

From: [Matt Brewer](#)
To: [Planning Policy Consultations](#)
Subject: City Plan 2040 - Reg19 Public Consultation - Historic Royal Palace Response Submission May21
Date: 26 May 2024 12:48:22
Attachments: [urbspace.png](#)
[HRP & UDC Completed Reg19 Response Submission.pdf](#)
[HRP Completed Reg19 Reconsultation Form for City Plan 2040 Policy 512.pdf](#)
[HRP Completed Reg19 Reconsultation Form for City Plan 2040 Policy 463.pdf](#)
[HRP Completed Reg19 Reconsultation Form for City Plan 2040 Policy 146.pdf](#)
[HRP Completed Reg19 Reconsultation Form for City Plan 2040 Figures 148 151.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

Please see attached HRPs response to the Regulation 19 City Plan 2040 public consultation.

I look forward to receiving confirmation of receipt of our representations.

Kind Regards
Matt

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Director



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HISTORIC ROYAL PALACES

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21 May 2024

Draft City Plan 2040, Regulation 19 Consultation

Dear Sir/ Madam

Thank you for inviting Historic Royal Palaces to respond to the Regulation 19 consultation on the draft City Plan 2040.

Historic Royal Palaces (HRP) is the independent charitable trust responsible, for the benefit of the nation, for the care, conservation and presentation to the public of the unoccupied royal palaces, which include the Tower of London World Heritage Site (WHS). As guardians of the Tower, we have significant concerns in respect of the current draft City Plan 2040 and consider the current approach and policies of the plan in respect of tall buildings and impact on the Tower of London to be **UNSOUND** due to the impact of them on the OUV of the Tower WHS.

We instructed Urbanspace Planning Ltd to undertake a full review and assessment, and the detailed analysis and conclusions are contained in the attached statement. We request that the City of London Corporation take full account of the comments and assessment set out in reviewing the plan, and adopt the modifications and amendments included within the Urbanspace Planning Ltd review in order to ensure the plan is sound and that the TOL WHS is appropriately protected over the course of the plan period.

HRP welcome the general approach to heritage set out in policies HE1, HE2 and HE2 and support the aims and wording of these policies, and particularly support the inclusion of Policy HE3 related specifically to protecting the setting of the TOL and WHS status. However, we have identified that the approach taken in the plan to new tall buildings, and the contours and maximum heights referred to in draft Strategic Policy S12, would result in an unacceptable harmful impact on the WHS OUV in both views of the Tower and views from within the Tower.

Historic Royal Palaces

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Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)

The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



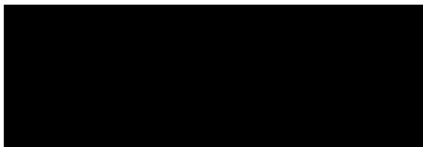
HISTORIC ROYAL PALACES

To address these impacts the maximum height and proximity of the proposed contours to the eastern end of the City Cluster Tall Building Area should be reduced and the eastern end of the cluster reprofiled, as well as the heights of contours to the east of 20 Fenchurch Street reduced, as set out in the Urbanspace Planning Ltd assessment.

We also welcome policies within the plan that strengthen the connections between the Tower and the City, and enhance the overall cultural aspects of the Tower, including Policy CV3 and HE3. We are of the opinion that these policies could be further be strengthened to optimise the delivery of benefits, as suggested in the attached review.

We would welcome further liaison and discussion on these matters with the City of London Corporation to address these matters and ensure the protection of the TOL WHS within a sound and effective City Plan.

Yours faithfully



Adrian Phillips



Encs: *City of London – Draft City Plan 2040 Regulation 19 Consultation. Tower of London World Heritage Site : HRP Response* Urbanspace Planning Ltd, May 2024

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CITY OF LONDON – DRAFT CITY PLAN 2040 REGULATION 19 CONSULTATION

TOWER OF LONDON WORLD HERITAGE SITE: HRP RESPONSE

1. INTRODUCTION

- 1.1 Urbanspace Planning Ltd is instructed by Historic Royal Palaces (HRP) in respect of planning and heritage matters related to their portfolio of historic properties within the United Kingdom. Urbanspace Planning Ltd has advised HRP for over four years, whilst lead Director, Matthew Brewer, also advised HRP since 2015 in his former role at CgMs. This work has included involvement in a number of projects at the Tower of London and its surroundings, which has required detailed assessment and consideration of the planning and heritage matters related to the World Heritage Site, its significance and setting. Urbanspace Planning Ltd therefore has an extensive and detailed knowledge and understanding of the heritage significance, principal planning considerations and sensitivities, of this nationally and internationally important monument.
- 1.2 The Tower of London is a major historic landmark and is set within the historic landscape of its moat and setting on the Thames. The Tower of London is a key visitor and tourist attraction of regional and national importance, which is host to a large number of visitors per year and acts as a major draw to national and international tourism to the capital.
- 1.3 Historic Royal Palaces (HRP) is a charitable trust established by Royal Charter in April 1998. HRP is vested by the Crown with responsibility for the care and maintenance of the Tower of London on behalf of the Crown. HRP work in partnership with a variety of central, regional and local government, private sector communities and charitable stakeholders to sustain the ‘Outstanding Universal Value’ (OUV), significance and public enjoyment of the Tower of London World Heritage Site (WHS). For over 25 years HRP has delivered an enhanced programme of visitor and educational exhibitions at the Tower of London to facilitate it’s role as a key tourist and visitor attractor and destination. This has been undertaken in parallel to its role in restoration and maintenance projects, which have been based on detailed heritage survey and assessment work, to maintain and improve the historic significance and setting of this Scheduled Ancient Monument and World Heritage Site. HRP therefore has deep knowledge and understanding of the value, significance and setting of the Tower, and its changing context and risks over time.

- 1.4 The Tower itself, together with the Moat, is included within the boundary of the World Heritage Site and forms a Scheduled Ancient Monument. The whole site and surrounding public realm area is within The Tower Conservation Area, whilst there are a number of listed buildings and structures within the Tower and its surroundings. The Outstanding Universal Value of the World Heritage Site is related to both the nature, history, composition and detail of the Tower itself, as well as the strategic siting of the fortress and its wider setting, including long views related to its landmark siting and visual dominance.
- 1.5 The vision for the World Heritage Site 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. The Tower benefits from unique characteristics, however these are fragile and raise complex issues that affect the conservation and management of the site.
- 1.6 Whilst the Tower of London is located just outside the boundary of the City Corporation, a large part of the City lies within the local setting of the World Heritage Site. The wider setting and backdrop of its landmark position as a fortress on the Thames to the north and west also lies within the City of London authority. The greatest challenge to the World Heritage Site remains the impact on its value and setting of development and tall buildings. Given the extreme sensitivity of the World Heritage Site to the impact of new development and tall buildings within these areas, and potential to further permanently erode the Outstanding Universal Value and harm its heritage significance, it is essential that the City Plan plan appropriately and sensitively for new development in the setting of the WHS.
- 1.7 Following review of the Regulation 19 Draft City Plan 2040 the significant concerns expressed by HRP in previous Local Plan representations in respect of the potential location, height and form of tall buildings within the City Cluster Tall Building Area (Figure 14 & 15 of the draft City Plan 2040) remain. From our further assessment set out below it is evident that the approach and the detailed wording of Policy S12: Tall Buildings (Part 3.), together with the Tall Building Contours (Figure 15) are **NOT SOUND**. Modifications are required to the policy, Policies Maps A & C, and Tall Building Contours in Figure 15 in order to ensure soundness and consistency with the NPPF, Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monuments and Archaeological Areas Act 1979; and ensure compliance with the other draft policies of the City Plan and consistency with the adopted policies of the London Plan.
- 1.8 Modifications and reductions in maximum heights of potential tall buildings in the identified areas is essential to deliver the protection required to safeguard the

heritage significance and Outstanding Universal Value of the Tower of London World Heritage Site and Scheduled Ancient Monument.

2. REGULATION 19 CITY PLAN 2040 - DRAFT POLICIES

- 2.1 Historic Royal Palaces (HRP) welcome the general approach to heritage set out in draft **Policies HE1, HE2 and HE3**; and support the aims and wording of these policies. The overall approach and requirements of these policies within the draft City Plan are considered to be broadly in line with the NPPF, PPG and London Plan policies and guidance. Overall, the significance of heritage assets within and on the edge of the city, and the protection afforded to key heritage assets, is clear and support the conservation and enhancement of key heritage assets and their setting.
- 2.2 HRP particularly support the inclusion of **Policy HE3** and a specific policy related to protecting the setting of the Tower of the London and World Heritage Site status. It is considered that some minor alterations to the wording of Policy HE3 could further strengthen the requirements for developments in the 'vicinity' to enhance routes and the setting of the Tower of London, and this is further addressed in Section (7) below.
- 2.3 HRP also support the aims and wording of **Strategic Policy 13** in respect of Protected Views, protecting and enhancing significant and strategic London views of important buildings, townscapes and skylines; and implementation of the Mayor of London's London View Management Framework SPG, with specific reference to managing designated views of strategically important landmarks, including the Tower of London (**Part 1 of Strategic Policy S13**). In respect of Part 3 of **Strategic Policy S13**, the specific reference and protection afforded to the Tower of London is welcome and we support the approach of securing the appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).
- 2.4 However, it is clear that the current approach to new tall buildings, and the contours and maximum heights, referred to in draft **Strategic Policy S12: Tall Buildings**, and the referenced associated policies maps and figures, in respect of the City Cluster Tall Buildings Area is not in accordance with the approach, aims and policy requirements of draft **Policies S13, HE1, HE2 and HE3** in respect of the Tower of London and the impact resulting on the Scheduled Ancient Monument and World Heritage Site Outstanding Universal Value.

- 2.5 Whilst the approach of **Policy S12 Part 3** in providing greater clarity and certainty in respect of potential new tall building heights in this area is encouraged, it is of significant importance that the policy sets an appropriate framework for new development and maximum heights for these to be delivered in, which ensures the requirements of policies S13, H1, H2 and H3 are upheld and the significance of heritage assets maintained and protected. There are significant concerns with the assessment and analysis that underpins the maximum height contours within the Proposals Map and Figure 15, and it is evident that the current proposed maximum contours/heights will result in significant heritage and visual harm in respect of the protected views of the Tower of London, and key views from within the Tower of London. As a result, the draft City Plan is currently **unsound** in this regards, with detailed assessment set out below demonstrating this matter (Section 4), as well as alternative approaches to address this make the plan sound (Section 5).

