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Introduction to the Report

The report is divided into 3 parts, all available to download from the City of London tall buildings page:

Part 1:
- Section 1: Introduction to tall buildings in the City of London including the planning policy framework.
- Section 2: A more detailed assessment of the different policy considerations affecting tall buildings in the City of London and identification of areas inappropriate for tall buildings.

Part 2:
- Section 3: An analysis of the development history of tall buildings in the City of London.
- Section 4: An analysis of the spatial distribution of tall buildings in the City of London in the context of the Key City Places set out in the City of London Local Plan. This also includes tall buildings under construction or with planning permission with works yet to commence.

Part 3:
- Appendices: Site details and contact information
Executive Summary

Within the policy framework of the London Plan and City of London Local Plan, the development of Tall Buildings in the City of London has been focussed in areas not considered inappropriate for tall buildings. This excludes areas within protected views policy areas and takes into consideration areas which contain heritage assets.

Most tall buildings within the City are within the:
- Northern area of the City near London Wall, the Barbican and Golden Lane, and
- The eastern area of the City focussed in the Eastern Cluster. This has been identified as the area most appropriate for the development of a cluster for tall buildings, set out in the Local Plan Key City Place Core Strategic Policy CS7.

In terms of the timeframe of development completions, the first tall buildings were constructed in the 1970s. In the period 2000 to 2018 the number of new tall buildings delivered increased significantly.

As at 31st March 2018, there are 53 tall buildings within the City of London of which 6 tall buildings are over 150m AOD in height. There are a further 7 tall buildings over this height threshold projected to be delivered (all in the Eastern Cluster) within the period through to 2023.
Section 1: Introduction

Tall Buildings Policy Context

The adopted London Plan (and Draft London Plan 2017) and the City of London Local Plan 2015 set out the planning policy approach to tall buildings in the City of London.

London Plan Policy D5 states:

“Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:

1) the visual, functional, environmental and cumulative impacts of tall buildings,

2) their potential contribution to new homes, economic growth and regeneration,

3) the public transport connectivity of different locations.”

Visual impacts detailed in the policy include those from both local and strategic views, taking account of and avoiding harm to London’s heritage assets and their setting, preserving the Outstanding Universal Value of World Heritage Sites and avoidance of a canyon effect in the Thames Policy Area.

The Mayor’s London View Management Framework Supplementary Planning Guidance explains the London Plan’s policies in more detail. Within the City of London all locations are considered to be sensitive to tall buildings with some areas considered to be inappropriate.

The City of London Local Plan Core Strategic Policy CS14 outlines the City’s tall buildings policy. Local Plan Core Strategic Policies CS12-14 recognise the unique environment and built heritage of the City and its sensitivity to the development of tall buildings.
City of London Local Plan Core Strategic Policy CS14 states:

“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:

1. Permitting tall buildings on suitable sites within the City’s Eastern Cluster.

2. 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.

3. 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.

4. Ensuring that tall building proposals do not adversely affect the operation of London’s airports.”

The City of London Local Plan Core Strategic Policy CS7 sets out the planning policy approach to the Eastern Cluster (Photo 1), which contains the greatest density of businesses and jobs in the City and has fewer constraints on the development of tall buildings compared to other locations in the City of London.

“To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City, by:

3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views.”

A detailed assessment of the tall building policy considerations in the City of London is set out in Section 2.
Tall Buildings in the City of London

The definition of what constitutes a tall building in the City of London has evolved over time as the City’s built form has developed. Core Strategic Policy CS14 defines tall buildings as those significantly exceeding the height of their general surroundings. For the purposes of this paper, this is defined as 75m Above Ordnance Datum (AOD). However, buildings between 50-75m AOD often provide a context for tall buildings and many are affected by a number of Protected Views policies outlined in Core Strategic Policy CS13. Therefore, this document also monitors these buildings.

Details of all the tall buildings in the City of London including those in the planning pipeline are set out in Appendix 1.

Photo 1: Skyline of tall buildings in the Eastern Cluster with 20 Fenchurch Street
Section 2: Tall Buildings Policy Considerations in the City of London

Identification of appropriate areas for tall buildings

Guidance issued by Historic England on tall buildings states that the appropriate scale and form of development is to be assessed as well as a local height definition and the identification of appropriate locations for tall buildings as part of the formulation of the local plan.

Principal issues to consider within the City of London are set out in Local Plan Core Strategic Policy CS14: Tall Buildings. This includes refusing planning permission for tall buildings in inappropriate areas set out in the Policies Map comprising:

- Local views of St Paul’s Cathedral set out in the St Paul’s Heights policy.
- St Paul’s Cathedral protected vista viewing corridors and the Tower of London set out in the London Views Management Framework.
- Local views from the Monument.
- Heritage Assets in the form of conservation areas.

