

Relationship With the River Thames

We consider the assessment of impact for this section to be insufficient due to the reductive nature of the baseline. Due to the insufficient baseline assessment, we consider the HIA cannot properly and effectively assess the full extent of heritage impact.

We would note the HIA infers harm in this section, as appreciable from riverside views. The HIA also refers to potential conflict with other policies. This harm is inferred rather than made explicit. This conflicts with the positive overall conclusions of the report which consequently are in error.

We consider the assessment does not acknowledge the harm that would be caused when considered in the context of the HIA's own baseline. The 'contribution of the setting to the Cathedral' section of the HIA notes that 'When seen from the river, the Cathedral dominates its setting, towering above the steeples and spires of the parish churches seen throughout the City'. The expansion of the City Cluster would therefore challenge this visual dominance and cause heritage harm as illustrated in AVRs. As previously noted the 'group value' of these local and strategic landmarks, including the church spires, is underplayed.

The HIA also notes the plan proposals would increase the 'dramatic juxtaposition between the clusters and the clear sky setting of St Paul's'. As noted within the recent inquiry for 'The Tulip' – juxtaposition is only positive where both aspects are respected. We would argue these impacts actively diminish St Paul's by favouring the cluster, upsetting this relationship and causing heritage material harm. This is an issue that also occurs within the baseline assessment of the HIA.

This disregard for balance is also echoed earlier at paragraph 5.22 of the HIA, which notes that clusters would 'consolidate the future baseline with new schemes of outstanding skyline presence' without any specific reference to St Paul's or indeed its significance. This both favours proposed new development while disregarding the importance of the Cathedral, indicating an imbalanced juxtaposition and we would represent, heritage harm.

We consider that assessment in line with the baseline of the *Setting Study* would also indicate heritage harm. This harm would arise through increasing the height, massing and physical presence of the cluster, creating a poorly considered edge to the cluster close to the Cathedral, and in general negatively affecting the Cathedral prominence and skyline presence – inherently related to its significance (especially through the clear skyspace aspect of setting – see also below). This would harmfully alter the character of this element of the setting of the Cathedral by altering an appreciation

of the scale of the Cathedral in relation to its setting. While the City cluster is here the primary issue, the massing of the Fleet Valley tall buildings zone would also be of concern, exacerbating this effect. We therefore consider that impacts as appreciated within this part of the setting of the Cathedral would be harmful.

We therefore consider that the proposed clusters would directly conflict with the following 'vulnerabilities to tall buildings' outlined by the City.

- *The partial or total obscuring of views associated strongly with historic representations such as paintings, photographs or etchings.*
- *Overly dominant intrusion into near, medium and distant views, eroding the sense of an intentional and balanced curation to the skyline.*
- *Transformation with the existing hierarchy of the skyline such that the remaining medieval contributors to skyline, such as church spires, are overwhelmed.*
- *Loss of clear sky setting or prominence of specific landmarks.*
- *Loss of a sense of composition to the City Cluster.*

We also consider that the inference of harm contradicts the City's own *Topic Paper's* assertion that 'While the overall sky space occupied by the cluster will potentially increase and become more layered in its appearance, these changes are considered to on the whole, not alter the nature of the City Cluster's existing contribution to the setting of the Cathedral in these views.'



View 15B.1 (zoomed)



View 17B.2 (zoomed)

Clear Sky Setting

We have fundamental issues with the definition and extent of this part of the heritage baseline of the Cathedral in the HIA, which creates issues that are borne out by the assessment of heritage impact. This is noted above.

As such the impacts which are recognised by the HIA are very limited, simply noting that the clear sky would be retained. Given the commentary above on impacts as appreciable elsewhere, we do not consider this is correct. In our view, the proposed clusters would adversely affect the overall skyspace contribution and thus harm the significance of the Cathedral.

We consider that the proposed clusters would directly conflict with the 'vulnerabilities to tall buildings':

- *Overly dominant intrusion into near, medium and distant views, eroding the sense of an intentional and balanced curation to the skyline.*
- *Transformation with the existing hierarchy of the skyline such that the remaining medieval contributors to skyline, such as church spires, are overwhelmed.*
- *Loss of clear sky setting or prominence of specific landmarks.*

We therefore consider that assessment here does not fully reflect the nuances of setting as required by guidance and outlined within the *Setting Study*. From a variety of viewpoints the clusters may retain some clear sky space directly around the Cathedral. However, overall skyspace would be reduced by the large massing and outline of the cluster as defined by Strategic Policy S12: Tall Buildings. This would create a large mass of development very close to and clearly negatively impacting on the setting of the Cathedral and its contribution to significance, and how this significance can be appreciated. While this is predominantly concerning the eastern cluster in views from the river, in longer distance views of the Cathedral (such as from Hungerford Bridge) the Fleet Valley tall buildings zone would also begin to challenge the Cathedral.

In addition and related to clear sky space as described within the *Setting Study*, the proposed clusters would also alter the way in which the historic pre-eminence of the Cathedral, appreciated through its scale and size in comparison to its setting, is appreciated. This contribution to the significance of the Cathedral would be disrupted by the massing of the cluster, which would alter the 'centre of gravity' for the views of the Cathedral, leading to it to be further challenged and dwarfed by the proposed extent of the city cluster. This also diminishes how its key architectural elements, the dome and the towers, are appreciated. This is evident in strategic views (such as 15B.1, above) and non-strategic views (such as Somerset House, below). Both are of direct relevance with regard to heritage considerations and setting.