3. EXISTING SIGNIFICANCE OF THE TOWER OF LONDON, IT'S WHS OUTSTANDING UNIVERSAL VALUE, AND CURRENT RISKS

- 3.1 To determine the potential appropriate location, height and form of buildings in the City Cluster Tall Building Area in respect of the heritage significance of the Tower of London Scheduled Ancient Monument, and the World Heritage Site Outstanding Universal Value, it is important to first establish the current heritage significance of the Tower, its Outstanding Universal Value, setting and the existing risks to its status. A brief summary of the Heritage Value of the Tower of London is included within the TCC *'Heritage Impact Assessment – Tower of London'* document, however, further detailed consideration of the key elements of heritage significance and value are set out below which provide the principal baseline elements for assessment and consideration of potential new development and consistency with the policies of the NPPF, PPG, London Plan and requirements of the Acts.
- 3.2 The Outstanding Universal Value of the Tower is recognised by a number of key attributes, including 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.
- 3.3 The Statement of Outstanding Universal Value makes it clear that the siting, position in the landscape and setting of the Tower of London is a key aspect of its significance and value. The statement notes that the Tower of London is an internationally famous iconic complex, *"the most complete example of an 11th century fortress palace remaining in Europe"*, and *"a rare survival of a continuously developing ensemble of royal buildings"*. *Significant value is derived from it's strategic siting on the river Thames acting as "a symbol of Norman power"*. The Statement notes that The Tower's landmark siting and visual dominance on the

edge of the River Thames, and the impression of great height are all key aspects of its significance. The ensemble “*has strong associations with State institutions*” that “*incorporated such fundamental roles as the nation’s defence, its records and its coinage*”. It is noted that the strategic siting lends itself to “*the Tower’s historic physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital*”.

- 3.4 The visual setting of this fortress on the River Thames, and physical relationship with both the River Thames and City, acting as a dominant landmark providing the gateway to the city, is a key attribute of its Outstanding Universal Value in both physical and historical terms, as a symbol of importance and state power.
- 3.5 The role of the White Tower itself within the centre of the fortress as a symbol of Norman power is evident in its massive masonry. It remains, with limited later change an outstanding example of innovative Norman architecture. Its form, design and materials remain intact and legible. Its height and clear visibility against the sky in key views across the river in respect of its visual relationship with its surroundings, the River Thames and City of London, are key attributes to its role and function, and its value and significance as a World Heritage Site.
- 3.6 It is evident that these key attributes of the Tower of London, and White Tower, are neither identified sufficiently, nor assessed in appropriate detail and depth, within the TCC Heritage Impact Assessment.
- 3.7 As well as the heritage significance and value of the Tower of London, it is also important and relevant to understand the current position in respect of potential risks to the Outstanding Universal Value of the Tower.
- 3.8 The Statement of Outstanding Universal Value prepared by ICOMOS confirms that “*there are few threats to the Property itself, but the areas immediately beyond the moat and the wider setting of the Tower, an ensemble that was created to dominate its surroundings, have been eroded. 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 these have, to a degree, had an adverse impact on the views into, within and out of the property. 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.”

- 3.9 In respect of the views from the Inner Ward, over and between its enclosing buildings and walls, the historic sky views have been broken up more recently through the evolving primarily 20th and 21st century, cityscape beyond. Since 2014, the prospect to the west, over the Beauchamp Tower and 1-2 Tower Green, has been dominated by the upper part of 20 Fenchurch Street (Walkie Talkie), a substantial office building. The view north-west, over the roof of the Church of St Peter ad Vincula, is increasingly dominated by the growing eastern cluster in the City, of which the Leadenhall Building known as the ‘Cheesegrater’ and is the tallest, but which will soon be surpassed by taller new buildings currently under construction or committed through approved planning consents. Despite these new additions an important gap in the skyline above the Tower of London’s walls and boundary structures between the Walkie Talkie and eastern part of the City Cluster Tall Buildings Area is evident. This area free from development appearing above the Tower in views from the Inner Ward allows the Tower, its form and historic dominance to be appreciated against the sky, enables the tower of the Church of St Peter ad Vincula to be read against the sky, and avoids a view of a solid wall of development above the Tower’s boundaries, reducing the legibility and integrity of the tower in views from within the Tower.
- 3.10 It is evident that to continue to protect the World Heritage Site, its significance and Outstanding Universal Value, and ensure that new development can meet the requirements of draft policies S13, HE1, HE2 and HE3 (as well as policies of the NPPF and London Place, and requirements of the Acts) careful consideration is required in respect of potential new tall buildings in respect of both ensuring appropriate separation and relationship between the Tower and new tall buildings, and maintaining an appropriate clear skyline in key views to the Tower, and from views within it. The current contours, heights and massing established within Figure 15 of the draft City Plan, and Proposals Maps C and D, do not achieve this and therefore has the potential to have significant adverse heritage impacts in respect of the Tower of London, its significance and OUV.

4. ASSESSMENT OF THE PROPOSED TALL BUILDING POLICY PROPOSALS

- 4.1 On the basis of the above assessment of key aspects of the Tower of London’s significance and value in respect of setting, and the identified risks to the significance and value of the World Heritage Site, we set out below our objections to the current proposed contours and heights for tall buildings in the City Cluster Tall Building Area, and reason as to why the current approach is unsound.

Heritage Impact Assessment

- 4.2 We have undertaken a review of the TCC ‘*Heritage Impact Assessment - Tower of London*’, which has considered the potential impact of the proposed heights and contours of the City Cluster Tall Buildings Area on the World Heritage Site based on the wealth of knowledge and supporting information available in respect of the Tower and its setting.
- 4.3 Para. 6.18 of the HIA states that “*the shape of the proposed skyline would create interest when seen from different points in relation to the Tower of London*”. It is evident that the proposals will result in significant elements of new development appearing both in views of the Tower in the wider area, and in views from within the Tower itself. As defined in Section 3 above, maintaining clear sky area, the impression of height and visual dominance of the Tower of London in respect of its surroundings and new development, is essential to its setting and in maintaining the heritage significance and OUV of the World Heritage Site. The delivery of further development which increasingly erodes these principles through additional tall buildings in close proximity to the Tower, which reduce the sky space and impinge on these views, would be of substantial heritage harm to the Tower of London.
- 4.4 This paragraph goes on to state that “*the eastern side has a more pronounced sloped form, stepping down from the tallest elements within the Proposed City Cluster to the ToL*”. It is clearly evident that this is not the case in respect of LVMF View 10A.1 shown in Figure 6.1. of the HIA. This figure shows that the proposed contours to the eastern edge of the cluster will result in the appearance of a dramatic and stark vertical edge condition immediately adjacent and towering over the White Tower. The height contours currently propose only minor reduction in the stepping down in scale to the top of this element and a sheer edge is presented in respect of the relationship with the Tower of London. It is evident that this does not take account of, nor acknowledge, the setting and heritage significance of the Tower of London and the conclusion in 6.18 is incorrect.
- 4.5 The HIA goes onto assess the Proposed City Cluster against three aspects of the OUV:

Internationally Famous Monument

- 4.6 In respect of Para. 7.9 of the HIA, it is evident that the proposed contours would not preserve the existing legible relationship of the Tower as stated. The paragraph refers to “*a clear sky gap evident within the skyline of the four towers of the White Tower*”. The proposed cluster however extends up to a height significantly above the height of the White Tower, immediately adjacent to one of the western towers of the White Tower in LVMF View 10a.1. Only a very small slither of sky space is

retained to the western side of the tower, with the proposal significantly reducing the clear sky space around this tower and resulting in a potential new building which will dominate the White Tower and substantially interrupt its legibility and clear visual appreciation. This view is a dynamic public view from a bridge crossing, as such it is not static and minor movement to the north would result in the contours of the cluster dissecting the White Tower and further harming the visual impact of the proposals on the setting and heritage significance of the Tower by removing any sky space, and clear reading of its silhouette against the sky.

- 4.7 The LVMF SPG makes particular reference to the fact that the appreciation of the Tower of London, its detail and layers of history, are enhanced by the free sky space around the White Tower. The assessment of the heritage significance and Outstanding Universal Value (set out in Section 3 above) demonstrates the key importance of the setting of the Tower of London and the height and clear visibility of the White Tower against the sky in key views.
- 4.8 Para. 7.9 also states that the White Tower would remain visually dominant within the view. It is however evident in the VuCity view of the proposed contours shown in View 10a.1 (shown in Figure 6.1 of the HIA) that the maximum heights set out would dominate the Tower in this view and result in significant heritage harm. The sheer vertical edge proposed for this cluster in immediate adjacency to the Tower of London, and with a height significantly above that of the White Tower, will result in visual dominance and reduce the significance of the Tower of London in this important regard.
- 4.9 Para. 7.10 relates to the SVIA in respect of assessment of View 1 (LVMF 10a.1). We have undertaken a detailed review of the SVIA and assessment of View 1, which is included below. This review demonstrates a significant **adverse** effect, contrary to the conclusion of the SVIA. As seen within the VuCity modelling in View 1 (Figure 6.1 of the HIA) the eastern edge of the cluster would not respond to the context of the ToL WHS as proposed and does not accord with the Protected Views SPG; does not retain appreciation of the Tower of London; and results in substantial harm to the significance of the heritage asset and Outstanding Universal Value of the World Heritage Site.
- 4.10 Para. 7.14 claims that *“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”*. First, in respect of LVMF View 10a.1, it is clear that the proposed cluster contours result in the complete loss in the separation and free sky space between the Tower of London and Proposed City Cluster, such that the

Tower of London is no longer read as a separate entity from the cluster given the proposed proximity and height of new tall buildings in such close proximity.

- 4.11 The conclusion set out in Para. 7.8 in respect of ‘an internally famous monument’ does not reflect an appropriate assessment of the potential heritage impacts related to the significance of the heritage assets and the impact of the proposed tall building heights. No positive change would result in terms of the impact on the Tower of London World Heritage Site. The proposed location and height of new tall buildings to the eastern edge of the City Cluster Tall Building Area would clearly result in a **large** degree of change compared to the existing baseline, and the quality of change would be substantially **negative** and raise significant concerns. There would be a **major** resultant effect in respect of its value as an **Internationally Famous Monument**.

Landmark Siting

- 4.12 Para. 7.16 of the HIA provides some context to the historic relationship of the Tower to the City. An important attribute of its value to be protected and enhanced remains its sense of position as the gateway to the city, its symbol of power and its dominance in the landscape. The context provided in the HIA fails to acknowledge that these attributes have already been eroded to some extent by new tall buildings erected in the eastern part of the City (as confirmed by continued ICOMOS Technical Reviews), and that the impact of new buildings has not been positive in respect of the setting and OUV of the Tower of London. It is essential that this is recognised as forming the current heritage baseline from which new proposals and policies are to be considered and assessed.
- 4.13 Para. 7.17 of the HIA highlights that the eastern edge of the Proposed City Cluster is in close proximity to the TOL, however states “*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 Siting. The Proposed City Cluster would have an improved reading as a distinctly separate urban form from the White Tower...The Proposed City Cluster would have a clear gesture of stepping down towards the edges, completing its form.*”
- 4.14 It is evident in LVMF View 10a.1 that the Proposed City Cluster will appear within the backdrop of the Tower of London, being immediately adjacent to the White Tower, reducing the clear sky space around the Tower and White Tower, and increasing the height and dominance of development in the background of the Tower. The edge condition in this view is of a sheer vertical edge of significant height, which will distract and dominate the view of the Tower and substantially detract from its setting and appreciation. Proposals within these contours will not

result in a positive impact in this view and will have a negative impact on the ToL's Landmark Siting. It is evident in the VuCity view in Figure 6.1 of the HIA that the Proposed City Cluster will effectively conjoin with the urban form of the Tower of London, removing any apparent and discernible visual separation. There is no effective stepping down of the cluster to the ToL in this view and the proposed impact will be harmful to the setting and visual appreciation of the Tower of London.

