating new features on the skyline, such as the towers of Cannon Street Station and the dome of the Central Criminal Courts, the Old Bailey.

This general pattern of activity and development continued into the twentieth century, and the density of development and size of buildings continued to increase. By the 1930s the City's working population had grown to almost 500,000, but the resident population had fallen to only a few thousand.

The City was heavily bombed in the Second World War, with one third of its area destroyed. After the war reforms were introduced that would radically influence the reconstruction, including the Town and Country Planning Act in 1948 and revisions to the building acts that promoted greater flexibility in design and removed limits on the height of buildings.

The built form of the City was perceived as suffering from high density, lack of space, congestion and poor daylighting, and rebuilding and replanning was thought necessary. Although reconstruction was initially delayed by shortages of building materials, many war damaged locations were declared comprehensive development areas, and compulsory purchase powers were used to assemble sites for redevelopment. The district including the Golden Lane and Barbican Estates and London Wall was one of the largest and most radical areas of comprehensive replanning, while others can be seen between Fetter Lane and Farringdon Street, around St Paul's Cathedral, along the riverside and east of Minories.

Motor traffic was to be accommodated by road building. Options were put forward for the provision of new routes to accommodate through traffic: these were the "northern route" from Holborn to Aldgate, including a new dual-carriageway road at London Wall; the "southern route", achieved by widening Lower and Upper Thames Street and constructing Blackfriars

underpass to link it to the Victoria Embankment; and road widening from Bishopsgate to London Bridge, including the rebuilding of the bridge. Elsewhere, there was further extensive road widening, achieved by the setting back of building frontages on redevelopment. Pedestrians were to be segregated from vehicles by the creation of a network of upper-level walkways. It was envisaged that this would be made possible through the redevelopment of almost all buildings in the City.

New buildings were designed to avoid the perceived problems of the pre-war City. Larger sites enabled buildings to be designed with regular floor plans, maximising daylight both within the building and to its surroundings, and often incorporating open space. During the 1950s Bucklersbury House (Queen Victoria Street), Fountain House (Fenchurch Street) and the towers lining London Wall became the City's first tall buildings. They were followed by many more during the 1960s and 70s, culminating in the completion of the NatWest Tower (now Tower 42) in 1981.

Offices became more specialised, concentrating on higher-level and headquarters functions, while clerical work was increasingly decentralised. In many cases the total amount of floorspace was not substantially increased on redevelopment, so the overall density of development in the City did not rise markedly. The decline in the City's residential population was reversed by the construction of the Golden Lane and Barbican estates, and the Middlesex Street housing estate was rebuilt. All these residential schemes incorporated tall buildings.

During the 1960s this radical approach to planning began to be questioned. In the 1970s the policy of accommodating road traffic was replaced by one of traffic restraint. The City's first conservation areas were designated in 1971 and an increasing number of buildings were protected by listing for their special architectural and historic interest. While the creation of an upper-level walkway network was achieved in the Barbican and London Wall area, elsewhere only disconnected sections were realised, and the concept was abandoned in the 1970s.

In 1986 the deregulation of the financial markets stimulated new forms of working and trading which required large trading floors with greater floor-to-ceiling heights to accommodate office technology. These changed needs made many buildings of the 1960s and 70s redundant, leading to their redevelopment. The abolition of plot ratio controls in 1994 removed a quantitative limit on density of development, leading to greater variations in

the amount of floorspace on individual sites. These development trends have continued to the present, albeit with a greater emphasis on the delivery of flexible and adapatable floorspace suited to a range of commercial office and technology needs.

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.

The City's antiquity also results in a very fragmented and complex pattern of land ownership. Many street blocks are in a large number of separate ownerships. These interests can often be difficult to establish as records go back many centuries. Within individual buildings there are also often many different leasehold and tenancy interests.

The street and land ownership patterns mean that site assembly in the City is often extremely complex. A developer wishing to acquire a site with the potential to accommodate a large development, such as a tall building, must often investigate and acquire a very considerable number of interests in the land. This can be a time-consuming process, sometimes taking years, but is of critical importance to realising development potential.

The pattern of streets and spaces is important to the character and functioning of the City. The street pattern is of historic value and is an essential component of the City's townscape. The dense network of streets and alleys provides convenient walking routes and a high degree of pedestrian permeability, which is of particular importance as most movement in the City is on foot. In the densely developed City the numerous churchyards, open spaces and gardens provide a valuable resource.

General urban design considerations for tall buildings

One of the characteristics of areas of the City which distinguishes them from many other parts of central London is the dynamic relationship between buildings of different design, age and scale. Whilst such relationships may appear incongruous and harmful in some locations, in others it may create contrast in scale that is characteristic and dynamic.

Tall 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. Within this context the podiums of tall buildings (especially the earlier generation of 1950s and 60s podium blocks) can appear incongruous. However, in other locations, the larger scale and urban grain of some areas means that tall buildings may be acceptable within such settings.

Tall buildings in the City have an impact on the public realm. Such buildings can limit sunlight and result in unwelcome wind effects which significantly diminish the quality of the public realm. An older generation of tall buildings of the 1950s to 1970s paid little attention to the desirability of providing permeable routes for pedestrians through the site or retaining historic lanes and alleys. However, recently permitted and constructed schemes have sought to retain and integrate pedestrian routes through the sites which reflect the distinctive pattern of alleyways that characterise the City.

The relationship of tall buildings to one another on the skyline, and to existing clusters as well as the townscape impacts of isolated tall structures are important considerations. Tall buildings may contribute to the uniqueness and distinctiveness of the City. The design and materials used should reflect the activities within the building and the orientation of the facades, and should be innovative, high quality and contemporary. The profile and upper areas of tall buildings are important design considerations and there is an opportunity to incorporate innovative façade designs and environmental solutions at higher levels which may be inappropriate at lower levels where seen in a street context. Tall buildings offer the potential for publicly accessible roofspaces, terraces and viewing galleries which can enhance the overall experience of a tall building and open up previously unseen vantage points from which to see and appreciate the wider urban form and skyline of the City and the wider London conurbation.

The Distribution of Tall Buildings

The location of existing and proposed tall buildings in the City is shown below:

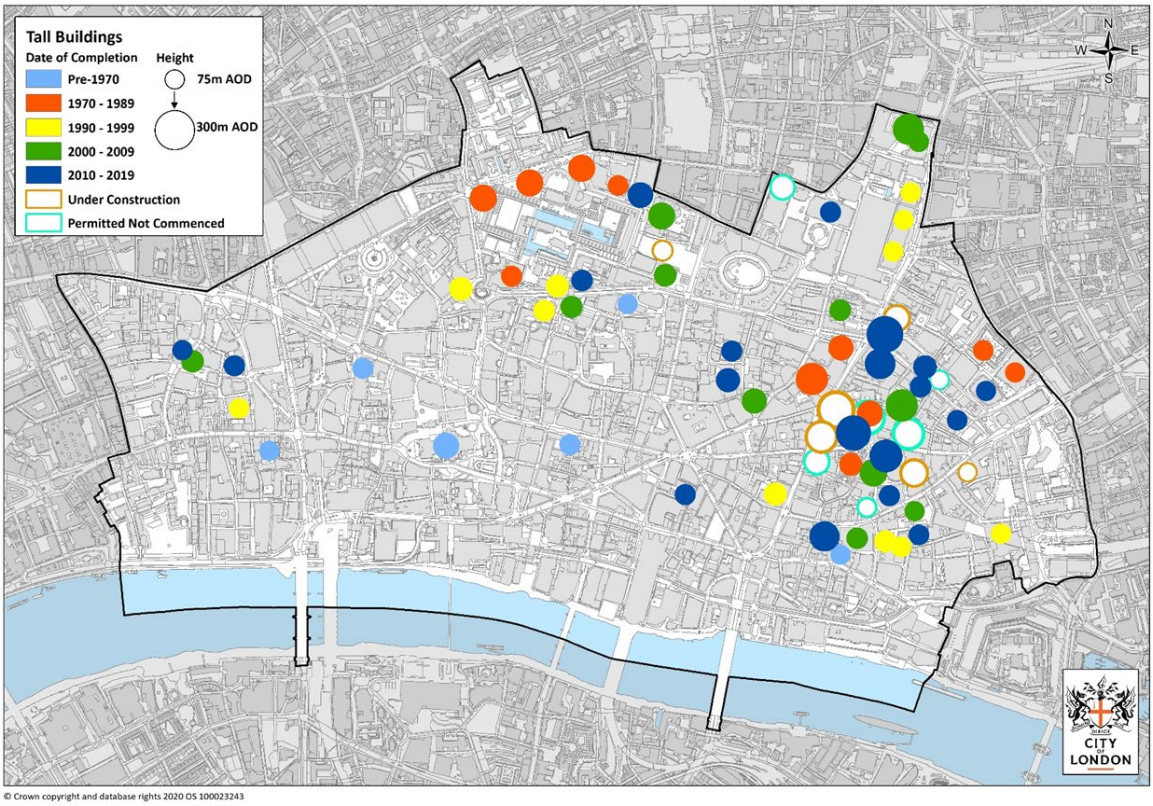


Figure 5: City of London Tall Buildings distribution

Planning and other considerations have led to tall buildings being mainly located in the City Cluster area to the east of the City and in the north of the City.

