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To: Planning Policy Consultations
Cc: Foxall, Tom; English, David; Forsyth, Louise
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Dear Planning Policy Team

Please find attached the Historic England response to the current consultation on the Regulation 19 version of the City of London's draft local plan.

Please note that the St Paul's Setting Study (referred to in our response as Appendix B) will be sent on when finalised next week. Also attached is the Alan Baxter report on the City of London that Historic England commissioned in 2021 and previously shared with you.

We look forward to further discussions with you on the Plan and the issues raised in our letter. Please do not hesitate to come back to me if you would like any further information in the meantime.

Regards

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



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

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1 Purpose and methodology of this study

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

2 Character of the City's historic environment

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

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

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

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

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

- Topography
- Archaeology
- Green space
- Streets
- Defences
- Plots and blocks
- Building types and architecture
- Skyline
- Use, activity and specialisation

3 Topography

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

See Supporting Information part E: Archaeology Notes

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

4 Archaeology

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

See Supporting Information part E: Archaeology Notes

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

5 Green space

See mapping: Designations

See Supporting Information part J: Conservation Area Summaries

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

6 Streets

See mapping: Roman Street Pattern, C17 Street Pattern

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

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

Roman

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

Medieval

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

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

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

Post medieval

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

Post war

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

7 Defences

See mapping: *Designations*

See Supporting Information part J: *Tower of London WHS SOUV*

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

8 Plots and blocks

See mapping: *Medieval City, C17 Street Pattern*

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

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

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

9 Building types and architecture

See mapping: Medieval City, 1938 Land Use

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

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

Landmark City buildings

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

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

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

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

Traditional financial and commercial architecture

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

Post war buildings

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

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

Façade and materials

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

10 Skyline

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

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

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

Creation

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

Controls

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

The present strategy

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

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

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

The effect of the Cluster on the historic environment

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

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

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

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

Setting of the Tower of London World Heritage Site

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

Setting of the River Thames

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

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

11 Uses, activity and specialisation

See mapping: 1938 Land Use

See Supporting Information part J: Conservation Area Summaries

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

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

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

Within the City

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

From outside the City

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

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

Applying an understanding of significance

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

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

City specific:

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

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

City specific:

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

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

Step 5: Make and document the decision and monitor outcomes

City specific:

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

13 Mapping

See over the page

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

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

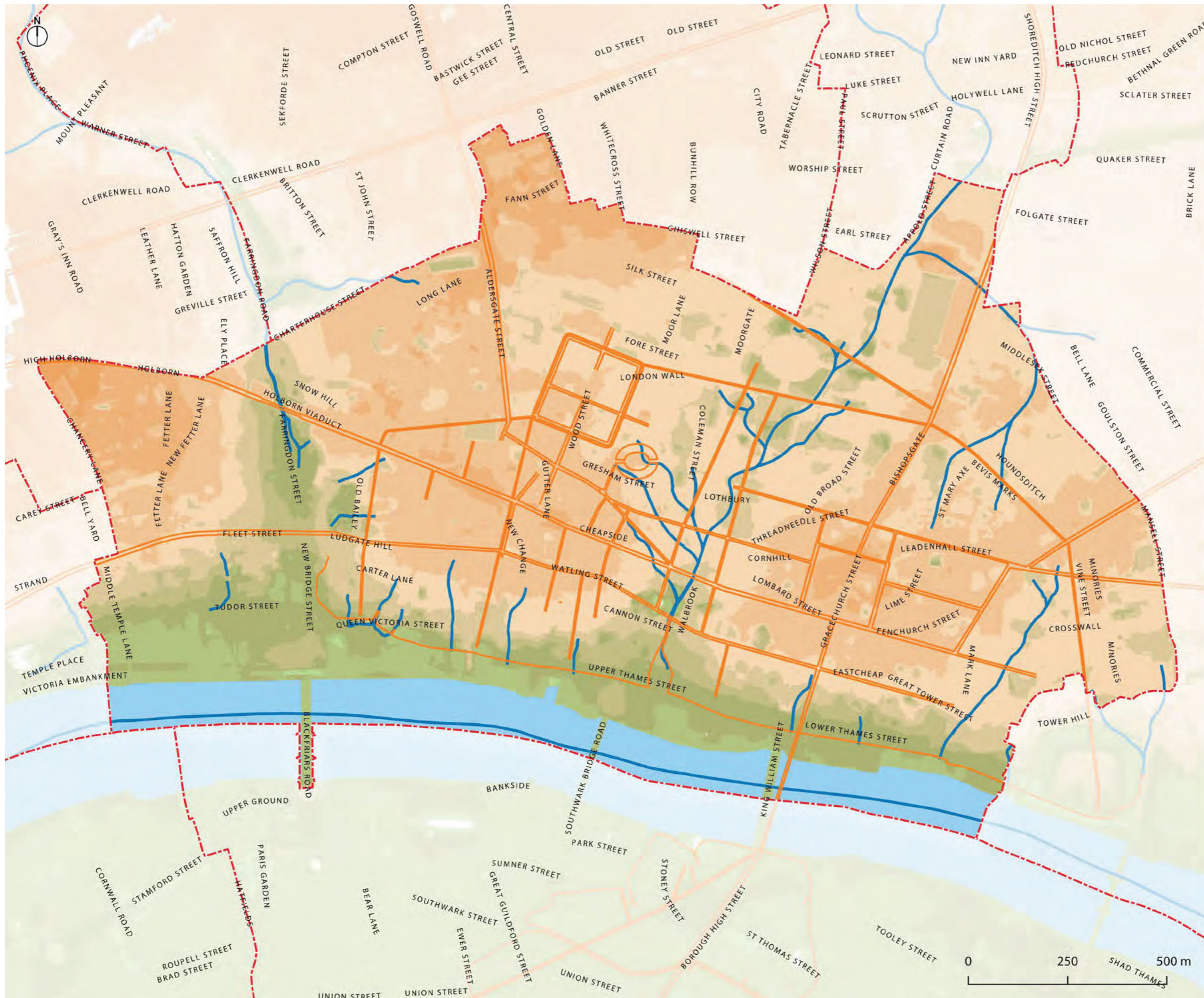
City specific:

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

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

City specific:

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

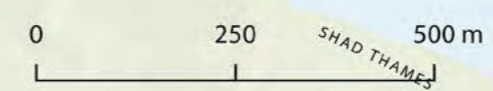


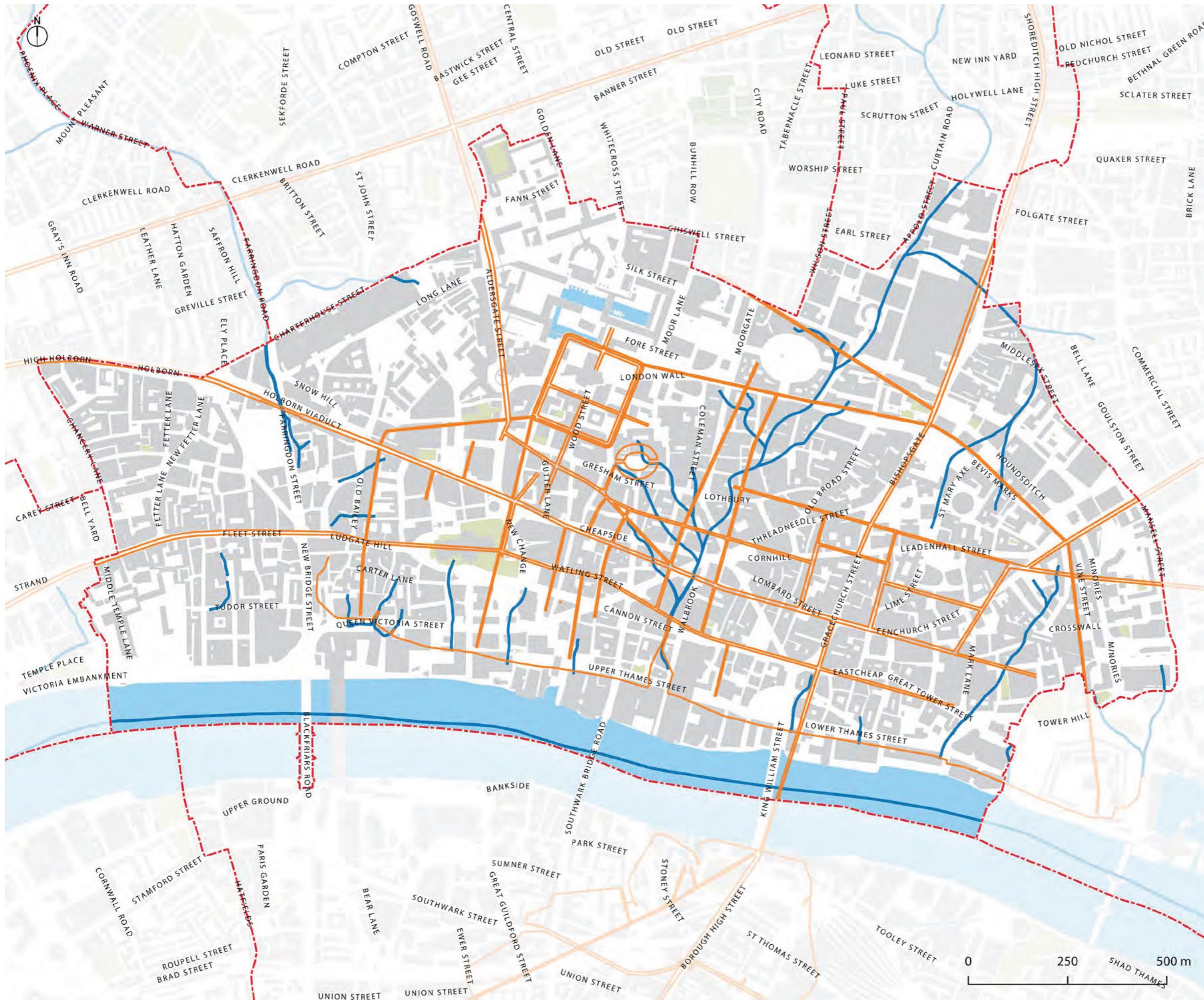
- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
 - Roman infrastructure
(© MOLA)
 - Roman water
(© MOLA)
 - Modern Tidal Water
(Source: Ordnance Survey OpenMap Local)
- Modern contours
(Source: Environment Agency)
- 0 - 2.5m
 - 2.5 - 5m
 - 5 - 7.5m
 - 7.5 - 10m
 - 10 - 12.5m
 - 12.5 - 15m
 - 15 - 17.5m
 - 17.5 - 20m
 - 20 - 22.5m

CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE
HISTORIC ENGLAND STUDY

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

1733/260 Map 1
MARCH 2021 Alan Baxter





- Borough boundaries
(Source: Ordnance Survey Boundary Line 2020)
- Roman infrastructure
(© MOLA)
- Roman water
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CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE HISTORIC ENGLAND STUDY	
ROMAN STREET PATTERN: ROMAN INFRASTRUCTURE OVERLAID OVER MODERN STREET PATTERN	
1733/260 Map 2	
MARCH 2021	Alan Baxter



Borough boundaries
 (Source: Ordnance Survey Boundary Line 2020)

CITY OF LONDON STATEMENT OF HERITAGE SIGNIFICANCE
 HISTORIC ENGLAND STUDY

1270-1300 MEDIEVAL MAP:
 BRITISH HISTORIC TOWN ATLAS

1733/260 Map 3

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