The Cathedral and the City Cluster
(Image credit: Chris Redgrave, Historic England Archive, taken from the St Paul's Cathedral Setting Study)

Wider Civic Views

Here, the HIA conflates identified views by view management policy with setting and wider setting. There are also further deficiencies with the baseline assessment as outlined above. As such we consider that the assessment of heritage impact to be deficient.

We consider that any further increase in the built form of the Fleet Street Cluster in Monument views would cause heritage harm to the Cathedral, given the already harmful elements within this part of its setting and the relationship with skyspace outlined within the *Setting Study*. We therefore disagree with the assertion of a 'minimal' change and 'neutral' impact outlined in the HIA – unless it can be proven that no more increase would take place under this policy. As noted, we already view 120 Fleet Street as harmful development, which is included within the cluster.

In terms of other 'civic views' the baseline within the HIA states that *'the contribution to significance of these aspects of setting [wider civic views] lies in the persistence of the presence of St Paul's Cathedral in views, with the dome and towers retaining their dominate place in the cityscape of the western part of the City.'* Given the dominance the cluster would have in these views given the planned proposals, it is unclear how the proposals would *'at a macro level strategic sense.... Minimise the possibility of future individual tall building proposals harming the significance of the Cathedral though impact upon its setting and thereby conflicting with relevant policy and guidance.'* We would again note that this infers harm to significance, which conveniently is not taken into account in the conclusions of the report.

More broadly, the clusters would not directly occlude the Cathedral or affect LVMF planes, we would again note that the HIA is not an SVIA and the proposals would cause a change in the setting of the Cathedral as appreciable from these viewpoints. While the HIA notes the proposals would consolidate the existing cluster and strengthen *'the identity of the City'* – this again speaks to a bias in favour of juxtaposition as outlined elsewhere and is not clearly communicated in terms of heritage.

Discussion is provided on impacts as appreciable from Somerset House. We have great concerns on the heritage impact of the proposed City Cluster as appreciable in this area. The cluster would disrupt an appreciation of the significance of the Cathedral through directly disrupting the silhouette of the dome. Additionally, an appreciation of the historic interest of the Cathedral as the pre-eminent building of the City of London would be disrupted by the large massing of the cluster within this view. This is described above in relation to our comments on 'clear sky setting'.

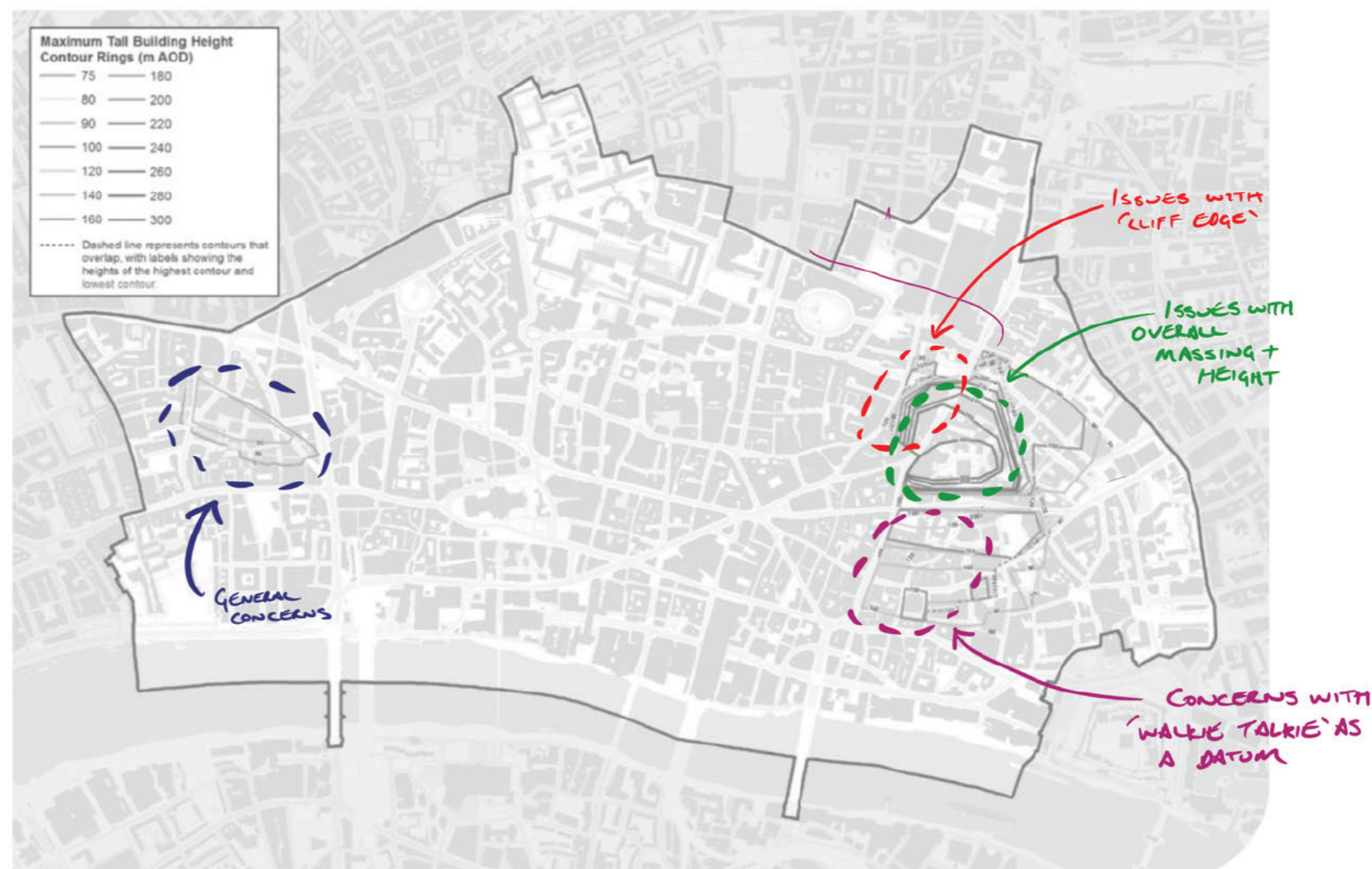


View from Somerset House (zoomed)

Summary

In summary, we consider the HIA for St Paul’s Cathedral prepared for the City Plan 2040 to be fundamentally flawed in terms of methodology and the conclusions. These are flaws which have ultimately shaped Strategic Policy S12: Tall Buildings.