The City Cluster area has long been characterised by the highest building densities in the City. This was recognised by the early town planning schemes of the 1930s, which allowed greater building height here, and the plot ratio zones introduced in the 1950s, which designated this area for the highest plot ratios in London. As tall buildings were constructed from the 1950s onwards their locations were relatively scattered and a cluster was not initially apparent. In the 1973 edition of the Buildings of England Sir Nikolaus Pevsner opined "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." However, a recognisable cluster later began to emerge as a distinctive feature

of the City's skyline. In the 1997 edition of the Buildings of England Simon Bradley, while still regretting "the loss of coherence caused by the failure to group tall buildings properly" in some areas, felt able to write "From the old financial heart, east of the Bank, they surge up in a mass that communicates a sense of excitement worthy of the area."

The greater coherence of the cluster was in part due to the construction of Tower 42 (formerly the Nat West Tower), completed in 1981, which was significantly taller than other buildings in the area and gave the cluster a distinct visual focus. Planning policy in the 2000s has sought to provide coherence to further tall building development in the Cluster, with the height of tall buildings rising to a peak in the heart of the Cluster. Initially, the proposed Pinnacle development on Bishopsgate was envisaged as providing this focal point, with surrounding tall buildings stepping down in height with distance from this point. The financial crisis from 2008 resulted in the abandonment of the Pinnacle development, but this has now been superseded by 22 Bishopsgate, which has recently achieved practical completion, as the tallest building in the City. The adjacent 1 Undershaft development when constructed will provide a taller peak, whilst retaining the pattern of buildings stepping up towards the centre, making the cluster a distinct and striking feature of the City's skyline.

Elsewhere in the City there are isolated tall buildings and loose groupings have been built on sites considered appropriate with regard to their local surroundings and their setting on the wider skyline. Most are located in the north and east of the City, although New Street Square is a notable addition to the skyline in the west.

The City's tall buildings need to be considered in relation to tall developments nearby in neighbouring boroughs. The City's tall buildings have a visual relationship to those at London Bridge in Southwark when seen on either side of the Thames in views along the River. There are also some tall buildings to the north and east of the City in Islington, Hackney and Tower Hamlets. These buildings loosely relate to City tall buildings, but do not generally form any distinctive grouping.

Skyline and Topography of the City

The topography of the City and its surroundings is a major determinant of the visibility of its skyline. The City's skyline is made up of a number of elements, comprising buildings that rise above the general roofline. From some

viewpoints the entire City skyline can be seen, but from most places only certain elements are visible.

The skyline of the City can be seen from locations both near the Square Mile's boundaries and from more distant vantage points around London. Tall buildings are prominent in views of the City and their effect on the skyline is an important consideration that needs to be taken into account in the City Plan 2036 policies. The main elements within the skyline can be described as:

- The City Cluster of tall buildings in the east of the City. These are all office buildings and form a distinct grouping.
- Isolated tall buildings and loose groupings elsewhere in the City, mainly in the north and east.
- St Paul's Cathedral. Policies to protect views of the Cathedral have ensured that it has remained a dominant element in the skyline of the western part of the City.
- Historic skyline landmarks, such as church towers and spires, the Monument and other secular buildings. They are mostly of lower height than the preceding elements.

The physical relief of London is a series of terraces stepping up from the River Thames. The City is situated on high ground above the River Thames. Most of the City is 15 to 17 metres above Ordnance Datum, other than beside the Thames and in the valley of the former River Fleet. The visibility of the City's skyline and the elements within it depends on the height of the vantage points relative to the City. Views can be seen from the following categories of vantage points, which are described in detail below:

- The Thames and riverside
- Environs of the City
- More distant hills and ridges

The Thames and Riverside

The ground in the City rises up relatively steeply from the river and the skyline is prominent in views from the riverside walk along south bank and Thames bridges stretching from Rotherhithe in the east to Hungerford Bridge in the west. The riverside walk is nearly continuous and each stretch of the south bank shows different aspects of the City skyline. The following is a description of the views from each stretch of the south bank, moving from east to west.

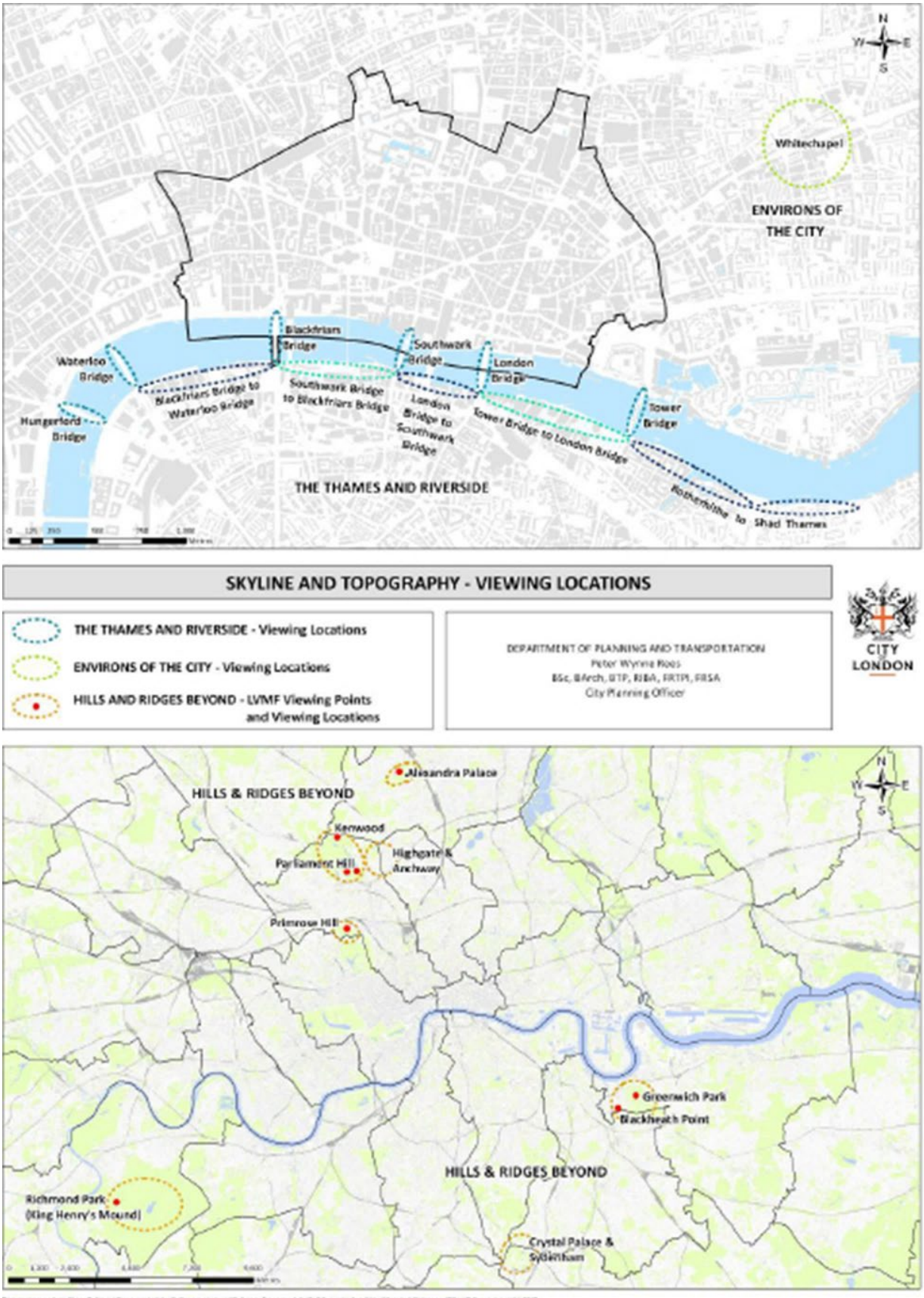


Figure 6: Skyline and Topography Viewing Locations

Rotherhithe to Shad Thames The most easterly point on the south bank from which the City's skyline forms an eye-catching element in views is King's Stairs Gardens in Rotherhithe. The City Cluster of tall buildings forms a striking feature of the skyline. From the eastern part of this stretch of riverside walk the cluster is seen behind the river-front buildings on the north bank of the river in Wapping, but further west towards Bermondsey the cluster is seen with the Thames and Tower Bridge in the foreground. The angle of view ensures that the tall buildings of the City Cluster appear significantly higher than the general roof-line and so form a distinctive and highly noticeable skyline feature. Tall buildings in the north of the City, however, are not visible. From westerly parts of this stretch, the City's riverside can be seen. The dome of St Paul's can be seen against clear sky, and the Monument and the towers of Cannon Street Station are noticeable. Tower Bridge forms a notable foreground feature of all the views, and from some points frames views of the skyline.

