



**CITY OF LONDON TALL BUILDINGS POLICY
HERITAGE IMPACT ASSESSMENT- ST. PAUL'S CATHEDRAL**

Project

City of London Tall Buildings Policy

Client

City of London

Visualisations

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Disclaimer*Assumptions and Limitations*

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

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Executive summary

1. This report has been prepared by The Townscape Consultancy (TTC) for the City of London Corporation (CoLC) to assess heritage effects of the Proposed Clusters. The Proposed Clusters comprise the City Cluster and the Holborn and Fleet Valley Cluster.
2. CoLC have undertaken scoping and testing exercises to prepare the indicative massing of the Proposed Clusters, in which TTC were not involved. This report presents an independent assessment of the indicative massing as a result of CoLC's testing.
3. This document assesses the effects of the Proposed Clusters on the setting of the Grade I listed St. Paul's Cathedral as one of the three strategic landmark heritage assets of the City.
4. The other two strategic heritage assets; the Tower of London World Heritage Site, and the Grade I listed Monument are assessed in separate reports.
5. A separate Strategic Visual Impact Assessment (SVIA) also accompanies these documents which assesses the effects on 50 strategic views.
6. The Proposed Clusters respond to a series of hard and soft constraints to achieve overall forms that are both sensitive to their context and establish a collective identity.
7. The consideration and consolidation of the Proposed Clusters as whole forms can enhance the relationship between them and their context through defining crests, foothills and edges to create identity and legibility at a city wide scale.
8. Individual schemes that come forward within these areas will need to further consider architectural and urban design detail to respond to these aspects of the clusters.
9. Overall, this HIA, based on Historic England's guidance and the NPPF, found that no harm would be caused to the significance of St. Paul's Cathedral as a result of changes to its setting through the Proposed Clusters.



1. Introduction

- 1.1 This Heritage Impact Assessment (HIA) has been prepared for the City of London Corporation (CoLC), as part of the evidence base for the emerging 'City Plan 2040'.
- 1.2 The areas outlined in red in Figure 1.1 illustrate the locations of the two proposed tall buildings areas.
- 1.3 This document presents the findings of an independent assessment of the effects of the Proposed Clusters, referred to as the 'City Cluster' and 'Holborn and Fleet Valley' within the jurisdiction of the CoLC, on heritage significance. The HIA was undertaken by The Townscape Consultancy (TTC), a practice that provides independent expert advice on architecture, urban design, townscape and heritage.
- 1.4 The assessment is informed by baseline research into the proposed tall building areas and surrounding built context undertaken by CoLC in the form of the 'Character Areas Study', as well as the consultant's own desk-based research and site visits.
- 1.5 This HIA is also informed by the Strategic Visual Impact Assessment (SVIA) which accompanies this document. The SVIA assesses the effect on 49 strategic views, including those of St. Paul's. Cross references are made where relevant.

Authorship

- 1.6 This HIA has been prepared by The Townscape Consultancy (TTC), a consultancy with expertise in the areas of built heritage and townscape. The consultants are employed by CoLC to provide independent and unbiased professional advice and to consider any beneficial, neutral, or adverse aspects of the Proposed Clusters based on best practice guidance in a balanced and transparent manner. Any qualitative aspects of the assessments that can be considered to a certain extent to be subjective are based on informed professional judgment based on the authors' experience. All consultants are highly qualified and trained professionals in the areas of planning, architecture, urban design, and the historic environment. The assessments have been drafted in full collaboration with CoLC and CoLC takes ownership of the entire text as setting out its Tall Building Strategy.

Conflicts of interest

- 1.7 The Townscape Consultancy is a limited company which advises local authorities, private developers, and their design teams on new development in London, including for many sites within the City of London, which would fall within or nearby the Proposed Clusters. Therefore, in order to carry out this assessment without creating any conflicts of interest on other existing or future projects, The Townscape Consultancy and CoLC have agreed on the appropriate boundaries of the consultants' involvement and remit in conducting the work presented in this HIA and the associated SVIA, as described below.
- 1.8 The Proposed Clusters assessed in this document have been developed uniquely and independently by CoLC, with no involvement, nor any advice, from The Townscape Consultancy. The consultants' role is to carry out an independent, third-party assessment of the heritage effects of the Proposed Clusters as provided by CoLC. In conducting this exercise, The Townscape Consultancy has not, and will not, influence the design of the Proposed Clusters, including any aspects such as their location, extent, height, and overall form.

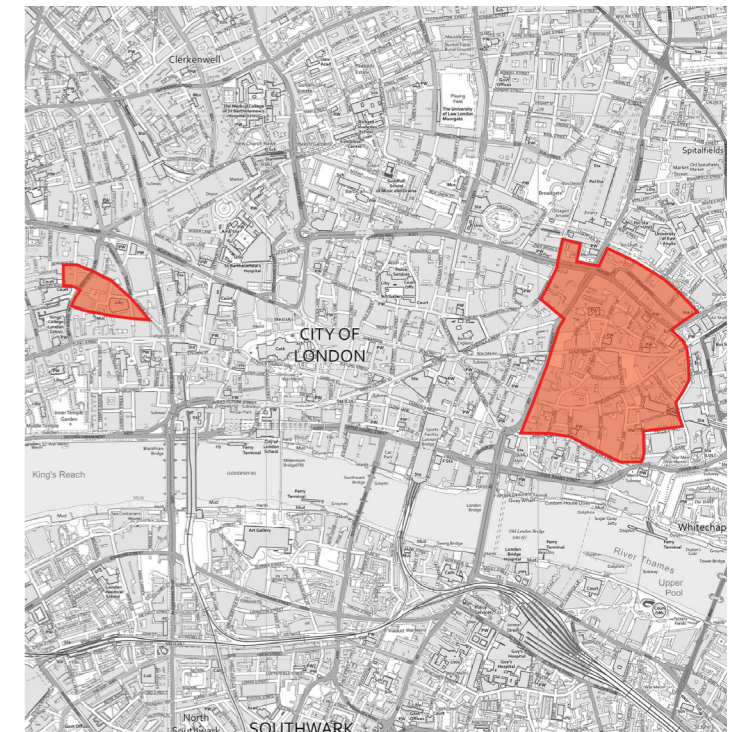


Figure 1.1: Map of Proposed Clusters.

2. Methodology of assessment

Introduction

2.1 This Heritage Impact Assessment (HIA) considers the impact of the two proposed tall buildings areas for the City Cluster and Holborn and Fleet Valley Cluster, represented through indicative massing of the Proposed Clusters, on the setting of a strategic landmark heritage asset.

2.2 The assessment methodology set out in this section has been informed by policy and guidance at a national, regional and local level with regards to design and heritage. The relevant policies and guidance are set out in Chapter 4.

Method of Assessment – Heritage

2.3 Heritage assets have been identified using information derived from the National Heritage List for England website (historicengland.org.uk/listing/thelist).

2.4 The Proposed Clusters will affect the setting of many heritage assets in the local and wider context owing to their extent and scale. This assessment focuses on the effects on strategic landmark heritage assets as scoped by CoLC. In this case this comprises the Grade I listed St. Paul's Cathedral. Accompanying documents also assess the effects on the Tower of London World Heritage Site and Monument. These are the three strategic landmarks identified by CoLC. The impacts upon the settings of other heritage assets, below this strategic tier, would have to be considered as part of a site-by-site assessment in relation to an individual scheme.

2.5 This heritage assessment considers the indirect effects arising from the Proposed Clusters i.e. on the setting of the heritage asset, including those elements of setting, if any, that contribute to its heritage significance. Assessments are carried out in line with HE guidance documents as set out in Chapter 4.

2.6 In line with NPPF paragraph 200, these assessments are considered to be proportionate.

Method of Baseline Data Collection

2.7 The process of collecting baseline data involved identifying the relevant heritage assets included in the following documentary and mapping resources:

- Historic England's National Heritage List for England (online);
- Statutory List of Buildings of Special Architectural and Historic Interest;
- Historic Environment Record (online);
- The City of London, Local Plan, and other guidance (including Conservation Area Appraisals/ Character Statements);
- The Buildings of England, London 1: The City of London, Bridget Cherry and Nikolaus Pevsner, 1997; and
- Online digital records and historic maps, among other sources.

2.8 There is no information relevant to this assessment that is available in other Historic Environment Records that is not available in the sources identified above that we have used to compile the baseline.

2.9 The extent of the baseline was informed by knowledge of the surrounding area and further desktop research. It has included consideration of:

- National and local heritage policy and guidance;
- The existing effects of the clusters, including intervisibility between them and receptors;
- The physical characteristics of the context, including the effect of existing large scale buildings in the area; and
- The nature of the Proposed Clusters.