We also consider that the clusters within proposed Strategic Policy S12: Tall Buildings have the potential to cause a very high level of harm to significance of the Grade I listed St Paul’s Cathedral, and the way its significance can be appreciated, through alteration of its setting. The implications of this harm are discussed below with regard to the soundness of the plan.



Above is a sketch mark-up of the contours map associated with Policy S12, indicating broadly where we have concerns. This should be read alongside our written response and not taken in isolation. (image credit: diagram from the City Plan 2040 with CAL mark-ups).

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

GPA3 also discusses ways to minimise and mitigate impacts. These are not explicitly discussed within the HIA. However, this is an important step that raises questions as to the derivation of the contours map and clusters at large. These are discussed below.

Relationship with the Topic Paper

The relationship between the topic paper and the HIA is unclear. The HIA notionally states that extensive assessment has been undertaken by the City of London. This assessment is not directly referenced within the HIA – though it is used to justify and contextualise the impact of the clusters. As the purpose of the HIA is to provide an independent assessment, we would query this justification for impacts and whether this presents a circular argument.

We offer limited comment on the majority of the topic paper. We note that this paper needed to reconcile a number of related, but different, aspects of assessment – most namely townscape, visual impact, and heritage. We note each type of assessment could be more clearly communicated within the paper to avoid confusion over methodology and ultimately outcomes of assessment - and a reliance on views.

The assessment also notes in numerous places that *'since [its] earliest times, the City has been characterised by tall buildings'* (para. 1.34). Statements such as this are concerning as they must be taken in context – historically tall buildings were the exception not the norm, and were of a clear historical importance and manifest social, political and architectural purpose.

Meaningful Options Appraisal

We welcome the inclusion of an options appraisal in the volumetric testing. However, we would here note that only two options were prepared, both of which we consider are clearly harmful in the sense of view management and heritage.

In line with the advice we often give to those proposing projects in the setting of the Cathedral, we would expect to see a wide range of options, including a 'no-harm' option, rather than the choice between two harmful options. It is difficult to understand why some aspects of the development envelope have been shaped as they have, especially with reference to past, less harmful iterations of the 'jelly mould' reviewed earlier in 2023 and publicly communicated in early consultation.

We have previously written to City Planners to raise a real concern that the 'jelly mould' contours appear to have been shaped around emerging developments subject to confidential pre-application consultation and negotiations, which we represent is unsuitable if not inappropriate as part of an active plan-making process, but also clearly has not properly considered heritage evaluation and consequential harm in the policy nor the (confidential) live project.

Convincing, Well Communicated Justification

As we have written in the separate paper on the strategic and detailed policies, we reiterate here our concerns regarding the justification for the quantum of development required, namely the need for 1.2 million sq metres of office space in the upcoming plan period.

It is not clear, as non-specialists in the field, exactly how this figure has been derived nor how policy has been informed by what appears to be a rather shaky and imprecise metric. Additionally, it is unclear what proportion of this figure, if any, is bound up with the very positive approach to retrofit iterated throughout the plan. Finally, it is unclear if the 1.2 million sq metres is exclusive of those buildings already consented following the emergence of this policy. These questions are important, as one must assume there is some (unclear) but direct correlation between the size and form of the proposed clusters (which we consider harmful) and the quantum of office space which we are told in the Topic paper is required.

Role of the Sustainability Appraisal

We do not seek to provide detailed comments on the sustainability appraisal, especially given the time involved in responding to this consultation. However, to our understanding, the appraisal does not assess the visualisations and modelling that are so crucial in understanding the impacts of the Plan policies. In general the appraisal does not appear to acknowledge the detrimental impact of the drive for office space upon the historic environment of the City and wider London – with no full acknowledgement of cross-boundary impacts.

Operation of the Policies

Wording of Strategic Policy S12: Tall Buildings

Our comments below are provided notwithstanding the heritage harm we consider would arise from the contours as they are currently described within the map to Strategic Policy S12: Tall Buildings. This includes the contour heights themselves – which we consider have been incorrectly derived and have been evaluated in a manner that results in mistaken conclusions with regards to heritage impacts (as noted above).

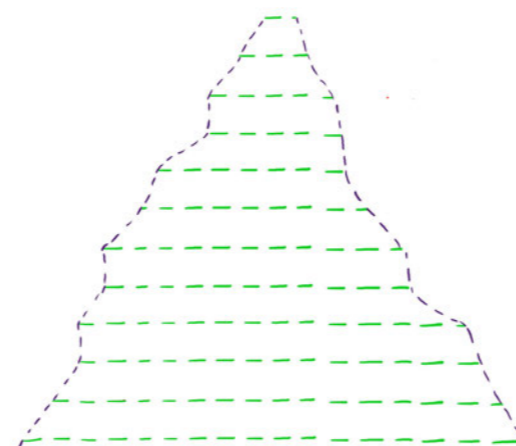
As also outlined above, we consider the proposed policy would not sufficiently comply with the aims and aspirations of the protection of the historic environment outlined in other policies of the City Plan, such as Strategic Policy S11: Historic Environment. We have concerns over the wording of Policy S12: Tall Buildings which states that proposals should ‘have regard’ to the significance of heritage assets. We consider that this wording should be more robust and adequately reflect the aspirations for heritage protection we share with the City. This should be discussed more heavily throughout the policy, with specific reference to actively avoiding heritage harm.