Each of these criteria are assessed and a composite of all policy areas created to identify areas inappropriate for tall buildings.

St Paul’s Heights

The St Paul’s Heights have been in operation since 1937 to protect local views of the Cathedral from the South Bank and Bankside (Photo 2), the Thames bridges (such as Waterloo Bridge, Photo 3), and along key streets such as Fleet Street and Farringdon Road. Map 1 shows the area protected by the St Paul’s Heights Policy and the indicative viewing points/areas with protected views towards the Cathedral. Examples of the full range of views can be found in the St Paul’s Heights Study which is a technical document that looks at the historical context of the Heights, analysing the form of the Heights, evaluating the existing views and summarising the issues that arise.

The Heights policy is incorporated into Core Strategic Policies CS13 and CS14. The policy originated in the 1930s in response to the construction of buildings such as Unilever House and the Faraday Building which blocked cherished views of the Cathedral. Several of the views are from Islington. The City of London and the London Borough of Islington cooperate on the protection of these views and Islington’s view protection policy is conformant with St Paul’s Heights. The City Corporation also cooperate with the London Boroughs of Southwark and Lambeth to protect views from the South Bank.
The Heights policy area consists of a grid of squares each with a building height limit given for the centre of the square in metres Above Ordnance Datum (AOD). In addition, there are ‘set-backs’ defined to protect slot views along certain streets and the immediate setting of the Cathedral.

Taken together, the Heights describe a series of planes sloping up from view points to the Cathedral with height limits varying from 8m to 52m AOD. Map 2 illustrates the spatial pattern of the relevant grid height limits.
Tall Buildings in the City of London - part 1

Photo 2: View location from the South Bank at Bankside

Photo 3: View location from Waterloo Bridge
Map 2: St Paul’s Heights grid of building height limits - A more detailed grid of maximum building heights is available in the City of London

Interactive Mapping
London View Management Framework (LVMF)

The Government’s Strategic Views were defined in 1991 to protect long-distance views crossing borough boundaries. They included eight views of St Paul’s Cathedral from Richmond Park, Primrose Hill, Parliament Hill, Kenwood, Alexandra Palace, Westminster Pier, Greenwich Park and Blackheath Point. The views were protected by view corridors, wider setting consultation areas and background consultation areas.

Strategic Views protection was subsequently devolved to the Mayor of London. The Mayor’s London View Management Framework was published in 2007 and revised in 2010 and 2012. The 2007 Protected Vistas defined by the Mayor were significantly narrower in width than the old Strategic Views, but the 2010 revision widened them again as a compromise between the two previous widths. The 2012 revisions were minor clarifications. In the City, the 2012 Protected Vistas comprise the original eight views of St Paul’s Cathedral and an additional view of the Tower of London from the Queen’s Walk (Map 3). For more details, see the Mayor’s London View Management Framework Supplementary Planning Guidance.
The LVMF Protected Vistas are defined geometrically based on the locations and heights of the Assessment Points and the Strategically Important Landmarks (St Paul's Cathedral and the Tower of London). Threshold planes (defined in metres AOD) can be calculated for any given site within a Protected Vista based on the geometry set out in the LVMF. The Protected Vistas are made up of a number of elements. The Landmark Viewing Corridors have the strongest protection as proposed development exceeding the threshold height should be refused. A more flexible approach is taken in the Wider Setting Consultation Areas (includes the background) where proposed development should preserve or enhance the viewer's ability to recognise and appreciate the Strategically Important Landmark.

The threshold planes for the Viewing Corridors vary within the City. From the south they generally rise from around 51m AOD at the City boundary to 52.1m AOD at St Paul’s Cathedral. From the north they fall from 55m AOD at the City boundary to 52.1m AOD at the Cathedral.

The Background Wider Setting Consultation Area threshold planes vary within the City. From the south, they rise from 52.1m AOD at the Cathedral to 83m AOD at the City boundary for the Westminster Pier view, and from 52.1m AOD at the Cathedral to 53m at the City boundary for the Greenwich Park (Photo 4) and Blackheath Point views. For the Tower of London view they rise from around 25.7m AOD at the White Tower to 66m AOD at the City boundary. All other Background Wider Setting Consultation Areas have flat threshold planes set at 52.1m AOD.

Map 4 shows an example of the threshold planes in the vicinity of St Paul’s Cathedral for the Greenwich Park Protected Vista. The view is shown in Photo 4.
Map 4: Threshold plane near the Cathedral for the Greenwich Park Protected Vista

Photo 4: Protected Vista 5A.2 from Greenwich Park
The LVMF identifies several additional views of the Tower of London as well as designating a number of Townscape Views and River Prospects along the Thames that are subject to qualitative visual assessment only. These viewpoints are shown in Map 5. Photo 5 shows an example of the view of the River Prospect from Gabriel’s Wharf.