- 4.15 The assessment in the HIA fails to assess the impact of the Proposed City Cluster on View 1 (LVMF 10a.1) in respect of Landscape Siting. The iconic silhouette of the Tower of London against the sky, as referred to in Para. 7.18, would be detrimentally affected in this key LVMF view. The relationship to the City would be adversely affected through the close proximity and height of the potential new tall buildings, harmful to the setting and value of the Tower of London.
- 4.16 It is therefore evident that the basis of the assessment undertaken, and the resulting conclusions in Para. 7.15, are inaccurate and impacts understated. It is demonstrated that the degree of change to this attribute would be **large**, and the quality of change would be significantly **negative**, raising substantial concerns, with a **major** resultant effect.

Physical Dominance of the White Tower

- 4.17 As with "Landmark Siting" above, the context set out in Para. 7.20 of the HIA fails to appropriately take account of, and incorporate consideration of, the negative impacts of existing development on the significance and value of the World Heritage Site. This paragraph of the HIA identifies the key value attributes of the height and scale dominating the landscape, and notes that there has been erosion of its value as a result of new tall buildings in the city – but appears to suggest this gives licence for further impacts. It is evident from the WHS Management Plan and ICOMOS Reviews that this erosion has been harmful and that further new potential tall buildings within the setting of the Tower further threatens the value of the Tower. This position provides the current baseline from which new proposals should be assessed, and it is evident that further erosion of these attributes through new tall buildings in the wider setting would be of significant harm to the heritage significance and Outstanding Universal Value of the World Heritage Site.
- 4.18 The assessment in Para. 7.21 related to the existing and future baseline therefore does not provide justification for further extent of development proposed in the wider setting of the World Heritage Site. It is demonstrated in VuCity View 1 (Figure 6.1 of the HIA) that the substantial increase in height of the eastern edge of the cluster, extended in very close proximity to the White Tower, would result in a

significant adverse additional impact which would be harmful to its setting in this view.

- 4.19 The close proximity of the eastern edge of the cluster, together with its increased height, would significantly reduce the clear sky space around the White Tower, and negatively impact on views of it, its appreciation and legibility. Whilst a very small slither of sky space would be retained in the specific view point on London Bridge shown in the image, this view is a dynamic public view from a bridge crossing. As such it is not static and minor movement to the north would result in the contours of the cluster dissecting the White Tower, further negatively affecting the visual impact of the proposals on the setting and heritage significance of the Tower by removing any sky space, and clear reading of its outline against the sky. It is evident that the resulting impact from the major encroachment into the sky space, coupled with the proposed height of development, results in a **major** impact on the physical dominance of the White Tower, and its significance and value would be substantially harmed as a result.
- 4.20 In respect of Para. 7.22 and reference to the assessment within the SVIA, full consideration and review of the significant impact of the Proposed City Cluster on View 1 (LVMF 10a.1) is set out in detail below. It concludes that the proposed contours will not respond appropriately to the context of the ToL WHS. It would not leave appropriate free sky space around the White Tower, or provide appropriate separation with the City's new increased built form. The height and proximity of the proposed new development to this eastern end of the cluster will tower over the White Tower, permanently harming the setting and heritage value of the Tower and its key attributes.
- 4.21 In terms of the conclusion in Para. 7.19 of the HIA, the degree of change in respect of the physical dominance of the White Tower will be **large**, with the quality of change substantially **negative**, and raises significant concerns. There would be a **major** resultant effect.
- 4.22 The conclusions set out in the HIA are not therefore supportable or effectively evidenced, and it is demonstrated that the effects of the Proposed City Cluster on the OUV of the ToL WHS would be **major and of substantial concern**. In NPPF terms there would be substantial harm to both the heritage significance of the Tower of London and the Outstanding Universal Value of the WHS and therefore the current approach is not justified and is **unsound**.

Strategic Visual Impact Assessment

4.23 As referred to above, a review has also been undertaken of the VuCity images representing the potential contours set out within Figure 15 and Proposals Map A and C, and the Strategic Visual Impact Assessment (SVIA) prepared in respect of the resulting visual impacts.

SVIA - View 1

4.24 This view represents View 10a.1 of the Mayor's London View Management Framework. Whilst the viewpoint represents a view from one particular viewpoint along Tower Bridge, it is essential to recognise that this is a dynamic public view, which changes as people experience the Tower from different points along the bridge. The key aspects of the view are the dominance of the Tower of London in the foreground on the River Thames; the clear reading of the boundaries of the fortress and separation and clear sky background and space around the White Tower; and the central prominent and highest element of the fortress. Para. 6.10 of the SVIA confirms this in respect of this viewpoint with reference to the LVMF SPG: *"The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and the appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued"*. As set out above in Section 3, these elements go to the heart of the OUV and heritage significance of the wider setting of the Tower of London in terms of both its physical character and historical context, and are key to consideration of new development proposals.

4.25 Whilst the Future Baseline represented in the SVIA includes new buildings committed/under construction within the cluster, it is evident that there are no committed/under construction buildings which in this view would appear closer to the Tower of London, and particularly the White Tower. Concerns do remain in respect of the committed 100 Leadenhall Street building and the height and sheer edge of this building in terms of relationship and overdominance in respect of the Tower. It is evident from the visual representations of 100 Leadenhall Street that additional tall buildings in the area between 100 Leadenhall Street and the Tower of London would have a significant **adverse** effect on the view of the Tower and the setting and free sky space around the White Tower.

4.26 The Proposed View 1 (LVMF 10a.1) within the SVIA, based on the proposed heights and contours, clearly demonstrates a significant **adverse** effect in respect of this view and the value of the Tower of London. The area of harm and adverse effect results from the proposed heights and contours to the eastern edge of the City Cluster Tall Building Area, closest to the Tower of London.

- 4.27 Para. 6.15 suggests that “*From the crests the contour heights descend towards the south and south-east to create significantly lower foothills of the Proposed City Cluster, in order to mediate successfully between it, the river, and the WHS*”. However, it is evident from the VuCity image that, first, the height does not descend to the east toward the Tower of London World Heritage Site to create “*significantly lower foothills*”; and second, the contour heights do not “*mediate successfully between it... and the WHS*”.
- 4.28 In respect of the first point, the potential location and height of tall buildings to the eastern end of the cluster will evidently result in a significant increase in height and massing to this edge of the cluster, closest to the Tower of London. Whilst there is a slight reduction in potential height from the committed 100 Leadenhall Street building, the overall height does not decrease to create “lower foothills” in this location, with a tall steep cliff edge resulting at this part of the cluster as seen in this view.
- 4.29 The resulting impact on the Tower of London is a significant intrusion on the free sky space around the White Tower, and proposed dominant and disrupting form of development immediately adjacent to it. The impact significantly harms the appreciation of the White Tower, and the overall physical and historic setting of the Tower of London in this view.
- 4.30 Furthermore, the dynamic nature of this public view means that this is not a static view and movement along Tower Bridge will result in the very small sliver of sky space that does appear between the White Tower and the proposals disappearing altogether, with the potential proposals within this contour appearing to rise directly out of the White Tower, and providing a developed backdrop to the Tower.
- 4.31 The effect of the proposed contours and heights will therefore be significantly **adverse** in respect of the Tower of London World Heritage Site. The current clear sky space around the White Tower, essential to maintaining the setting of the Tower and views of it in terms of its physical and visual dominance in its surroundings and its historic context as symbol of importance and power, would be unacceptably further eroded and compromised. Removing and infilling the area of clear sky space to the extent proposed would have a significant adverse impact on the legibility and clear visibility of the White Tower. The proposed heights and contours therefore will have a substantial harmful impact on the heritage significance of the Tower of London and Outstanding Universal Value of the World Heritage Site.
- 4.32 To address this harm and significant adverse impact, the maximum height contour is required to be reduced to the east of the Tower of London to ensure an

appropriate graduated increase in height, which provides appropriate separation and free sky space to the Tower and the White Tower, protects the setting of the Tower of London and addresses the existing harmful impact within LVMF View 10a.1.

SVIA - Views 33, 34 & 36

- 4.33 The assessment of the Proposed views from Tower Green, Inner Ward of the Tower of London, notes that the proposed City Cluster allows the ‘three crests’ to be visible in this view. However, the additional height and form of development proposed between 20 Fenchurch Street (Walkie Talkie) and the committed developments to the eastern part of the cluster also result in significant coalescence of development between these two elements, visible above the boundary of the Tower of London which would be of significant harm to the appreciation and heritage significance of the Tower in these views.
- 4.34 “*Drawing together the elements of the existing and emerging City Cluster to create a more coherent overall form*” (Para. 6.274 of the SVIA) would not have positive visual impact in this view in respect of the ToL. The scale and form of development shown in Proposed Views 33, 34 and 36 would increase the built form visible above the boundary of the Tower, remove the open sky against which the form, outline and significance of the Tower can currently be appreciated, and would result in **adverse** harm in this view.
- 4.35 Furthermore, the delivery of a “*denser backdrop to the Chapel*” (Para. 6.274 of the SVIA) and “*increased backdrop to the Chapel of Royal St Peter ad Vincula*” (Para. 6.283 of the SVIA) would be unacceptable and have a significant **adverse** effect, as having a detrimental impact on the current clearly identified form and scale of the tower of the Church of St Peter ad Vincula. Far from creating “*clear sky space*” (Para. 6.277 of the SVIA) the proposed contours and heights in this section of the cluster clearly have the potential to create a continuous form of built development visible above the Tower of London inner ward, resulting in a harmful visual impact on the visual integrity of the Tower, removing the existing sky space around the Church of St Peter ad Vincula and unacceptably reducing its viable appreciation and historic context.
- 4.36 The overall resulting effect would be significantly **adverse** in respect of Views 33, 34 and 36 and would have a harmful impact on views from within the Inner Ward, impacting negatively on the heritage significance of the Tower of London and Outstanding Universal Value of the World Heritage Site.

4.37 To address this harm and significant adverse impact, the maximum heights are required to be reduced so that new buildings do not appear above the height of the Tower of London boundary in views from within the Inner Ward (Views 33, 34 and 36). The current visual skyline gap in the cluster in these views from the Tower of London are a clear and important attribute that is essential to be retained to protect and safeguard the significance of the heritage asset and the OUV of the World Heritage Site.

CONCLUSION

4.38 It is demonstrated that the current policy approach and detail in respect of tall buildings set out in the draft City Plan 2040 is neither justified or effective, and is therefore **NOT SOUND**. Reductions in the maximum height and proximity of the proposed contours to the eastern end of the City Cluster Tall Building Area, as well as of the heights of contours to the east of 20 Fenchurch Street, are required in order to address these matters and deliver a sound City Plan.

5. CONSISTENCY WITH POLICY

5.1 It is evident that the current policy approach and detail in respect of tall buildings is also **not sound** as it is not consistent with National Policy.

5.2 The delivery of buildings within the contours shown within the City Cluster Tall Buildings Area as proposed would deliver new development contrary to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monument and Archaeological Areas Act 1979, and National Planning Policy Framework (NPPF), through failure to protect the historic interest and special character and setting of the Tower of London.

NPPF

5.3 Section 16 of the NPPF (2023) identifies that Heritage Assets, including World Heritage Sites, which are internationally recognised to be of Outstanding Universal Value, are an irreplaceable resource and 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.