Tower Bridge The bridge affords striking views of the City Cluster with the Tower of London in the foreground. Tall buildings appear behind the White Tower in this view, so that it is not seen in front of clear sky. This viewpoint is close enough to the City for the tall buildings to form a dominant and imposing element of the view.

Tower Bridge to London Bridge The view from the eastern part of the riverside walk near City Hall is similar to that from Tower Bridge, with the City Cluster prominent on the skyline and the Tower of London in the foreground. Further west the angle of view is such that the City's river-front buildings obscure the base of buildings in the City Cluster with the mid and upper parts of buildings visible.

London Bridge to Southwark Bridge From these bridges and the riverside walk St Paul's Cathedral is a prominent feature and is seen against clear sky. Looking east from London Bridge good views of the Tower of London are seen, although buildings at St Katherine's Dock appear on the skyline behind it. Tall buildings in the City Cluster are visible as part of a coherent cluster of buildings.

Southwark Bridge to Blackfriars Bridge Moving from east to west of this stretch of the river, the tall buildings of the City Cluster become more prominent. This stretch gives wide views, and almost all the City's tall buildings can be seen, including those in the north and west. St Paul's is highly visible. From Southwark Bridge and adjoining parts of the riverside walk the dome and

western towers are seen against clear sky, but further west the tall buildings of the Barbican and London Wall appear behind the Cathedral, compromising its dominance of the skyline. The lower general height of building in the west of the City allows church steeples and other historic skyline features to be seen rising above the roof line.

Blackfriars Bridge to Waterloo Bridge This stretch affords impressive views of the whole of the City skyline, with nearly all tall buildings and many historic skyline landmarks visible. The greater distance of these viewpoints means that there is a shallow angle of view, so that tall buildings and landmarks are not hidden by river-front buildings and are seen to rise well above the general roof line. The City Cluster forms a prominent feature, with 22 Bishopsgate providing a clear focus which other buildings step up to. St Paul's is a striking element in the views, although its skyline setting is compromised by tall buildings in the north of the City which appear behind it. However, the City Cluster appears well to the right of the Cathedral.

Waterloo Bridge The bridge affords some of the best views of the City skyline in central London. The views are similar to those from the south bank, but are better seen due to the higher vantage point. The City Cluster forms a distinctive element in the views. St Paul's is prominent in the views and appears separate from the City Cluster, although from the southern section of the bridge the Broadgate Tower appears behind the dome.

Hungerford Bridge The City skyline is seen over Waterloo Bridge and so the views seen are very similar. However, as Hungerford Bridge is further away, the viewing angle is shallower and the tall buildings are more prominent and less of the Cathedral is obscured by Unilever House.

As the City skyline is seen as a whole from the riverside, its overall composition from these viewpoints is important. Visual effects deserving careful consideration include: the benefits of achieving a distinctive cluster of tall buildings in the east; the impact of isolated tall buildings not related to any cluster; the relationship of modern tall buildings to the views and settings of historic skyline landmarks.

Environs of the City

Because the surrounding boroughs are generally at a similar elevation to the City, there are relatively few views of the City's skyline from within these areas. Such views as there are mainly take the form of glimpses: individual tall buildings or small numbers of buildings are seen, but not the whole

skyline. Some of the most noteworthy of these local views are from the east, such as from Whitechapel, where views of the City Cluster can be seen. The views from Whitechapel and other locations to the east allow an appreciation of the City Cluster, and so the composition of these views is of some significance.

More distant hills and ridges In outer London there are high ridges that afford impressive views of the central London skyline. These include Hampstead Heath, Highgate, Archway, Alexandra Palace and Primrose Hill in north London, Greenwich and Blackheath to the east, Sydenham and Crystal Palace to the south, and Richmond Park to the west. Within these views, the City's tall buildings form just one element among large numbers of tall structures in central and inner London. Because the viewpoints are at high elevations, the views are mostly downwards, so that the City's tall buildings are mainly seen against a background of buildings, hills and other features, rather than against the sky.

Specific views of St Paul's from defined viewpoints at Primrose Hill, Parliament Hill, Kenwood, Alexandra Palace, Greenwich Park, Blackheath Point and Richmond Park (King Henry's Mound) are protected by the LVMF.

As most or all of the City's tall buildings can be seen from these viewpoints, the overall skyline can be appreciated. The City Cluster appears as a relatively coherent element in these distant views, and so the relation of proposed tall buildings to the cluster may be a significant consideration.

Heritage Assets

The City is the original core from which London developed and consequently is of great historic interest. It has many historic buildings and areas, and considerable archaeological value. Its heritage assets are protected by a variety of policies and controls. These influence the potential location of tall buildings and so need to be examined.

Figure 7: City of London Heritage Assets

Conservation Areas

The City of London Corporation, under the Planning (Listed Buildings and Conservation Areas) Act 1990, has a duty consider whether it should designate conservation areas, which are defined as "areas of special architectural or historic interest, the character of which it is desired to preserve or enhance". The City also has a duty to review the boundaries of its conservation areas from time to time.

There are 27 conservation areas in the City, which vary considerably in size, scale and character. The City of London designated its first conservation areas in 1971 and has carried out three comprehensive assessments of these designations in 1981, 1991 and 2007. The latest addition to the list of conservation areas, the Barbican and Golden Lane Conservation Area was designated in 2018.

Conservation areas are designated to protect the special character of entire areas rather than individual buildings, and therefore not all buildings within their boundaries will necessarily contribute to their significance or conform to their predominant character.

Details of those tall buildings within conservation areas in the City of London are set out in the Tall Buildings Study report, December 2020.

Conservation Area Character Summaries and Management Strategies

The City Corporation has an ongoing programme for the preparation and review of Conservation Area Character Summaries and Management Strategies.

Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to "formulate and publish proposals for the preservation and enhancement of any parts of their area which are Conservation Areas." They are intended as a development management tool, and to provide a sound basis for each area's designation.

Conservation Area Character Summaries seek to identify the special character of a conservation area from a range of factors, including historical development, spatial analysis, and architectural character. Management Strategies summarise local policies and strategies relevant to the preservation and enhancement of the City's conservation areas.

At December 2020, the following Conservation Area Character Summaries and Management Strategies had been adopted as Supplementary Planning Documents by the City Corporation:

Adopted Conservation Area SPDs	Date of Adoption
Bank	January 2012
Charterhouse Square	January 2012
Crescent	January 2012
Lloyds Avenue	January 2012
Bow Lane	September 2012
Queen's Street	September 2012
Smithfield	September 2012
Eastcheap	March 2013
Fenchurch Street Station	March 2013
St Paul's Cathedral	March 2013
Bishopsgate	September 2014
Trinity Square	September 2014
Finsbury Circus	July 2015
Foster Lane	July 2015
Chancery Lane	February 2016
Fleet Street	February 2016
Whitefriars	February 2016
Leadenhall Market	July 2017
Postman's Park	May 2018

Table 2: Adopted Conservation Areas SPDs and Date of Adoption

The following Conservation Area SPDs are in preparation:

Conservation Area SPD	Proposed Date of Adoption
Barbican & Golden Lane Estates	Summer 2021

Table 3: Conservation Area SPDs in preparation

Listed Buildings

There are over 600 buildings in the City which are listed for their special architectural and historic interest, ranging in scale from statues and telephone kiosks to St Paul's Cathedral and the Barbican and Golden Lane residential estates.