2.10 Site visits were undertaken to check the desktop assessment with regard to the potential significance of the effect of the Proposed Clusters on the heritage assets within the surrounding area. Site visits were undertaken in September and October 2023.

2.11 Listed building descriptions can be found on the National Heritage list for England and on Historic England's website historicengland.org.uk. Conservation area boundary maps can be found on the local planning authority websites.

Assessment

2.12 The following terminology has been adopted within this assessment for classifying and discussing the environment:

2.13 A 'heritage asset' is a *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest'* (NPPF, Annex 2 Glossary).

2.14 The 'setting' of a heritage asset is *'the surroundings in which a heritage asset is experienced. Its extent is not fixed, can extend beyond the asset's curtilage and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'* (NPPF, Annex 2 Glossary); and

2.15 'Significance' (for heritage policy), as defined in the NPPF (Annex 2 Glossary), is used to describe *'the value of the heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, historic and/or architectural/artistic. Significance can derive not only from a heritage asset's physical presence, but also from its setting.'*



2.16 The determination of heritage significance is based on statutory designation and/or professional judgement against these values. They are identified in Historic England's Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019), as follows:

- *"Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*
- *Architectural and/or artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*
- *Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity."*

2.17 In addition, professional judgement is used to consider the change the proposal would have on the significance of a known heritage asset. This is assessed in NPPF terms as 'no harm', 'less than substantial harm', 'substantial harm' or 'total loss of significance'. Generally, the following levels of harm may be identified:

- Substantial harm – the Planning Practice Guide discusses 'substantial harm' (using Listed buildings as an example) and states that 'an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed';
- Less than substantial harm; and
- No harm (or 'preservation') – such that the attributes identified within the statement of significance of the heritage asset have not been harmed.

2.18 In relation to designated heritage assets, an assessment of significance will also need to consider the contribution that the setting makes to the asset. Setting is the way in which the asset is understood and experienced. It is not an asset in itself. It differs from curtilage (historic/present property boundary), context (association with other heritage assets) and historic character (sum of all historic attributes, including setting, associations, and visual aspects).

Assessment of setting

2.19 Historic England has issued Historic Environment Good Practice Advice in planning guidance notes of which the following are relevant to the Proposed Development: Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (March 2015), as well as Advice Note 3 (2nd Ed.) – The Setting of Heritage Assets (December 2017) and Advice Note 4 – Tall Buildings (December 2015 and also its Second Edition: Consultation Draft of March 2020).

2.20 Historic England's guidance advocates a systematic and staged approach to the assessment of the implications of proposals in terms of their effects on the settings of heritage assets.

- **Step 1** of the approach is 'identifying the heritage assets affected and their settings'. This initial step is carried out by undertaking documentary research, including (where relevant) assessing data sourced from the Historic Environment Records and national heritage datasets.
- **Step 2** requires consideration of 'whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)'. The guidance states that this stage of the assessment should first address the key attributes of the heritage asset itself and then consider: i) the physical surroundings of the asset, including its relationship with other heritage assets; ii) the way the asset is appreciated; and iii) the asset's associations and patterns of use.
- **Step 3** involves 'Assessing the effect of the proposal on the significance of the asset(s)'. This stage of the assessment addresses the key attributes of the proposed development, such as its: i) Location and siting; ii) Form and appearance; iii) Additional effects; and iv) Permanence.
- **Step 4** encourages to explore opportunities for 'maximising enhancement and minimising harm'.

2.21 Step 5 is to 'make and document the decision and monitor outcomes'. For the purposes of this assessment, Steps 1-4 of the process have been followed. Step 5 falls under the duty of the Local Planning Authority and therefore not undertaken as part of this assessment.

Future baseline

2.22 A number of proposals for new development within the Proposed Clusters have been granted planning permission, or are under construction. These are considered 'committed' schemes, because they are reasonably likely to be built out.

2.23 The committed schemes identified contribute to what is called the 'future baseline'; that is, a future scenario in which they have been constructed and therefore change the environment within which they are located, including the setting of heritage assets.

2.24 If any harm were derived from each committed scheme, it is considered that the local authority would have carried out the planning balance in weighing benefits against such harm. It is therefore not further assessed here as to any harm as a result of the future baseline.

2.25 In this HIA, the assessment focusses on the 'additional' effects of the Proposed Clusters on the heritage asset over and above the future baseline scenario.

3. Assumptions and limitations

3.1 This report includes some assumptions and limitations:

- This report is compiled using primary and secondary information derived from a variety of sources, only some of which has been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate. This includes the assumption that the baseline material set out in CoLC's Character Areas Study is reasonably accurate.
- This HIA provides a quantitative assessment of the form of the Proposed Clusters and a qualitative assessment of the overall shape within their context. This document does not provide a qualitative assessment for individual forms on a site specific basis.
- The assessments undertaken in chapter 6 are based on the indicative massing of the Proposed Clusters. Specific design quality of individual buildings is not assessed in this document. For all emerging proposals, a tailored HTVIA will need to be carried out.
- Proposals for sites within the Proposed Clusters will be required to respond to the relevant heights specified on the 2D contour map produced by CoLC so that they sit within these 3D envelopes. It is not expected that individual sites would be fitted exactly to the three dimensional forms, but to work within them.
- The visually represented forms are not actual proposals, instead, they represent indicative massing of the two Proposed Clusters. This massing has been developed through detailed testing of the building heights within each area, taking into account hard constraints and other relevant criteria.



4. Policy and guidance

4.1 This Chapter sets out the relevant national, regional and local planning policy and guidance. For the purposes of this assessment, it is those policies relating to design and the historic environment that are of most relevance.

Statutory duties

4.2 The legislation set out below is relevant to this assessment:

- The Planning and Compulsory Purchase Act 2004
- The Town and Country Planning Act 1990
- The Planning (Listed Buildings and Conservation Areas) Act 1990

Planning policy

National planning policy and guidance

The National Planning Policy Framework, 2023

4.3 The Government issued the latest version of the National Planning Policy Framework (NPPF) in December 2023. The NPPF sets out planning policies for England and how these should be applied.

4.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that *'at the heart of the Framework is a presumption in favour of sustainable development.'*

NPPF Section 12: Achieving well-designed and beautiful places

4.5 Section 12 of the NPPF deals with design. At paragraph 131, the NPPF states that *'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*

4.6 Paragraph 135 notes that *'Planning policies and decisions should ensure that developments:*

- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*

4.7 Paragraph 137 states that: *'Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'*

4.8 Paragraph 139 states that *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*. It goes on to say that *'Conversely, significant weight should be given to:*

- a) *development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) *outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*

NPPF Section 16: Conserving and enhancing the historic environment

4.9 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.

4.10 Heritage assets are defined in Annex 2 of the NPPF as a *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*

4.11 The NPPF notes, at paragraph 195, that heritage assets *'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'*

- 4.12 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 200). It goes on to say that *'the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*
- 4.13 The NPPF identifies three key factors that local authorities should take into account in determining applications (para 196):
- 'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - The desirability of new development making a positive contribution to local character and distinctiveness; and*
 - Opportunities to draw on the contribution made by the historic environment to the character of a place.'*
- 4.14 Paragraph 205 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that *'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*
- 4.15 The setting of a heritage asset is defined in Annex 2 as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'*
- 4.16 Paragraph 206 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 4.17 The NPPF states, at paragraph 207, that where a proposed development would lead to *'substantial harm'* or total loss of heritage significance of a designated heritage asset, consent should be refused, *'...unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss'*, or all of a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.
- 4.18 Paragraph 208 states that where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Legal judgements have confirmed that considerable importance and weight should be placed on the impact of development on heritage assets or their settings when undertaking the requisite balancing exercise.
- 4.19 Paragraph 209 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.
- 4.20 The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and World Heritage Sites (WHSs) and within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 212 goes on to say: *'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*
- 4.21 Paragraph 213 states *'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance' and that 'Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ... should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area [...] as a whole.'*
- Planning Policy Guidance**
- 4.22 The national Planning Practice Guidance (PPG) was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. It is updated on an ongoing basis, and the parts cited below are current at the time of writing.
- 4.23 The PPG includes a section called 'Design: process and tools' which *'provides advice on the key points to take into account on design'*. This was issued on 1 October 2019; it replaces a previous section called 'Design'.
- 4.24 The PPG deals with the processes of the planning system with respect to design, and notes that guidance on good design is set out in the National Design Guide.
- The National Design Guide**
- 4.25 The National Design Guide (September 2019) ('NDG') states (paragraph 3) that it *'forms part of the Government's collection of planning practice guidance'*.
- 4.26 At paragraph 21 the NDG states that well-designed places are achieved by making the right choices at all levels, including:
- 'The layout (or masterplan)*
 - The form and scale of buildings*
 - Their appearance*
 - Landscape*
 - Materials; and*
 - Their detailing'*
- 4.27 At paragraph 35 the NDG sets out ten characteristics which contribute to the character of places, nurture and sustain a sense of community, and address issues affecting climate. These are described as follows:
- 'Context - enhances the surroundings.*
 - Identity - attractive and distinctive.*
 - Built form - a coherent pattern of development.*
 - Movement - accessible and easy to move around.*
 - Nature - enhanced and optimised.*
 - Public spaces - safe, social and inclusive.*
 - Uses - mixed and integrated.*
- Homes and buildings - functional, healthy and sustainable.*
 - Resources - efficient and resilient.*
 - Lifespan - made to last.'*
- Historic England: Historic Environment Good Practice Advice in Planning Note 3 (second edition): The Setting of Heritage Assets (2017)**
- 4.28 This guidance provides *'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties'* and states that *'alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives'*.
- 4.29 At paragraph 2 it states that *'The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision [...] At the same time those taking decisions need enough information to understand the issues.'*
- 4.30 At paragraph 9 it states that, *'setting is not a heritage asset, nor a heritage designation, although land compromising a setting may itself be designated...its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings.'*
- 4.31 At paragraph 11 the guidance sets out the type of views which contribute more to the understanding of the significance of a heritage asset, including those where the composition of the view *'[...] was a fundamental aspect of the design or function of the heritage asset'*, those with unplanned or unintended beauty, those with historical or cultural associations, and those where relationships between the heritage asset and other assets or natural features or phenomena are relevant.