5.4 Paragraph 196 sets out that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Paragraph 205 requires great weight to be given to the asset's conservation (and the more important the asset, the greater the weight should be). Clear and convincing justification is required to be provided where any harm results to, or loss of, the significance of a

designated heritage asset (including development within its setting). Unless there are substantial public benefits, local planning authorities should refuse consent for proposed development that will lead to substantial harm to a designated heritage asset (Para. 207). Paragraph 212 requires local planning authorities within the setting of heritage assets to enhance or better reveal their significance.

- 5.5 It is clear from the above assessment in Section 4 that proposed development within the heights and contours set out in Figure 15 of the draft City Plan, and policies maps A & C, would lead to substantial harm to the ToL World Heritage Site and its significance; negatively affect the conservation and enjoyment of the historic environment; and irreversibly impact on the Outstanding Universal Value of the ToL heritage asset. The current policy approach would neither enhance or better reveal the significance of the ToL, but would further erode its significance and heritage value. The detail of the policy as proposed is therefore not consistent with National policy.

London Plan

- 5.6 The approach and policy details are also not consistent with the adopted London Plan, and also results in significant contradictions between the tall buildings approach and detail, and the proposed heritage policies of the draft City Plan.
- 5.7 The current approach to tall buildings and contours proposals in Figure 15 and Proposals Map A & C are not consistent with the London Plan, in respect of Policies HC1, HC2, HC3 and HC4, as well as the London View Management Framework SPG, through the harmful impact on the heritage significance and setting of the Tower of London World Heritage Site and Strategic Views contained within the LVMF.
- 5.8 Development of the heights proposed would not be in accordance with Policy HC1(A) and (B) as the contours set out in Figure 15 would neither conserve or enhance the historic environment and heritage assets related to the Tower of London, and would not deliver positive benefits that conserve and enhance the historic environment. The proposed contours will also result in development which does not conserve the setting and significance of the Tower of London heritage asset, whilst the cumulative harm of existing, committed and future proposals would significantly erode the Outstanding Universal Value of the World Heritage Site and, harmful to its heritage. The draft City Plan is therefore not consistent with the requirements of HC1(C) and HC2(A) of the London Plan. The approach is also not consistent with the requirements in HC2(B) for proposals to conserve, promote and enhance the Outstanding Universal Value of World Heritage Sites, including the authenticity, integrity and significant of their attributes, and would severely

compromise the ability to appreciate the OUV, and the authenticity and integrity of its attributes.

- 5.9 New development which did come forward to the extent of the maximum contours set out in the draft City Plan would harm the characteristics and composition of Strategic View LVMF 10a.1 and its principle landmark element. Proposals would not preserve or enhance the viewers' ability to recognise and appreciate the Strategically Important Landmark in LVMF 10a.1. The scale of proposed development viewed in LVMF 10a.1 would have an unsightly and intrusive impact to the detriment of this view. It is evident that the current approach in the draft City Plan in respect of the height and location of tall buildings is not consistent with Policies HE3 and HE4 of the London Plan.

Draft City Plan 2040 – Heritage Policies

- 5.10 The policy approach to tall buildings is also considered to be contrary to the draft heritage policies in the City Plan as drafted, due to the resulting significant impact on the ToL World Heritage Site.
- 5.11 The current detail and approach would fail to meet the requirements of draft Policy HE1 to preserve, enhance and better reveal the special architectural or historic interest, and the significance of heritage assets and their setting, in respect of the ToL World Heritage Site. Future development in line with the heights and contours included in the Tall Buildings policy would lead to significant heritage harm.
- 5.12 Policy HE2 relates to Ancient Monuments and provides for the preservation, protection, safeguarding and enhancement of monuments and their settings. Policy HE3 specifically addresses and protects the setting of the Tower of London World Heritage Site. The draft policy requires development proposals to preserve, and seek to enhance, the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.
- 5.13 The assessment undertaken in Section 4 however confirms that the current scale of development proposed in the tall buildings policy would not fulfil these requirements in respect of the ToL Scheduled Ancient Monument and OUV of the World Heritage Site, and would be in direct contravention of the policy requirements of both HE2 and HE3.
- 5.14 By adopting the heights and contours within Figure 15 and Proposals Map A & C, the proposed plan would support development of a scale which would itself be inconsistent with the objectives and requirements of the heritage policies of the draft City Plan.

6. ALTERNATIVE POLICY APPROACH TO DELIVER A SOUND CITY PLAN 2040

- 6.1 To ensure a compliant and sound City Plan, reconsideration of the heights and contours within the City Cluster Tall Building Area is required in order to address these issues, protect and conserve the significance of the Tower of London and OUV of the World Heritage Site; and ensure a sound, effective and justified City Plan.
- 6.2 To achieve this in respect of the Tower of London World Heritage Site the following amendments are necessary:
- Reduction in the maximum height contour to the east of the Tower of London to ensure an appropriate graduated increase in height, which provides appropriate separation and free sky space to the Tower and the White Tower, protects the setting of the Tower of London and addresses the existing harmful impact within LVMF View 10a.1.
 - This would be appropriately secured through reduction in the heights to the eastern part of the cluster and reversion to the previously proposed contour heights (shown in Image 1 below).



Image 1 – 2018 Proposed Height



Image 2 - 2024 Proposed Heights

- The resulting building heights in Image 1 deliver a pronounced sloped form to the eastern part of the cluster, providing a suitable and effective relationship, and appropriate relief, with the Tower of London. It removes the current towering effect of the potential development immediately adjacent to the White Tower in the current proposed heights (Image 2), maintaining and conserving the dominance of the White Tower and its relationship to the City and River Thames. It would ensure that the appearance of new development in close proximity to the White Tower is of a height which is lower than the tower, retaining the physical dominance and significance of the Tower of London World Heritage Site.

- In addition, to address the heritage harm that would result in respect of the key views from the Inner Ward (Views 33, 34 & 36 of the SVIA) and negative impact on the heritage value from within the Tower of London, the maximum heights are required to be reduced in respect of buildings within the current gap to the east of 20 Fenchurch Street.
- Heights of new buildings within this part of the City Cluster are required to be reduced to the extent that they do not fill in any further clear sky space around the tower of the Chapel of St Peter ad Vincula in these views and avoid the creation of a solid wall of development above the boundary structures of the Tower of London. Reducing the heights in this area would enable the Tower to still be read against the sky in at least part of this important view from within the Inner Ward and ensure that the authenticity and legibility of the Tower is not further interrupted and eroded.
- The tall buildings policy should also provide further detailed requirements in respect of the design, form and detailing of buildings in respect of their relationship with historic building, including the Tower of London World Heritage Site. Policies should ensure that new buildings that are within the wider setting of the Tower of London are designed to gradually step away from the tower, dispersing height away from the ToL, and avoiding sheer vertical edges and straight cliff edge elevations which reduce the dominance, legibility and authenticity of the Tower and its heritage significance and value. Particular attention should be paid to the treatment of edges to buildings within close proximity of the Tower of London in key views, and their materiality, to ensure an appropriate relationship and visibility between the ToL and new City buildings is maintained, and the character and setting of the heritage asset maintained and significance conserved.
- It is evident that the delivery of maximum heights of new tall buildings within the City Cluster in line with the contours in Image 1 in respect of these two parts of the cluster are the maximum extent that would enable the Outstanding Universal Value of the Tower to be retained and the heritage significance of the Scheduled Ancient Monument to be safeguarded. Any further encroachment into the sky space around the tower in these key views than shown in Image 1 would have a significant harmful impact in terms of heritage and would not be consistent with National Policy.

7. OTHER RELEVANT POLICIES OF THE CITY PLAN 2040 IN RESPECT OF THE TOWER OF LONDON

Maximising the benefits and connectivity with visitor facilities

- 7.1 HRP welcome the inclusion of Policy CV3 in respect of Visitor Facilities, and the wider connectivity, wayfinding and links to these facilities across the city and across its boundaries identified in criteria (5); together with Policy HE3 part (3), relating specifically to the Tower of London. The ability of the Tower of London to attract tourists and visitors to the city and its environs is particularly noted in Para. 7.4.0 of the draft City Plan.
- 7.2 We would propose the wording of policy HE3 further be strengthened to optimise the benefits that can be secured in respect of the location and attraction of these visitor facilities. To maximise the cultural and heritage benefits of these heritage assets, including the Tower of London, improvements to the public realm, wayfinding and signage related to new development and connectivity with these facilities should be a requirement of the policy, not just encouraged.
- 7.3 We would request alternative wording as follows be incorporated in respect of Policy HE3, Part 3 to ensure the plan is fully effective and sound in this regard:

*3. Development proposals in the setting of the Tower of London World Heritage Site **will be required** to incorporate appropriate enhancements to pedestrian and cycle routes and connections with the Tower, including signage and wayfinding in the area that is appropriate and contributes to the importance of setting of the Tower by improving public accessibility and visibility.*

Tower of London Historic Processional Routes


- 7.4 All four of the key historic landward approaches to the Tower of London approach from the City of London to the north and west. These routes are shown in Figure 5 of the Tower of London World Heritage Site Management Plan and highlights Great Tower Street as *“the main route westwards through the late Saxon city from St Paul’s Cathedral, aligned on the original entrance of the Beauchamp Tower. This was and remains the ‘ceremonial route’ to and from the Tower.”*
- 7.5 Whilst the City Plan 2040 includes reference and policy consideration to the processional routes associated with St Paul’s Cathedral, the draft City Plan does not include similar reference to the Tower of London routes within the City.

- 7.6 We would request additional wording as follows be incorporated in Policy HE3 to address the significance and importance of this route as follows to ensure the plan is fully effective and sound in this regard:

Policy HE3

4. Development proposals will protect and enhance the character and appearance of the processional route between St Paul's Cathedral to the Tower of London along Eastcheap/Great Tower Street, including views of the Tower of London from this route.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal
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2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mr

Mr

First Name

Adrian

Matt

Last Name

Phillips

Brewer

Job Title	Palaces & Collections Director	Director
(where relevant) Organisation	Historic Royal Palaces	Urbanspace Planning Ltd
(where relevant) Address Line 1	[REDACTED]	[REDACTED]
Line 2	[REDACTED]	[REDACTED]
Line 3	[REDACTED]	[REDACTED]
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	C/O Agent	[REDACTED]
E-mail Address (where relevant)	C/O Agent	[REDACTED]

Part B – Please use a separate sheet for each representation

Name or Organisation: Historic Royal Palaces

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

SEE ENCLOSED Historic Royal Palaces and Urbanspace Planning Ltd's Response Submission

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE ENCLOSED Historic Royal Palaces and Urbanspace Planning Ltd's Response Submission (Section 6)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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Part B – Please use a separate sheet for each representation

Name or Organisation: Historic Royal Palaces

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SEE ENCLOSED Historic Royal Palaces and Urbanspace Planning Ltd's Response Submission (Section 7)

(Continue on a separate sheet /expand box if necessary)

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Yes, I wish to participate in hearing session(s)


Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To participate in the debate and discussion in relation to Heritage Matters within the draft City Plan 2040.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Model Representation Form for Local Plans

 <p>CITY OF LONDON</p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p>Ref: Reg 19</p> <p>(For official use only)</p>
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Name of the Local Plan to which this representation relates:

City Plan 2040

Please return to City of London Corporation BY 11:00PM 31 May 2024 emailing to: planningpolicyconsultations@cityoflondon.gov.uk

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](#).