The City Corporation has adopted more detailed guidance for residents and developers on the Barbican and Golden Lane Estates, both of which are designated Listed Buildings. The guidance has been adopted as Supplementary Planning Documents as follows:

Listed Building Management Guidance	Date of Adoption
Listed Building Management Guidelines for the Barbican Estate, Volume I: Introduction; Volume II: Residential Buildings	October 2012
Listed Building Management Guidelines for the Barbican Estate, Volume IV: Landscape	January 2015
Listed Building Management Guidelines for the Golden Lane Estate	November 2013

Table 4: Listed Building management Guidance

The following Listed Building Management Guidelines are in preparation:

Listed Building Management Guidelines	Proposed Date of Adoption
Listed Building Management Guidelines for the Barbican Estate, Volume III: Arts Centre	Summer 2021

Table 5: Listed Building Management Guidelines in preparation

Historic City Landmarks

The adopted Local Plan 2015, Core Strategic Policy CS13: Protected Views seeks the protection and enhancement of historic City landmarks and skyline features. This policy protection is carried forward into the draft City Plan 2036, Strategic Policy S13: Protected Views.

Section 6 of the City Corporation's Protected Views SPD, 2012, identifies those landmarks and skyline features that are protected by adopted policy CS13 and draft policy S13 (Figures 10 and 11, pages 36-40 and Figure 12, page 41, in the SPD). The majority of the landmarks are designated heritage assets and includes City churches considered to have a presence on the wider skyline.

Archaeology and Scheduled Ancient Monuments

There are 48 Scheduled Monuments in the City which include stretches of Roman and medieval City wall, and Roman fort, buried remains such as the Roman governor's palace, the Roman amphitheatre, and livery company halls. The setting of these will be important in considering tall building proposals.

Development proposals, particularly for tall buildings, may involve excavation, for example for basements and foundations, that affect scheduled ancient monuments and other archaeological remains. These are assessed on a site by site basis.

Detailed guidance on archaeology in the City of London is set out in the Archaelogy and Development Guidance SPD, adopted July 2017. The SPD provides a framework for archaeological projects in the City of London consistent with the European Convention on the Protection of the Archaeological Heritage (Valetta 1992), the National Planning Policy Framework, the adopted London Plan (2016) and the Publication London Plan (2020), the adopted City of London Local Plan (2015) and draft City Plan 2036 and professional best practice as articulated by the Chartered Institute for Archaeologists (CiFA).

Historic Parks and Gardens

There are four gardens in the City which are on the Register of Historic Parks and Gardens: Finsbury Circus, Inner Temple Gardens, Middle Temple Garden and the Barbican. The impact of tall buildings on the setting of these historic gardens will be an important consideration.

The Inner and Middle Temples are designated a conservation area. They are adjoined by other conservation areas in both the City of London and the City of Westminster. In addition, they are in an area where the height of development is largely restricted by protected views.

Finsbury Circus garden is located in a conservation area, which is adjoined by other conservation areas. The Drapers' Gardens tall building was formerly prominent in views out of the garden to the south, but this has now been demolished. Further guidance is provided in the Finsbury Circus Conservation Area Character Summary and Management Strategy SPD, adopted in July 2015.

The Barbican landscaping is an integral part of the master plan for the area and is important in the relationship of towers, lower buildings and spaces, and is now part of the listed fabric of the estate. Further guidance is set out in the Listed Building Management Guidelines for the Barbican Estate SPD, Volume IV: Landscape, adopted in January 2015. The Barbican Estate is now within a designated conservation area and further guidance in the form of the Barbican & Golden Lane Estates Conservation Area Character Summary and Management Strategy SPD will be published and adopted in 2021.

In addition, the London Parks & Gardens Trust maintains an inventory of historic green spaces, of which there are 116 in the City of London. The setting of these assets should also be recognised.

4. Protected Views and Settings

There are a number of policies for the protection and management of views that affect the City and these are a significant consideration in the location of tall buildings. These policies relate to:

- views and settings of St Paul's Cathedral, the Monument and the Tower of London
- views of the townscape and skyline seen from the Thames bridges, riverside and other locations.

These policies are set out in various policy documents, including the London Plan 2021, the Mayor's London View Management Framework 2012, the City of London Local Plan 2015 and draft City Plan 2036, the City of London Protected Views SPD 2012 and the various Conservation Area Character Summaries and Management Strategies and Listed Building Management Guidelines for the Barbican and Golden Lane Estates.

The Tower of London is located outside but adjoining the City's boundary. It is a designated World Heritage Site subject to international as well as national, regional and local protection.

These policy and other documents are briefly described below. This description should be read in conjunction with the earlier descriptions of the development of policy in the City of London. This paper does not provide a detailed analysis of the various views protections which are applicable in the City as these are set out in the pubished documents referred to. However, views protection and the associated policy documents are important in the consideration of tall building proposals in the City of London and have been taken into account in the development of City of London planning policy and in the determination on individual planning applications for tall buildings.

Views and Setting of the World Heritage Site

The Tower of London was inscribed by UNESCO as a World Heritage Site in 1988 for its "outstanding universal value". The City Corporation must take the setting of the Tower of London into account when considering development proposals, as the City forms the backdrop to many views to the Tower from the south, from the river and from the east.

The Tower of London World Heritage Site Management Plan (2016) was prepared by Historic Royal Palaces to ensure the effective management of the World Heritage Site for present and future generations. It provides an agreed framework for long-term decision making on the conservation and

improvement of the Tower, protecting and enhancing the visual and environmental character of its local setting, providing consideration of its wider setting and improving the understanding and enjoyment of the Tower as a cultural resource.

The Management Plan identifies a Local Setting Area for the Tower of London which extends to sites within the London Boroughs of Tower Hamlets and Southwark and the City of London. The Local Setting Area as it applies to the City of London is identified on the Local Plan 2015 Policies Map and the Policies Map for City Plan 2036.

Draft City Plan 2036, Policy HE3: Setting of the Tower of London World Heritage Site requires development to preserve and seek enhancements of the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.

Further information can be found in the Tower of London World Heritage Site Management Plan (2016), the Tower of London Local Setting Study (2010) and the Mayor's London View Management Framework SPG 2012.

London Views Management Framework

Protection of long-distance views of key London landmarks was first included in the Greater London Development Plan, approved in 1976. Several of these views were of St Paul's Cathedral and the views were incorporated into the City of London Local Plan, adopted in 1989. After the abolition of the Greater London Council in 1986 the Secretary of State asked the London boroughs to recommend long-distance views that should be included in strategic planning guidance.

In 1991, Regional Planning Guidance 3a identified strategic views of St. Paul's Cathedral and the Palace of Westminster from viewpoints across London. The views were included in the policies of the City of London's Unitary Development Plans, adopted in 1994 and 2002.

With the establishment of the GLA in 2001, the government's strategic views protection was devolved to the Mayor of London and included within the London View Management Framework set out in the first London Plan 2004. This policy approach has been taken forward into subsequent iterations of the London Plan, including the London Plan 2021. The Mayor has also published further supplementary planning guidance which sets out in more detail how the LVMF works, defining the protected views and the approach to protection

of these views. The most recent supplementary guidance is the London Views Management Framework SPG, adopted in 2012. Guidance on the application of the LVMF within the City of London is contained within the City of London Protected Views SPD, 2012.

Monument Views

The Monument, built between 1671 and 1677 to commemorate the Great Fire of London, is both a listed building and a scheduled ancient monument. It is an important vantage point with extensive views over London.

The City of London 2015, Core Strategic Policy CS13 seeks to protect and enhance significant local views of and from the Monument, a policy approach taken forward into Strategic Policy S13 in the draft City Plan 2036. The Monument Views Study, December 2020, provides detail of the 5 Monument views, the key features that lie within these views and the operation of the Monument Views protection policy.

St Paul's Cathedral: Local View and Setting

The St Paul's Heights code has been operated in the City of London since 1938 to protect local views of the Cathedral. The current policy for St Paul's is set out in Core Strategic Policy CS13: Protected Views in the adopted 2015 Local Plan and Strategic Policy S13: Protected Views in the draft City Plan 2036. Detailed guidance on the application of St Paul's Heights is set out in the Protected Views SPD, with further explanation of the development of the Heights set out in the St Paul's Heights Study 2015 and the protected views and tall buildings monitoring papers, details of which are set out earlier in this topic paper.