- 4.32 At paragraph 18 the guidance states that *'conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development'*. It goes on to say that *'many places coincide with the setting of a heritage asset and are subject to some degree of change over time'*.
- 4.33 The guidance proposes a five stage programme of assessment:
- 1) Identifying the assets and their settings which are affected;
 - 2) Assessing the degree to which setting makes a contribution to heritage significance;
 - 3) Assessing the effect of the development;
 - 4) Maximising enhancement and avoiding or minimising harm; and
 - 5) Making and documenting the decision and monitoring outcomes.
- Historic England Advice Note 4 – Tall Buildings (2022)**
- 4.34 This document sets out advice on planning for tall buildings within the historic environment. It supersedes Advice Note 4 issued by Historic England in 2015. It notes that *'alternative approaches may be equally acceptable, providing they are demonstrably compliant with legislation and national policy objectives.'*
- 4.35 Paragraph 1.3 states that when planning for tall buildings it is important to avoid or minimise impacts on the significance of heritage assets, and principles to consider that help to do this include:
- A plan-led approach to tall buildings to determine their location;
 - Evidence base exploring alternative options for location and heights;
 - Decision making informed by understanding of place, character and historic significance;
 - Tall building proposals which take account local context and historic character; and
 - Early and effective engagement at plan-making and decision-taking stages including the use of design review panels.
- 4.36 Paragraph 3.1 states that *'In the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment'* and that *'in the right place well-designed tall buildings can make a positive contribution.'* It notes that several tall buildings are listed.
- 4.37 Paragraph 3.2 states that if a tall building is not in the right place, by virtue of its size and visibility, it can harm the qualities of place that people value. It continues that there are places which are so distinctive, where the level of heritage significance is so great, that tall buildings will be too harmful, regardless of the perceived quality.
- 4.38 Paragraph 3.3 notes that the following factors - quality of place, heritage, visual, functional, environmental and cumulative - need to be considered when determining the impacts of a tall building could have on the historic environment.
- 4.39 Paragraph 3.4 and 3.4 notes that tall buildings vary in their impact depending on their height, mass and locations, and what is considered tall depends on the nature of the local area. Definitions of tall buildings vary, but in general they should be informed by local character.
- 4.40 Section 4, 'Development plans', covers the production of development plans and tall building policies, summarising the main considerations for a plan led approach for tall buildings within the historic environment.
- 4.41 Section 5, 'Developing proposals for tall buildings', stresses the need to have a good understanding of significance of any heritage assets that may be affected by the proposal, as well as the character of the place. It states that supporting information required describing the impacts on the historic environment should be proportionate, precise and accurate.
- 4.42 Section 6, 'Assessing proposals', notes that many of the heritage implications that arise with proposals for tall buildings are the same for other applications, and advice set out in Historic England's GPA Managing Significance in Decision Taking note 2 is relevant. However, issues which frequently arise include location and height parameters; context and local character; high quality design; significance and risk of harm to the significance of heritage assets; and cumulative impacts.
- 4.43 Paragraphs 6.3 states that the key considerations for local authorities is the ability to secure public benefits from tall building developments. Paragraph 6.4 continues that the extent, nature and justification of public benefits will be carried out by decision makers in light of potential harm and long-term impacts on the significance of heritage assets and the integrity of historic townscapes. It states that the *'conservation of the historic environment is itself a public benefit and secures its existence for future generations.'*
- Regional Planning Policy and Guidance
The London Plan, 2021**
- 4.44 The London Plan 2021 was adopted in March 2021. It is the *'overall strategic plan for London'* and sets out a *'framework for the development of London over the next 20-25 years'*.
- 4.45 The policies most relevant to townscape and visual impact are found in Chapter 3, 'Design', and Chapter 7, 'Heritage and Culture.'
- 4.46 Policy D1 on 'London's form, character and capacity for growth' highlights the necessity for Boroughs to identify an area's capacity for growth by undertaking an assessment of the *'characteristics, qualities and values of different places'*. This should include the consideration of urban form and structure, historical evolution and heritage assets, and views and landmarks.
- 4.47 Policy D3 on 'Optimising site capacity through the design-led approach' states that *'All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.'* The policy states that development proposals should *'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.'* Development should *'respond to the existing character of a place'*, and *'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.'* The policy further states that development design should *'be of high quality, with architecture that pays attention to detail,' and use 'attractive, robust materials which weather and mature well'.*
- 4.48 Policy D8 on 'Public realm' states that development plans and proposals should ensure that the public realm is *'[...] well-connected, related to the local and historic context [...]'*. It states that there should be *'a mutually supportive relationship between the space, surrounding buildings and their uses'* and that development should *'ensure that buildings are of a design that activated and defines the public realm, and provides natural surveillance.'*
- 4.49 Policy D9 on 'Tall buildings' notes that the height of what is considered a tall building should be defined in development plans and identified on maps, and that although this will vary in different parts of London, *'should not be less than 6 storeys or 18 metres'*. The policy also notes that *'tall buildings should only be developed in locations that are identified as suitable in Development Plans.'*

4.50 Policy D9 also notes that the views of buildings from different distances should be considered. This includes long-range views (developments should make a 'positive contribution to the existing and emerging skyline and not adversely affect local or strategic views'), mid-range views (developments should make a 'positive contribution to the local townscape in terms of legibility, proportions and materiality'), and immediate views (developments should 'have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street'). Proposals should 'take account of, and avoid harm to, the significance of London's heritage assets and their settings' and should 'positively contribute to the character of the area.' It goes on to note that the architectural quality and materials should be of an exemplary standard. Buildings that are situated in the setting of a World Heritage Site 'must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.' Buildings near the River Thames should protect the open quality of the river, including views.

4.51 Policy HC1 on 'Heritage conservation and growth' notes that development proposals that affect heritage assets and their settings should 'conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings'.

4.52 Policy HC3 on 'Strategic and Local Views' states that 'development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.' The Mayor will identify Strategically-Important Landmarks within designated views and will 'seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista'. The Mayor will 'identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity and attributes.'

4.53 Policy HC4 on the 'London View Management Framework' states that 'development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.' It notes that development should not be 'intrusive, unsightly or prominent to the detriment of the view', when it falls within the foreground, middle, or background of a designated view. With regard to protected vistas, development should protect and enhance, not harm, the viewer's ability to recognise and appreciate the strategically important landmark, and it should not harm the composition of the protected vista, whether it falls within the wider setting consultation area or not.

London View Management Framework Supplementary Planning Guidance (March 2012)

4.54 In March 2012 the Mayor published the 'London View Management Framework Supplementary Planning Guidance' ('LVMF') which is designed to provide further clarity and guidance on London Plan policies for the management of these views. The Proposed Clusters will be visible in many views defined within the LVMF, the visual management guidance is referred to in the accompanying SVIA. Cross reference is made to this views in this document where relevant.