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal
Details*

2. Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

Mr

Mr

First Name

Adrian

Matt

Last Name

Phillips

Brewer

Job Title	Palaces & Collections Director	Director
(where relevant) Organisation	Historic Royal Palaces	Urbanspace Planning Ltd
(where relevant) Address Line 1	Hampton Court Palace	[REDACTED]
Line 2		[REDACTED]
Line 3		
Line 4	[REDACTED]	[REDACTED]
Post Code	[REDACTED]	[REDACTED]
Telephone Number	C/O Agent	[REDACTED]
E-mail Address (where relevant)	C/O Agent	[REDACTED]

Part B – Please use a separate sheet for each representation

Name or Organisation: Historic Royal Palaces

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

SEE ENCLOSED Historic Royal Palaces and Urbanspace Planning Ltd's Response Submission

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE ENCLOSED Historic Royal Palaces and Urbanspace Planning Ltd's Response Submission (Section 6)

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To participate in the debate and discussion in relation to Heritage Matters within the draft City Plan 2040.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Morgan, Jackson

From: Adrian Phillips [REDACTED]
Sent: 29 May 2024 11:05
To: Planning Policy Consultations
Subject: City Plan 2040 Regulation 19 Consultation Response
Attachments: 2024-05-29_City_Local_Plan_2040_HRP_Response_Letter.pdf; 2024-05-21_HRP_REPRESENTATION_CITY_PLAN_2040_RESPONSE.pdf

Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Sirs

Please find attached Historic Royal Palaces' Regulation 19 consultation response to the City Plan 2040.

Kind Regards

ADRIAN PHILLIPS
Palaces & Collections Director



SPACE TO STIR AND BE STIRRED

[REDACTED]

hrp.org.uk

Historic Royal Palaces is a registered charity (No 1068852), correspondence details, Hampton Court Palace, Surrey KT8 9AU Historic Royal Palaces Enterprises Ltd, a company registered in England (No 3418583) registered office Hampton Court Palace, Surrey KT8 9AU.



HISTORIC ROYAL PALACES

Development Plans Team
Environment Department
City of London Corporation
Guildhall
London
E2P 2EJ

By email to: planningpolicyconsultations@cityoflondon.gov.uk

29 May 2024

Draft City Plan 2040, Regulation 19 Consultation

Dear Sir/ Madam

Thank you for inviting Historic Royal Palaces to respond to the Regulation 19 consultation on the draft City Plan 2040.

Historic Royal Palaces (HRP) is the independent charitable trust responsible, for the benefit of the nation, for the care, conservation and presentation to the public of the unoccupied royal palaces, which include the Tower of London World Heritage Site (WHS). As guardians of the Tower, we have significant concerns in respect of the current draft City Plan 2040 and consider the current approach and policies of the plan in respect of tall buildings and impact on the Tower of London to be **UNSOUND** due to the impact of them on the OUV of the Tower WHS.

We instructed Urbanspace Planning Ltd to undertake a full review and assessment, and the detailed analysis and conclusions are contained in the attached statement. We request that the City of London Corporation take full account of the comments and assessment set out in reviewing the plan, and adopt the modifications and amendments included within the Urbanspace Planning Ltd review in order to ensure the plan is sound and that the TOL WHS is appropriately protected over the course of the plan period.

HRP welcome the general approach to heritage set out in policies HE1, HE2 and HE2 and support the aims and wording of these policies, and particularly support the inclusion of Policy HE3 related specifically to protecting the setting of the TOL and WHS status. However, we have identified that the approach taken in the plan to new tall buildings, and the contours and maximum heights referred to in draft Strategic Policy S12, would result in an unacceptable harmful impact on the WHS OUV in both views of the Tower and views from within the Tower.

Historic Royal Palaces

Tel +44(0)20 3166 6000 www.hrp.org.uk

Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)

The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



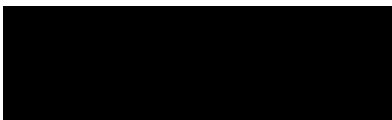
HISTORIC ROYAL PALACES

To address these impacts the maximum height and proximity of the proposed contours to the eastern end of the City Cluster Tall Building Area should be reduced and the eastern end of the cluster reprofiled, as well as the heights of contours to the east of 20 Fenchurch Street reduced, as set out in the Urbanspace Planning Ltd assessment.

We also welcome policies within the plan that strengthen the connections between the Tower and the City, and enhance the overall cultural aspects of the Tower, including Policy CV3 and HE3. We are of the opinion that these policies could be further be strengthened to optimise the delivery of benefits, as suggested in the attached review.

We would welcome further liaison and discussion on these matters with the City of London Corporation to address these matters and ensure the protection of the TOL WHS within a sound and effective City Plan.

Yours faithfully



Adrian Phillips
Palaces & Collections Director



*Encs: City of London – Draft City Plan 2040 Regulation 19 Consultation.
Tower of London World Heritage Site : HRP Response Urbanspace
Planning Ltd, May 2024*

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CITY OF LONDON – DRAFT CITY PLAN 2040 REGULATION 19 CONSULTATION

TOWER OF LONDON WORLD HERITAGE SITE: HRP RESPONSE

1. INTRODUCTION

- 1.1 Urbanspace Planning Ltd is instructed by Historic Royal Palaces (HRP) in respect of planning and heritage matters related to their portfolio of historic properties within the United Kingdom. Urbanspace Planning Ltd has advised HRP for over four years, whilst lead Director, Matthew Brewer, also advised HRP since 2015 in his former role at CgMs. This work has included involvement in a number of projects at the Tower of London and its surroundings, which has required detailed assessment and consideration of the planning and heritage matters related to the World Heritage Site, its significance and setting. Urbanspace Planning Ltd therefore has an extensive and detailed knowledge and understanding of the heritage significance, principal planning considerations and sensitivities, of this nationally and internationally important monument.
- 1.2 The Tower of London is a major historic landmark and is set within the historic landscape of its moat and setting on the Thames. The Tower of London is a key visitor and tourist attraction of regional and national importance, which is host to a large number of visitors per year and acts as a major draw to national and international tourism to the capital.
- 1.3 Historic Royal Palaces (HRP) is a charitable trust established by Royal Charter in April 1998. HRP is vested by the Crown with responsibility for the care and maintenance of the Tower of London on behalf of the Crown. HRP work in partnership with a variety of central, regional and local government, private sector communities and charitable stakeholders to sustain the ‘Outstanding Universal Value’ (OUV), significance and public enjoyment of the Tower of London World Heritage Site (WHS). For over 25 years HRP has delivered an enhanced programme of visitor and educational exhibitions at the Tower of London to facilitate it’s role as a key tourist and visitor attractor and destination. This has been undertaken in parallel to its role in restoration and maintenance projects, which have been based on detailed heritage survey and assessment work, to maintain and improve the historic significance and setting of this Scheduled Ancient Monument and World Heritage Site. HRP therefore has deep knowledge and understanding of the value, significance and setting of the Tower, and its changing context and risks over time.

- 1.4 The Tower itself, together with the Moat, is included within the boundary of the World Heritage Site and forms a Scheduled Ancient Monument. The whole site and surrounding public realm area is within The Tower Conservation Area, whilst there are a number of listed buildings and structures within the Tower and its surroundings. The Outstanding Universal Value of the World Heritage Site is related to both the nature, history, composition and detail of the Tower itself, as well as the strategic siting of the fortress and its wider setting, including long views related to its landmark siting and visual dominance.
- 1.5 The vision for the World Heritage Site 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. The Tower benefits from unique characteristics, however these are fragile and raise complex issues that affect the conservation and management of the site.
- 1.6 Whilst the Tower of London is located just outside the boundary of the City Corporation, a large part of the City lies within the local setting of the World Heritage Site. The wider setting and backdrop of its landmark position as a fortress on the Thames to the north and west also lies within the City of London authority. The greatest challenge to the World Heritage Site remains the impact on its value and setting of development and tall buildings. Given the extreme sensitivity of the World Heritage Site to the impact of new development and tall buildings within these areas, and potential to further permanently erode the Outstanding Universal Value and harm its heritage significance, it is essential that the City Plan plan appropriately and sensitively for new development in the setting of the WHS.
- 1.7 Following review of the Regulation 19 Draft City Plan 2040 the significant concerns expressed by HRP in previous Local Plan representations in respect of the potential location, height and form of tall buildings within the City Cluster Tall Building Area (Figure 14 & 15 of the draft City Plan 2040) remain. From our further assessment set out below it is evident that the approach and the detailed wording of Policy S12: Tall Buildings (Part 3.), together with the Tall Building Contours (Figure 15) are **NOT SOUND**. Modifications are required to the policy, Policies Maps C and D, and Tall Building Contours in Figure 15 in order to ensure soundness and consistency with the NPPF, Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monuments and Archaeological Areas Act 1979; and ensure compliance with the other draft policies of the City Plan and consistency with the adopted policies of the London Plan.
- 1.8 Modifications and reductions in maximum heights of potential tall buildings in the identified areas is essential to deliver the protection required to safeguard the

heritage significance and Outstanding Universal Value of the Tower of London World Heritage Site and Scheduled Ancient Monument.

2. REGULATION 19 CITY PLAN 2040 - DRAFT POLICIES

- 2.1 Historic Royal Palaces (HRP) welcome the general approach to heritage set out in draft **Policies HE1, HE2 and HE3**; and support the aims and wording of these policies. The overall approach and requirements of these policies within the draft City Plan are considered to be broadly in line with the NPPF, PPG and London Plan policies and guidance. Overall, the significance of heritage assets within and on the edge of the city, and the protection afforded to key heritage assets, is clear and support the conservation and enhancement of key heritage assets and their setting.
- 2.2 HRP particularly support the inclusion of **Policy HE3** and a specific policy related to protecting the setting of the Tower of the London and World Heritage Site status. It is considered that some minor alterations to the wording of Policy HE3 could further strengthen the requirements for developments in the 'vicinity' to enhance routes and the setting of the Tower of London, and this is further addressed in Section (7) below.
- 2.3 HRP also support the aims and wording of **Strategic Policy 13** in respect of Protected Views, protecting and enhancing significant and strategic London views of important buildings, townscapes and skylines; and implementation of the Mayor of London's London View Management Framework SPG, with specific reference to managing designated views of strategically important landmarks, including the Tower of London (**Part 1 of Strategic Policy S13**). In respect of Part 3 of **Strategic Policy S13**, the specific reference and protection afforded to the Tower of London is welcome and we support the approach of securing the appropriate setting of and backdrop to the Tower of London World Heritage Site, ensuring its Outstanding Universal Value and taking account of the Tower of London World Heritage Site Management Plan (2016).
- 2.4 However, it is clear that the current approach to new tall buildings, and the contours and maximum heights, referred to in draft **Strategic Policy S12: Tall Buildings**, and the referenced associated policies maps and figures, in respect of the City Cluster Tall Buildings Area is not in accordance with the approach, aims and policy requirements of draft **Policies S13, HE1, HE2 and HE3** in respect of the Tower of London and the impact resulting on the Scheduled Ancient Monument and World Heritage Site Outstanding Universal Value.

