



**CITY OF LONDON TALL BUILDINGS POLICY
HERITAGE IMPACT ASSESSMENT - TOWER OF LONDON**

Project

City of London Tall Buildings Policy

Client

City of London Corporation

Visualisations

Vu.City

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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 City Cluster on the Tower of London World Heritage Site (ToL WHS) as one of the three strategic landmark heritage assets of the City. The Proposed Fleet Valley Cluster is not assessed in this document as it would not affect the ToL WHS.
2. The other two strategic heritage assets; the Grade I listed St. Paul's Cathedral, and the Grade I listed Monument are assessed in separate reports.
3. CoLC have undertaken scoping and testing exercises to prepare the indicative massing of the Proposed City Cluster, in which TTC were not involved. This report presents an independent assessment of the indicative massing as a result of CoLC's testing.
4. A separate Strategic Visual Impact Assessment (SVIA) which accompanies this document assesses the effects of the Proposed City Cluster and the Proposed Fleet Valley Cluster on the local townscape and visual amenity of the area as experienced in a set of 50 views, the location of which was set out by CoLC officers.
5. 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.
6. 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.
7. 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.
8. As a result, the heritage assessment, based on ICOMOS guidance and the NPPF, found that there would be a minor effect of no concern to three attributes of Outstanding Universal Value. All other attributes are unaffected.
9. In NPPF terms, no harm would be caused to the significance of the ToL WHS.

1. Introduction

- 1.1 This report has been prepared for the City of London Corporation (CoLC), as part of the evidence based for the emerging New City Plan.
- 1.2 This document presents the findings of an independent assessment of the effects of the 'Proposed City Cluster' within the jurisdiction of the CoLC, on the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (ToL WHS). The Heritage Impact Assessment (HIA) was undertaken by The Townscape Consultancy (TTC), a practice that provides independent expert advice on architecture, urban design, townscape and heritage.
- 1.3 The areas outlined in red in Figure 1.1 illustrate the locations of the two proposed tall buildings areas by the CoLC. Only the Proposed City Cluster area is relevant to this assessment. The Proposed Holborn and Fleet Valley Cluster would not affect the ToL WHS.
- 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', the ToL WHS Management Plan and other relevant guidance as well as the consultant's own desk-based research and site visits.

Authorship

- 1.5 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 indicative massing of the Proposed City Cluster 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 informed by 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.

Conflicts of interest

- 1.6 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 City Cluster. 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.

- 1.7 The indicative massing of the Proposed City Cluster assessed in this document has 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 effect on the OUV of the ToL WHS of the indicative massing of the Proposed City Cluster as provided by CoLC. In conducting this exercise, The Townscape Consultancy has not, and will not, influence the design of the Proposed City Cluster, including any aspects such as their location, extent, height, and overall form.

Document structure

- Executive Summary
- Relevant statutory duties as well as historic environment policy and guidance in Chapter 2;
- TTC's methodology for assessment in Chapter 3;
- Assumptions and limitations in Chapter 4;
- Significance of Tower of London, including OUV, in Chapter 5;
- A description and assessment of the indicative massing of the Proposed City Cluster in Chapter 6;
- An assessment of the effect of the indicative massing of the Proposed City Cluster on the OUV of the ToL WHS in Chapter 7; and
- Conclusions.

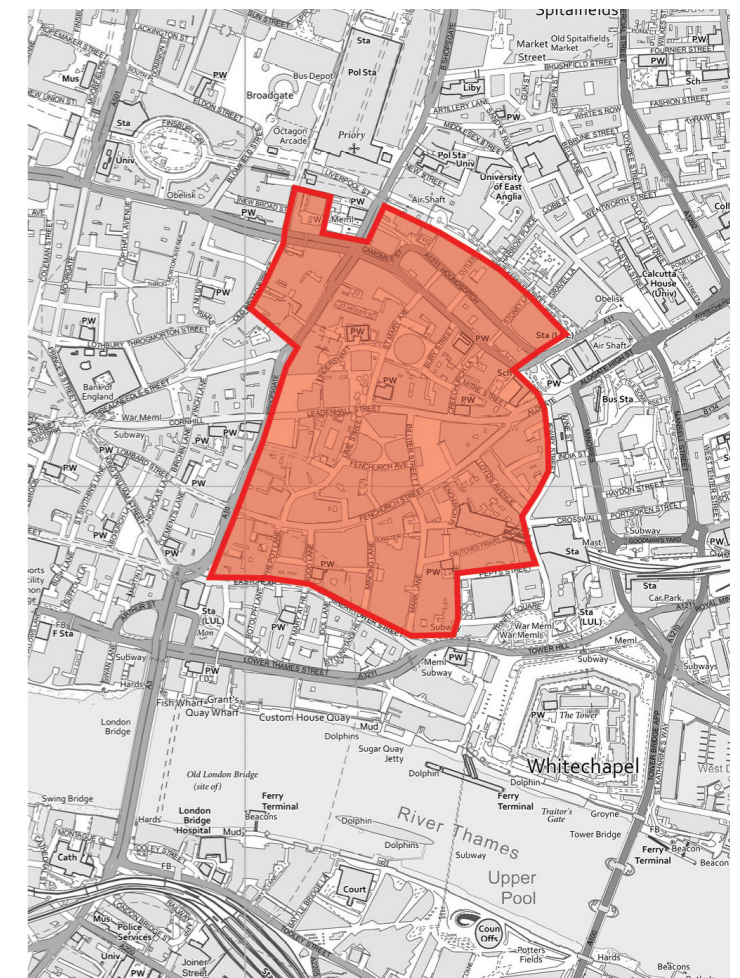


Figure 1.1: Map showing the extent of the City Cluster area.

2. Policy and guidance

2.1 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 townscape and the historic environment, particularly the ToL WHS that are of most relevance.

WHS policy and guidance Guidance and Toolkit for Impact Assessments in a World Heritage Context; UNESCO's 'Operational Guidelines for the Implementation of the World Heritage Convention' 2022

2.2 The Guidance produced by ICOMOS explains how impact assessments can be used for the OUV of the World Heritage properties in order to manage continuity and change by informing good decision making. This is done in the context of UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage – the 'World Heritage Convention' (UNESCO, 1972) at a time of great concern about the effects of rapid transformations taking place in the modern world. The document states that Impact Assessments can be used as a tool to address changes both within and outside World Heritage properties need to be managed in line with the Convention's objectives.

2.3 The document sets out good practice for producing impact assessments of proposed developments which have the potential to impact WHS. These impact assessments should be underpinned by the following principles:

- By signing UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage, each State Party has pledged to protect and conserve World Heritage.
- Impact assessment can help achieve sustainable development that is compatible with the protection and conservation of World Heritage.
- States Parties have an obligation to notify the UNESCO World Heritage Centre in advance before considering any proposed action that may have an impact on World Heritage.
- Any impact assessment on a World Heritage property should address Outstanding Universal Value specifically, as well as other heritage/conservation values.
- Impact assessment should begin at the earliest consideration of a proposed action that may impact on World Heritage, and should continue during and after the action's development and execution.
- Impact assessment should be carried out by specialists with the relevant expertise.
- Impact assessment should promote and encourage the effective, inclusive and equitable participation of rights-holders, including Indigenous peoples, local communities and other stakeholders.
- Impact assessment should identify a range of reasonable alternatives, and assess their potential impacts.
- Impact assessment should evaluate broader trends and cumulative impacts.

- Impact assessment is an iterative, not a linear, process.
- Impact assessment processes should be embedded in the management system of the World Heritage property.

ICOMOS Guidelines on Fortifications and Military Heritage, ICOMOS (2021)

2.4 The ICOMOS Guidelines on Fortifications and Military Heritage' has several core objectives:

'The objectives of the Guidelines on Fortifications and Military Heritage are to establish basic principles for interventions and methods of research that are specific to the conservation, protection and value of fortifications and their surrounding cultural landscapes. The Guidelines aims to bring clarity and ensure authenticity and integrity in the forms, setting and functionality of the fortifications and military heritage which is essential for the conservation of all attributes including the protection and enhancement of their tangible and intangible values.'

The Guidelines also contributes to the safeguarding of the tangible and intangible values of fortifications and military heritage as "memory" tied to facts, people, communities, and expressions of cultural identity of local history.'

2.5 The guidance recognises that there are specific issues that apply to fortifications and military heritage assets that distinguish them from other types of heritage assets. The guidance defines the main characteristics of 'strategies used in conjunction with fortifications and military heritage' as follows:

'Barrier and protection: The primary attribute to protect human activity and settlement against any external threats with the ability to resist attack;

Command: the ability to monitor the area surrounding the defended zone as far as possible and prevent the attacker from approaching;

Depth: a military strategy that seeks to delay rather than prevent the advance of an attacker by yielding space to buy time; this tactic allows for the creation of successive defensive lines;

Flanking: A strategy that aims to delete blind spots, commonly applied with above-ground structures (e.g., rampart, towers, or bastions);

Deterrence: a defensive strategy used to deter the enemy from attacking by instilling doubt or fear of the consequences. This strategy can include a range of tactics including, the construction of a majestic enclosure and its defensive attributes, (e.g., multiple openings for shooting, scale of gates and towers, decoration of walls and entrance).'



2.6 The guidance recognises that fortifications and defensive heritage assets can have different kinds of values:

- 1) Architectural and technical value;
- 2) Territorial and geographical value;
- 3) Cultural landscape value;
- 4) Strategic value;
- 5) Human and anthropological value;
- 6) Memory, identity, educational value;
- 7) Historic value; and
- 8) Social/economic value

ICCROM Management Guidelines for World Cultural Heritage Sites, 1998

2.7 These guidelines were first published in 1993 by ICCROM and they aim to provide 'a general framework, and should be properly interpreted in the particular situations arising in each specific case'. The guidance explains management, evaluation and maintenance strategies and practices for world heritage assets.

2.8 Chapter 9 of the guidance deals with 'Urban Planning and World Heritage Towns'. It states that 'conservation planning is an activity designed to bridge the preferred future to the present; it is a critical element of the management of cultural resources'.

The Tower of London World Heritage Site Management Plan (2016)

2.9 The Tower of London WHS Management Plan was developed by HRP to set out the vision for the WHS is to sustain its Outstanding Universal Value and to manage the Tower effectively in order to protect, conserve and present it to the public and to transmit it to future generations.

2.10 The ToL has unique characteristics that afford opportunities for its future development. Conversely, these characteristics are fragile and raise complex issues that affect the conservation and management of the site. The Plan presents opportunities for the WHS which are appropriate to its significance and helps work towards an optimal solution to the challenges and issues faced by the ToL. The Plan sets out the principal aims and management objectives for the ToL, supported by actions, which reflect the opportunities and mitigate, where possible, the challenges and issues highlighted in the Plan.

2.11 The setting of the ToL is most relevant to the Proposed City Cluster. Within the document, the concept of 'setting' is discussed, relating primarily to the surroundings in which a place is perceived, experienced and understood.

2.12 The document states that 'the setting of the Tower includes its relationship to historic features visible in the urban landscape, and its evolving visual relationships to that landscape, insofar as they contribute to, or detract from, perceptions of its significance and, particularly, its OUV.' IT also states that 'the importance of setting is enhanced by the Tower's public accessibility and visibility.'