Views of St Paul's from the Processional Route

The City of London Protected Views SPD notes that, in some of the views protected by St Paul's Heights, tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge; and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. Within these views, new development and the redevelopment of existing tall buildings

should aim not to worsen and, where possible, to improve the backdrop to the views.

Views of St Paul's Cathedral from the Processional Route along Fleet Street and Ludgate Hill make an immensely important contribution to the significance of St Paul's Cathedral and form a key part of its setting.

These views of St Paul's are experienced from the ancient Processional Route between Westminster and the City on nationally and internationally significant occasions, during which St Paul's is perceived as a supreme destination unchallenged on the skyline.

They are the most generous and dynamic views of Sir Christopher Wren's ingenious juxtaposition of the Dome and Western Towers, which have retained their pristine sky setting for over 300 years. These elements are the most acclaimed individual architectural elements of St Paul's Cathedral and are at the heart of its international architectural significance.

The Processional Route runs from Westminster Abbey to St Paul's Cathedral in the City of London.

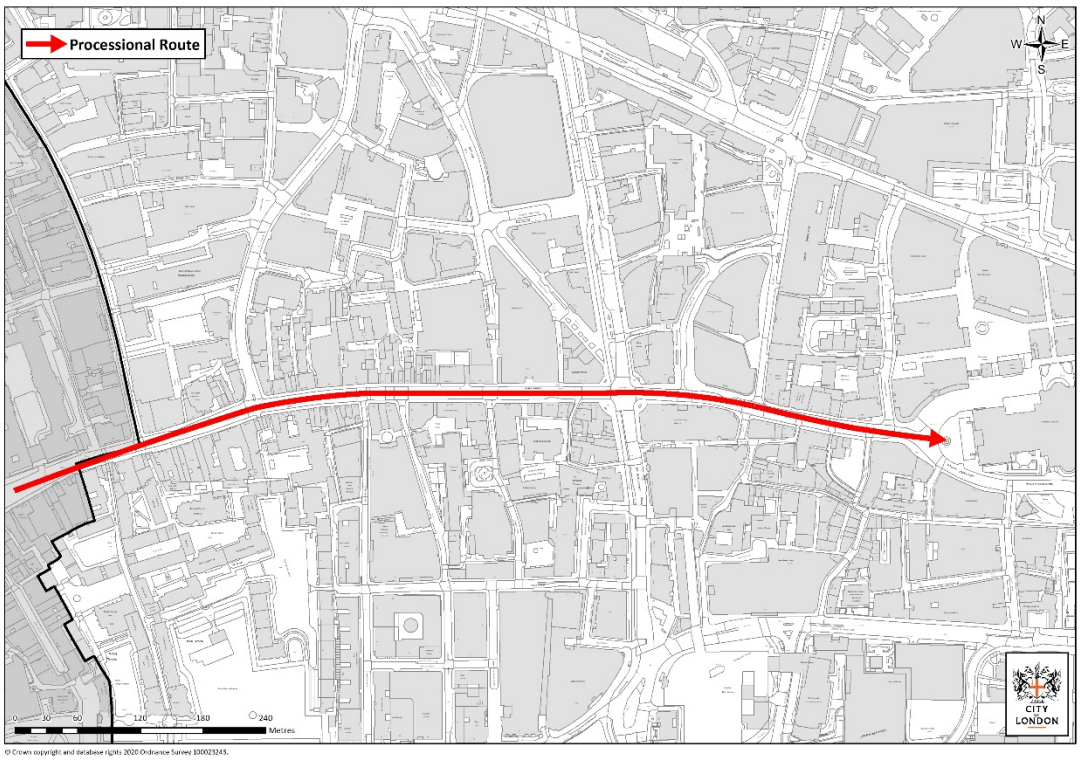


Figure 8: Processional Route in the City of London

The Processional Route views of St Paul's are experienced eastwards of Fleet Street's junction with Fetter Lane and are largely, but not exclusively, located on the north side of Fleet Street. The views continue to be experienced over the crossing with Ludgate Circus and traversing Ludgate Hill on the approach to St Paul's. The views are experienced from both the footways and the carriageway.

In addition to the Fleet Street and St Paul's Cathedral conservation areas, many listed buildings frame the Route. Views of the Cathedral unfold as the observer walks eastwards along the northern side of Fleet Street. The experience is dynamic, rather than static. As the viewer progresses along the street, the buildings on the south side of the street are like a curtain slowly being pulled back to gradually reveal the Cathedral, the constituent elements of which align and realign in relation to one another in a series of juxtapositions as the observer descends Fleet Street to Ludgate Circus and commences the final approach up Ludgate Hill.

These views have become one of the iconic experiences of London, with no single defined viewing point, but a sequence of interlinked views that form an evolving, dynamic experience, sinuous rather than linear, with significant changes of level reflecting the ancient pre-Roman topography underlying the approach to the Cathedral.

As well as the overall experience, the Processional Route views contribute strongly to an appreciation of the architectural significance of St Paul's. At first, only the aerial elements of the Cathedral are seen: the western towers and the dome. The view of these is not static, but ever-changing, the topography and alignment of the Route causing the simple geometry of the dome and the baroque richness of the western towers to be differently juxtaposed. As such, the Processional Route offers the most dynamic experience of these key elements of Wren's Cathedral and a rich appreciation of the quality of the architecture.

Of great importance is the way these features are framed by clear sky throughout the views, as they have been since St Paul's was constructed. The prospect of the Cathedral from the west has come to be a defining image of London, captured in a long tradition of painting and photography. Although there has been development of tall building in the City Cluster of tall buildings to the north-east of the Cathedral, these have been sited to leave sufficient sky space around the Cathedral in these views. No tall building has ever breached the silhouette of the Cathedral when seen from Fleet Street.

This policy framework and the impact of development on the setting and backdrop of the Cathedral has been a significant consideration in the design, form and shape of the emerging 'City Cluster' – inspiring, for example, 'iconic' modern design at 122 Leadenhall Street (the Cheesegrater), 52-54 Lime Street (The Scalpel) which were raked back on the north and south sides of the cathedral silhouette to avoid intrusion into the view.

Consideration of the implications of new development on the views of the Cathedral from the Processional Route, including the impact of tall buildings in the background to the view, are addressed in the adopted Local Plan and the draft City Plan, with further detailed guidance established in the Protected Views SPD. The City Corporation is preparing further guidance on of the Processional Route and intends to consult upon and adopt a Statement of Significance of the Processional Route later in 2021.

St Paul's Cone

Draft City Plan 2036, Policy S13 protects the view of St Paul's Cathedral along the length of the Processional Route. Development proposals, including those in the City Cluster, that could be visible from places along the route should ensure that they do not iminge of the ability of the viewer to recognise and appreciate the silhouette of the Cathedral and that they maintain the clear sky background profile. The City Corporation has developed a 3D modelling approach to the assessment of development, particularly tall building development, to ensure maintenance of this clear sky background. This approach, know as the St Paul's Cone, is illustrated in the following images from the 3D modelling. Each development proposal will be considered individually, with the 3D modelling used alongside St Paul's Heights and LVMF assessments, to consider the impact on views of the cathedral.