- 2.5 Whilst the approach of **Policy S12 Part 3** in providing greater clarity and certainty in respect of potential new tall building heights in this area is encouraged, it is of significant importance that the policy sets an appropriate framework for new development and maximum heights for these to be delivered in, which ensures the requirements of policies S13, H1, H2 and H3 are upheld and the significance of heritage assets maintained and protected. There are significant concerns with the assessment and analysis that underpins the maximum height contours within the Proposals Map and Figure 15, and it is evident that the current proposed maximum contours/heights will result in significant heritage and visual harm in respect of the protected views of the Tower of London, and key views from within the Tower of London. As a result, the draft City Plan is currently **unsound** in this regards, with detailed assessment set out below demonstrating this matter (Section 4), as well as alternative approaches to address this make the plan sound (Section 5).

3. EXISTING SIGNIFICANCE OF THE TOWER OF LONDON, IT'S WHS OUTSTANDING UNIVERSAL VALUE, AND CURRENT RISKS

- 3.1 To determine the potential appropriate location, height and form of buildings in the City Cluster Tall Building Area in respect of the heritage significance of the Tower of London Scheduled Ancient Monument, and the World Heritage Site Outstanding Universal Value, it is important to first establish the current heritage significance of the Tower, its Outstanding Universal Value, setting and the existing risks to its status. A brief summary of the Heritage Value of the Tower of London is included within the TCC *'Heritage Impact Assessment – Tower of London'* document, however, further detailed consideration of the key elements of heritage significance and value are set out below which provide the principal baseline elements for assessment and consideration of potential new development and consistency with the policies of the NPPF, PPG, London Plan and requirements of the Acts.
- 3.2 The Outstanding Universal Value of the Tower is recognised by a number of key attributes, including 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.
- 3.3 The Statement of Outstanding Universal Value makes it clear that the siting, position in the landscape and setting of the Tower of London is a key aspect of its significance and value. The statement notes that the Tower of London is an internationally famous iconic complex, *"the most complete example of an 11th century fortress palace remaining in Europe"*, and *"a rare survival of a continuously developing ensemble of royal buildings"*. *Significant value is derived from it's strategic siting on the river Thames acting as "a symbol of Norman power"*. The Statement notes that The Tower's landmark siting and visual dominance on the

edge of the River Thames, and the impression of great height are all key aspects of its significance. The ensemble “*has strong associations with State institutions*” that “*incorporated such fundamental roles as the nation’s defence, its records and its coinage*”. It is noted that the strategic siting lends itself to “*the Tower’s historic physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital*”.

- 3.4 The visual setting of this fortress on the River Thames, and physical relationship with both the River Thames and City, acting as a dominant landmark providing the gateway to the city, is a key attribute of its Outstanding Universal Value in both physical and historical terms, as a symbol of importance and state power.
- 3.5 The role of the White Tower itself within the centre of the fortress as a symbol of Norman power is evident in its massive masonry. It remains, with limited later change an outstanding example of innovative Norman architecture. Its form, design and materials remain intact and legible. Its height and clear visibility against the sky in key views across the river in respect of its visual relationship with its surroundings, the River Thames and City of London, are key attributes to its role and function, and its value and significance as a World Heritage Site.
- 3.6 It is evident that these key attributes of the Tower of London, and White Tower, are neither identified sufficiently, nor assessed in appropriate detail and depth, within the TCC Heritage Impact Assessment.
- 3.7 As well as the heritage significance and value of the Tower of London, it is also important and relevant to understand the current position in respect of potential risks to the Outstanding Universal Value of the Tower.
- 3.8 The Statement of Outstanding Universal Value prepared by ICOMOS confirms that “*there are few threats to the Property itself, but the areas immediately beyond the moat and the wider setting of the Tower, an ensemble that was created to dominate its surroundings, have been eroded. 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 these have, to a degree, had an adverse impact on the views into, within and out of the property. 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.”

- 3.9 In respect of the views from the Inner Ward, over and between its enclosing buildings and walls, the historic sky views have been broken up more recently through the evolving primarily 20th and 21st century, cityscape beyond. Since 2014, the prospect to the west, over the Beauchamp Tower and 1-2 Tower Green, has been dominated by the upper part of 20 Fenchurch Street (Walkie Talkie), a substantial office building. The view north-west, over the roof of the Church of St Peter ad Vincula, is increasingly dominated by the growing eastern cluster in the City, of which the Leadenhall Building known as the ‘Cheesegrater’ and is the tallest, but which will soon be surpassed by taller new buildings currently under construction or committed through approved planning consents. Despite these new additions an important gap in the skyline above the Tower of London’s walls and boundary structures between the Walkie Talkie and eastern part of the City Cluster Tall Buildings Area is evident. This area free from development appearing above the Tower in views from the Inner Ward allows the Tower, its form and historic dominance to be appreciated against the sky, enables the tower of the Church of St Peter ad Vincula to be read against the sky, and avoids a view of a solid wall of development above the Tower’s boundaries, reducing the legibility and integrity of the tower in views from within the Tower.
- 3.10 It is evident that to continue to protect the World Heritage Site, its significance and Outstanding Universal Value, and ensure that new development can meet the requirements of draft policies S13, HE1, HE2 and HE3 (as well as policies of the NPPF and London Place, and requirements of the Acts) careful consideration is required in respect of potential new tall buildings in respect of both ensuring appropriate separation and relationship between the Tower and new tall buildings, and maintaining an appropriate clear skyline in key views to the Tower, and from views within it. The current contours, heights and massing established within Figure 15 of the draft City Plan, and Proposals Maps C and D, do not achieve this and therefore has the potential to have significant adverse heritage impacts in respect of the Tower of London, its significance and OUV.

4. ASSESSMENT OF THE PROPOSED TALL BUILDING POLICY PROPOSALS

- 4.1 On the basis of the above assessment of key aspects of the Tower of London’s significance and value in respect of setting, and the identified risks to the significance and value of the World Heritage Site, we set out below our objections to the current proposed contours and heights for tall buildings in the City Cluster Tall Building Area, and reason as to why the current approach is unsound.

Heritage Impact Assessment

- 4.2 We have undertaken a review of the TCC ‘*Heritage Impact Assessment - Tower of London*’, which has considered the potential impact of the proposed heights and contours of the City Cluster Tall Buildings Area on the World Heritage Site based on the wealth of knowledge and supporting information available in respect of the Tower and its setting.
- 4.3 Para. 6.18 of the HIA states that “*the shape of the proposed skyline would create interest when seen from different points in relation to the Tower of London*”. It is evident that the proposals will result in significant elements of new development appearing both in views of the Tower in the wider area, and in views from within the Tower itself. As defined in Section 3 above, maintaining clear sky area, the impression of height and visual dominance of the Tower of London in respect of its surroundings and new development, is essential to its setting and in maintaining the heritage significance and OUV of the World Heritage Site. The delivery of further development which increasingly erodes these principles through additional tall buildings in close proximity to the Tower, which reduce the sky space and impinge on these views, would be of substantial heritage harm to the Tower of London.
- 4.4 This paragraph goes on to state that “*the eastern side has a more pronounced sloped form, stepping down from the tallest elements within the Proposed City Cluster to the ToL*”. It is clearly evident that this is not the case in respect of LVMF View 10A.1 shown in Figure 6.1. of the HIA. This figure shows that the proposed contours to the eastern edge of the cluster will result in the appearance of a dramatic and stark vertical edge condition immediately adjacent and towering over the White Tower. The height contours currently propose only minor reduction in the stepping down in scale to the top of this element and a sheer edge is presented in respect of the relationship with the Tower of London. It is evident that this does not take account of, nor acknowledge, the setting and heritage significance of the Tower of London and the conclusion in 6.18 is incorrect.
- 4.5 The HIA goes onto assess the Proposed City Cluster against three aspects of the OUV:

Internationally Famous Monument

- 4.6 In respect of Para. 7.9 of the HIA, it is evident that the proposed contours would not preserve the existing legible relationship of the Tower as stated. The paragraph refers to “*a clear sky gap evident within the skyline of the four towers of the White Tower*”. The proposed cluster however extends up to a height significantly above the height of the White Tower, immediately adjacent to one of the western towers of the White Tower in LVMF View 10a.1. Only a very small slither of sky space is

retained to the western side of the tower, with the proposal significantly reducing the clear sky space around this tower and resulting in a potential new building which will dominate the White Tower and substantially interrupt its legibility and clear visual appreciation. This view is a dynamic public view from a bridge crossing, as such it is not static and minor movement to the north would result in the contours of the cluster dissecting the White Tower and further harming the visual impact of the proposals on the setting and heritage significance of the Tower by removing any sky space, and clear reading of its silhouette against the sky.

- 4.7 The LVMF SPG makes particular reference to the fact that the appreciation of the Tower of London, its detail and layers of history, are enhanced by the free sky space around the White Tower. The assessment of the heritage significance and Outstanding Universal Value (set out in Section 3 above) demonstrates the key importance of the setting of the Tower of London and the height and clear visibility of the White Tower against the sky in key views.
- 4.8 Para. 7.9 also states that the White Tower would remain visually dominant within the view. It is however evident in the VuCity view of the proposed contours shown in View 10a.1 (shown in Figure 6.1 of the HIA) that the maximum heights set out would dominate the Tower in this view and result in significant heritage harm. The sheer vertical edge proposed for this cluster in immediate adjacency to the Tower of London, and with a height significantly above that of the White Tower, will result in visual dominance and reduce the significance of the Tower of London in this important regard.
- 4.9 Para. 7.10 relates to the SVIA in respect of assessment of View 1 (LVMF 10a.1). We have undertaken a detailed review of the SVIA and assessment of View 1, which is included below. This review demonstrates a significant **adverse** effect, contrary to the conclusion of the SVIA. As seen within the VuCity modelling in View 1 (Figure 6.1 of the HIA) the eastern edge of the cluster would not respond to the context of the ToL WHS as proposed and does not accord with the Protected Views SPG; does not retain appreciation of the Tower of London; and results in substantial harm to the significance of the heritage asset and Outstanding Universal Value of the World Heritage Site.
- 4.10 Para. 7.14 claims that *“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”*. First, in respect of LVMF View 10a.1, it is clear that the proposed cluster contours result in the complete loss in the separation and free sky space between the Tower of London and Proposed City Cluster, such that the

Tower of London is no longer read as a separate entity from the cluster given the proposed proximity and height of new tall buildings in such close proximity.

- 4.11 The conclusion set out in Para. 7.8 in respect of ‘an internally famous monument’ does not reflect an appropriate assessment of the potential heritage impacts related to the significance of the heritage assets and the impact of the proposed tall building heights. No positive change would result in terms of the impact on the Tower of London World Heritage Site. The proposed location and height of new tall buildings to the eastern edge of the City Cluster Tall Building Area would clearly result in a **large** degree of change compared to the existing baseline, and the quality of change would be substantially **negative** and raise significant concerns. There would be a **major** resultant effect in respect of its value as an **Internationally Famous Monument**.