2.13 The Proposed City Cluster are understood to fall within the wider setting of the ToL, comprising 'buildings and areas beyond the local setting that are inter-visible with the Tower, or which could (if redeveloped) have an effect on its setting. The wider setting is therefore not fixed, and is proportionate to the scale of development in the vicinity of the Tower - the taller the development, the further its visual impact will extend'.

2.14 The Plan describes some element of the ToL's wider setting, comprising 'a mix of historic and modern commercial buildings, mostly ranging up to about 10 storeys (30-40m) high, with residential and commercial buildings of varying heights predominating to the north-east.'

2.15 The Plan goes on to describe the ToL's relationship with the City Cluster, or 'eastern cluster': 'Since the 1960s, tall commercial buildings, particularly in the City of London, have become increasingly characteristic of parts of the wider setting of the Tower. There is strong and sustained interest in expanding both the number and the locations of such buildings, which are perceived as contributing to London's skyline and image as a dynamic 'World City', as well as to its economy. To the north-west of the Tower stands the City of London's growing 'eastern cluster' of tall buildings, signifying its commercial centre. Its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London. This 'eastern cluster' forms the background to views of the Tower of London from the east, and the upper parts of these buildings are visible in views between and over buildings in the Inner Ward.'

London's World Heritage Sites - Guidance on Settings, Supplementary Planning Guidance (SPG), March 2012

2.16 This GLA SPG, published in March 2012, provides guidance on defining the settings of London's World Heritage Sites, in line with the London Plan. London's WHSs are set in a dynamic, complex urban environment. The guidance acknowledges that the way London combines old and new makes it distinctive and seeks to manage this dynamic relationship in ways that protect the value of the sites, while allowing the city to grow and change around them. The intention is to ensure a more consistent interpretation of setting and of its importance in contributing to 'outstanding universal value' ('OUV').

2.17 With regards to the Tower of London World Heritage Site, the SPG notes that this has a local setting, a zone defined by the Tower of London World Heritage Site Management Plan that includes that part of the city lying to the immediate to the north, east and west of the WHS, a stretch of the Thames, and the south bank as far south as Tooley Street.

Tower of London Local Setting Study, August 2010

2.18 The Tower of London 'Local Setting Study' was published in August 2010 by the Tower of London World Heritage Site Consultative Committee. The Study describes the current character and condition of the Tower's local setting and sets out aims and objectives for conserving, promoting and enhancing appreciation of the OUV of the Tower. Chapter 7 of the Study identifies a series of views to and from the Tower. Views of relevance are as follows:

- View 1: Tower Green, Inner Ward, which 'Illustrates the Tower's significance as the setting for key historical events in European history. It also illustrates the relationship and scale of the individually outstanding palace buildings of the Inner Ward.'
- View 2: Inner Curtain Wall (North) "Illustrates the Tower's landmark siting, particularly its relationship to the City."
- View 4: Inner Curtain Wall (South) "Illustrates the outstanding example of concentric castle design, the prominence of the White Tower, and the Tower's relationship to the Thames to the south".
- View 5: Tower of London, Byward Tower Entrance which "Illustrates the Tower's relationship to the Thames and the City..."
- View 9: Tower Bridge (LVMF Viewing Location 10A.1) which "Illustrates the Tower's aesthetic value as a recognisable landmark and symbol of national identity."
- View 10: The Queen's Walk (LVMF Viewing Location 25A.1) which "Illustrates the Tower's aesthetic value as a recognisable landmark and symbol of national identity."
- View 11: London Bridge (LVMF Viewing Location 11B.2) which "reinforce(s) the landmark siting of the Tower on the Thames as a symbol of Norman power."

National planning policy and guidance**The National Planning Policy Framework, 2023**

2.19 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.

2.20 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

2.21 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.'*

2.22 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.'

2.23 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.'

2.24 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.

2.25 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).'*

2.26 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.'*

2.27 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.'*

2.28 The NPPF identifies three key factors that local authorities should take into account in determining applications (para 196):

- a) *'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) *The desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) *opportunities to draw on the contribution made by the historic environment to the character of a place.'*

2.29 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.'*

2.30 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.'*

2.31 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.

2.32 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 (para 208).

2.33 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.

2.34 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.'*

2.35 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

- 2.36 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.
- 2.37 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'.
- 2.38 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.
- 2.39 The PPG includes a section called 'Historic environment' which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 2.40 The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that 'HAs may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals' (18a-007-20190723). It goes on to say 'understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm' (18a-008-20190723). It states that in assessing proposal, where harm is found, the extent of harm should be 'clearly articulated' as either 'substantial' or 'less than substantial' (18a-018-20190723).
- 2.41 The PPG notes that setting is defined in the NPPF and that 'all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent' (18a-013-20190723). It goes on to say, 'the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each' (18a-013-20190723).
- 2.42 With regard to non-designated HAs, the PPG notes that 'there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.' It states 'it is important that all non-designated heritage assets are clearly identified as such' noting it is 'helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies' (18a-040-20190723).
- The National Design Guide**
- 2.43 The National Design Guide (September 2019) ('NDG') states (paragraph 3) that it 'forms part of the Government's collection of planning practice guidance'.
- 2.44 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'
- 2.45 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 2: Managing Significance in Decision Taking in the Historic Environment (2015)**
- 2.46 This guidance, published by Historic England, provides information to assist in the implementation of historic environment policy in the NPPF and the related guidance given in the PPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
- 2.47 The guidance notes at paragraph 4 that 'The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest'.
- 2.48 At paragraph 5, it is stated that 'The National Heritage List for England is the official database of all nationally designated heritage assets – see www.HistoricEngland.org.uk/listing/ the-list. Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application. Archaeological potential should not be overlooked simply because it is not readily apparent'.
- 2.49 At paragraph 6, it is stated that 'Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed'. It goes on to set out several stages that indicate the order in which this process can be approached, although the reader is advised that while it is good practice to check individual stages 'they may not be appropriate in all cases and the level of detail applied should be proportionate'. It gives the following example:
- 'For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary'.*

2.50 The stages are as follows:

- 'Understand the significance of the affected assets
- Understand the impact of the proposal on that significance
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF
- Look for opportunities to better reveal or enhance significance
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected'.

2.51 At paragraph 52, it is noted that while there will not always be opportunities to enhance the significance or improve a heritage asset, *'the larger the asset the more likely there will be'*. It acknowledges that *'most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation'*.

2.52 Paragraph 53 discusses design and local distinctiveness. With reference to the NPPF and PPG, it notes that *'In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:*

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept

- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials.'

Historic England: Historic Environment Good Practice Advice in Planning Note 3 (second edition): The Setting of Heritage Assets (2017)

2.53 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'.

2.54 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.'

2.55 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.'

2.56 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.

2.57 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'.

2.58 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)

2.59 This document sets out advice on planning for tall buildings within the historic environment. It supersedes Advice Note 4 issued by HE in 2015. It notes that *'alternative approaches may be equally acceptable, providing they are demonstrably compliant with legislation and national policy objectives.'*

2.60 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.

2.61 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.

2.62 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.

2.63 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.



- 2.64 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.
- 2.65 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.
- 2.66 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.
- 2.67 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 HE'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.
- 2.68 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.*'
- Historic England Advice Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)**
- 2.69 Historic England issued Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets in October 2019. The note covers the NPPF requirement that heritage significance is described in order to help local authorities make decisions on the impact of proposals for change to heritage assets. It states, in paragraph 2 of the introduction, that '*the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance.*' It describes a statement of heritage significance as '*an objective analysis of significance, an opportunity to describe what matters and why.*'
- 2.70 The advice note states that a staged approach to decision making, where the significance is assessed before the design of the proposal commences, is the best approach. It states in paragraph 29, under 'proportionality', that while '*analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance.*'
- Regional Planning Policy and Guidance
The London Plan, 2021**
- 2.71 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'.
- 2.72 The policies most relevant to townscape, visual impact and heritage are found in Chapter 3, 'Design', and Chapter 7, 'Heritage and Culture.'
- 2.73 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.
- 2.74 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'.
- 2.75 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.*'
- 2.76 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.*'
- 2.77 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.
- 2.78 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.*'
- 2.79 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.'

2.80 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)

2.81 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 following LVMF views are potentially of relevance to the assessment in this document:

- LVMF 10A.1 Tower Bridge: Upstream
- LVMF 11B.2 London Bridge: Downstream
– Close to the Southwark Bank
- LVMF 12B.1 Southwark Bridge: downstream
- LVMF 13B.1 Thames side at Tate Modern
- LVMF 15B.1 Waterloo Bridge: Downstream
– Close to the Westminster Bank
- LVMF 15B.2 Waterloo Bridge: Downstream
- LVMF 16B.2 The South Bank: Gabriel's Wharf viewing platform – Centre of the bridge
- LVMF 17B.1 Golden Jubilee/Hungerford Footbridges: Downstream – Crossing the Westminster Bank
- LVMF 17B.2 Golden Jubilee/Hungerford Footbridges: Downstream
- LVMF 25A.1 The Queen's Walk at City Hall: Foot of pathway from Potter's Fields
- LVMF 25A.2 The Queen's Walk at City Hall: In front of the public terraces

- LVMF 25A.3 The Queen's Walk at City Hall: Close to Tower Bridge
- LVMF 26A.1 St James's Park Footbridge

Local Planning Policy and Guidance City of London Local Plan 2015

2.82 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.

2.83 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.'

2.84 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.'

2.85 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 adaptation measures, must be sensitive to heritage assets.'

2.86 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).'*

2.87 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

- 2.88 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.
- 2.89 The relevant views in relation to the ToL, are referred to in this report and are also assessed in terms of visual amenity in the accompanying SVIA.

Emerging Local Plan

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

- 2.90 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.
- 2.91 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.
- 2.92 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.

2.93 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;
- DE6: Shopfronts;
- S11: Historic Environment;
- HE1: Managing change to heritage assets;
- S12: Tall Buildings;
- S13: Protected Views; and
- OS1: Protection and provision of open spaces.

3. Methodology of assessment

- 3.1 The methodology used to assess the impact of the Proposed City Cluster on the ToL WHS, is based on ICOMOS Guidance and Toolkit for Impact Assessments in a World Heritage Context, 2022 ('IMOCOS Guidance, 2022'). The purpose of this document is to provide direction in order to evaluate effectively the impact of potential development on the OUV of properties, in this case the ToL.
- 3.2 This HIA accompanies the SVIA as part of the evidence base for the tall buildings policy in the emerging City Plan. The method of assessment within this Impact Assessment on the ToL differs from the method set out within the SVIA and the HIA for St. Pauls due to differences in requirements by ICOMOS. This report has been provided in addition, acknowledging its status as a WHS which establishes international protections on the asset.
- 3.3 This report aims to guide users through a stepped process to carry out impact assessments for projects of all types and scopes at all World Heritage properties – cultural, natural or mixed – using the same adaptable framework. This is particularly relevant for circumstances where some form of change may affect the Outstanding Universal Value (OUV) of those sites. Change may be positive or negative, but both need to be assessed as objectively as possible, against the stated OUV as reference point.
- 3.4 The guidance states that impact assessment should start early in the development process and inform the entire planning process.
- 3.5 ICOMOS Guidance, 2022, suggests that the process of the impact assessment should consist of a series of 11 steps, which are flexible and can be adapted to the type and location of the action being proposed. These are as follows:
- 1) Screening
 - 2) Scoping
 - 3) Baseline
 - 4) The proposed action and alternatives
 - 5) Identifying and predicting impacts
 - 6) Evaluating impacts
 - 7) Mitigation and enhancement
 - 8) Reporting
 - 9) Reviewing the report
 - 10) Decision making
 - 11) Follow-up
- 3.6 Throughout this process, participation and proactive problem-solving should be undertaken; this includes engagement with different stakeholders, addressing how any negative impact of the Proposed City Cluster could be avoided or minimised and opportunities to provide or enhance any positive impact of the proposed development.