If revised as we recommend, there will be a beneficial consequence from more effective development (delivered without causing harm) which is more confident and certain in the execution of policy with greater certainty of outcome for developments.

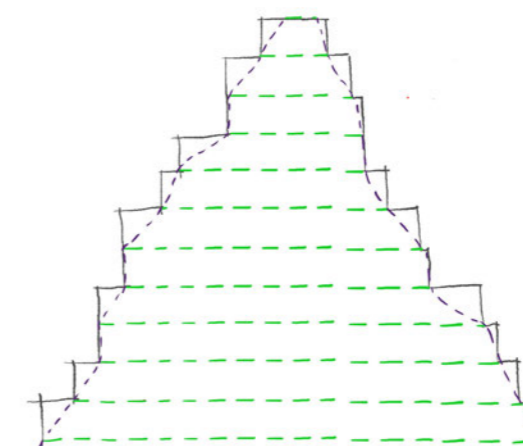
We also have issues regarding the lack of acknowledgement of cumulative impacts. As outlined within the *Setting Study*, the rate of change of the City Cluster in particular has profound consequences for the way the setting of the Cathedral contributes to its significance. The quantum and rate of development is ever increasing. We consider that specific consideration of cumulative impacts should be made clear within Policy S12: Tall Buildings.

The wording of Strategic Policy S12 states: ‘*Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.*’

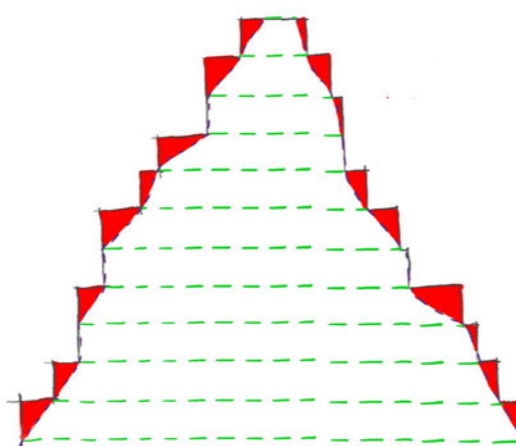
While the discussion of the need to mediate between the contour heights is helpful (notwithstanding our concerns over the heights themselves), the policy statement that, ‘*contour ring heights and should not exceed the next higher contour,*’ we fear would open up these areas to inappropriate development that would exacerbate issues with the height and massing of any final adopted contour map.



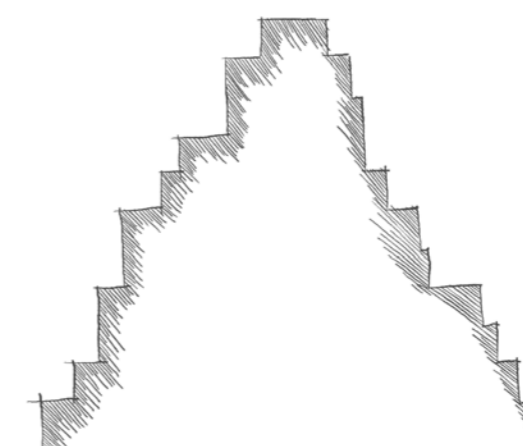
1. contours and envelope



2. potential built form



3. zones of concern above envelope



4. potential silhouette

Here, we have attempted to illustrate the issues involved with the wording of Policy S12, which we fear may cause creep in height and massing beyond the contour rings eventually decided upon.

We fear that the imprecision in this wording will become clear to any developers legal advisor as indicating that essentially any development sited within the borders of a contour ring can implicitly be developed to the maximum height level. We consider that the policy should be clarified to remove any ambiguity and make the extents of development absolutely clear. We also consider that this ambiguity means that the policy as written does not reflect the boundaries of the development envelope (as published) - this is important as it is this envelope is assessed in the HIA and forms the basis of the policy - and the cause of our concern

We posit that a potential answer to the issue above would be to make the lower ring the maximum height – and thus there would be no room for ambiguity which could be exploited and planning process would be more confident and clear (please note, we also query parts of the contour map where contours overlap and the potential for harmful effects and ambiguity).

We also note the requirement for AVRs to be submitted. We welcome this inclusion, and request that other media, such as digital walkthroughs, are both submitted and made accessible to the planning portal. The accessibility of digital modelling to other stakeholders such as St Paul’s would be of great service to assist us in understanding the potential impacts of schemes. We suggest that greater emphasis could be made of accessibility of this data.

We also have concerns with the omission of policies prepared for the previous plan. In our estimation, the removal of the policy prohibiting or limiting tall buildings in conservation areas is of concern. While we understand that conservation areas are protected through alternate policy and legislation (as designated heritage assets) the explicit limitation of tall buildings within such areas was a positive limit in terms of heritage and townscape management more broadly. We also regret the removal of this explicit limitation as a way of opening negative/harmful expansion of the clusters.

Concerns with Strategic Policy S12: Tall Buildings and Other Policies within the Heritage and Tall Buildings Section.