Local Policy and Guidance City of London Local Plan 2015

4.55 The City of London Local Plan was adopted in January 2015. The Local Plan sets out the spatial vision for shaping the City until 2026 and how this will be achieved. The Local Plan provides a spatial framework that brings together a range of strategies prepared by the City Corporation, its partners and other agencies and authorities.

4.56 Policy DM 10.1: New development requires 'all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- appropriate, high quality and durable materials are used;
- the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design
- there is provision of amenity space, where appropriate;
- there is the highest standard of accessible and inclusive design.'

4.57 Policy DM 10.4 Environmental Enhancement states that 'The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- the predominant use of the space, surrounding buildings and adjacent spaces;
- connections between spaces and the provision of pleasant walking routes;
- the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- the use of high quality street furniture to enhance and delineate the public realm;
- lighting which should be sensitively co-ordinated with the design of the scheme.'



4.58 Policy DM 12.1: Managing change affecting all heritage assets and spaces aims to:

- *'To sustain and enhance heritage assets, their settings and significance.*
- *Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.*
- *The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.*
- *Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.*
- *Proposals for sustainable development, including the incorporation of climate change adaption measures, must be sensitive to heritage assets.'*

4.59 Policy CS13: Protected Views aims: *'to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks, by:*

- *Implementing the Mayor's London View Management 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: local views of St. Paul's Cathedral, through the City's "St. Paul's Heights" code; 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, which adjoins the City, so ensuring its Outstanding Universal Value, taking account of the Tower of London World Heritage Site Management Plan (2007).'*

4.60 Policy CS14: Tall Buildings aims *'to allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:*

- *Permitting tall buildings on suitable sites within the City's Eastern Cluster.*
- *Refusing Planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.*
- *Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect 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 settings; and the effect on historic skyline features.*
- *Ensuring that tall buildings proposals do not adversely affect the operation of London's airports.'*

City of London Protected Views Supplementary Planning Document (SPD), January 2012

4.61 The Protected Views SPD was adopted on 31st January 2012. It provides further guidance to the public and developers on the operation of the view protection policies outlined in the documents noted above. The SPD includes sections on St Paul's Cathedral, The Monument, the Tower of London, the LVMF and other historic landmarks and skyline features within the City of London. The Proposed Clusters do not fall within the St Paul's Heights policy area or the Monument Views policy area. Potentially relevant views identified towards the Tower of London and St Paul's Cathedral, which are also identified in the LVMF, are considered in the accompanying SVIA and referenced in this document.

**Emerging Local Plan
City of London, Draft City Plan 2036. Proposed
Submission version, March 2021**

4.62 The City of London is currently consulting on a new Local Plan, 'City Plan 2040' (previously referred to as 'City Plan 2036'). The latest (third) stage of consultation took place between 19 March-10 May 2021 on the Proposed Submission Draft (Regulation 19 consultation). The Draft City Plan process was paused to address issues raised by the Mayor of London with respect to tall buildings and other factors, including the impact of the Covid-19 pandemic.

4.63 As of April 2023, a revised timetable has been published by the City of London with an anticipated adoption date of June/July 2025. Once adopted, the new Local Plan will replace the City of London Local Plan, 2015.

4.64 The Plan sets out the City Corporation's vision, strategy and objectives for planning the square mile. It identifies 'Key Areas of Change' within the City and provides area-based policies and proposals relating to these. These are provided in at Section 7, which notes (at 7.1.1) *'The Key Areas of Change have been identified as they are likely to experience significant change over the Plan period and present particular opportunities or challenges that warrant a specific policy focus'*. The site lies within the 'City Cluster' Key Areas of Change.

4.65 The other draft policies of most relevance to this assessment are found in Section 6: *'Shape outstanding environments'*. Those policies are:

- S8: Design;
- DE2: New Development;
- DE3: Public Realm;
- DE4: Pedestrian Permeability;
- DE5: Terraces and Viewing Galleries;
- S11: Historic Environment;
- HE1: Managing change to heritage assets;
- S12: Tall Buildings; and
- S13: Protected Views.

5. Proposed Clusters - Indicative Massing

- 5.1 The CoLC have undertaken a detailed scoping and testing exercise to establish the indicative massing of the Proposed Clusters. This included a wide range of views to account for various hard and qualitative constraints as set out below. A refined set of views have been used in the accompanying SVIA to assess the indicative massing of the Proposed Clusters to achieve an overview of the potential significant effects to the most strategic views.
- 5.2 A summary of the indicative massing of the Proposed Clusters is set out below.
- Hard Constraints**
- 5.3 The final shaping of the Proposed Clusters was informed by a 'Select Criteria' identified by CoLC - these are established, adopted macro-level strategic view and heritage constraints.
- 5.4 These Comprise:
- The Tower of London World Heritage Site, and associated policy and guidance;
 - St Paul's Cathedral, and associated policy and guidance;
 - The London View Management Framework (LVMF), and associated policy and guidance;
 - City Landmarks and Skyline Features, and associated policy and guidance and;
 - The Monument to the Great Fire, and associated policy and guidance.
- 5.5 The hard constraints were modelled, i.e protected vistas, silhouettes and St. Pauls Heights as parameters in which the indicative massing works within.
- Qualitative constraints**
- 5.6 The qualitative constraints that further shaped the indicative massing comprise:
- local heritage assets and their settings;
 - Local townscape character; and
 - The future baseline of consented schemes.
- 5.7 In addition to the hard constraints, the qualitative constraints further shaped the indicative massing. This was achieved through a series of model testing studies from a large set of viewpoints undertaken by CoLC.
- 5.8 The indicative form as a result of the above testing by the CoLC is assessed in this HIA.
- Proposed City Cluster Skyline**
- 5.9 The overall qualitative feature of the Proposed City Cluster is its achievement of a coherent urban form on the skyline which is an enhancement over the future baseline. This considered form adds to legibility and identity through its three-dimensional considerations in its relationship to its context.
- 5.10 The Proposed City Cluster has a primary crest and two smaller crests in combination with foothills and edges. Each of these components of the overall form is a result of responding to the constraints as described above.
- 5.11 Together this creates a recognisable form; a series of individual parts that would establish a collective identity for the City.
- Height and massing**
- 5.12 The height and massing of the Proposed City Cluster is largely informed by the scale of existing and emerging developments already within the City Cluster area.
- 5.13 The Proposed City Cluster subsumes the future baseline and offers a continuation and completion of an entire form by stepping down towards the Tower of London, creating a western edge condition in response to views of St. Paul's, and identifying how the existing and emerging crests can relate to each other through foothills.
- 5.14 The Proposed City Cluster would further consolidate the established cluster of tall buildings in this location and is considered to minimise the possibility of adverse visual effects or of harm arising to three strategic heritage assets, and/or conflict with related policy and guidance, from future individual tall building proposals.
- 5.15 The consolidation of the existing and emerging cluster ensures that the setting of strategic assets is protected.
- Urban design**
- 5.16 The urban design will be established through the relationship of the individual forms as part of the Proposed City Cluster; this relates both to the ground condition and experience on the street as well as the perception of legibility, wayfinding and identity as experienced from further away, throughout London.
- 5.17 This will need to be assessed through individual application for sites within the Proposed City Cluster as they come forward.
- Proposed Holborn and Fleet Valley Cluster Skyline**
- 5.18 The overall qualitative feature of the Proposed Holborn and Fleet Valley Cluster is its achievement of consolidation of the future baseline into a coherent new skyline presence. This form adds to legibility and identity through its three-dimensional considerations in its relationship to its context.



5.19 The Proposed Holborn and Fleet Valley Cluster envelope relates to the heights of existing and emerging schemes within the area. It would take the form of a singular, gentle crest stretching east to west. This subtle form, much lower in height than the City Cluster to the east, would respond to the constraints described above, in particular, the Temples area to the south and the local views of St Paul's Cathedral.

5.20 While the Proposed Holborn and Fleet Valley Cluster envelope takes a simple, linear form, it is envisaged that individual schemes within this Cluster would be required to achieve a graceful, architectural termination at roof level in order to create a compelling new skyline presence, avoiding the impression of a linear 'wall' of development.

Height and massing

5.21 The height and massing of the Proposed Holborn and Fleet Valley Cluster is largely informed by the scale of existing and emerging developments already within the City Cluster area.

5.22 The Proposed Holborn and Fleet Valley Cluster would consolidate the future baseline with new schemes of outstanding skyline presence that would create a compelling new mid-rise, north-west corner of the City.

5.23 The proposed heights within the Proposed Holborn and Fleet Valley Cluster would be managed through extrapolation of suitable relationships between the individual buildings of the future baseline and the potential for future sites. This has been achieved through testing heights options on sites with prospective extrusions and extensive testing in views carried out by CoLC.