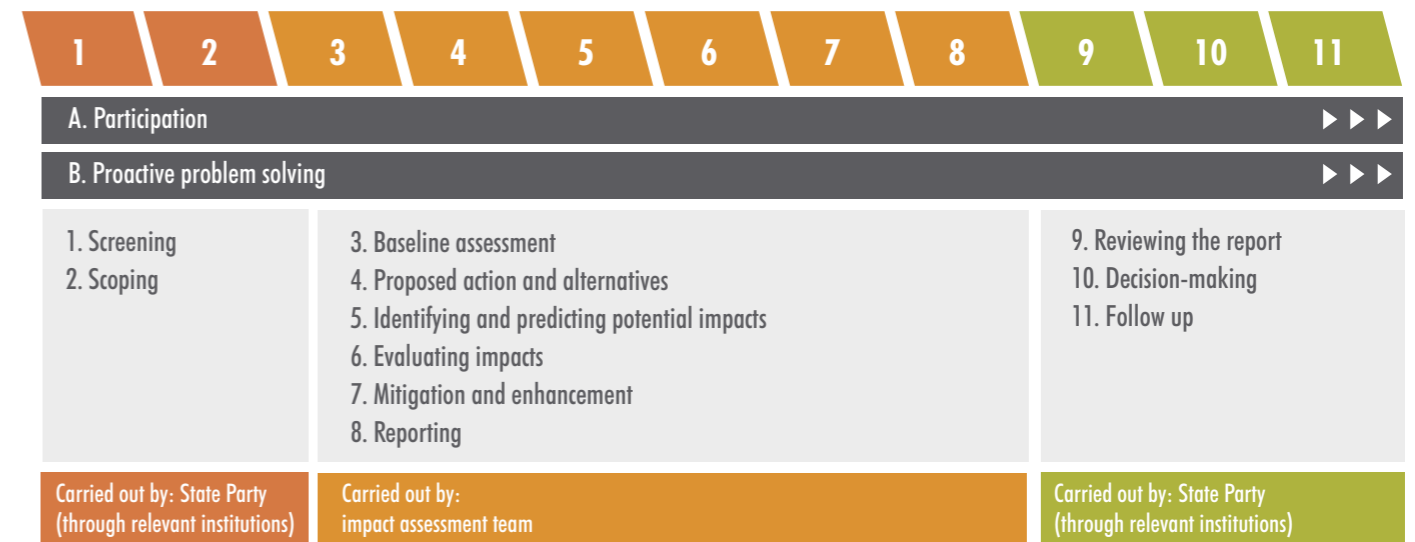


Figure 3.1: The process of an impact assessment conducted for WHS. Source: ICOMOS Guidance, 2022.



- 3.7 Figure 3.1 sets out this process of impact assessment diagrammatically.
- 3.8 Steps 1, 2, 9, 10 and 11, are to be carried out by State Parties, steps 3, 4, 5, 6, 7 and 8 are addressed in this report as part of the impact assessment.
- Participation**
- 3.9 The participation of rights-holders, local communities and other stakeholders in impact assessment should start early and continue throughout the process.
- 3.10 Within the ICOMOS Guidance, 2022, it states; *'Information about the proposed action and its impacts should be shared with all of these groups in a clear and timely manner, and they should be given the opportunity to contribute to understanding heritage/conservation values, raising issues, meaningfully discussing alternatives, and suggesting measures to mitigate any impacts'*.
- 3.11 It also states that, *'the nature, scope and frequency of engagement should be proportionate to the nature and scale of the proposed action, its potential risks and impacts, and the group being engaged'*.
- 3.12 The CoLC have engaged stakeholders through the scoping process.
- Proactive problem solving**
- 3.13 Proactive problem solving involves considering the proposed action throughout its development, to determine whether it is needed, whether an alternative approach would be more sustainable, whether any negative impacts could be avoided or minimised, and whether any positive impacts could be produced or enhanced.
- 3.14 This is discussed in Chapter 6 of this report.
- Screening and Scoping**
- 3.15 These stages of the Impact Assessment identify the type and quantity of information needed for the baseline assessment.
- 3.16 Screening information has largely been provided within the Tower of London World Heritage Site Management Plan, produced by HRP. This identifies values and attributes of the WHS.
- 3.17 Regarding scoping, the Proposed City Cluster is located within the setting of the WHS, which therefore has the potential to be affected. The Proposed City Cluster is understood to fall within the wider setting of the ToL, comprising *'buildings and areas beyond the local setting that are inter-visible with the Tower, or which could (if redeveloped) have an effect on its setting'*. Guidance states that the wider setting 'is not fixed, and is proportionate to the scale of development in the vicinity of the Tower - the taller the development, the further its visual impact will extend'.
- 3.18 The following assessment will, therefore, be based on attributes of the ToL's wider setting that contribute to its OUV.
- Baseline**
- 3.19 Step 3 of the ICOMOS Guidance, 2022, states that a baseline assessment should be provided which discusses the WHS's OUV, other heritage/conservation values, attributes, boundary, buffer zone and wider setting. This is provided in Chapter 5 of this report.
- Cumulative**
- 3.20 The ICOMOS Guidance, 2022, also states that future change should also be discussed within the baseline. This includes, *'other planned projects, emerging plans, and national or regional trends'*. This cumulative condition will later be used to identify and evaluate cumulative impacts, showing where the effects of a proposed action may be more significant due to its connection to other actions in the past, present and foreseeable future.
- 3.21 The Proposed City Cluster is assessed in addition to the future baseline which comprises all schemes that are both built, under construction and have been granted consent.
- The proposed action and alternatives**
- 3.22 Step 4 of the methodology, set out in the ICOMOS Guidance, 2022, is to present the proposed action and alternatives in detail, including any associated works such as infrastructure. This is provided in Chapter 6 of this report.
- 3.23 The guidance also states that, if necessary, further information should be sought, or additional documentation should be prepared to ensure that the nature and full extent of potential effects of the action can be understood – particularly how the action might affect the attributes that contribute to the OUV. This is done through the Accurate Visual Representation (AVRs) which have been provided in the SVIA and referenced in Chapter 7 of this report.
- Identifying and Predicting Impacts**
- 3.24 The ICOMOS Guidance, 2022, states that identifying and predicting impacts is 'a technical step at the heart of the impact assessment process'. The identification part of this involves bringing together information about the attributes of OUV and other heritage/conservation values (Chapter 5) and the proposed action and alternatives (Chapter 6) to determine what would happen to the attributes of a World Heritage property if a proposed action took place.
- 3.25 ICOMOS Guidance, 2022, states that, 'all relevant impacts should be considered, including those on intangible attributes which are reflected in physical elements of the property'.
- 3.26 The proposed action can directly impact on the WHS and its OUV. It can also have indirect impacts, where a direct impact has follow-on impacts. In this case, the Proposed Development is located within the wider setting of the ToL, therefore has the potential to have indirect impact on the WHS and its OUVs.
- Tool 2 – Identifying Potential Impacts**
- 3.27 Tool 2 shows how an action's impacts on the attributes of a World Heritage property can be identified: each of the impacts identified needs to be explored in more detail in the impact assessment. During impact identification and prediction, it is important to remain aware of how a World Heritage property is interconnected with its buffer zone and wider setting, and that it cannot be viewed in isolation.
- 3.28 This table is presented in Appendix 1.
- Tool 3 – Evaluating Potential Impacts**
- 3.29 The purpose of this tool is to illustrate a step-by-step approach to evaluating impacts, which includes a detailed consideration of how a proposed action will impact attributes of World Heritage.
- 3.30 This table is presented in Appendix 1.
- 3.31 Chapter 7 of this report sets out an assessment of each of the relevant OUVs. The following categories of impact are set out within the ICOMOS Guidance, 2022, and can be either negative or positive:
- Neutral: Research into the potential impact reveals that no change would occur to the attribute.
 - Minor: Research into the potential impact shows that the change would be negligible.
 - Moderate: Research into the potential impact shows that there would be some change to the attribute.
 - Major: Research into the potential impact shows that there would be large change to the attribute.
- 3.32 Effects on cultural heritage attributes from development or other changes may be adverse or beneficial.

3.33 In the case of the Proposed City Cluster, this change would be to the setting of the WHS, which is regarded in ICOMOS guidance as a 'direct impact'. There is sometimes a tendency to see impacts as primarily visual. While visual impacts are often very sensitive, a broad approach is needed (ICOMOS Xi'an Declaration, 2005).

Cumulative assessment

3.34 Effects may also be cumulative. ICOMOS Guidance, 2022 states that, 'the proposed action may create a precedent which then creates cumulative impacts in the future. For this reason, it is important to be aware of other actions and trends in the past, present and future, and not consider a proposed action in isolation'.

3.35 The Proposed City Cluster is assessed in addition to the future baseline which includes all the existing and consented schemes in the City.

3.36 These effects are set out within Chapter 7 of this report.

Mitigation and enhancement

3.37 Step 7 involves mitigation and enhancement. Every reasonable effort should be made to eliminate or minimise adverse impacts on significant places. The ICOMOS Guidance, 2022, states that mitigation should be included, where possible, proposing methods to mitigate or offset the effects of a development proposal or other agent of change, '*it may involve creative problem-solving to re-think and potentially redesign the proposed action or identify measures that avoid negative impacts*'.

3.38 The guidance also acknowledges that, in some cases, it may not be possible to entirely avoid all negative impacts, but they should be minimised to acceptable levels that cause no concern for World Heritage by significantly reducing their magnitude, duration, extent, etc.

3.39 It is said that proponents should not only aim to 'do no harm', but seek to actively 'do good' while not compromising OUV' in order to enhance the positive impact of a proposed development.

Reporting

3.40 ICOMOS Guidance 2022 states that the methodology and findings of the previous sections should be clearly documented in an impact assessment report. The report should be made available for comment to a range of interested parties, both expert and non-expert, and findings should be laid out clearly so that all readers can follow the analysis and understand why the assessment makes certain recommendations based on protecting OUV and other heritage/conservation values.



4. Assumptions and limitations

4.1 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 7 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.