As noted above, we have concerns that the policy relating to Tall Buildings would cause inherent heritage harm and adverse visual impact to strategic and local views. In doing so, we consider that the policy will conflict with the other heritage specific policies within the draft City Plan, specifically Strategic Policy S11: Historic Environment and Policy GE1: Managing Change to the Historic Environment.

The wording of these policies is broadly positive, seeking to celebrate the City's heritage and acknowledge the multifaceted benefits that can be drawn from our historic environment. However, we consider that the heritage harm inherent to the tall buildings policy would be clearly inconsistent with Policy S11's mandate to '*celebrate the City's Heritage*' or be said to be '*conserving or enhancing heritage assets and their setting*' making positive contributions to their significance '*at the heart of placemaking*'.

It is wholly unclear how the development described by Strategic Policy S12: Tall Buildings would deliver this vision. This is discussed below in terms of the soundness of the plan

Concerns with Strategic Policy S12: Tall Buildings and Other Policies in the wider City Plan 2040

As noted within the 'Collated Response' Document, we have concerns over the effectiveness of certain policies within the wider City Plan inherently linked to Strategic Policy S12: Tall Buildings, and the quantum of development described therein. This is described below in terms of the soundness of the plan, and focusses on conflicts with strategic priorities, the strategic strategy, key areas of change and the strategic policy on Offices that underpins the quantum of development required.

Potential (actual and/or perceived) undeclared Conflicts of Interest

We note that the SVIA and standalone HIA for St Paul's Cathedral has been prepared by the Townscape Consultancy (TTC).

We represent that there is an undeclared and therefore potentially inappropriate conflict of interest, for a general and specific reason. We do not imply any impropriety by this observation.

We wholly understand that private companies have a role to play in the development of new plans, including calls for sites and additional assessment work. We remark however that the SVIA and HIA clearly state that TTC has provided independent assessment of the development envelope produced by the contour map and were not involved in the design, generation or derivation of said development envelope. As noted above we have methodological questions as to the relationship of the HIA, where this work is used to justify the cluster, and the Topic Paper, which we also understand was produced entirely independently of the HIA.

The role of the SVIA and HIA - particularly in relation to St Paul's Cathedral - in providing justification for the contours map and subsequent development envelope should, however, not be underplayed. In clarifying the City's views on the potential impacts of the policies the TTC documents form a critical part of the evidence and subsequent justification for the plan.

TTC is one of a number of respected professional consultancies that are regularly engaged to assess new development within the City. This by necessity involves the interplay of emerging proposals and emerging policy, often in sensitive areas. A key example of this is in the case of 99 Bishopsgate, an emerging (and now announced in the public sphere and media) proposal on the fringes of the cluster.

We understand that any emerging scheme in this area should respond to the constraints of emerging policy. However, it is uncertain how the emerging policy itself has been crafted in this area, given we consider it will result in a significant and avoidably harmful urban form. The causality of development and policy is therefore here uncertain. St Paul's has written to the City Planners to raise this reverse causation as a concern.

Since TTC are representing the private interests of many reputable projects and clients in the City generally, but most specifically for the 99 Bishopsgate emerging project, around which the 'jelly mould' appears to have been shaped, at the very least a COI should have been declared in relation to the preparation of an HIA for the 2040 Plan, which would have aided transparency and scrutiny in our view.

We have articulated our concerns about methodology and conclusions of the HIA extensively above.

Tests Against the NPPF and Overall Soundness of Plan

While this section focusses upon Heritage and Tall Buildings, it also by necessity involves discussion of the soundness of other policies that we consider would either conflict with the development described by Strategic Policy S12, or have been used to underpin the development described within that policy.

Paragraph 35 of the NPPF defines 4 tests for soundness, which are discussed below.

a) Positively prepared – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

This demands that the needs of the area have been 'objectively assessed' or adequately communicated without ambiguity. For the reasons outlined above, we have concerns that the assessment of the need for 1.2million square metres of office space has been communicated clearly and effectively and the basis for this figure is ambiguous.

More importantly, due to the harm inherent within the plan policies, we do not consider that the policies would be fully '*consistent with achieving sustainable development*'.

We therefore do not consider the plan has been fully positively prepared.

b) Justified – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

As noted above, we do not consider the plan is sufficiently justified. We consider the evidence base has concerning flaws in terms of methodology and differ on the impacts of the proposed policies as outlined in the Plan's supporting documentation. Additionally, we do not consider that reasonable alternatives were suitably explored through a clearly defined options appraisal. Given these factors, we are also critical of the overall proportionality of the plan and evidence base, and would offer the alternative *St Paul's Setting Study* for consideration in the development of policies affecting the setting of the Cathedral.

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

We offer no commentary on joint working inherent to such a plan, or inter-borough relationships.

We do however have concerns regarding the effectiveness of the plan. There is an inherent conflict between the strategic objectives of the plan and the target for development and resultant inappropriate and impactful form of the clusters as planned and defined. We would therefore query if this is truly fulfilling a 'plan-led' approach.

As a general commentary on effectiveness and deliverability, we would note that the harm we see as inherent to the policies would bring decision making on individual projects in conflict with both strategic policies of the draft *City Plan 2040* and with national policies (see below). Given the inherent harm of the proposed policies, and the paradox of overtly harmful schemes that would comply with the local tall buildings policy but would both conflict with the strategic policy within the plan on heritage and national policies regarding the preservation of the historic environment (see below) it is difficult to understand how the plan could deliver sustainable development, and thus its own self defined strategic objectives.