5.24 The Proposed Holborn and Fleet Valley Cluster would consolidate the existing nucleus of taller buildings in this location and would, on balance, minimise the possibility of adverse visual effects or of harm arising to the three strategic heritage assets, and/or conflict with related policy and guidance, from future individual tall building proposals.

Urban design

5.25 The urban design will be established through the relationship of the individual forms as part of the Proposed Holborn and Fleet Valley Cluster; this relates both to the ground condition and experience on the street as well as the perception of legibility, wayfinding and identity as experienced from further away, particularly from the south side of the Thames.

5.26 This will need to be assessed through individual application for sites within the Proposed Holborn and Fleet Valley Cluster as they come forward.

6. Assessment of effects on the heritage significance of St. Paul's Cathedral

Introduction

- 6.1 While the Proposed Clusters have the potential to affect the settings of a great number of heritage assets, this heritage assessment is aligned to the strategic objectives of the City's Tall Buildings Strategy and, as such, the impacts on the three strategic landmarks are assessed as part of the evidence base; of the Tower of London World Heritage Site, St Paul's Cathedral and the Monument. This document assesses the effect on the Grade I listed St. Paul's Cathedral, the other two heritage assets are assessed in separate documents.
- 6.2 The disposition of the form of the Proposed Clusters have been determined by CoLC through the study of their composition, in response to the existing and emerging context of the City and their role as part of the setting to many heritage assets.
- 6.3 To assess the potential impact of future development on strategic views and heritage constraints, detailed 3D modelling was carried out for the two identified tall building areas. This work has been undertaken with leading experts in the field, Vu.City and Miller Hare, working closely with officers at CoLC.
- 6.4 A statement of significance of the Grade I listed St. Paul's Cathedral is set out below. This is considered sufficient to assess the effects of the Proposed Clusters on this strategic landmark and heritage asset.
- 6.5 The National Planning Policy Framework defines heritage significance at 'Annex 2: Glossary' as:
- 'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance'.*
- 6.6 The heritage significance of St. Paul's forms part of this assessment, including the special architectural or historic interest of the listed building (including discussion of the nature and extent of its settings in so far as it contributes to that heritage significance), is assessed below. The following assessment of significance is proportionate both to the importance of the asset and to the nature and extent of the Proposed Clusters. It is sufficient to understand the potential impact of the Proposed Clusters on its heritage interest.



Figure 6.1: St. Paul's Cathedral.



Statement of Significance: The Cathedral Church of St Paul

Cathedral Church of St Paul, Grade: I, Designated: January, 1950, List Entry Number: 1079157

6.7 St Paul's Cathedral is the mother church of the Diocese of London. It sits at the highest point of the City of London (CoL) upon Ludgate Hill and is a Grade I listed building. St Paul's Cathedral was designed by Sir Christopher Wren, and it is widely considered to be his magnum opus. Construction began in 1675 and was completed in 1711. St Paul's Cathedral is one of the best examples of English Baroque architecture and is one of the most recognisable buildings upon the London skyline.

Heritage Significance

6.8 The local, national and international significance of St Paul's is well established and described in the St Paul's Cathedral Conservation Plan (2003).

6.9 The greater part of the architectural significance of St Paul's Cathedral, as with most buildings, lies in its fabric, both in its interior and in its exterior. The Cathedral has been little altered since its construction and the Buildings of England guide to the City of London notes that its history has been 'reassuringly uneventful' (Bradley and Pevsner 1997:161).

6.10 The setting of St Paul's Cathedral also contributes to its significance. Its immediate and wider setting have changed significantly since its construction and most notably during the contemporary period with extensive post-war construction and the development of tall buildings within the Eastern Cluster of the City. Safeguarding and view protection policies (the St Paul's Heights Study SPD, Regional Planning Guidance 3A on the protection of strategic views, and LVMF guidance) have been introduced progressively in response to these changes.

6.11 Half of the Historic England list description is devoted to the interior. The Proposed Clusters would not affect the interiors, they are not considered further in this assessment.

Large crypt. Contains important contemporary and later fittings and monuments including a very few survivals from the previous church. C19 fittings, monuments, decorations etc of importance. Dome painted by Thornhill. Above the two west chapels are the library and music room. The south west tower contains a fine circular staircase.

6.12 The significance of the exterior of St Paul's Cathedral derives from several sources:

- Its architectural interest as a central point and symbol of London;
- The pre-eminence of Wren as an English architect of the Renaissance period; and
- The role of the Cathedral as the mother church of Protestantism in England.

6.13 The architectural interest of the Cathedral is drawn from its imposing design with the dome and western towers being principal features afforded protection in views throughout London. At the time of its construction, the dome was one of the world's largest. Its contrasting presence along with Wren's other City churches remains one of London's most recognisable symbols.

6.14 St Paul's expressive English Baroque design received considerable criticism at the time of its building. For example, the Cathedral was 'seen by the staunchly Protestant as too Italianate and thus too Catholic' (Ault 2015). Other contemporaries such as Daniel Defoe called it 'the beauty of all the churches in the city, and of all the Protestant churches in the world' (Defoe 1724). Regardless of the wide variety of historical opinion concerning the Cathedral, its grand stately design and its use of classical architectural proportion and detail contrasts with the verticality of the otherwise dominant gothic character of English Cathedrals.



Figure 6.2: Giovanni Antonio Canal (Canaletto), 'St Paul's Cathedral,' c. 1746.

6.15 Beyond the merits of the design of the Cathedral, the status of Wren, as a pre-eminent figure within the English architectural canon, also adds significance to the building. Wren was a leading seventeenth century astronomer and geometrician, who taught at both Gresham College and the University of Oxford. He was the most famous English architect of his time, responsible for designing the Sheldonian Theatre (1664-1669), Trinity College Library, Cambridge (1676-1684), and Greenwich Hospital (begun 1696), as well as many of the churches of the City of London which were rebuilt after the Great Fire of London. In the opinion of Bradley and Pevsner, these churches are collectively 'Wren's principal contribution to the appearance of London' (73).

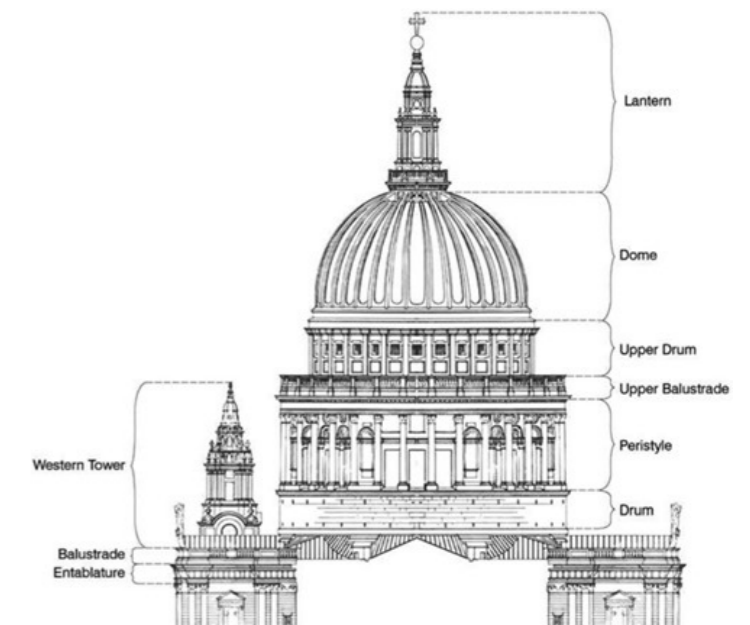


Figure 6.3: Section through St. Paul's Cathedral at roof level (Source: St Paul's Heights Study).

6.16 Historically, St Paul's Cathedral interests are also multiple. As the mother church of London, it links observers to the English Christian tradition which dates back almost two millennia. Furthermore, its reconstruction following the devastating Great Fire allows it to act as an unofficial central point of London's rebirth following the destruction of its medieval core, represented symbolically in the architecture by the 'Resurgam' phoenix on the pediment of the south transept.

Contribution of the Setting of the Cathedral to its Heritage Significance

6.17 The setting of St Paul's Cathedral contributes to its heritage significance. In its local setting, there are opportunities to experience it as a whole. In its wider setting, the dome and western towers are visible, the lower portions are obscured by buildings that surround it.

Local Setting, including St Paul's Churchyard, Cheapside, Cannon Street etc

6.18 St Paul's Cathedral is situated at the heart of local and strategic route structures, its local setting plays an important role in being able to appreciate the Cathedral's significance.