5. Significance of Tower of London

- 5.1 This chapter sets out the significance of the ToL. It provides a summary of the historical development, heritage value and contribution of setting to heritage value.
- 5.2 The ToL was designated as a WHS in 1988 and includes a Scheduled Ancient Monument and 14 listed buildings, five of which are listed at Grade I, two listed at Grade II*, and seven at Grade II.

Summary of Historic Development

- 5.3 The ToL originates from the 11th century when William the Conqueror built the White Tower as a demonstration of Norman power. The location was strategically chosen on the River Thames to act as both fortress and gateway to the capital. It was used as a grand palace and royal residence and prison from 1100 until 1952.
- 5.4 The White tower and the tower complex as a whole underwent several phases of expansion over the centuries, however the general layout established by the late 13th century largely remains legible and is made up of three wards. The innermost ward contains the White Tower, encircled to the north, east and west by the inner ward, which was built during the reign of Richard I. The outer ward encompasses the castle and was built by Edward I.

- 5.5 Later additions include the Grade I listed Chapel of St Peter ad Vincula, which was historically used as the parish church of the Tower of London. The current building dates from 1520, although the church was thought to be established several centuries earlier. Although restored in the 19th century, the chapel is a rare example from the 16th century and features an interesting design with a flint tower with Portland stone dressings and late 17th century timber bell cupola. The current building is 500 years old and is the burial place of many important historical figures such as Anne Boleyn, Thomas More and Lady Jane Grey. It is considered a place of deep religious and royal importance.
- 5.6 The Tower of London has also served as an armoury, treasury, the Royal Observatory, the home of the Crown Jewels and as the Royal Mint.
- 5.7 The Tower of London is now established as a popular tourist destination and is home to the regimental headquarters of the Royal Regiment of Fusiliers.

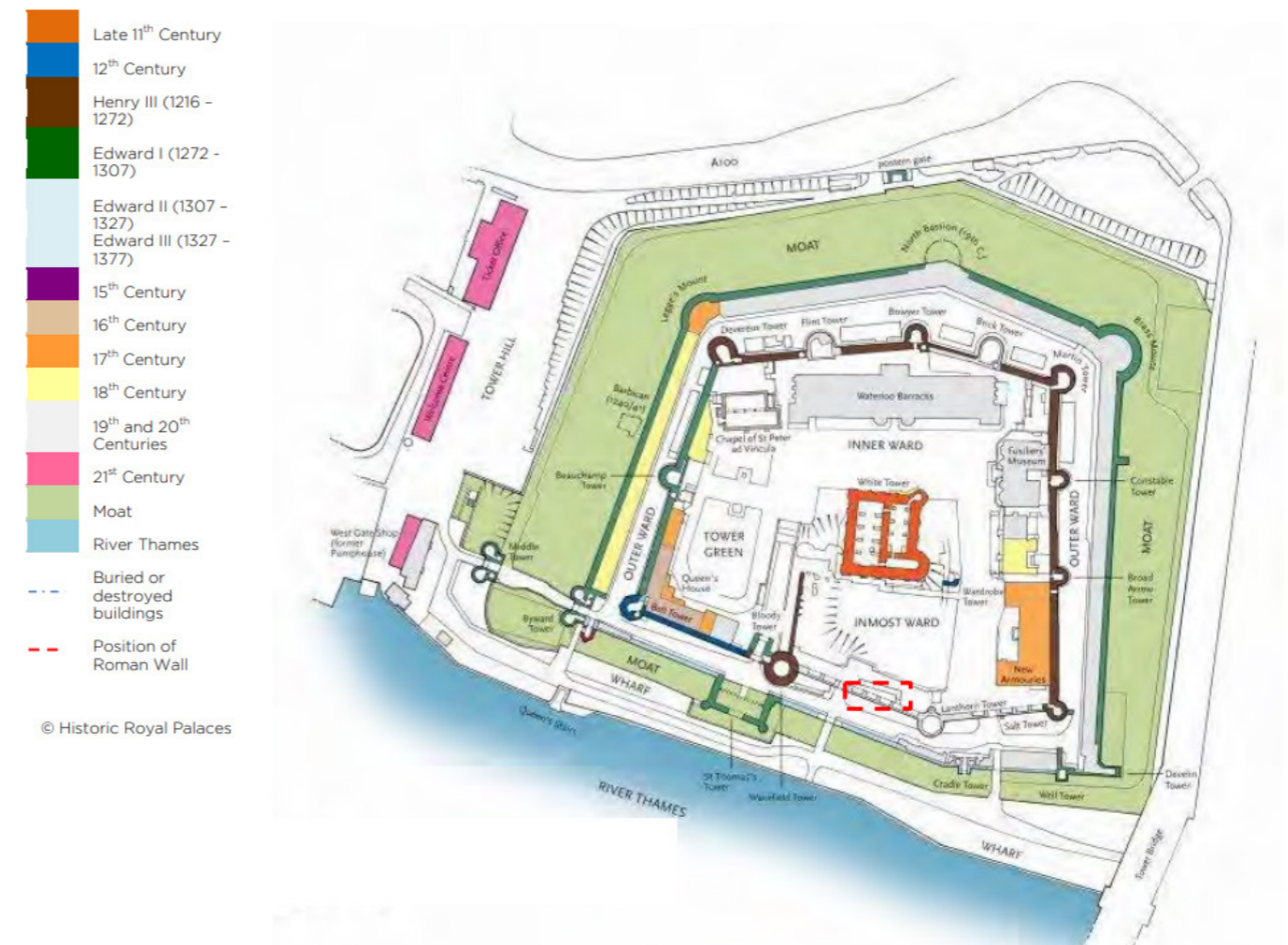


Figure 5.1: Historic development of ToL.
Source: ToL Management Plan, 2011



Heritage Value

5.8 The ToL is of Outstanding Universal Value. There are ten criteria listed by UNSECO and a Site must meet at least one of these to be designated as a WHS. The two which are claimed to be attributed to the ToL are:

- (ii) to exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design; and
- (iv) to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.

5.9 The Tower of London was inscribed onto the World Heritage List in 1988 as it met the following criteria:

“(ii): A monument symbolic of royal power since the time of William the Conqueror, the Tower of London served as an outstanding model throughout the kingdom from the end of the 11th century. Like it, many keeps were built in stone: e.g. Colchester, Rochester, Hedingham, Norwich, or Carisbrooke Castle on the Isle of Wight.

“(iv): The White Tower is the example par excellence of the royal Norman castle in the late 11th century. The ensemble of the Tower of London is a major reference for the history of medieval military architecture”.

5.10 The UNESCO inscribed notes in relation to Outstanding Universal Value that: “The Tower of London is an internationally famous monument and one of England’s most iconic structures. William the Conqueror built the White Tower in 1066 as a demonstration of Norman power, siting it strategically on the River Thames to act as both fortress and gateway to the capital. It is the most complete example of an 11th century fortress palace remaining in Europe. A rare survival of a continuously developing ensemble of royal buildings, from the 11th to 16th centuries, the Tower of London has become one of the symbols of royalty. It also fostered the development of several of England’s major state institutions, incorporating such fundamental roles as the nation’s defence, its record-keeping and its coinage. It has been the setting for key historical events in European history, including the execution of three English queens.”

5.11 The WHS Management Plan was first drawn up in 2007 and was last updated in 2016 by HRP. The WHS Management Plan sets out a ‘Statement of Significance’ of the Tower of London. In its summary statement of significance, it notes its outstanding universal value as being attributable to the following attributes:

- An internationally famous monument;
- Landmark siting, for both protection and control of the City of London;
- Symbol of Norman power;
- Outstanding and most complete example of late 11th-century innovative Norman military architecture;
- Model example of a Medieval fortress palace which evolved from the 11th to 16th centuries;
- Association with State institutions; and
- Setting for key historical events in European history.

Relationship to surroundings

5.12 As this report assesses the impact of the Proposed City Cluster on the ToL, it will focus on the attributes that express the relationship between the WHS and its surroundings, namely:

- An internationally famous monument;
- Landmark siting, for both protection and control of the City of London; and
- Symbol of Norman power.

5.13 The attributes are expressed, in part, in views of the ToL from its surroundings and within its inner and outer wards.

5.14 The ToL Management Plan notes that there are a number of components which contribute to the ToL’s attribute as an internationally famous monument. These include:

- The physical form and dominance to the White Tower, and the silhouette of the White Tower;
- The concentric defences around the White Tower;
- The defences around the White Tower seen in the raised view of the Tower from Tower Bridge and Shard; and
- The relationship with the River Thames to the south.

5.15 The Management Plan also records the components which contribute to the ToL’s landmark setting attribute. These include:

- The visible elements and line of the Roman wall;
- The Tower’s relationship to the City;
- The wharf/river wall;
- Key views of the Tower up, down, across, and from the river;
- The Tower’s skyline (silhouette) as seen from the river and from across the river; and
- The open quality of the Liberties (on the Tower’s landward sides).

5.16 The Management Plan also records the components which contribute to the ToL’s symbol of Norman power. These include:

- its plan and three dimensional form; and
- its relationship to the adjacent foundations of the remains of the Roman land and river walls.

5.17 When constructed, the ToL was seen as the gateway to the Norman kingdom. It is strategically located at a bend in the River Thames and has been a crucial demarcation point between the power of the developing City of London, and the power of the monarchy. It had the dual role of providing protection for the City through its defensive structure and the provision of a garrison. Until the 19th century, the White Tower of the ToL was still one of the tallest buildings in London and would literally have ‘towered’ over its surroundings.

Contribution of setting to heritage value

5.18 Within the ToL Management Plan, three ‘tiers’ of setting are defined for the WHS:

- Wider setting – the buildings and areas beyond the local setting that are intervisible with the Tower, or which would (if redeveloped) have an effect on its setting. The wider setting is therefore not fixed, and is proportionate to the scale of development in the vicinity of the Tower – the taller the development, the further its visual impact will extend.
- Local setting – ‘spaces from which it [the Tower] can be seen from street and river level, and the buildings that enclose, or provide definition to, those spaces.’
- Immediate setting – the part of the setting ‘that is on the north bank of the River Thames’.

5.19 The wider setting of the ToL is most relevant to the Proposed City Cluster.

5.20 The wider setting comprises:

'a mix of historic and modern commercial buildings, mostly ranging up to about 10 storeys (30-40m) high, with residential and commercial buildings of varying heights predominating to the north-east. Since the 1960s, tall commercial buildings, particularly in the City of London, have become increasingly characteristic of parts of the wider setting of the Tower. There is strong and sustained interest in expanding both the number and the locations of such buildings, which are perceived as contributing to London's skyline and image as a dynamic 'World City', as well as to its economy.'

Tower of London Local Setting Study, August 2010

5.21 The 'Tower of London Local Setting Study' was commissioned by UNESCO in 2010, following concern about the protection of the setting of the ToL. The document explores the relationship between the ToL and the surrounding city and is aimed at ensuring that the ToL remains the dominant building from within the local setting (night and day). This would be ensured by encouraging built development that respects the setting of the WHS and enhances the appreciation of its Outstanding Universal Value.

5.22 The 'Tower of London Local Setting Study' describes the current character and condition of the ToL's local setting and sets out aims and objectives for conserving, promoting, and enhancing appreciation of the OUV of the Tower.