Given the issues with the evidence base outlined above, and the concerns with both the wording of Strategic Policy S12: Tall Buildings and the quantum, form and level of harmful development it would permit, we consider that it would conflict with other policies within the Heritage and Tall Buildings section. While we welcome the overall aims and objectives of Strategic Policy S11: Historic Environment, we consider that its effectiveness would be severely limited by the extent of development permitted within Strategic Policy S12: Tall Buildings. This would create a conflict between the objectives and letter of the policy (regarding conserving and enhancing the setting of heritage assets). We therefore consider Policy S11: Historic Environment unsound.

Additionally, as mentioned above in relation to the SVIA, we have both concerns about the evidence base produced and with the development resultant from Policy S12: Tall Buildings with regards to protected views. We consider that this would conflict with the wording of Policy S13: Protected Views. This conflict would cause issue with the effectiveness of the Plan. This policy explicitly states that implantation of the LVMF will be used to 'manage designated views of strategically important landmarks (St Paul's Cathedral...)...'. As noted above, we do not consider the clusters to comply with LVMF guidance and subsequent London Plan policies (see below). We do not consider that the clusters would protect and enhance local views,

such as Fleet Street, as outlined in section 2 of Strategic Policy S13. As will be outlined elsewhere, the views are limited to City views and LVMF views (with a few exceptions) – it is uncertain how other local views in different Boroughs could be impacted. We therefore do not consider the clusters would comply with the wording of Policy S13: Protected Views – thus making the policy unsound.

There are also concerns regarding policies outside of the Heritage and Tall Buildings Section. Strategic Policy S4: Offices discusses the requirements for 1.2 million square metres of office space. As outlined above and elsewhere (see Collated Response), we consider that has not been adequately or convincingly justified or communicated. Given the quantum of development that would be resultant from this policy, we consider this to be unsound.

The quantum of development described by Strategic Policy S12: Tall Buildings also has links to two key areas of change: Strategic Policy S21: City Cluster and Strategic Policy S22: Fleet Street & Ludgate. We have concerns with the justifications for these policies and how it will regulate development and the harms from developments that would be permitted under these policies. In the case of Strategic Policy S21, this would directly conflict with the section of the policy regarding the preservation of heritage assets and their setting. We would note that this section is not explicitly included in Strategic Policy S22: Fleet Street and Ludgate – a further error. We therefore consider these policies to be unsound.

Fundamentally, we consider that the conflict between the strategic objectives of the plan therefore also renders 'Strategic Objectives' and the 'Spatial Strategy' unsound.

As outlined above, in addition to conflicts inherent between policies of the *City Plan 2040*, we also have concerns with the compliance of the City Plan with regional policy, in the form of the London Plan 2021. As outlined above, we do not consider that the clusters described by Policy S11 would comply with Policy HC3: Strategic and Local Views or HC4 London View Management Framework. In terms of heritage, we would consider that the clusters described by Policy S12: Tall Buildings and the general wording and direction of the plan would conflict with the aspirations and wording of London Plan Policy HC1 Heritage conservation and growth.

We understand that the City Plan was revised to better relate to London plan Policy D9: Tall Buildings. However, we have concerns that the current iteration of the City Plan would entrench harm contrary to the aims of Policy D9, which states at d) that 'proposals should take account of, *and avoid harm to* [our emphasis added], the significance of London's heritage assets and their settings.'

By these inherent conflicts the plan will fail to reduce risk and uncertainty in the planning process and in many case can give rise to contested determinations (pre or post determination). We would represent that by (re) defining a plan for tall buildings and heritage, with accompanying revisions to the strategic priorities, spatial strategy and key areas of change in a manner that is clearer and explicitly does not permit or presume levels of unacceptable harm to heritage, the planning process would be more certain with better and more effective outcomes for the development community and other public interests.

All of these issues are also discussed below in relation to consistency with national policy.

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Given the commentary provided above, we have concerns that the policies within this section of the City Plan would not be consistent with the spirit or letter of the *National Planning Policy Framework*. We also consider that any inconsistencies discussed below would undermine the effectiveness of the plan.

A Positive Vision for the Future

Paragraph 15 of the NPPF states that plans should be ‘*Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities...*’

We do not consider that this chapter of the plan, for the reasons given above, provides the best genuinely positive version for the future of the area that encompasses and delivers sustainable development. The harm inherent in the policy for tall buildings, coupled with the drive for a large quantum of office space, would be to the detriment of not just the historic built environment, but also by extension the cultural landscape of the City and wider London.