6.19 The local setting consists of its churchyard, the largely open area around it which has historically been a place of process and contemplation. It is a place where the Cathedral continues to be intimately experienced.

6.20 Of the buildings that surround the churchyard, those that lie to the north, east and south, are for the most part from the post-war period and set further away from St. Paul's than their predecessors. Few of the buildings that surrounded the Cathedral in the eighteenth century remain, the most notable exception being Wren's much rebuilt Chapter House to the north. The setting is not therefore a historic setting such as might be found in a provincial Cathedral city such as Canterbury or York; rather, it is part of a metropolitan business district that is itself of international importance. The contribution of this immediate part of the setting therefore derives principally from those few historic buildings and structures that remain, and from the opportunity provided to see and appreciate the architecture of St Paul's Cathedral from all points of the compass (Fig.6.4).

6.21 The St Paul's Cathedral Conservation Area encompasses the parts of the local setting of St Paul's that contribute most to its significance (Fig.6.5). These are mainly to its west in an area that did not experience major bomb damage and represents the more densely occupied surroundings of St Paul's as they existed before the Second World War. The group of historic buildings surrounding the Cathedral which includes the church of St Martin, the church of St Andrew, the tower of St Augustine, and the Chapter House, add to the significance of St. Paul's Cathedral, as do the near contemporary secular buildings at Wardrobe Place and Carter Lane.

The Processional Route to the Cathedral

6.22 As one approaches St Paul's Cathedral, the architectural detail and sculptures can be better appreciated. It is from the open areas that surround the Cathedral and through its circumnavigation that the composition of the Cathedral in its entirety can be best appreciated.

6.23 The St. Paul's Conservation Area includes Ludgate Hill and the most significant approach to the Cathedral from the west along the historic processional route from the Palace of Westminster along Fleet Street. Wren's design had a conscious intent to place the Cathedral slightly off axis for dramatic effect in this planned view from Ludgate Hill. In the context of this processional route, the western elevation of St Paul's Cathedral contributes most to its significance with the dome seen beyond the two western towers.

Relationship with the River Thames

6.24 Wren invested great care in the design of both the Cathedral's west front and its silhouette so that it would have a unique presence on the skyline. The interplay between the Dome and the western towers is the architectural highlight of the exterior of the Cathedral. The other elevations, elevations, although part of a magnificent whole, are of relatively lesser significance.

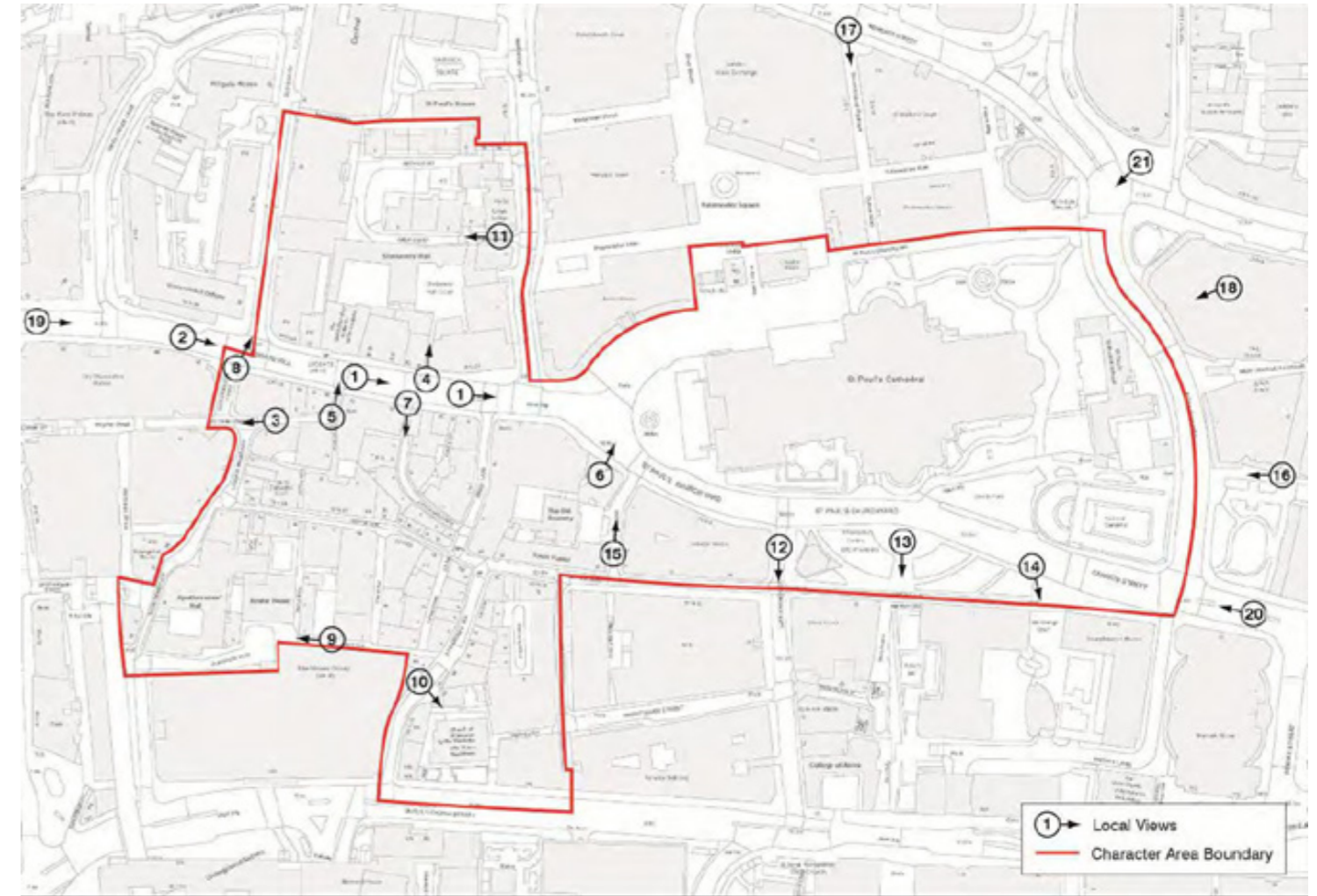


Figure 6.4: Extract from the St Paul's Cathedral Conservation Area SPD showing 'distant and local views' conservation area contributing to its character and appearance.



6.25 This is appreciated in south-westerly views from the South Bank and the bridges, where the Cathedral is perceived as the central focal point of the City's skyline and the southern frontage is prominent. When seen from the river, the Cathedral dominates its setting, towering above the steeples and spires of the parish churches seen throughout the City.

6.26 The approach from the south over the Millenium Bridge, whilst not a historic route, is also highly dramatic with the bridge on axis with the south transept. This is a part of the modern setting of the Cathedral but highly important now and an example how a specific urban intervention can greatly enhance that setting.

Clear Sky Setting

6.27 Wren's original design intent was for the dome, spires and other skyline features to be seen against clear sky. The preservation of this pristine sky setting also relates to preserving the intended appreciation of Wren's architectural concept.

Wider Civic Views

6.28 The setting of a heritage asset is defined in Annex 2 of the NPPF as 'the surroundings in which a heritage asset is experienced.' In the case of St Paul's Cathedral, its wider setting, beyond the local setting characterised above, can be taken to be the considerable number of locations in London from which St Paul's Cathedral can be seen, the most notable of which are the locations designated in the LVMF. These comprise places as far away as the hills to the north and south of central London from which St Paul's is seen within a panorama as a focal point of the western part of the City. Generally speaking, it is either the dome, or the combination of the dome and the western towers, that are the dominant aspects of the Cathedral that are seen from such locations.