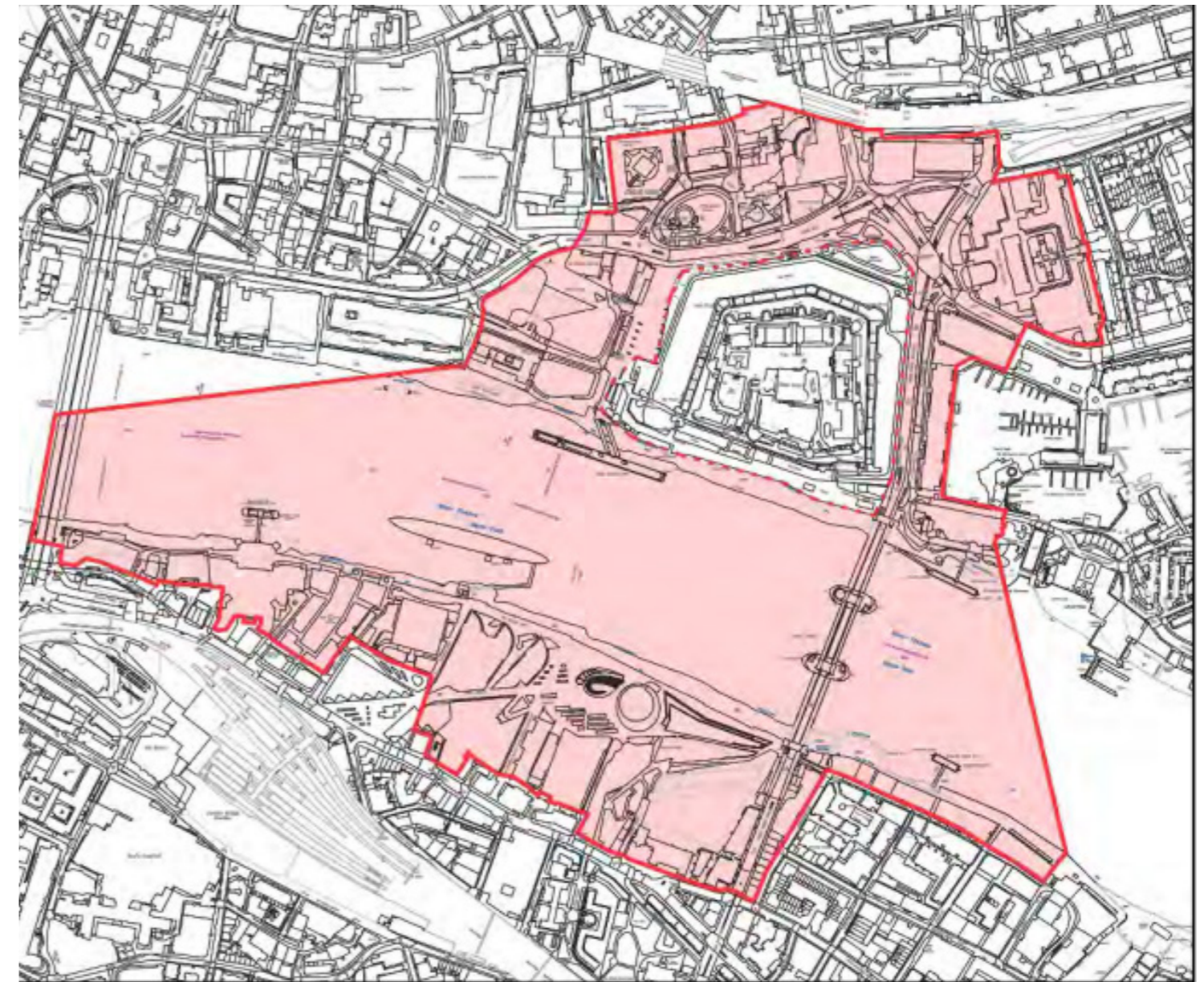
5.23 Though the 'Tower of London Local Setting Study' mostly focuses on the local setting of the ToL, it does conclude that the ToL must remain the dominant building within its setting, separated from the City, and respected by new developments. It introduces visual 'thresholds' that reflect the historic transition between the local setting and surrounding city.

5.24 Broadly speaking, the setting of the WHS makes a positive contribution to its heritage value, including its evolving relationship with the existing and emerging City Cluster. Whilst there is some tension between the prominence of the cluster and the White Tower, its appearance in conjunction with the ToL reinforces the character of this part of the City as the economic heart of the Capital since Roman times and is, overall, a positive juxtaposition.

Cumulative condition of the ToL setting

5.25 A number of consented and under-construction schemes are within the vicinity of the ToL. The Assessment of the Proposed City Cluster is considered in addition to those as part of the future baseline.

5.26 Notably, many of these are located within the City Cluster, the form of the Proposed City Cluster takes this into account consolidating its form with the intention to limit its effects on the ToL.



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- World Heritage Site Boundary
- Local setting of the Tower

Figure 5.2: Local setting of the ToL.
Source: ToL Management Plan, 2011

6. Indicative massing of the Proposed City Cluster

6.1 The CoLC have undertaken a detailed scoping and testing exercise to establish the indicative massing of the Proposed City Cluster.

6.2 A summary of the indicative massing of the Proposed City Cluster is set out below.

Hard Constraints

6.3 The final shaping of the Proposed City Cluster was informed by a 'Select Criteria' identified by CoLC - these are established, adopted macro-level strategic view and heritage constraints.

6.4 These comprise:

- Strategic pan-London views of the London View Management Framework;
- St Paul's Heights Viewing Points contained in the Protected Views SPD;
- Monument Views contained in the Protected Views SPD;
- Tower of London WHS approaches, and representative views identified in the Tower of London Local Setting Study; and
- Relevant neighbouring borough's strategic local views.

6.5 The hard constraints were modelled, i.e. protected vistas, silhouettes, and St. Paul's Heights as parameters in which the indicative massing would work within.

Qualitative constraints

6.6 The qualitative constraints that further shaped the indicative massing comprise:

- Local heritage assets and their setting;
- Micro-climate;
- Local townscape character; and
- The future baseline of consented schemes.

6.7 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. The full suite of views tested, and a summary of this initial testing is included in appendix 2 of the SVIA which accompanies this HIA document.

6.8 The indicative form as a result of the above testing by the CoLC is assessed in the following chapters and in the accompanying SVIA.