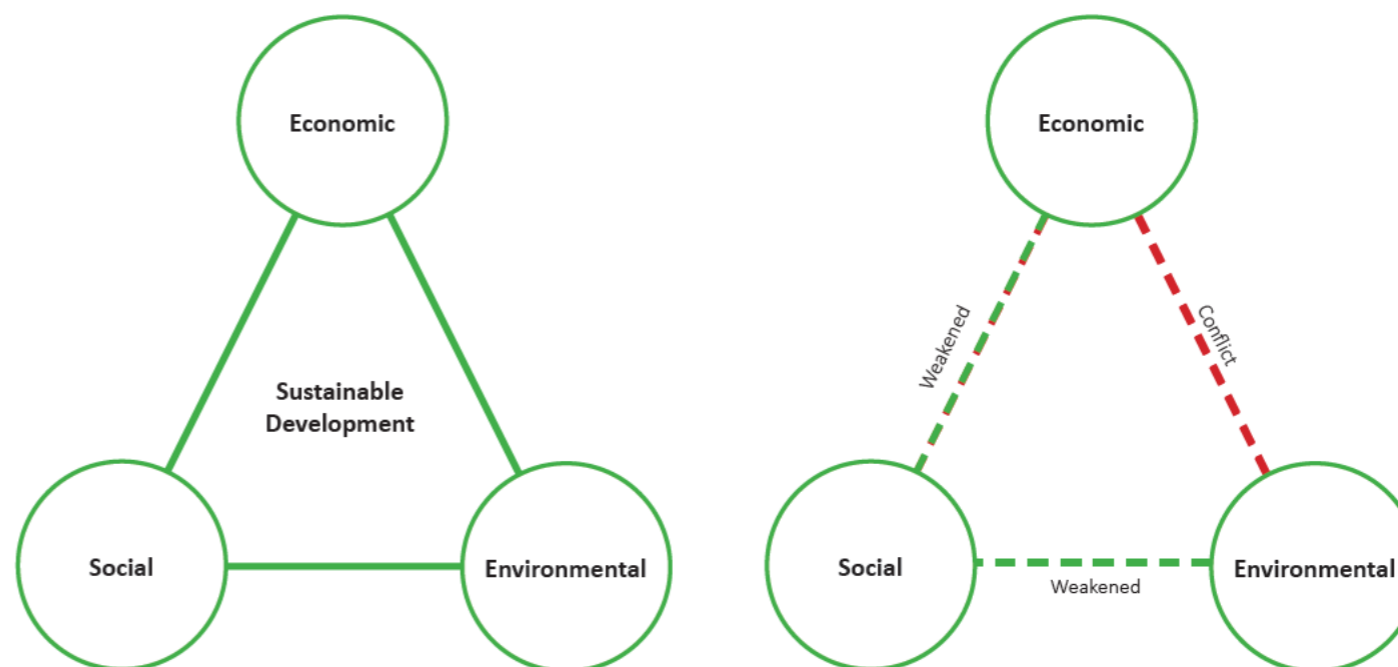
The Objectives of the NPPF

This detrimental impact arises through the pursuit of one part of one strand of one of the three objectives of the *National Planning Policy Framework*, to the detriment of the others. Paragraph 16 of the NPPF also states that plans should be ‘*prepared with the objective of contributing to the achievement of sustainable development*’. This means meeting the three objectives of the NPPF.

In the pursuit of 1.2 million sq metres of office space, the proposed policies would, in our opinion, adversely harm the historic environment of the Square Mile and wider London, thus being contrary to the NPPF’s environmental objective (including heritage).

Additionally, the proposals also neglect to acknowledge - or places insufficient weight to - the multifaceted nature of the City’s heritage, which also contributes to with the cultural and spiritual aspects of the Square Mile and London as a whole. As such, the proposed policies have the potential to be to the detriment of the social objective of the NPPF.

Finally, though the pursuit of 1.2 million sq m of office space is clearly intertwined within the economic objective of the NPPF, it is just one strand. If this works to the potential detriment or results in actual harming of the historic environment, and indeed the amenity, quality and character of the internationally recognised City Skyline, the proposed clusters have the potential to detrimentally affect other aspects of the City that are linked to its economic performance, specifically those related to the burgeoning efforts of Destination City policy. As such, prioritisation of this quantum of new office floor space would also not meet the NPPF’s economic objective.



This diagram begins to describe the tensions within the strategic objectives of the plan that contribute to its unsound nature..

Heritage Specific Aspects of the NPPF

We consider that is drawn and defined at present heritage harm is ‘baked-in’ to the plan to conflict with the heritage specific areas of the NPPF. This is both inconsistent with national policy and would lead to the ineffectiveness of the plan, as described above.

With regard to strategic policies, paragraph 20 of the NPPF states that strategic policies should make provision for ‘c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.’ Given the impacts which, correctly evaluated against a suitable evidence base, are clearly present in the plan and as outlined above, we do not consider the plan meets this test. Given the strategic nature of these policies and their inherent conflicts, we therefore have strong concerns regarding the effectiveness of this plan.

At paragraph 195, the NPPF notes that heritage assets 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.’ Through the harm inherent to the policies within the City Plan, we would consider that this irreplaceable resource (of exceptional significance) is under threat.

Paragraph 196 of the NPPF describes how plans should ‘set out a positive strategy for the conservation and enjoyment of the historic environment.’ While the wording of the strategic policy for heritage protection is broadly both admirable and aspirational, the development resultant from the detailed policies such as tall buildings would result in harm to the Cathedral, a building of exceptional architectural and historic interest. We therefore do not consider that the proposed policies would present a positive strategy for the City’s unique and rich historic environment.

This is borne out by analysis of the City Plan in relation to the individual parts of paragraph 196. It is not considered that the plan sustains, preserves or enhances the significance of the Cathedral, in line with part (a). In

addition, through the focus on extensive office space to the detriment of other factors of sustainable development, including the economic merits of heritage assets, the plan does not take into account ‘the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring’ as described in part (b). Additionally, through inappropriate form and massing we consider that the clusters would not ‘make a positive contribution to local character and distinctiveness’ in line with part (c), or ‘draw on the contribution made by the historic environment to the character of a place’ mandated by part (d).

There are also helpful parallels with plan making and the ‘understanding impacts’ section of Chapter 16 of the NPPF. While we understand we are discussing a plan and policies, not specific development, we consider a number of these points are relevant considering this involves critiquing the heritage impact of the clusters.

Paragraph 200 requires proportionality in assessments of significance which includes any contribution made by the setting of heritage assets. As noted above, we do not consider the evidence base included as part of the plan to be proportionate, as proven through the draft of our own assessment.

In accordance with paragraph 201, decision makers should take their own assessment of the significance of a heritage asset into account when considering impacts, ‘to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’ Where the Plan’s own policies conflict with this conservation it is difficult to see how such policies could accord with the spirit or letter of national policy. We also consider the extent and detail of the HIA provided as part of the plan to be insufficient and the conclusions are in error as a consequence.