Landmark Siting

- 4.12 Para. 7.16 of the HIA provides some context to the historic relationship of the Tower to the City. An important attribute of its value to be protected and enhanced remains its sense of position as the gateway to the city, its symbol of power and its dominance in the landscape. The context provided in the HIA fails to acknowledge that these attributes have already been eroded to some extent by new tall buildings erected in the eastern part of the City (as confirmed by continued ICOMOS Technical Reviews), and that the impact of new buildings has not been positive in respect of the setting and OUV of the Tower of London. It is essential that this is recognised as forming the current heritage baseline from which new proposals and policies are to be considered and assessed.
- 4.13 Para. 7.17 of the HIA highlights that the eastern edge of the Proposed City Cluster is in close proximity to the TOL, however states “*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 Siting. The Proposed City Cluster would have an improved reading as a distinctly separate urban form from the White Tower...The Proposed City Cluster would have a clear gesture of stepping down towards the edges, completing its form.*”
- 4.14 It is evident in LVMF View 10a.1 that the Proposed City Cluster will appear within the backdrop of the Tower of London, being immediately adjacent to the White Tower, reducing the clear sky space around the Tower and White Tower, and increasing the height and dominance of development in the background of the Tower. The edge condition in this view is of a sheer vertical edge of significant height, which will distract and dominate the view of the Tower and substantially detract from its setting and appreciation. Proposals within these contours will not

result in a positive impact in this view and will have a negative impact on the ToL's Landmark Siting. It is evident in the VuCity view in Figure 6.1 of the HIA that the Proposed City Cluster will effectively conjoin with the urban form of the Tower of London, removing any apparent and discernible visual separation. There is no effective stepping down of the cluster to the ToL in this view and the proposed impact will be harmful to the setting and visual appreciation of the Tower of London.

- 4.15 The assessment in the HIA fails to assess the impact of the Proposed City Cluster on View 1 (LVMF 10a.1) in respect of Landscape Siting. The iconic silhouette of the Tower of London against the sky, as referred to in Para. 7.18, would be detrimentally affected in this key LVMF view. The relationship to the City would be adversely affected through the close proximity and height of the potential new tall buildings, harmful to the setting and value of the Tower of London.
- 4.16 It is therefore evident that the basis of the assessment undertaken, and the resulting conclusions in Para. 7.15, are inaccurate and impacts understated. It is demonstrated that the degree of change to this attribute would be **large**, and the quality of change would be significantly **negative**, raising substantial concerns, with a **major** resultant effect.

Physical Dominance of the White Tower

- 4.17 As with "Landmark Siting" above, the context set out in Para. 7.20 of the HIA fails to appropriately take account of, and incorporate consideration of, the negative impacts of existing development on the significance and value of the World Heritage Site. This paragraph of the HIA identifies the key value attributes of the height and scale dominating the landscape, and notes that there has been erosion of its value as a result of new tall buildings in the city – but appears to suggest this gives licence for further impacts. It is evident from the WHS Management Plan and ICOMOS Reviews that this erosion has been harmful and that further new potential tall buildings within the setting of the Tower further threatens the value of the Tower. This position provides the current baseline from which new proposals should be assessed, and it is evident that further erosion of these attributes through new tall buildings in the wider setting would be of significant harm to the heritage significance and Outstanding Universal Value of the World Heritage Site.
- 4.18 The assessment in Para. 7.21 related to the existing and future baseline therefore does not provide justification for further extent of development proposed in the wider setting of the World Heritage Site. It is demonstrated in VuCity View 1 (Figure 6.1 of the HIA) that the substantial increase in height of the eastern edge of the cluster, extended in very close proximity to the White Tower, would result in a

significant adverse additional impact which would be harmful to its setting in this view.

- 4.19 The close proximity of the eastern edge of the cluster, together with its increased height, would significantly reduce the clear sky space around the White Tower, and negatively impact on views of it, its appreciation and legibility. Whilst a very small slither of sky space would be retained in the specific view point on London Bridge shown in the image, this view is a dynamic public view from a bridge crossing. As such it is not static and minor movement to the north would result in the contours of the cluster dissecting the White Tower, further negatively affecting the visual impact of the proposals on the setting and heritage significance of the Tower by removing any sky space, and clear reading of its outline against the sky. It is evident that the resulting impact from the major encroachment into the sky space, coupled with the proposed height of development, results in a **major** impact on the physical dominance of the White Tower, and its significance and value would be substantially harmed as a result.
- 4.20 In respect of Para. 7.22 and reference to the assessment within the SVIA, full consideration and review of the significant impact of the Proposed City Cluster on View 1 (LVMF 10a.1) is set out in detail below. It concludes that the proposed contours will not respond appropriately to the context of the ToL WHS. It would not leave appropriate free sky space around the White Tower, or provide appropriate separation with the City's new increased built form. The height and proximity of the proposed new development to this eastern end of the cluster will tower over the White Tower, permanently harming the setting and heritage value of the Tower and its key attributes.
- 4.21 In terms of the conclusion in Para. 7.19 of the HIA, the degree of change in respect of the physical dominance of the White Tower will be **large**, with the quality of change substantially **negative**, and raises significant concerns. There would be a **major** resultant effect.
- 4.22 The conclusions set out in the HIA are not therefore supportable or effectively evidenced, and it is demonstrated that the effects of the Proposed City Cluster on the OUV of the ToL WHS would be **major and of substantial concern**. In NPPF terms there would be substantial harm to both the heritage significance of the Tower of London and the Outstanding Universal Value of the WHS and therefore the current approach is not justified and is **unsound**.

Strategic Visual Impact Assessment

4.23 As referred to above, a review has also been undertaken of the VuCity images representing the potential contours set out within Figure 15 and Proposals Map B and C, and the Strategic Visual Impact Assessment (SVIA) prepared in respect of the resulting visual impacts.

SVIA - View 1

4.24 This view represents View 10a.1 of the Mayor's London View Management Framework. Whilst the viewpoint represents a view from one particular viewpoint along Tower Bridge, it is essential to recognise that this is a dynamic public view, which changes as people experience the Tower from different points along the bridge. The key aspects of the view are the dominance of the Tower of London in the foreground on the River Thames; the clear reading of the boundaries of the fortress and separation and clear sky background and space around the White Tower; and the central prominent and highest element of the fortress. Para. 6.10 of the SVIA confirms this in respect of this viewpoint with reference to the LVMF SPG: *"The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and the appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued"*. As set out above in Section 3, these elements go to the heart of the OUV and heritage significance of the wider setting of the Tower of London in terms of both its physical character and historical context, and are key to consideration of new development proposals.

4.25 Whilst the Future Baseline represented in the SVIA includes new buildings committed/under construction within the cluster, it is evident that there are no committed/under construction buildings which in this view would appear closer to the Tower of London, and particularly the White Tower. Concerns do remain in respect of the committed 100 Leadenhall Street building and the height and sheer edge of this building in terms of relationship and overdominance in respect of the Tower. It is evident from the visual representations of 100 Leadenhall Street that additional tall buildings in the area between 100 Leadenhall Street and the Tower of London would have a significant **adverse** effect on the view of the Tower and the setting and free sky space around the White Tower.

4.26 The Proposed View 1 (LVMF 10a.1) within the SVIA, based on the proposed heights and contours, clearly demonstrates a significant **adverse** effect in respect of this view and the value of the Tower of London. The area of harm and adverse effect results from the proposed heights and contours to the eastern edge of the City Cluster Tall Building Area, closest to the Tower of London.

- 4.27 Para. 6.15 suggests that “*From the crests the contour heights descend towards the south and south-east to create significantly lower foothills of the Proposed City Cluster, in order to mediate successfully between it, the river, and the WHS*”. However, it is evident from the VuCity image that, first, the height does not descend to the east toward the Tower of London World Heritage Site to create “*significantly lower foothills*”; and second, the contour heights do not “*mediate successfully between it... and the WHS*”.
- 4.28 In respect of the first point, the potential location and height of tall buildings to the eastern end of the cluster will evidently result in a significant increase in height and massing to this edge of the cluster, closest to the Tower of London. Whilst there is a slight reduction in potential height from the committed 100 Leadenhall Street building, the overall height does not decrease to create “lower foothills” in this location, with a tall steep cliff edge resulting at this part of the cluster as seen in this view.
- 4.29 The resulting impact on the Tower of London is a significant intrusion on the free sky space around the White Tower, and proposed dominant and disrupting form of development immediately adjacent to it. The impact significantly harms the appreciation of the White Tower, and the overall physical and historic setting of the Tower of London in this view.
- 4.30 Furthermore, the dynamic nature of this public view means that this is not a static view and movement along Tower Bridge will result in the very small sliver of sky space that does appear between the White Tower and the proposals disappearing altogether, with the potential proposals within this contour appearing to rise directly out of the White Tower, and providing a developed backdrop to the Tower.
- 4.31 The effect of the proposed contours and heights will therefore be significantly **adverse** in respect of the Tower of London World Heritage Site. The current clear sky space around the White Tower, essential to maintaining the setting of the Tower and views of it in terms of its physical and visual dominance in its surroundings and its historic context as symbol of importance and power, would be unacceptably further eroded and compromised. Removing and infilling the area of clear sky space to the extent proposed would have a significant adverse impact on the legibility and clear visibility of the White Tower. The proposed heights and contours therefore will have a substantial harmful impact on the heritage significance of the Tower of London and Outstanding Universal Value of the World Heritage Site.
- 4.32 To address this harm and significant adverse impact, the maximum height contour is required to be reduced to the east of the Tower of London to ensure an

appropriate graduated increase in height, which provides appropriate separation and free sky space to the Tower and the White Tower, protects the setting of the Tower of London and addresses the existing harmful impact within LVMF View 10a.1.

SVIA - Views 33, 34 & 36

- 4.33 The assessment of the Proposed views from Tower Green, Inner Ward of the Tower of London, notes that the proposed City Cluster allows the ‘three crests’ to be visible in this view. However, the additional height and form of development proposed between 20 Fenchurch Street (Walkie Talkie) and the committed developments to the eastern part of the cluster also result in significant coalescence of development between these two elements, visible above the boundary of the Tower of London which would be of significant harm to the appreciation and heritage significance of the Tower in these views.
- 4.34 “*Drawing together the elements of the existing and emerging City Cluster to create a more coherent overall form*” (Para. 6.274 of the SVIA) would not have positive visual impact in this view in respect of the ToL. The scale and form of development shown in Proposed Views 33, 34 and 36 would increase the built form visible above the boundary of the Tower, remove the open sky against which the form, outline and significance of the Tower can currently be appreciated, and would result in **adverse** harm in this view.
- 4.35 Furthermore, the delivery of a “*denser backdrop to the Chapel*” (Para. 6.274 of the SVIA) and “*increased backdrop to the Chapel of Royal St Peter ad Vincula*” (Para. 6.283 of the SVIA) would be unacceptable and have a significant **adverse** effect, as having a detrimental impact on the current clearly identified form and scale of the tower of the Church of St Peter ad Vincula. Far from creating “*clear sky space*” (Para. 6.277 of the SVIA) the proposed contours and heights in this section of the cluster clearly have the potential to create a continuous form of built development visible above the Tower of London inner ward, resulting in a harmful visual impact on the visual integrity of the Tower, removing the existing sky space around the Church of St Peter ad Vincula and unacceptably reducing its viable appreciation and historic context.
- 4.36 The overall resulting effect would be significantly **adverse** in respect of Views 33, 34 and 36 and would have a harmful impact on views from within the Inner Ward, impacting negatively on the heritage significance of the Tower of London and Outstanding Universal Value of the World Heritage Site.