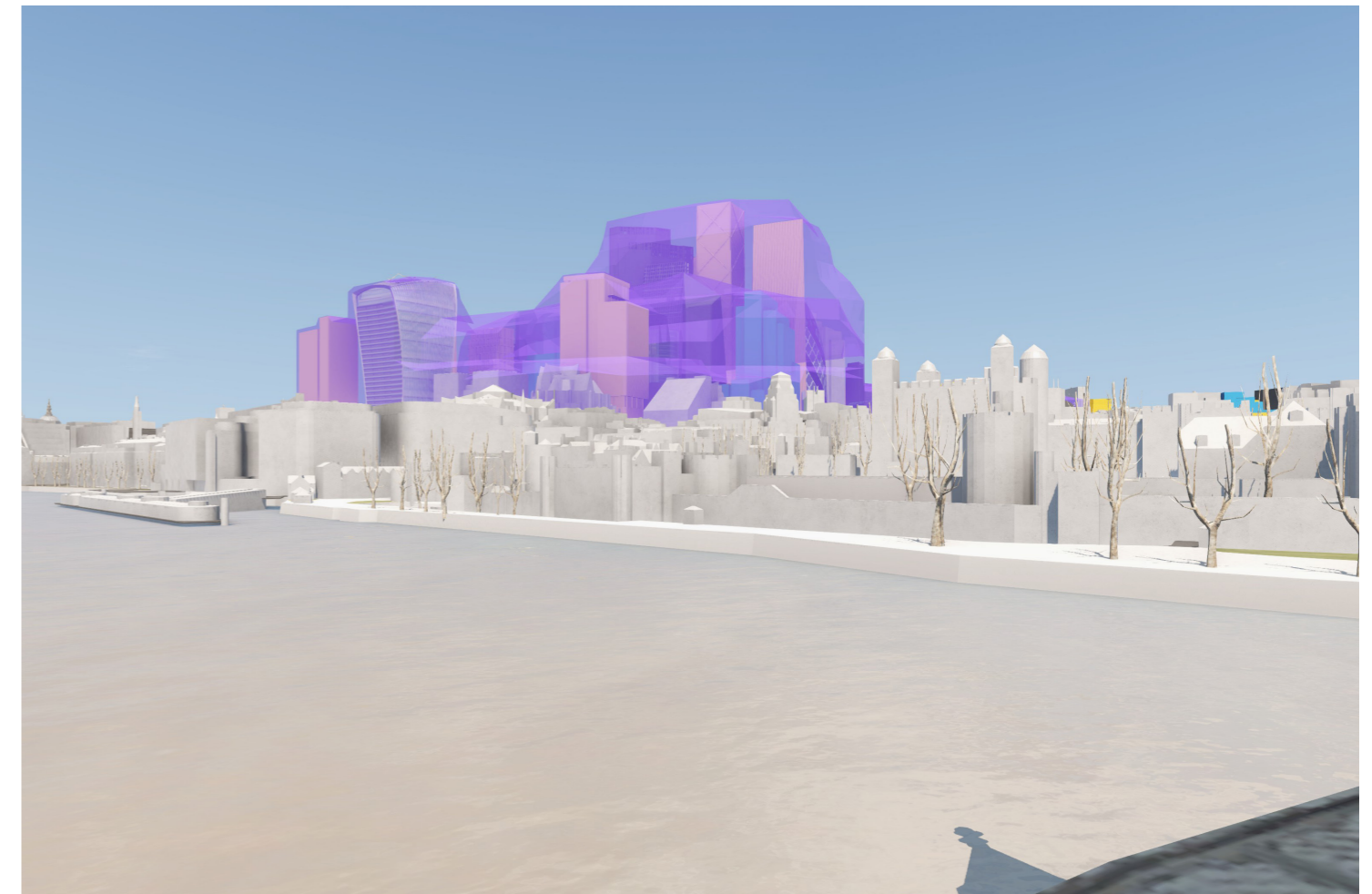


Figure 6.1: LVMF 10A.1



Figure 6.2: LVMF 25A.3

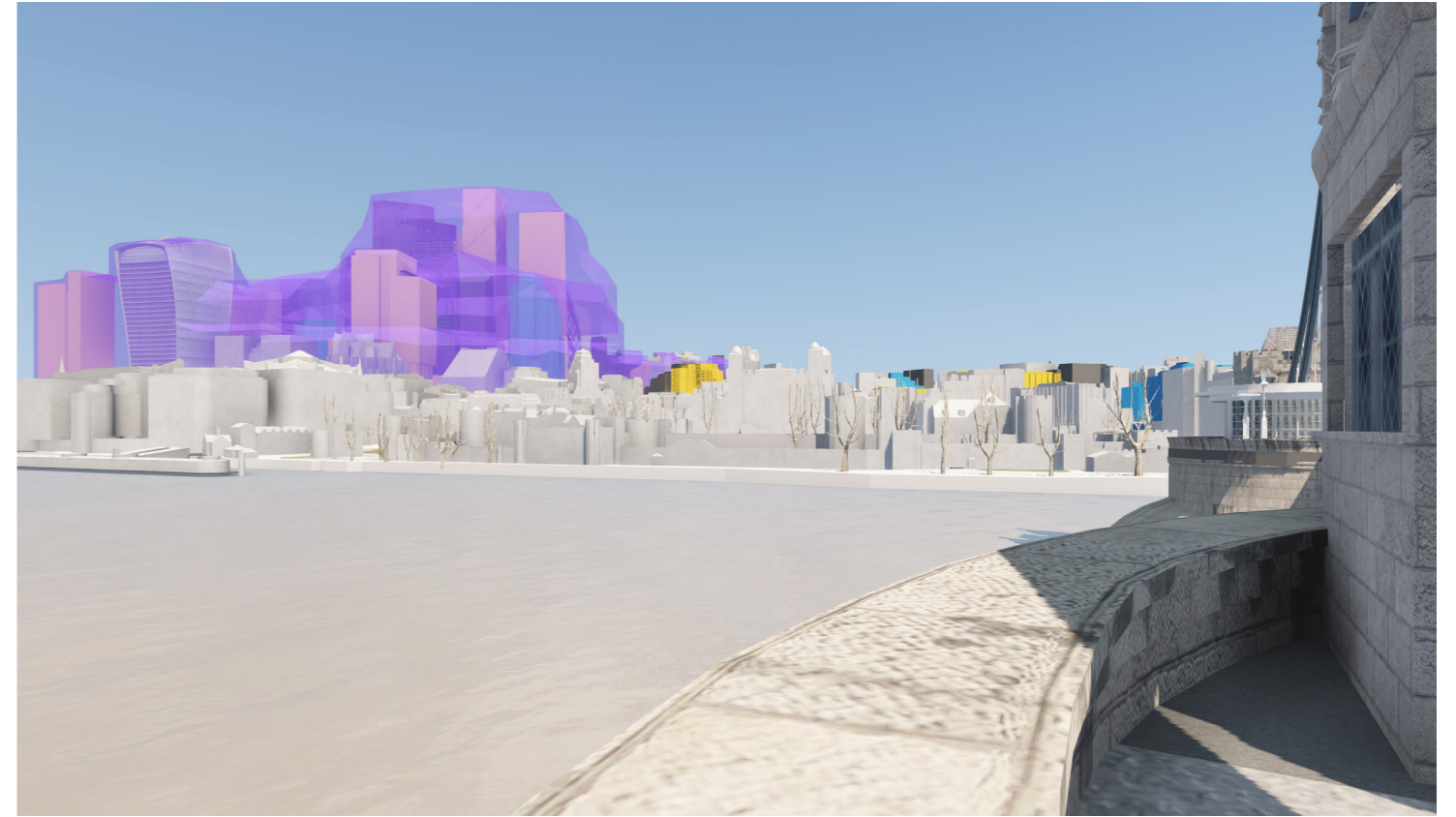


Figure 6.3: HRP -ar14a

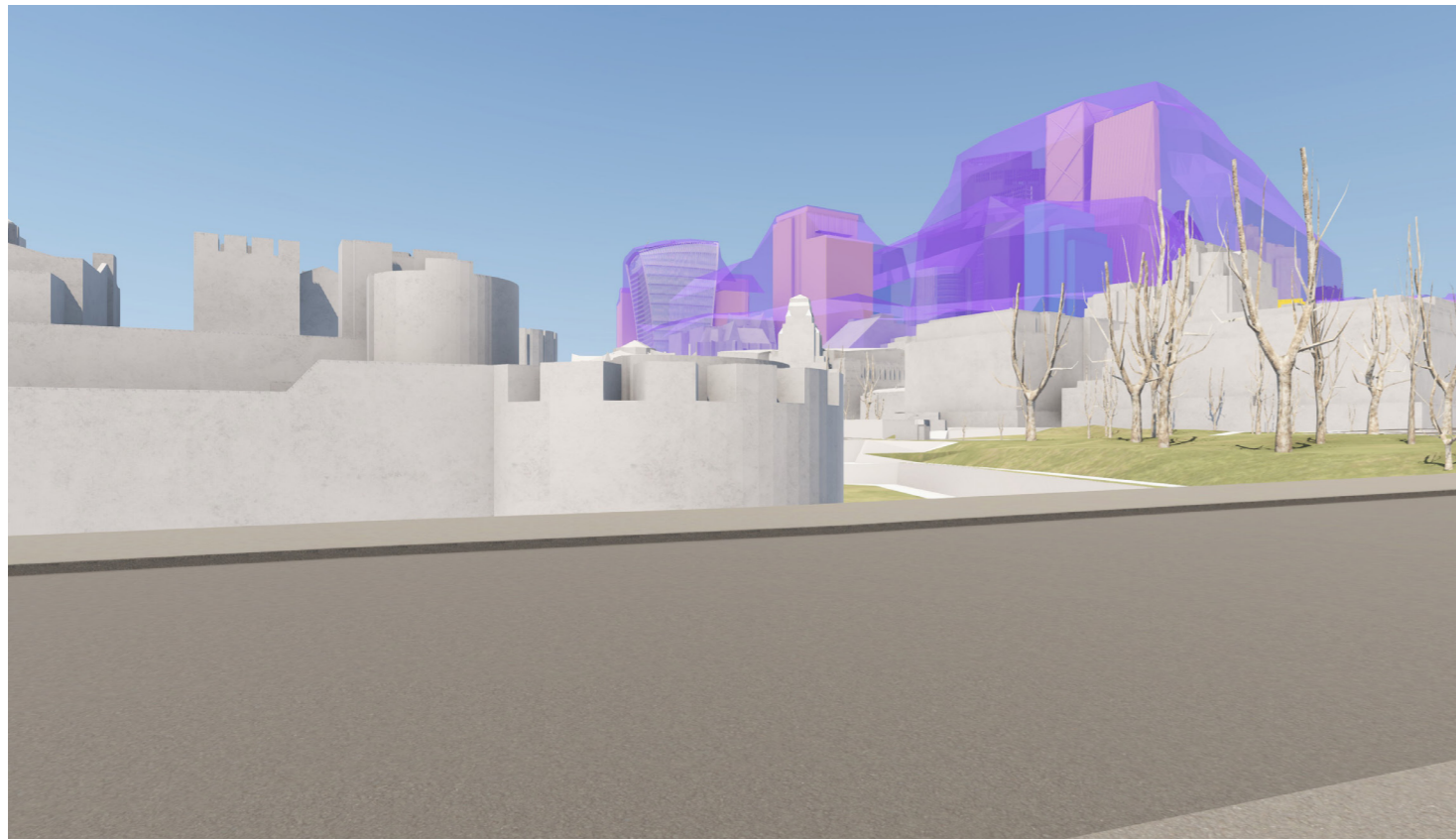


Figure 6.4: HRP -ar12b



Figure 6.5: HRP -rv1e

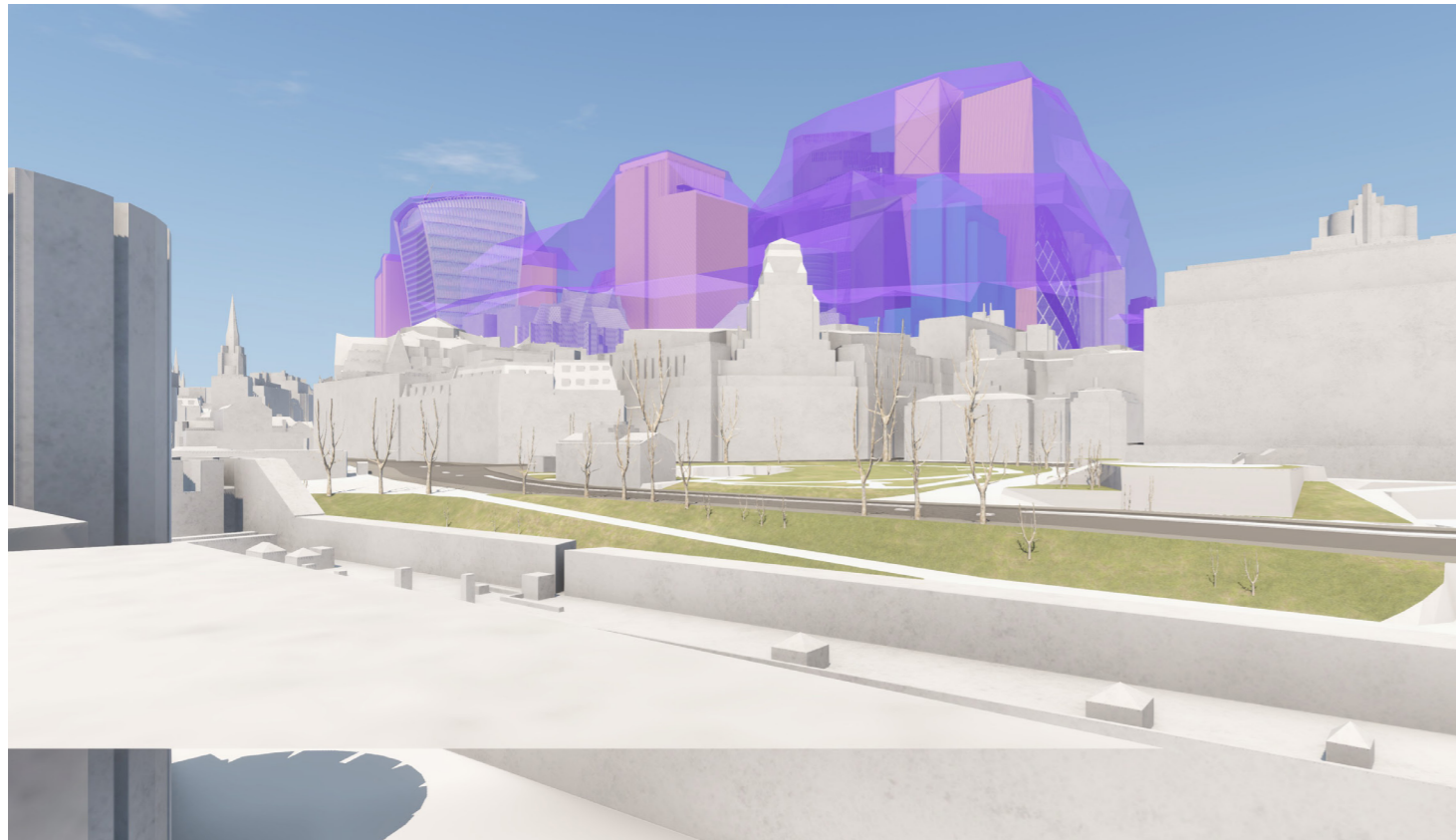


Figure 6.6: HRP -rv2a

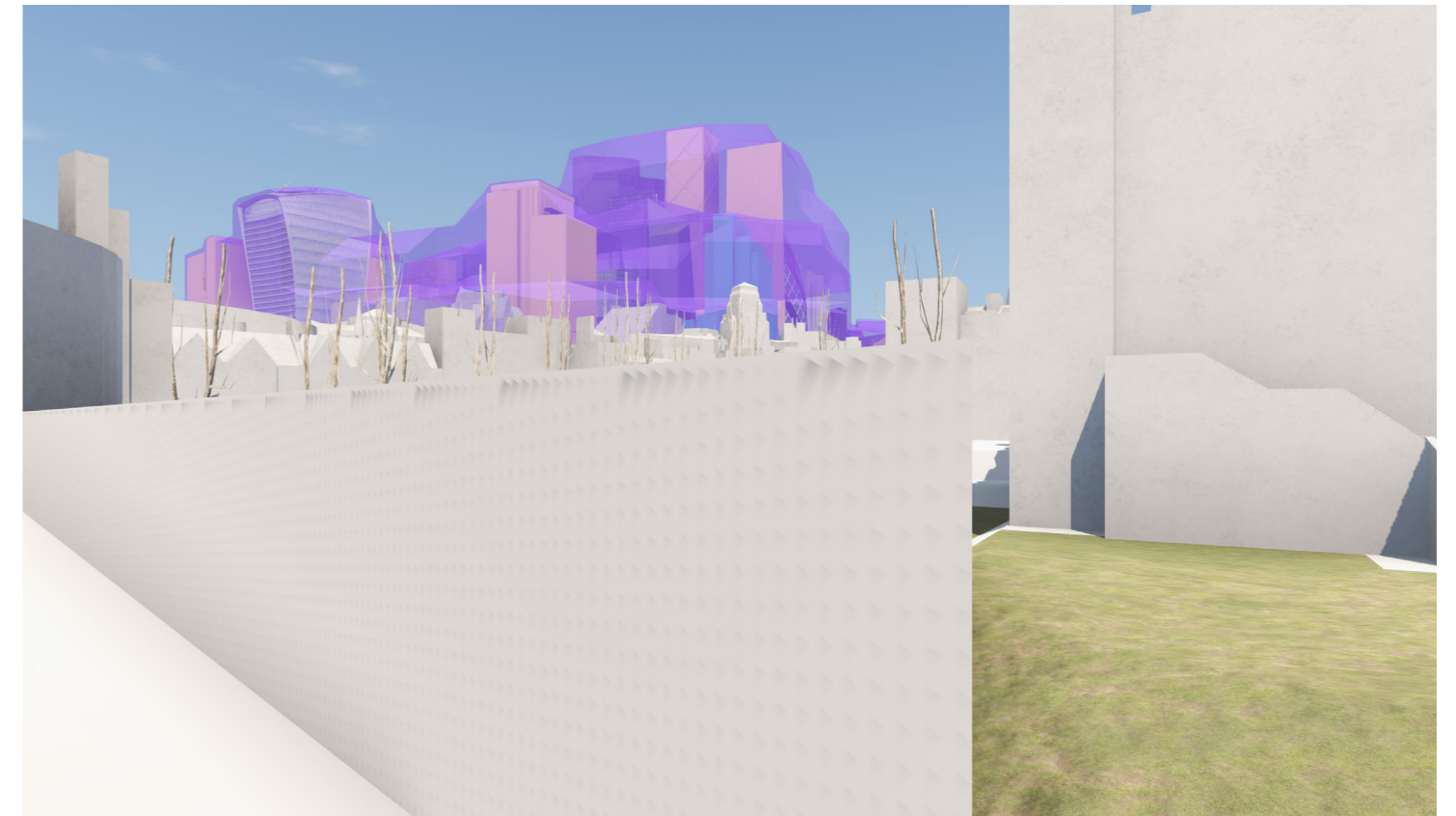


Figure 6.7: HRP -rv4a

Assessment of forms

Skyline

- 6.9 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.
- 6.10 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 are a result of responding to the constraints as described above.
- 6.11 Together, these create a recognisable form; a series of individual parts that would establish a collective identity for the City.

Height and massing

- 6.12 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.
- 6.13 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.
- 6.14 The Proposed City Cluster manages heights through extrapolating suitable relationships between the individual buildings of the future baseline and the potential of further sites to come forward. This has been achieved through testing heights options on sites with prospective extrusions and extensive testing in views carried out by CoLC.

- 6.15 The consolidation of the existing and emerging cluster ensures that the setting of strategic assets is protected and, where possible, enhanced.

Urban design

- 6.16 The urban design will be established through the relationship of the individual forms as part of the Proposed City Cluster. This would relate 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.
- 6.17 This will need to be assessed through individual applications for sites within the Proposed City Cluster as they come forward.

Response to the ToL

- 6.18 In terms of articulation, the shape of the proposed skyline would create interest when seen from different points in relation to the ToL. From the east, the Proposed City Cluster would read as three crests stepping down to the south and from the south it would read as two crests stepping down to the west. In the more distant views (LVMF25A.1) the western side of the Proposed City Cluster has a verticality to its edge condition, the eastern side has a more pronounced sloped form, stepping down from the tallest elements within the Proposed City Cluster to the ToL. This acknowledges the heritage significance of the ToL.

7. Assessment of effect on the OUV of the ToL WHS

- 7.1 The Proposed City Cluster would not alter the physical fabric of the ToL which lies approximately 120m southeast of the City Cluster at their closet point. Therefore, the Proposed City Cluster would cause no change and therefore no harm to the attributes of the OUV of the ToL which are primarily or wholly related to its physical fabric. These include:
- Concentric Defences;
 - Surviving Medieval Remains; and
 - Physical (Historical) Associative Evidence.
- 7.2 Instead, the City Cluster has the potential to affect the setting of the ToL and the attributes of the OUV of the ToL which are related to this, namely:
- An Internationally Famous Monument;
 - Landmark Siting;
 - Physical Dominance of the White Tower; and
 - Symbol of Norman Power.
- 7.3 The assessment of the indicative massing of the City Cluster on the ToL is carried out for each attribute of the OUV of the ToL which are related to setting, listed above. Viewpoints within the ToL and its setting relate to its OUV. Relevant views are referred to as part of the assessment on the aspects of OUV.
- 7.4 The assessment has been guided by The Tower of London Local Setting Study, August 2010, which defines the concept of 'setting' as relating 'primarily to the surrounding in which a place is seen, experienced and understood'.
- 7.5 Key elements of the ICOMOS guidance (2022) on the setting of the ToL are reinforced by the London Views Management Framework (LVMF, 2012). Views 10A and 25A of this, where the ToL is viewed in conjunction with existing modern elements of the City, are particularly relevant for this assessment.
- 7.6 A description and assessment of existing, future baseline and proposed views is provided within the SVIA. The set of views within the SVIA are a result of an in-depth scoping process undertaken by CoLC. Views which are most relevant to impacts to the setting of the ToL and OUV include:
- View 1 (C1) – LVMF 10A.1 - Tower Bridge: upstream