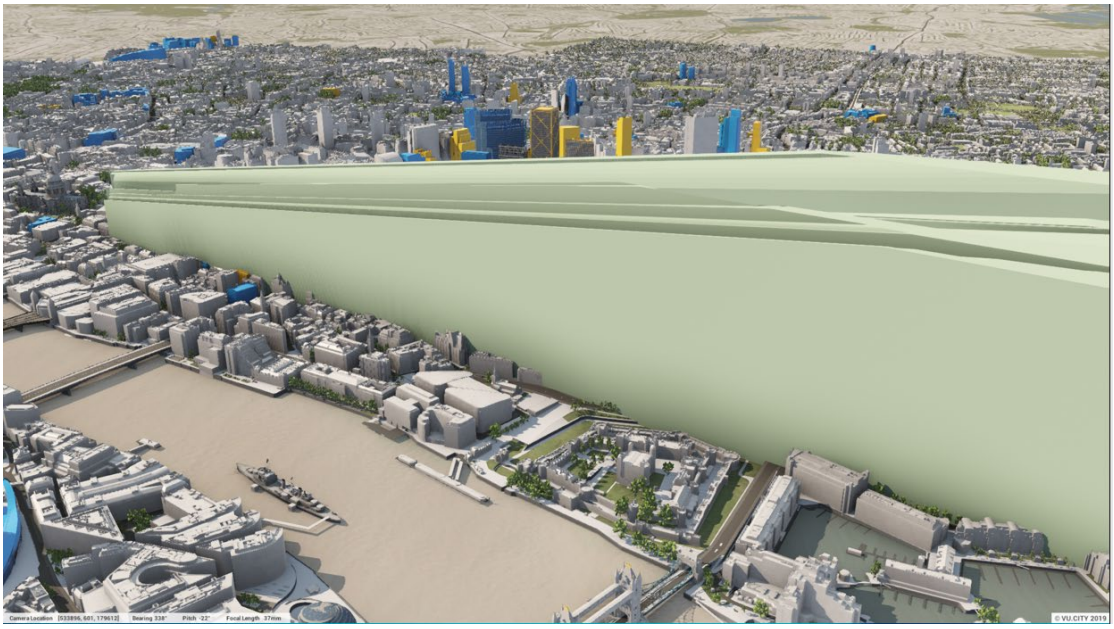


Figure 9: St Paul's Cone extending east from the Cathedral Source: VuCity)

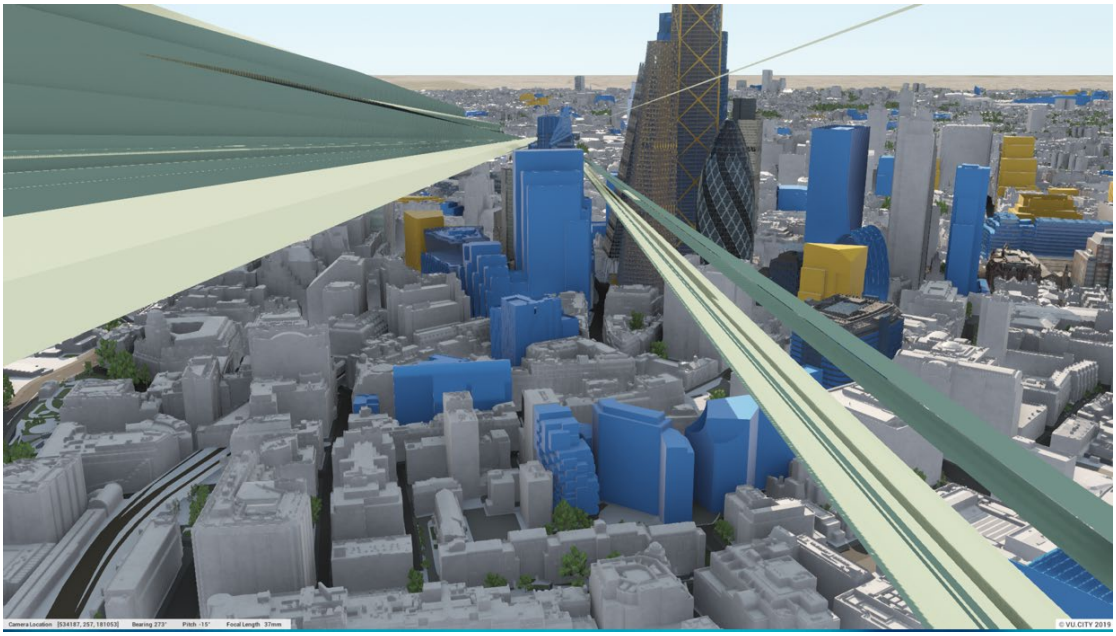


Figure 10: St Paul's Cone existing and consented towers in the City Cluster (Source: VuCity)

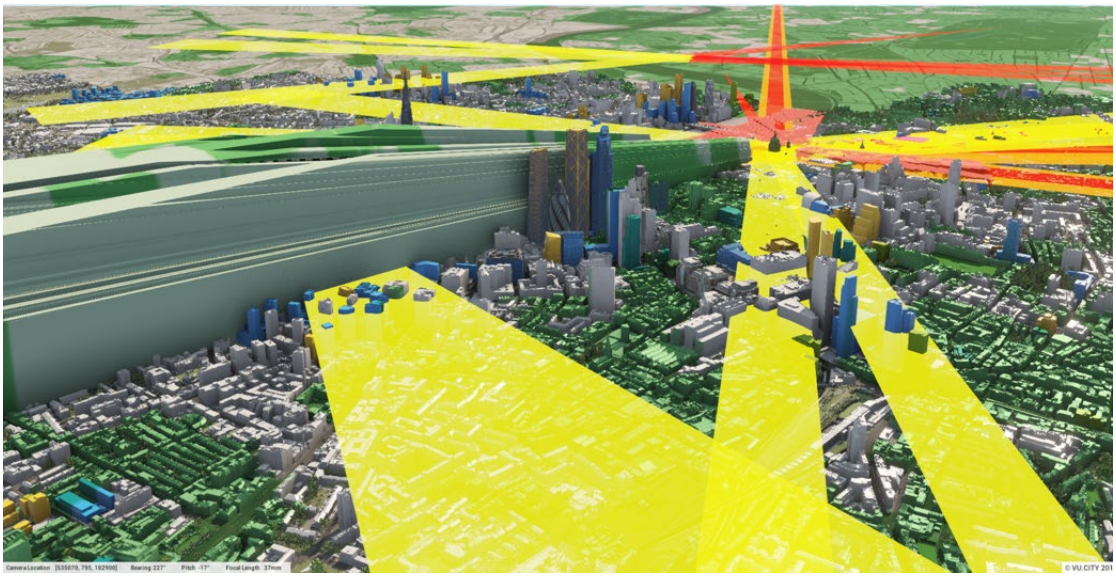


Figure 11: St Paul's cone alongside St Paul's heights (red), conservation areas (green) and LVMF viewing coridors (Source VuCity)

5. 3D Modelling

The City Corporation has assessed the impacts of development, particularly tall building development, on protected views using a variety of methods.

St Paul's Heights policy dates from the 1930s and is implemented principally through the application of a Heights Grid on an Ordnance Survey base map to individual development proposals. This approach is a 2D approach and relies upon the assessment of notified building heights against the maximum heights identified in the St Paul's Heights Grid.

LVMF policy has been applied through the application of viewing planes from established viewing points, as set out in the London Plan and the LVMF SPG. Assessment of individual development schemes is undertaken in the context of verified views of proposed development schemes and wire line drawings, used to understand the extent to which proposed development is visible in LVMF views.

Within the Core Strategy 2011 and the 2015 Local Plan, the City Corporation defined a policy area, the Eastern Cluster (now renamed the City Cluster), where new tall building would be acceptable on appropriate sites. This policy area has existed for many years, but the form and profile of the Cluster has evolved incrementally as development proposals came forward. To inform the development of the new draft City Plan 2036, the City Corporation sought to develop a more proactive approach, based on a robust and holistic understanding of the complexities and dynamics of the Cluster to inform future planning decisions through 3D modelling. Whilst initially focussed on the Cluster area, this 3D modelling approach has been extended to cover the whole of the City to provide a more robust approach to new development proposals, not just those involving tall buildings.

The approach involves achieving a detailed 3 Dimensional interactive understanding of the City and the cumulative impact of consented schemes, leading to a better understanding of opportunities for increasing the capacity and intensifying development, particularly in the City Cluster, to achieve the commercial floor space necessary to maintain the City's international status.

How 3D modelling has been used to inform City Cluster policy

Significant growth of commercial floor space is anticipated, particularly in the City Cluster which is likely to absorb over half the City's new floorspace. This will result in a further intensification of the cluster of tall buildings. Any new

development will have implications on London wide and local views. 3D modelling has been used to gain a holistic three dimensional understanding of these impacts. In particular the manner in which future developments could affect views and the setting of landmarks such as St Paul's Cathedral and the Tower of London.

Tall building development, including in the City Cluster, has the potential to have wide ranging impacts in views from the periphery of the City to key central London views through to local townscape views. These viewpoints vary from elevated positions such as King Henry VIII's mound, Kenwood and Greenwich to riverside views such as Gabriel's Wharf. A 3D model has been used to capture this three dimensional topography of London. Furthermore many of these views are appreciated kinetically over a continuous distance and a 3D model has been used to convey this dynamic quality of views.

This holistic understanding has allowed the City Corporation not only to respond to individual development schemes but to define and sculpt the future City Cluster profile in relation to key views as well as to gain a better understanding of the future capacity of the City Cluster and other areas of the City and the development opportunities afforded.