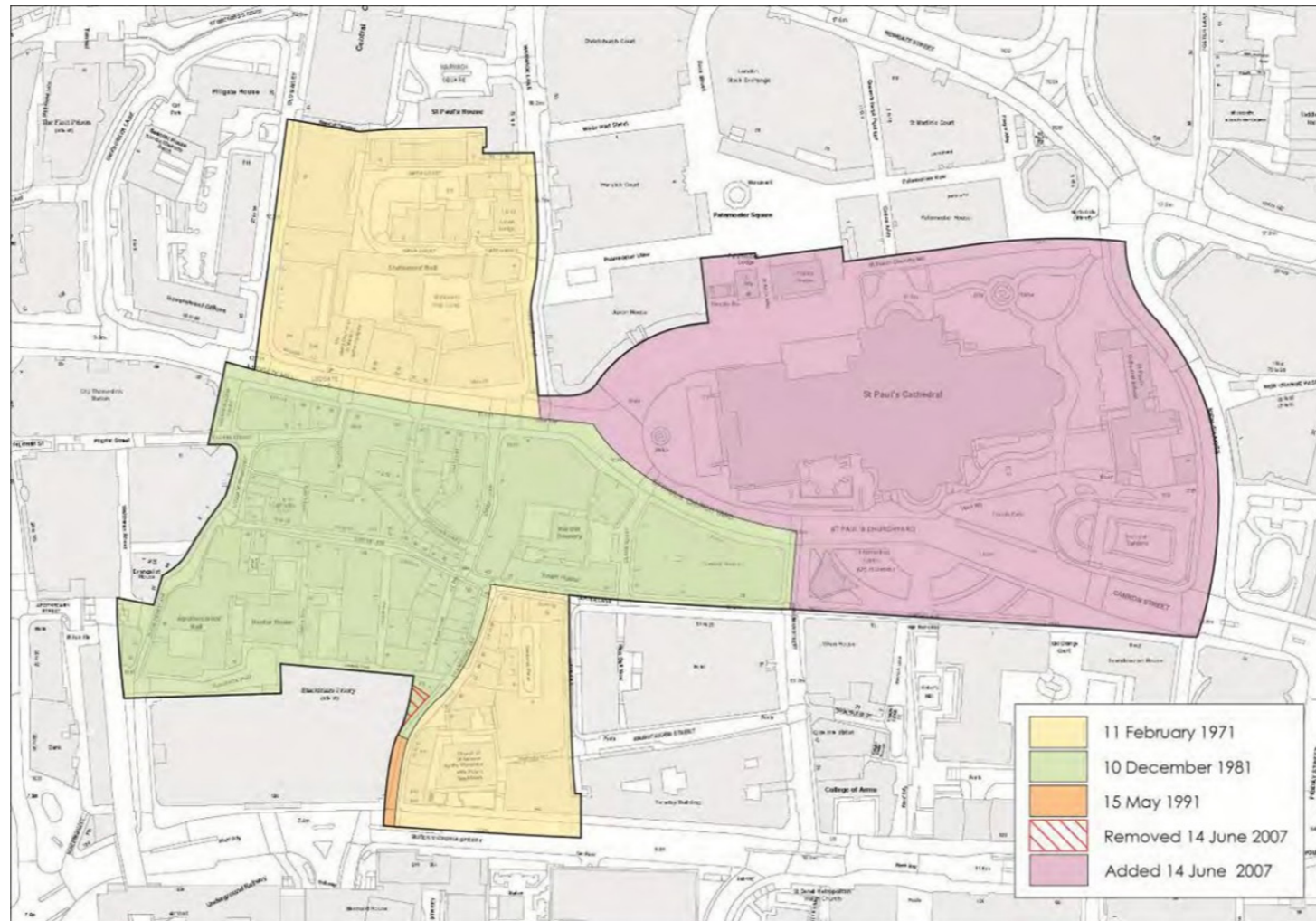


Figure 6.5: Extract from the St Paul's Cathedral Conservation Area SPD with the area in rose added 14 June 2007 approximately indicating the immediate local setting of the Cathedral.

6.29 For the purposes of this report, it is views from the river Thames, Fleet Street and Cannon Street that are the principal consideration for effects on the setting and significance of St Paul's Cathedral. These views are protected by the St Paul's Height's Study SPD with further development guidance defined by the LVMF.

6.30 The St Paul's Heights Study SPD states that the CoLC 'has operated a unique policy known as the St Paul's Heights to protect and enhance important local views of the cathedral from the South Bank, Thames bridges and certain points to the north, west and east' (para 3). Viewing areas relevant to this report that are defined by CoLC in association the Heights policy area extend from Hungerford and Waterloo Bridge to the west, via the south bank of the river, to London Bridge in the east. From these areas, the dome and the western towers can be seen to varying degrees and for the most part, little of St Paul's Cathedral below the level of its balustrade above the cornice is visible.

6.31 The LVMF is in 'general conformity' with the content and objectives of the St Paul's Heights Study SPD. It presents St Paul's Cathedral as a Strategically Important Landmark, 'prominent building or structure in the townscape, which has visual prominence, provides a geographical or cultural orientation point and is aesthetically attractive through visibility from a wider area or through contrast with objects or buildings close by.'

6.32 The contribution to significance of these aspects of setting lies in the persistence of the presence of St Paul's Cathedral in views since its construction, with the dome and towers retaining their dominant place in the cityscape of the western part of the City. The dome and to a great extent the western towers, except where occluded by Unilever House and Faraday House, remain continuously visible as one proceeds along the south bank, seen beyond buildings dating from the last 100 years for the most part. This is a walk that is possible to take today which did not exist historically when much of the south bank was occupied by wharves and industry. From many locations, such views are not particularly coherent nor of good quality when one considers what is visible as a whole and St Paul's Cathedral is often seen in the backdrop of later development rather than a dominant component of a historic townscape.

6.33 In historic views from the south bank such as Canaletto's which is taken from the south west (Fig.6.2), St Paul's Cathedral dominates the view and the spires of the City's churches are also prominent on the skyline. Today the Cathedral still dominates and many of the spires seen in Canaletto's view are still visible, but much less prominent than in previous centuries, as larger scale development of greater architectural diversity has been added to the skyline.

The wider setting of the Cathedral

6.34 The setting of St Paul's Cathedral is recognised as being of national significance, and it is the principal focus of 16 London View Management Framework (LVMF) views. The Cathedral is an important feature of the following LVMF protected views:

- 1A: Alexandra Palace
- 2A.1: Parliament Hill: the summit
- 3A: Kenwood: the viewing gazebo
- 4A.1: Primrose Hill: the summit
- 5A.2: Greenwich Park: the General Wolfe statue – north-east of the statue
- 6A.1: Blackheath Point
- 9A.1: King Henry VIII's Mound
- 11A.1: London Bridge: upstream
- 12A.1: Southwark Bridge: upstream
- 13A.1: Millennium Bridge
- 13B.1: Thames side at Tate Modern
- 15B.1: Waterloo Bridge: downstream – close to the Westminster bank
- 15B.2: Waterloo Bridge: downstream – at the centre of the bridge
- 16B.1: The South Bank: Gabriel's Wharf viewing platform – centre of north rail
- 16B.2: The South Bank: Gabriel's Wharf viewing platform – centre of north-east rail
- 17B.1: Golden Jubilee/Hungerford Footbridges: downstream – the Westminster bank
- 17B.2: Golden Jubilee/Hungerford Footbridges: downstream – the Westminster bank

6.35 The LVMF viewpoint positions fall into a number of categories. Views 1 to 6 are London Panoramas, distant views of the city centre from hills around central London, where St Paul's is identified as a 'Strategically Important Landmark'. Typically these are locations, such as Greenwich Park, where the visibility of the Cathedral has been of note, and illustrated in images, since the time of its construction. While the wider townscape has changed significantly and large-scale development has appeared, St Paul's Cathedral remains a focus of the view because of the size and recognisable profile of the dome.

6.36 View 8 and 9 are focussed 'linear views' where the dome of St Paul's is seen closely framed.

6.37 Views 10 to 22 are River Prospects from positions closer to St Paul's Cathedral than the London Panoramas. They are broad riverscapes, generally taken from bridges or riverside locations, where large parts of the city centre can be seen and appreciated. St Paul's is an important feature of a number of these, which are taken from five of the central London Thames bridges, and two locations on the south bank.

6.38 Viewpoint positions defined within the LVMF are located beyond the immediate setting of St Paul's Cathedral and have been designated by the Greater London Authority as the most significant locations to 'recognise and appreciate' the Cathedral. All of the LVMF views which feature St Paul's Cathedral contribute to a degree to its significance, principally because of its importance and its status as a well-known London landmark.

6.39 Other views of St Paul's Cathedral have been designated within the St Paul's Cathedral Conservation Area Appraisal and by several London boroughs, most notably Islington to the north and Southwark and Lambeth to the south and south-west.

Summary of Significance of St Paul's Cathedral

6.40 Most of the significance of St Paul's Cathedral is derived from its interior and exterior fabric, nearly all of which remains in its original state when completed in 1711.

6.41 This Statement of Significance has focussed on the setting of St Paul's Cathedral, which contributes to its significance to a lesser degree. Unlike the Cathedral itself and as recognised within the St Paul's Cathedral SPD, the immediate and the wider setting has changed greatly since its completion.

6.42 The effects on significance of the Cathedral have been considered in respect of its immediate and wider setting. The immediate setting allows appreciation of the architecture of St Paul's Cathedral, albeit set within a townscape that differs markedly from what existed when it was built. Views from the river and more distant views are generally of the dome and western towers and again for the most part these are seen as part of a wider townscape that has also changed greatly over the centuries.