 - View 2B – (C8) – LVMF 11B.2 – London Bridge: downstream
 - View 10A (C2) - LVMF 25A.3 The Queen's Walk at City Hall - close to Tower Bridge; (panned towards the cluster)
 - View 10B (C3) - LVMF 25A.2 The Queen's Walk at City Hall - in front of the public terraces; (panned towards the cluster)
 - View 10C (C4) - LVMF 25A.1 The Queen's Walk at City Hall: foot of pathway from Potter's Fields; (panned towards the cluster)
 - View 11 (C5) - LVMF 25A.3 The Queen's Walk at City Hall - close to Tower Bridge;
 - View 12 (C6) - LVMF 25A.2 The Queen's Walk at City Hall - in front of the public terraces;
 - View 13 (C7) - LVMF 25A.1 The Queen's Walk at City Hall: foot of pathway from Potter's Fields;
 - View 23 (C40) – HRP-rv8 - Approach route 14 Tower Bridge (kinetic sequence representative view 2)
 - View 24 (C41) – HRP-ar4b - Approach route 12 Commodity Quay (kinetic sequence representative view 2)
 - View 25 (C42) – HRP-ar4a - Approach route 12 Commodity Quay (kinetic sequence new selected view)
 - View 26 (C43) – HRP-rv5 - "Local Setting Route 5: (Kinetic sequence representative view 1) Pedestrian subway to East Smithfield south of Tower Gardens"
 - View 27 (C44) – HRP-rv1a - Representative Viewpoint 8 The Royal Mint (panned north to include cluster)
 - View 28 (C45) – HRP-rv1b - Approach route 4 Great Tower Street (new selected view)
 - View 29 (C46) – HRP-rv1c - Approach route 4 Great Tower Street (new selected view)
 - View 30 (C47) – HRP- rv1d - Representative Viewpoint 5 Main entrance of the Tower (looking away from TOL)
 - View 31 (C48) – HRP-rv1e - Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
 - View 32 (C49) – HRP-rv1f - Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
 - View 33 (C50) - HRP-rv1c - Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
 - View 34 (C51) - HRP-rv1d - Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
 - View 35 (C52) - HRP-rv1e - Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
 - View 36 (C53) - HRP-rv1f - Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
 - View 37 (C54) - HRP-rv2a - Representative Viewpoint 2 Tower Green, Inner Ward (new selected viewpoint -panned west)
 - View 38 (C55) - HRP-rv2b - Representative Viewpoint 2 Tower Green, Inner Ward
 - View 39 (C56) - HRP-rv2c - Representative Viewpoint 2 Tower Green, Inner Ward (new selected viewpoint -panned east)
 - View 40 (C57) - HRP-rv4a - Representative Viewpoint 4 Inner Curtain Wall South (new selected viewpoint -panned west West)
 - View 41 (C58) - HRP-rv4b - Representative Viewpoint 4 Inner Curtain Wall South (new selected viewpoint - moved east)



Assessment against OUV

7.7 Following ICOMOS Guidance, 2022, the indicative massing of the City Cluster has been assessed separately against the three attributes of the OUV of the ToL, which have the potential to be affected by the Proposed City Cluster.

An Internationally Famous Monument

7.8 The physical elements of this attribute would be unaffected. The degree of change to this attribute through a change to setting would be **very small**, and the quality of change would be mostly **positive** and raise no concerns. There would be a very **minor** resultant effect.

7.9 The White Tower, its physical form and visual dominance, would remain appreciable. The Proposed City Cluster would appear visually separate from the White Tower and not encroach any further toward it in views from the southern approach on Tower Bridge (view LVMF 10A.1). Despite the form of the City Cluster, the Norman form, colour and sturdy appearance of the white stone façade of the White Tower would remain visually dominant within the view. A clear sky gap is evident within the skyline of the four towers of the White Tower and the existing legible relationship of the Tower to the River Thames would be preserved.

7.10 The SVIA identifies the low potential for adverse effects as experienced in view 1 (LVMF 10A.1), particularly at the eastern edge next to the WHS. The eastern edge of the Proposed City Cluster has been carefully modelled to respond to the context of the ToL WHS and to accord with the CoL Protected Views SPG. It is considered that the form and modelling of the Cluster at this point strikes, overall, an appropriate balance in respect of the CoL Protected Views SPG and the consolidation of the City Cluster form retaining the appreciation of the ToL as an internationally famous monument.