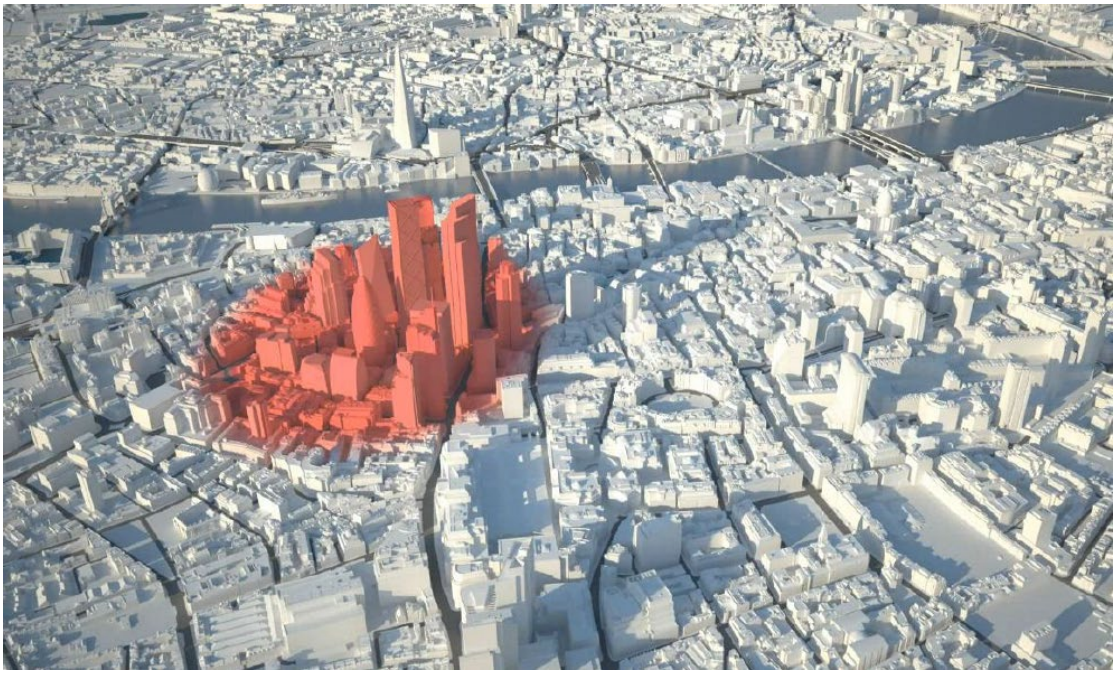


Figure 12: City Cluster area (source GMJ)

Identifying the potential for further tall building development in the City Cluster involved modelling a range of policy and other constraints using 3D imagery, in a number of stages:

1) Applying LVMF Protected Vistas

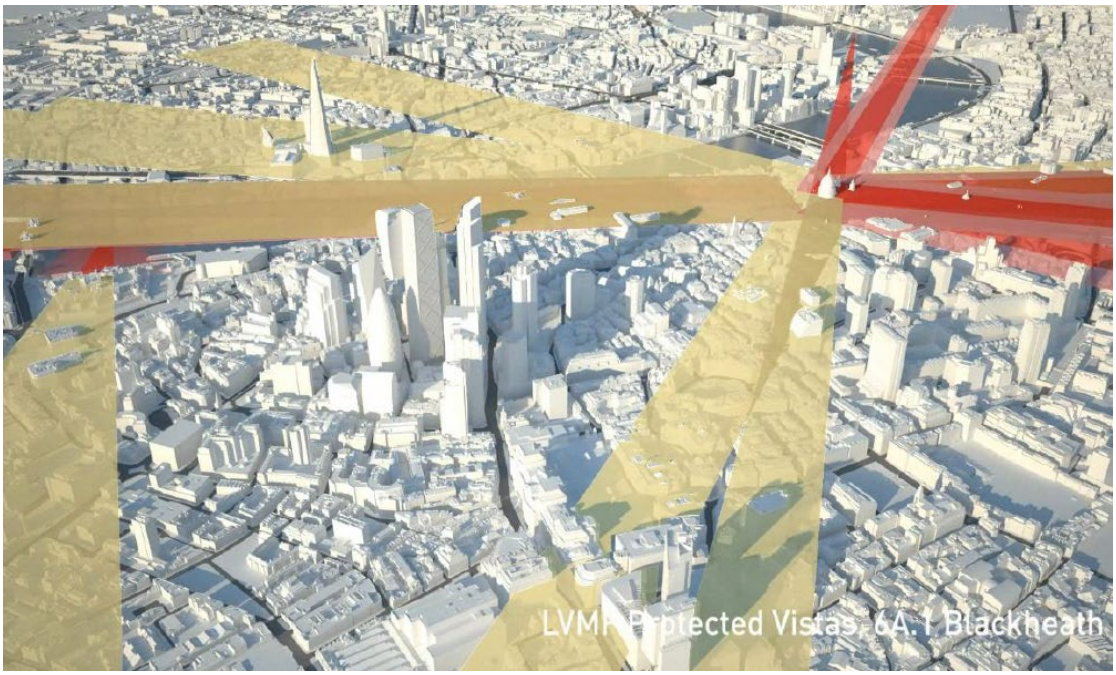


Figure 13: City Cluster showing LVMF Protected Vistas (source: GMJ)

2) LVMF assessment points were inputted, including a dynamic animated sequence between key assessment points.

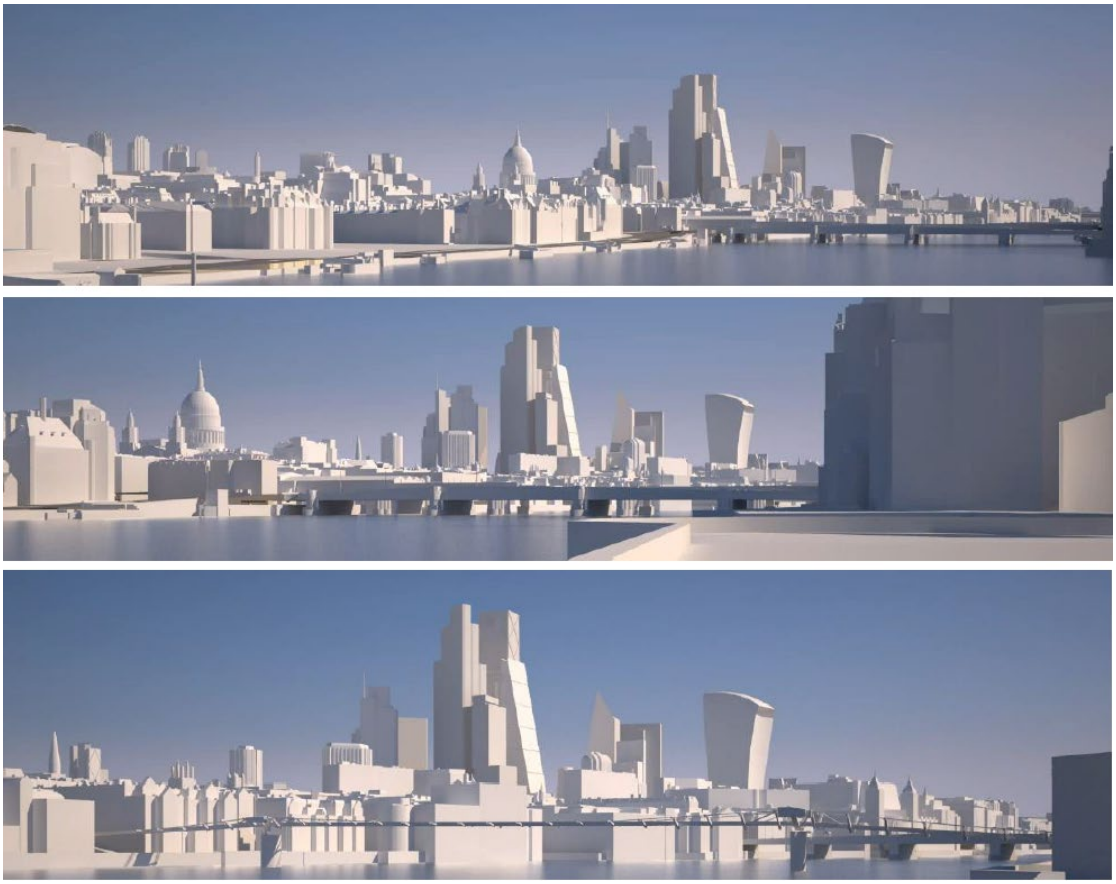


Figure 14: Dynamic animation from Waterloo Bridge and South Bank (source: GMJ)

3) The St Paul's Heights grid was then applied setting out the height limitations of that policy.