Existing and emerging tall buildings in the setting

6.43 The wider eastern setting of St. Paul's already comprises tall buildings, those that comprise the existing City Cluster. Recently several more have been granted permission as part of the emerging City Cluster. These are illustrated as the future baseline in the views included in chapter 6 of the accompanying SVIA. Any harm arising from these committed schemes would have been considered against public benefits by the local authority before planning permission was granted. This document therefore does not give any further consideration to any harm caused by committed schemes.

Assessment of the effect of the Proposed Clusters on the Setting of the Heritage Asset

6.44 The Proposed Clusters have been developed in response to the LVMF views as set out at paragraph 6.34, in addition to locally significant views identified by CoLC.

Local Setting, including St Paul's Churchyard, Cheapside, Cannon Street etc

6.45 The Proposed City Cluster and Proposed Fleet Valley Cluster lie to the east and west of St. Paul's respectively; both are over 500m away as part of the wider setting. Both clusters reinforce the existing and emerging context of the Cathedral's dynamic setting. The Proposed Clusters do not affect the St. Paul's Heights area.

6.46 The Proposed Clusters are considered to preserve the contribution made by the churchyard to the Cathedral's significance. The churchyard's existing contemplative and enclosed character contrasts with the character of the bustling city beyond, and this relationship would be unaffected by new tall buildings in the wider setting, preserving the local setting and maintaining a sense of a layered and changing city.

The Processional Route to the Cathedral

6.47 The Proposed Clusters have been developed in response to the views set out in the St. Paul's Conservation Area SPD and the draft St. Paul's Setting Study. In views from Fleet Street (views 42a-d in the SVIA) the Proposed City Cluster steps up away from the dome of St. Paul's, continuing the formal arrangement of the existing and consented schemes. Consideration of this route has informed the modelling of the Proposed City Cluster, which has been designed to prevent any further visual encroachment upon the silhouette of the western front in views north along Fleet Street and Ludgate Hill beyond the outlines of consented development. The overall visible extent of the Proposed City Cluster will potentially increase, though this is considered to preserve visual amenity within the streetscape along the local routes towards the Cathedral and the appreciation of the processional route to the Cathedral.



6.48 In the views from Cannon Street towards the Cathedral (Views 43a-f in the SVIA), which look towards the Proposed Holborn and Fleet Valley Cluster, the consented development, at 120 Fleet Street, is seen as a back drop element, consuming a small amount of additional sky-space in relation to the Cathedral. Within these views the indicative massing of the Proposed Holborn and Fleet Valley Cluster can be seen to broadly follow the outline of the future baseline.

6.49 The SVIA identifies the potential for slight adverse effects over that of the consented baseline. Further development that is to be experienced from this set of views along Cannon Street would need to be rigorously scrutinised at individual scheme stage, to mitigate or avoid these potential adverse effects.

Relationship with the River Thames

6.50 In mid-range views from the river (Views 8 and 9 in the SVIA) the Proposed Clusters consolidate the existing and emerging forms within the setting which steps up both to the east and west of the Cathedral. The silhouette of the Cathedral would remain intact. When experienced from the river, the addition of schemes through the Proposed Clusters would be within the wider setting of the Cathedral to its east and west. This would be in the context of existing and emerging tall and modern buildings and has the potential to increase the dramatic juxtaposition between the Proposed Clusters and the clear sky setting of St. Pauls.

6.51 In longer riverine views, specifically LVMF view 15B from Waterloo Bridge (view 6 in the SVIA), the angle across the river causes the Proposed City Cluster and the Cathedral to be perceived closer together in comparison to elsewhere along the river front.

6.52 The CoLC Protected Views SPG requires development to maintain the Cathedral's visual prominence and not dominate any element of the Cathedral's silhouette in the background of the view (paras 266 and 267). The Proposed Cluster would maintain its skyspace but would increase development in closer proximity. It is acknowledged that there is the potential for slight adverse effects in this view, with the increased juxtaposition, experienced at its closest. In this scenario, individual schemes coming forward on sites at the Proposed City Cluster's edge would need to be rigorously scrutinised at individual scheme stage.

6.53 Overall, It is considered that the form of the Proposed City Cluster strikes an appropriate balance in respect of maintaining the visual dominance of St. Pauls and the consolidation of the Cluster form.

Clear Sky Setting

6.54 Where the Cathedral is currently experienced with a clear sky setting, the addition of schemes through the Proposed Clusters would retain the clear sky setting of St. Pauls.

Wider Civic Views

6.55 In the view from the Monument towards the Cathedral (view 50 in the SVIA) the setting here is already somewhat compromised with the development at New Street Square in its backdrop. The Cathedral dome would still be appreciated in the foreground. The future baseline would include 120 Fleet Street adding to this part of the backdrop. The assessment demonstrated that future development within the Proposed Holborn Fleet Valley cluster will potentially be visible in the backdrop of this view, seen behind the Western Towers and Cathedral Dome. The indicative massing would follow that of the future baseline in this view, the overall impact of the Proposed Holborn and Fleet Valley Cluster in addition to the future baseline would be minimal, the effect would be neutral.

6.56 In much longer distance views, including the LVMF panoramas (views 17-22 in the SVIA), the protected vistas would be unaffected. The Proposed Clusters would consolidate the existing and emerging character of the wider setting, strengthening the identity of the City.

6.57 The SVIA identifies the potential for an adverse impact in the view within WCC from the Somerset House terrace towards St. Paul's (view 44 within the SVIA). The Proposed City Cluster would form part of its setting. Its silhouette, remaining preserved. Individual schemes coming forward within the Proposed City Cluster will need to be rigorously scrutinised at planning stage, and mitigated through the massing and architectural design of individual proposals.

6.58 Overall, at a macro-level, strategic sense, it is considered that the indicative massing of the Proposed Clusters would minimise the possibility of future individual tall building proposals harming the significance of the Cathedral through impact upon its setting and thereby conflicting with relevant policy and guidance.

6.59 The views most relevant to St, Paul's, assessed in Chapter 7 of the SVIA, are Views 6, 7, 8, 9, 42a-d, 43a-f, 44, 46 and 47.

Conclusions

Introduction

1. The assessments presented in this document have taken into account the effects on St. Paul's Cathedral through an assessment of its heritage significance and the contribution that its setting makes to this significance. This assessment was carried out for the Proposed Clusters in addition to the future baseline, with other emerging schemes, consented or under construction.
2. The Proposed Clusters were described and independently assessed for their effects on the immediate and wider townscape in Chapter 5. It was found that they have been sensitively composed by CoLC, taking into consideration both hard and soft constraints.
3. Overall, the Proposed Clusters are a considered response to the heritage sensitivities. They would be a positive progression of the City's skyline and identity.

Effects on St. Paul's Cathedral

4. The potentially affected strategic landmark heritage assets were identified by CoLC and following the methodology as set out in Section 2 of this HIA. The Grade I listed St. Paul's Cathedral is the most significant listed building within the City of London. The significance of this heritage asset, including any contribution made by its setting, was also assessed.
5. It was found that the local setting of the Cathedral would be preserved and the appreciation of the processional route to the Cathedral along Fleet Street would also be preserved. There is the potential for slight adverse effects to setting as experienced along Cannon Street resulting from the Proposed Holborn and Fleet Valley Cluster.
6. When experienced from the river, the addition of schemes through the Proposed Clusters would be within the wider setting of the Cathedral to its east and west. This would be in the context of existing and emerging tall and modern buildings and has the potential to increase the dramatic juxtaposition between the Proposed Clusters and the clear sky setting of St. Pauls.
7. In much longer distance views, including the LVMF panoramas, the protected vistas would be unaffected. It is acknowledged that there is the potential for slight adverse effects in the view where the Proposed city Cluster is seen closest to St. Pauls and from the Somerset House terrace in WCC. In these scenarios, individual schemes coming forward on sites at the Proposed City Cluster's edge would need to be rigorously scrutinised at individual scheme stage.
8. It is considered that the form of the Proposed City Cluster strikes an appropriate balance in respect of maintaining the visual dominance of St. Pauls and the consolidation of the Cluster form.
9. Overall, at a macro-level, strategic sense, it is considered that the indicative massing of the Proposed Clusters would minimise the possibility of future individual tall building proposals harming the significance of the Cathedral through impact upon its setting and thereby conflicting with relevant policy and guidance.

Summary of effects

10. The overall qualitative feature of the Proposed Clusters is their achievement of coherent urban forms on the skyline which is an enhancement over the future baseline. These considered forms add to the legibility and identity of the Proposed Clusters through their three dimensional relationship to their context and as part of the setting of St Paul's.