7.11 In views from the Inner Ward, the Proposed City Cluster would appear beyond the historic buildings which bound the Inner Ward, and make up the wider setting of the ToL. The Proposed City Cluster would not interfere with the silhouette for the four turrets of the White Tower when seen from the inner curtain wall (View 40 and 41). The appreciation of the historic buildings within the view would not be altered and they would remain legible as separate from the modern city visible beyond, as shown in views 33-41 of the SVIA.

7.12 Similarly, from the Outer Ward, the form of the Proposed City Cluster would consolidate the shape of the existing and future baseline to create a three part rhythm stepping down to the south. The edges of the Proposed City Cluster are clearly defined to provide legibility and distinctiveness from the rest of the City. The visibility of the Proposed City Cluster would not alter the viewer's ability to appreciate ToL's fabric in the foreground, which would still be perceived as separate from the modern city, as shown in views 29 and 30 of the SVIA.

7.13 The ToL's close relationship with the Thames, which provides its principal setting and the foreground in iconic views from the south, would not be eroded and would remain a principal element to its setting, as shown in views from The Queens Walk (views 10-13 of the SVIA).

7.14 In addition to the future baseline, the Proposed City Cluster would further consolidate the emerging form of tall buildings in the City. The Proposed City Cluster would include crests, foothills and edges to create an articulated skyline that would read as a separate entity from the ToL in all sensitive views. Foothills will mitigate against any cliff edge effects, achieving a more gradual reduction in height towards the east of the cluster, as seen in views from south of the river, and contributing to 'completing' the shape of the cluster as a whole.

Landmark Siting

7.15 The physical elements of this attribute would be unaffected. The degree of change to this attribute through a change to setting would be **small**, and the quality of change would be **negative**, though it would raise no concerns. There would be a **minor** resultant effect.

7.16 The ToL's relationship to the City is a key part of its landmark sitting and both are intrinsically linked, as set out within guidance. Their relationship overtime has been important and long established. This is reflected visually in the existing and emerging cluster of tall buildings, which signifies the City's commercial centre, and has become one of the defining characteristics of views of the Tower of London.

7.17 The Proposed City Cluster, particularly the eastern edge, would be in close proximity to the ToL. However, the edge condition of the Proposed City Cluster would positively consolidate the dynamism of the existing and emerging cluster form, which is a defining characteristic of the ToL's Landmark Sitting. The Proposed City Cluster would have an improved reading as a distinctly separate urban form from the White Tower. The Proposed City Cluster would reinforce the character of contrasting tall modern buildings in the western setting of the WHS. This is demonstrated in views along Queen's Walk (view 10-13 of the SVIA). The Proposed City Cluster would have a clear gesture of stepping down towards the edges, completing its form.

7.18 The iconic silhouette of the ToL against the sky from within its local setting, and particularly from the lower level viewpoints of the river itself and its south bank, would be retained. This is shown in views from The Queen's Walk (Views 10-13 of the SVIA). In addition, given the location of the Cluster to the northwestern backdrop of the ToL, the form of the Proposed City Cluster would not affect the appreciation of the siting of the Tower on a bend of the river, nor its visibility both upstream and downstream. This is demonstrated in the view from London Bridge (view 2B of the SVIA). In this and other views, the strategic relationship of the Tower to the River Thames would remain clear, as would its relationship to the City.

Physical Dominance of the White Tower

7.19 The physical elements of this attribute would be unaffected. The degree of change to this attribute through a change to setting would be **very small**, and the quality of change would be **positive** and raise no concerns. There would be a **minor** resultant effect.

7.20 The White Tower, and its expression of the power of the Norman conquerors through domination of its environs, is said to have been evident until the 19th century as, until this point, it literally would have 'towered' over its surroundings. Guidance within the WHS Management Plan acknowledges that this dominance has gradually been eroded as the scale of the surrounding city has subsequently grown, but that it can still be appreciated, especially where the Tower's silhouette can be seen against clear sky.

7.21 The Proposed City Cluster would be seen in conjunction with the ToL, in its western setting, and appear at a greater height than the White Tower, as experienced in both the existing and future baseline scenarios. The White Tower's silhouette would still be appreciable against a clear sky in views toward the ToL from the south. There would be a minor impact from the increased encroachment of the edge condition of the Proposed City Cluster

7.22 The SVIA identifies the low potential for adverse effects as experienced in view 1 (LVMF 10A.1), particularly at the eastern edge next to the WHS. The eastern edge of the Proposed City Cluster has been carefully modelled to respond to the context of the ToL WHS and to accord with the CoL Protected Views SPG. It would leave a clear skyspace gap between the Cluster's eastern edge and the silhouette of the White Tower to maintain visual separation between the Cluster and the White Tower (para 186). It would minimise the potential for new development to visually 'dominate' the White Tower (para 183), but it is acknowledged that, in this scenario, individual schemes coming forward on sites at the Proposed City Cluster's edge in this location could have the potential to conflict with the guidance in this particular respect. Nevertheless, it is considered that the form and modelling of the Cluster at this point strikes, overall, an appropriate balance in respect of the CoL Protected Views SPG and the consolidation of the City Cluster form.

- 7.23 It is acknowledged that schemes coming forward would need to be rigorously scrutinised at individual scheme stage.
- 7.24 The White Tower would continue to dominate its foreground and immediate surroundings, not only within the Inner and Outer Wards, but in longer distance views which encompass the wider setting of the ToL. The Proposed City Cluster would clearly be separate to the WHS, which has an acknowledged and itself important relationship with the ToL. The consolidation of the existing and emerging form into the Proposed City Cluster is beneficial through its future proofing of the separation between the ToL.

Symbol of Norman Power

- 7.25 The physical elements of this attribute would be unaffected. The degree of change to this attribute through a change to setting would be **very small**, and the quality of change would be **positive** and raise no concerns. There would be a **minor** resultant effect.
- 7.26 The White Tower, and its expression of the power of the Norman conquerors through domination of its environs, is still evident though its plan and three dimensional form. As experienced from the surroundings the Proposed City Cluster would form part of the wider setting as experienced in both the existing and future baseline scenarios. The White Tower and its symbol of Norman power can still be appreciated, especially where the Tower's silhouette can be seen against clear sky. There would be a minor impact from the increased encroachment of the edge condition of the Proposed City Cluster.
- 7.27 The ToL would continue to dominate the foreground and immediate surroundings when seen from Tower bridge and the Queen's Walk which preserves its relationship to the adjacent foundations of the remains of the Roman land and river walls. The Proposed City Cluster would clearly be separate to the WHS, which has an acknowledged and itself important relationship with the ToL.



Conclusions

1. The form of the Proposed City Cluster has been informed by the wider setting of the ToL to ensure that its composition consolidates the existing and emerging context of the City Cluster. The shape of the Proposed City Cluster has a defined eastern edge, creating a clear separation from the ToL when experienced from the south.
2. The Proposed City Cluster is 100m to the north west of the ToL at its closest point and the distance between the two would be perceptible in views from the Queen's Walk. The form of the Proposed City Cluster would make a positive contribution to the reading of the Cluster above that of the future baseline through its consolidation and clear delineation of crests, foothills and edges. There is a more pronounced edge to the east, which is more dramatic in some views than others but seeks to keep a clear separation between the Proposed City Cluster and the ToL, reducing the impact of its OUV.
3. In terms of articulation, the shape of the proposed skyline would create interest when seen from different points. From the east, the Proposed City Cluster would read as three crests stepping down to the south and from the south it would read as two crests stepping down to the west. In the more distant views (LVMF25A.1) the western side of the Proposed City Cluster has a verticality to its edge condition, the eastern side has a more pronounced sloped form, stepping down from the tallest elements within the Proposed City Cluster to the ToL. This acknowledges the heritage significance of the ToL.
4. In closer views from within the ToL, the Proposed City Cluster would ensure that the extent of the form does not encroach beyond the existing and emerging relationship of the cluster and the ToL but rationalises the future baseline condition. This is considered to be a positive effect.
5. TTC's assessment, as stated in this report, concluded that the effects of the Proposed City Cluster, once completed, on the relevant elements of the OUV of the ToL WHS would be **minor and of no concern**. In NPPF terms, this report then concludes that no harm would be caused to the heritage significance of the ToL owing to the change to its setting resulting from the Proposed City Cluster.

References

- Guidance and Toolkit for Impact Assessments in a World Heritage Context; UNESCO's "Operational Guidelines for the Implementation of the World Heritage Convention
- ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties
- ICOMOS Guidelines on Fortifications and Military Heritage, ICOMOS (2021)
- ICCROM Management Guidelines for World Cultural Heritage Sites
- London's World Heritage Sites – Guidance on Settings (2012)
- The Tower of London World Heritage Site Management Plan (2016)
- Tower of London Local Setting Study, Historic Royal Palaces (2012)
- London Views Management Framework SPG, Greater London Authority, (2021)
- <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>
- <https://www.icofort.org/fortificationsguidelines>
- Xi'an Declaration on the Conservation of the Setting of Heritage of the Setting of the Heritage Structures, Sites and Areas, Adopted in Xi'an, China by the 15th General Assembly of ICOMOS on 21 October 2005



Appendix 1: Impact Tables

	ELEMENT OF A PROPOSED ACTION THAT HAS THE POTENTIAL TO CAUSE AN IMPACT	
ATTRIBUTES	Effect of the future baseline	Resultant effect of the Proposed Cluster
An internationally famous monument	Relationship of the existing and emerging City Cluster and the ToL as part of its setting	Relationship between the Proposed Cluster and the ToL as part of its setting
Lanmark sitting	Relationship of the existing and emerging City Cluster and the ToL as part of its setting	Relationship between the Proposed Cluster and the ToL as part of its setting
Symbol of Norman power	Relationship of the existing and emerging City Cluster and the ToL as part of its setting	Relationship between the Proposed Cluster and the ToL as part of its setting

Tool 2 – Identifying Potential Impacts

ELEMENT OF A PROPOSED ACTION THAT HAS THE POTENTIAL TO CAUSE AN IMPACT	ATTRIBUTE	DESCRIPTION OF POTENTIAL IMPACT	FREQUENCY OF ACTION	DURATION OF ACTION	REVERSIBILITY OF ACTION	REVERSIBILITY OF CHANGE TO THE ATTRIBUTE	LONGEVITY OF CHANGE TO THE ATTRIBUTE	DEGREE OF CHANGE TO THE ATTRIBUTE	QUALITY OF CHANGE TO THE ATTRIBUTE	EVALUATION OF IMPACT
	An internationally famous monument	Relationship between the Proposed Cluster and the ToL as part of its setting	Once	Long-term	Irreversible	Irreversible	Permanent	Very small	Positive	Minor, no concerns
	Lanmark sitting	Relationship between the Proposed Cluster and the ToL as part of its setting	Once	Long-term	Irreversible	Irreversible	Permanent	Small	Negative	Minor, no concerns
	Symbol of Norman power	Relationship between the Proposed Cluster and the ToL as part of its setting	Once	Long-term	Irreversible	Irreversible	Permanent	Very small	Positive	Minor, no concerns

Tool 3 – Evaluating Potential Impacts