Figure 15: St Paul's heights (source: GMJ)

4) Key views of the Cathedral, including a dynamic animated sequence along the Processional Route along Fleet Steet to Ludgate Circus were modelled.

Figure 16: Fleet Street to Ludgate Circus (source: GMJ)

5) The Tower of London World Heritage Site setting, local setting and views were then considered to allow an enhanced understanding of the impact on the Outstanding Universal Value of the World Heritage Site as well as the protected views from the Monument.

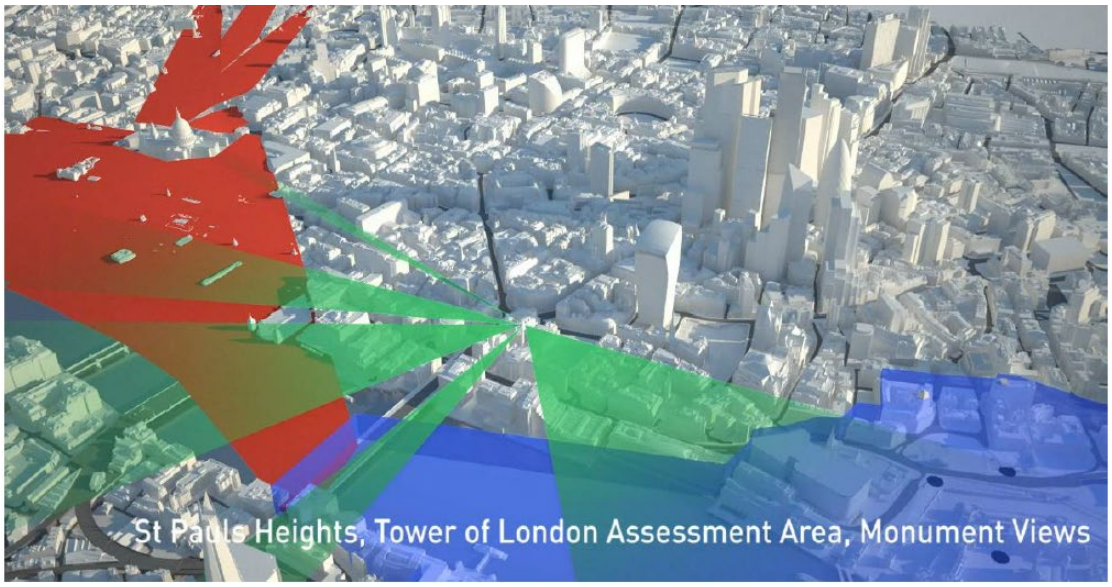


Figure 17: Tower of London WHS setting and Monument Views (Source: GMJ)

6) Listed buildings, conservation areas were added to the model.

Figure 18: Conservation areas and listed buildings (Source: GMJ)

7) These constraints were then combined to produce a holistic overview of the constraints affecting tall building development in and around the City Cluster area.

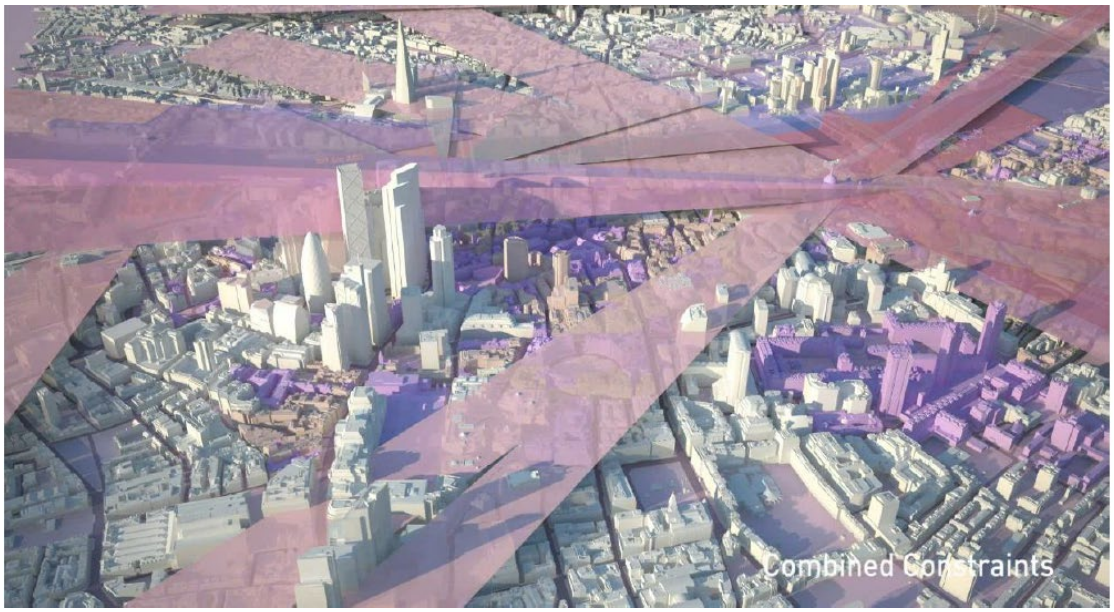


Figure 19: 3D model of combined constraints, City Cluster (source: GMJ)

From this model the City Corporation has been able to visualise various scenarios of intensifying development within the City Cluster area, which has included taking areas out of the Cluster where tall building development is not considered to be appropriate and including the potential for extensions to the City Cluster area to identify the Renewal Opportunity Sites to the north west and south west of the area. These scenarios were assessed from all viewpoints modelled as well as from street level views within the 3D model to assess local townscape impacts. The conclusion has enabled the City Corporation to establish an aspirational vision of the profile and extent of the future City Cluster in the draft City Plan 2036.

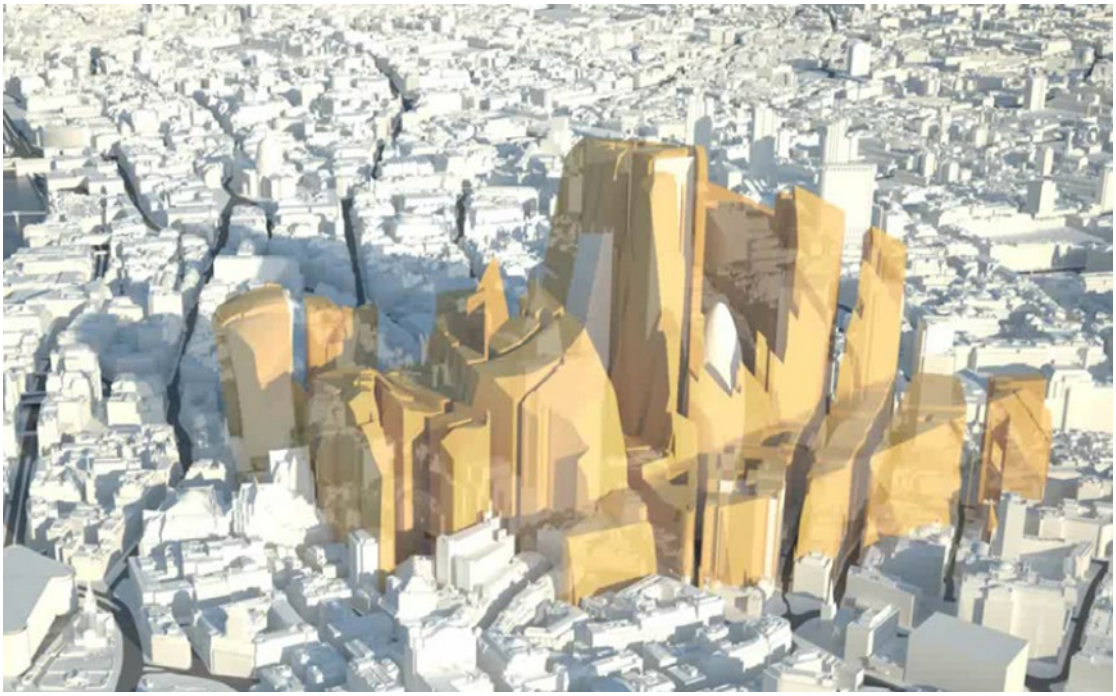


Figure 20: City Cluster aspirational profile (source: VuCity)