Map 5: Viewpoints for River Prospects and Townscape Views affecting the City
Monument Views

The Monument to the Great Fire of London is a listed building and Scheduled Ancient Monument. Local Plan Core Strategic Policy CS13 protects and enhances significant local views of and from the Monument. The Monument’s immediate setting is defined as the four street blocks surrounding the Monument. Local Plan Core Strategic Policy CS14 states that the area of the Monument Views and setting (Map 6) are inappropriate for tall buildings. The five protected views from the viewing gallery are:

1. South East to the Tower of London, Tower Bridge, River Thames and HMS Belfast (Photo 6),
2. South to St Magnus Church and the River Thames,
3. South West to London Bridge and Cannon Street Railway Bridge,
4. West to Waterloo Bridge and Victoria Embankment,
5. North West to St Paul’s Cathedral (Photo 7).

Map 6: Monument Views
Tall Buildings in the City of London - part 1

Photo 6: View 1 from the Monument, to the South East

Photo 7: View 5 from the Monument, North West to St Paul’s Cathedral
Heritage Assets

The National Planning Policy Framework advises that local planning authorities should seek to identify and assess the particular significance of elements of the historic environment that may be affected by a development proposal, including the setting of a Heritage Asset. The Heritage Assets within the City of London (Map 7) are Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, Historic Parks & Gardens as well as the setting of the Tower of London World Heritage Site.

Local Plan Core Strategic Policy CS14 states that Conservation Areas are inappropriate for tall buildings. Many other Heritage Assets have a strong spatial correlation with Conservation Areas. Local Plan Core Strategic Policy CS12 seeks to conserve and enhance the significance of the City’s Heritage Assets and their settings.

There are currently (March 2018) 26 Conservation Areas in the City of varying size and character. The first areas were designated in 1971 and they have been reviewed periodically. Conservation Areas are designated to protect the special character of an area rather than protect individual buildings. The development of a tall building in a
Conservation Area could be harmful to the Conservation Area, and so Local Plan Core Strategic Policy CS14 states that it is inappropriate.

It is the statutory duty of the City Corporation to consider whether it should designate conservation areas which are defined as ‘areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance’. The Golden Lane and Barbican Estates are Listed Buildings that are areas characterised by tall buildings which were an integral part of the design of the estates in the 1960s and 1970s. The City Corporation consulted in early 2018 on the potential designation of the Golden Lane Estate and Barbican Estate as conservation areas. Thus, the tall buildings within the estates are an integral part of their design and contribute to the massing of tall buildings in the City of London.

Other than the listed historic skyline features, there are a range of tall buildings within Bank Conservation Area (which was initially designated in 1974 followed by subsequent revisions). The tall buildings in the Bank Conservation Area are primarily on sites that contained tall buildings prior to the Conservation Area designation, except for one site which was an exceptional piece of architecture contributing to the views of a neighbouring Listed Building. The details of these sites are set out in Table 1.

<table>
<thead>
<tr>
<th>Location</th>
<th>Completed</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>12 Throgmorton Avenue</td>
<td>2010</td>
<td>Redevelopment, replacing an existing tall building developed before the designation of the Conservation Area</td>
</tr>
<tr>
<td>1 Angel Court</td>
<td>2017</td>
<td>Includes the refurbishment and recladding of Angel Court tower which was originally developed in 1974-80</td>
</tr>
<tr>
<td>125 Old Broad</td>
<td>2009</td>
<td>Development incorporating the refurbishment of an existing tower developed in the 1970s.</td>
</tr>
<tr>
<td>New Court</td>
<td>2011</td>
<td>An exceptional piece of architecture which creates a view of St Stephen Walbrook from St Swithin’s Lane. This was set out against the fact that the building will be out of context with the scale and design of the Conservation Area</td>
</tr>
</tbody>
</table>

Table 1: Tall buildings in the Bank Conservation Area:

There is an additional tall building under construction in the Bishopsgate Conservation Area located at 150 Bishopsgate. The height and design of the proposed building provides a stepping down in height and massing from the tall buildings to the south and facilitates a transition between the conservation area and the Eastern Cluster to the south.
Photo 8: 12 Throgmorton Avenue in the Bank Conservation Area
Areas Inappropriate for Tall Buildings

Local Plan Core Strategic Policy CS14 defines those areas of the City which are considered to be inappropriate for tall buildings where proposals will be refused. Map 8 sets out the individual policy areas inappropriate for tall buildings comprising:

- St Paul’s Heights Policy Area,
- LVMF Landmark Viewing Corridors,
- Monument Views Policy Area,
- Conservation Areas

Map 9 shows a composite of all areas inappropriate for tall buildings. All other sites in the City are considered to be sensitive to tall buildings.
Map 9: Composite of all policy areas inappropriate for tall buildings