4.37 To address this harm and significant adverse impact, the maximum heights are required to be reduced so that new buildings do not appear above the height of the Tower of London boundary in views from within the Inner Ward (Views 33, 34 and 36). The current visual skyline gap in the cluster in these views from the Tower of London are a clear and important attribute that is essential to be retained to protect and safeguard the significance of the heritage asset and the OUV of the World Heritage Site.

CONCLUSION

4.38 It is demonstrated that the current policy approach and detail in respect of tall buildings set out in the draft City Plan 2040 is neither justified or effective, and is therefore **NOT SOUND**. Reductions in the maximum height and proximity of the proposed contours to the eastern end of the City Cluster Tall Building Area, as well as of the heights of contours to the east of 20 Fenchurch Street, are required in order to address these matters and deliver a sound City Plan.

5. CONSISTENCY WITH POLICY

5.1 It is evident that the current policy approach and detail in respect of tall buildings is also **not sound** as it is not consistent with National Policy.

5.2 The delivery of buildings within the contours shown within the City Cluster Tall Buildings Area as proposed would deliver new development contrary to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Ancient Monument and Archaeological Areas Act 1979, and National Planning Policy Framework (NPPF), through failure to protect the historic interest and special character and setting of the Tower of London.

NPPF

5.3 Section 16 of the NPPF (2023) identifies that Heritage Assets, including World Heritage Sites, which are internationally recognised to be of Outstanding Universal Value, are an irreplaceable resource and 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.

5.4 Paragraph 196 sets out that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Paragraph 205 requires great weight to be given to the asset's conservation (and the more important the asset, the greater the weight should be). Clear and convincing justification is required to be provided where any harm results to, or loss of, the significance of a

designated heritage asset (including development within its setting). Unless there are substantial public benefits, local planning authorities should refuse consent for proposed development that will lead to substantial harm to a designated heritage asset (Para. 207). Paragraph 212 requires local planning authorities within the setting of heritage assets to enhance or better reveal their significance.

- 5.5 It is clear from the above assessment in Section 4 that proposed development within the heights and contours set out in Figure 15 of the draft City Plan, and policies maps B & C, would lead to substantial harm to the ToL World Heritage Site and its significance; negatively affect the conservation and enjoyment of the historic environment; and irreversibly impact on the Outstanding Universal Value of the ToL heritage asset. The current policy approach would neither enhance or better reveal the significance of the ToL, but would further erode its significance and heritage value. The detail of the policy as proposed is therefore not consistent with National policy.

London Plan

- 5.6 The approach and policy details are also not consistent with the adopted London Plan, and also results in significant contradictions between the tall buildings approach and detail, and the proposed heritage policies of the draft City Plan.
- 5.7 The current approach to tall buildings and contours proposals in Figure 15 and Proposals Map B and C are not consistent with the London Plan, in respect of Policies HC1, HC2, HC3 and HC4, as well as the London View Management Framework SPG, through the harmful impact on the heritage significance and setting of the Tower of London World Heritage Site and Strategic Views contained within the LVMF.
- 5.8 Development of the heights proposed would not be in accordance with Policy HC1(A) and (B) as the contours set out in Figure 15 would neither conserve or enhance the historic environment and heritage assets related to the Tower of London, and would not deliver positive benefits that conserve and enhance the historic environment. The proposed contours will also result in development which does not conserve the setting and significance of the Tower of London heritage asset, whilst the cumulative harm of existing, committed and future proposals would significantly erode the Outstanding Universal Value of the World Heritage Site and, harmful to its heritage. The draft City Plan is therefore not consistent with the requirements of HC1(C) and HC2(A) of the London Plan. The approach is also not consistent with the requirements in HC2(B) for proposals to conserve, promote and enhance the Outstanding Universal Value of World Heritage Sites, including the authenticity, integrity and significant of their attributes, and would severely

compromise the ability to appreciate the OUV, and the authenticity and integrity of its attributes.

- 5.9 New development which did come forward to the extent of the maximum contours set out in the draft City Plan would harm the characteristics and composition of Strategic View LVMF 10a.1 and its principle landmark element. Proposals would not preserve or enhance the viewers' ability to recognise and appreciate the Strategically Important Landmark in LVMF 10a.1. The scale of proposed development viewed in LVMF 10a.1 would have an unsightly and intrusive impact to the detriment of this view. It is evident that the current approach in the draft City Plan in respect of the height and location of tall buildings is not consistent with Policies HE3 and HE4 of the London Plan.

Draft City Plan 2040 – Heritage Policies

- 5.10 The policy approach to tall buildings is also considered to be contrary to the draft heritage policies in the City Plan as drafted, due to the resulting significant impact on the ToL World Heritage Site.
- 5.11 The current detail and approach would fail to meet the requirements of draft Policy HE1 to preserve, enhance and better reveal the special architectural or historic interest, and the significance of heritage assets and their setting, in respect of the ToL World Heritage Site. Future development in line with the heights and contours included in the Tall Buildings policy would lead to significant heritage harm.
- 5.12 Policy HE2 relates to Ancient Monuments and provides for the preservation, protection, safeguarding and enhancement of monuments and their settings. Policy HE3 specifically addresses and protects the setting of the Tower of London World Heritage Site. The draft policy requires development proposals to preserve, and seek to enhance, the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site.
- 5.13 The assessment undertaken in Section 4 however confirms that the current scale of development proposed in the tall buildings policy would not fulfil these requirements in respect of the ToL Scheduled Ancient Monument and OUV of the World Heritage Site, and would be in direct contravention of the policy requirements of both HE2 and HE3.
- 5.14 By adopting the heights and contours within Figure 15 and Proposals Map B & C, the proposed plan would support development of a scale which would itself be inconsistent with the objectives and requirements of the heritage policies of the draft City Plan.

6. ALTERNATIVE POLICY APPROACH TO DELIVER A SOUND CITY PLAN 2040

- 6.1 To ensure a compliant and sound City Plan, reconsideration of the heights and contours within the City Cluster Tall Building Area is required in order to address these issues, protect and conserve the significance of the Tower of London and OUV of the World Heritage Site; and ensure a sound, effective and justified City Plan.
- 6.2 To achieve this in respect of the Tower of London World Heritage Site the following amendments are necessary:
- Reduction in the maximum height contour to the east of the Tower of London to ensure an appropriate graduated increase in height, which provides appropriate separation and free sky space to the Tower and the White Tower, protects the setting of the Tower of London and addresses the existing harmful impact within LVMF View 10a.1.
 - This would be appropriately secured through reduction in the heights to the eastern part of the cluster and reversion to the previously proposed contour heights (shown in Image 1 below).



Image 1 – 2018 Proposed Height



Image 2 - 2024 Proposed Heights

- The resulting building heights in Image 1 deliver a pronounced sloped form to the eastern part of the cluster, providing a suitable and effective relationship, and appropriate relief, with the Tower of London. It removes the current towering effect of the potential development immediately adjacent to the White Tower in the current proposed heights (Image 2), maintaining and conserving the dominance of the White Tower and its relationship to the City and River Thames. It would ensure that the appearance of new development in close proximity to the White Tower is of a height which is lower than the tower, retaining the physical dominance and significance of the Tower of London World Heritage Site.

- In addition, to address the heritage harm that would result in respect of the key views from the Inner Ward (Views 33, 34 & 36 of the SVIA) and negative impact on the heritage value from within the Tower of London, the maximum heights are required to be reduced in respect of buildings within the current gap to the east of 20 Fenchurch Street.
- Heights of new buildings within this part of the City Cluster are required to be reduced to the extent that they do not fill in any further clear sky space around the tower of the Chapel of St Peter ad Vincula in these views and avoid the creation of a solid wall of development above the boundary structures of the Tower of London. Reducing the heights in this area would enable the Tower to still be read against the sky in at least part of this important view from within the Inner Ward and ensure that the authenticity and legibility of the Tower is not further interrupted and eroded.
- The tall buildings policy should also provide further detailed requirements in respect of the design, form and detailing of buildings in respect of their relationship with historic building, including the Tower of London World Heritage Site. Policies should ensure that new buildings that are within the wider setting of the Tower of London are designed to gradually step away from the tower, dispersing height away from the ToL, and avoiding sheer vertical edges and straight cliff edge elevations which reduce the dominance, legibility and authenticity of the Tower and its heritage significance and value. Particular attention should be paid to the treatment of edges to buildings within close proximity of the Tower of London in key views, and their materiality, to ensure an appropriate relationship and visibility between the ToL and new City buildings is maintained, and the character and setting of the heritage asset maintained and significance conserved.
- It is evident that the delivery of maximum heights of new tall buildings within the City Cluster in line with the contours in Image 1 in respect of these two parts of the cluster are the maximum extent that would enable the Outstanding Universal Value of the Tower to be retained and the heritage significance of the Scheduled Ancient Monument to be safeguarded. Any further encroachment into the sky space around the tower in these key views than shown in Image 1 would have a significant harmful impact in terms of heritage and would not be consistent with National Policy.

7. OTHER RELEVANT POLICIES OF THE CITY PLAN 2040 IN RESPECT OF THE TOWER OF LONDON

Maximising the benefits and connectivity with visitor facilities

- 7.1 HRP welcome the inclusion of Policy CV3 in respect of Visitor Facilities, and the wider connectivity, wayfinding and links to these facilities across the city and across its boundaries identified in criteria (5); together with Policy HE3 part (3), relating specifically to the Tower of London. The ability of the Tower of London to attract tourists and visitors to the city and its environs is particularly noted in Para. 7.4.0 of the draft City Plan.
- 7.2 We would propose the wording of policy HE3 further be strengthened to optimise the benefits that can be secured in respect of the location and attraction of these visitor facilities. To maximise the cultural and heritage benefits of these heritage assets, including the Tower of London, improvements to the public realm, wayfinding and signage related to new development and connectivity with these facilities should be a requirement of the policy, not just encouraged.
- 7.3 We would request alternative wording as follows be incorporated in respect of Policy HE3, Part 3 to ensure the plan is fully effective and sound in this regard:

*3. Development proposals in the setting of the Tower of London World Heritage Site **will be required** to incorporate appropriate enhancements to pedestrian and cycle routes and connections with the Tower, including signage and wayfinding in the area that is appropriate and contributes to the importance of setting of the Tower by improving public accessibility and visibility.*

Tower of London Historic Processional Routes

- 7.4 All four of the key historic landward approaches to the Tower of London approach from the City of London to the north and west. These routes are shown in Figure 5 of the Tower of London World Heritage Site Management Plan and highlights Great Tower Street as *“the main route westwards through the late Saxon city from St Paul’s Cathedral, aligned on the original entrance of the Beauchamp Tower. This was and remains the ‘ceremonial route’ to and from the Tower.”*
- 7.5 Whilst the City Plan 2040 includes reference and policy consideration to the processional routes associated with St Paul’s Cathedral, the draft City Plan does not include similar reference to the Tower of London routes within the City.

- 7.6 We would request additional wording as follows be incorporated in Policy HE3 to address the significance and importance of this route as follows to ensure the plan is fully effective and sound in this regard:

Policy HE3

4. Development proposals will protect and enhance the character and appearance of the processional route between St Paul's Cathedral to the Tower of London along Eastcheap/Great Tower Street, including views of the Tower of London from this route.