As outlined above we consider that the proposed policies would, through inappropriate form and massing, cause harm to the significance of the Cathedral and how this significance is appreciated. We do not consider that the development envelope wrought by the contours map presents ‘opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance’ and therefore should not be treated favourably, in line with paragraph 212.

Paragraph 205 of the NPPF states that when considering the impact of proposals, ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be.’ Given St Paul’s is Grade I listed, a heritage asset of exceptional significance and international renown, we have concerns over the magnitude of such inherent harm caused by the policies and consequently the weight that should be given to this harm is commensurately of the highest degree. As outlined above, we also do not consider this harm to be clearly or convincingly justified in line with paragraph 206 of the NPPF.

Inherent to the policy, and to subsequent planning decisions that will come from its observance and building-out, will be the weighting of public benefits vs heritage harm (as outlined in paragraph 208). As described above, we consider that through these policies entrench a skewed and inappropriate balancing of public benefit to the detriment of this irreplaceable and finite historic environment.

The NPPF, The Operation of Policies, and the Evidence Base

Paragraph 16c also states that a plan should *'contain policies that are clearly written and unambiguous'*. For the reasons noted above, we would consider that the Tall Buildings policy by nature contains ambiguity. While we understand there is a tension inherent to our 'case by case' system, the wording of the policy has the potential to further entrench harmful and inappropriate development.

The lack of a convincing options appraisal is also of concern. Paragraph 32 of the NPPF states that, in relation to a sustainability appraisal considering the plan, *'Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).'* For the reasons given above, we do not consider that alternative options have been considered to eliminate or even convincingly ameliorate the adverse impacts of the policies as presented in this consultation.

At paragraph 31, the NPPF also states that *'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'* As noted above, we have issues with the adequacy of the evidence base, both in terms of methodology, scope and proportionality, and the outcome of assessment provided is in error.

In comparison, we have included within our response a mature draft of the St Paul's Setting Study jointly commissioned by St Paul's Cathedral and Historic England. We feel that this adequately and robustly lays the foundations for a comprehensive heritage assessment of the contribution of the setting of the Cathedral to its exceptional significance – and is clearly differentiated from visual impact or townscape methodologies to meet the special regard to the desirability of the preservation of the Cathedral's and its setting required by the Planning (Listed Buildings and Conservation Areas) Act 1990.

The Setting of St Paul's Cathedral

Its contribution to heritage significance:
an analysis and evidence base

City Plan 2040 Regulation 19 consultation version
June 2024



Historic England



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FOREWORD



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St Paul's Cathedral is more than a masterpiece of the English Baroque. This is a building both of exceptional architectural ambition and renown, and also a spiritual focus for the people of the Square Mile, of wider London and the nation. St Paul's will never just be a physical symbol, beautifully crafted in stone, lead and gold: St Paul's is a vital and active community of worship. The Cathedral is a living expression of Christian faith and collective endeavour, as well as an architectural marvel: a sanctuary and a beacon.

It is fitting then that these multifaceted values and shared interests can be so clearly understood by the presence of the Cathedral in its surroundings, in the way St Paul's is perceived and interpreted. The Cathedral has a tangible visual presence on the internationally recognised London skyline. It is an important symbol of London and the nation. To those who interact with and in our capital city, the presence and resonance of the Cathedral is much more nuanced, complex and textured. Its presence is missional today and plays an important role in our collective memory.

St Paul's Cathedral has watched over the City of London for over 300 years in this form, but four earlier buildings stretching back over 1,400 years preceded Wren's masterpiece on this site with the arrival of St Mellitus in 604 A.D. As the city we serve has grown and evolved, the Cathedral has remained resolute at its heart. It has stood through celebration, destruction, upheaval, and change. More than simply an elaborate backdrop, the

Cathedral has been at the heart of events that have shaped our nation and formed our self-perception. A confluence of church and state, St Paul's remains uniquely important to the nation and city it serves, representing faith at the heart of the nation. The cathedral is an anchor point on the continuum of London's growth and change, offering continuity, solidity and reassurance for those who come into contact with this place.

There is a symbiosis and partnership between the dynamic, evolving and vibrant City and the Cathedral at its heart. Our partnership with the City is reflected in the structures of the planning system and the role of the Cathedral within these frameworks. As active participants in the spiritual and social landscape of London, we acknowledge that when the capital thrives, so does St Paul's. This fruitful common interest can be facilitated through the planning system.

In partnership with Historic England, we are therefore pleased to present the St Paul's Cathedral Setting Study. The Setting Study describes and understands the history of the unique setting of the Cathedral, so that all participants in the planning system are aided with evidence and greater certainty in planning for change, now and in the future. This important work is not solely about protection of the setting, which has long been understood in the City processes, but in our terms is about ensuring this incredible building can be appreciated long into the future. It is about celebrating success and seeking clarity about further areas where, collectively, we could better reveal the unique

significance of this building of exceptional heritage value for wider public benefit. We therefore hope that this report helps those who drive, shape and sustain the energetic progress of our capital into the future.



Very Reverend Andrew Tremlett
Dean of St Paul's



Foreword from Duncan Wilson, Chief Executive, Historic England, to follow in final version.

PART ONE:
Technical Summary



1.0 Purpose of this report

What is it and who is it for?

- 1.1 The purpose of this document is to assist those who are engaged or interested in the management of the setting of St Paul's Cathedral. The Cathedral is a Grade I listed building of exceptional architectural and historic significance. As a listed building, the preservation of the setting of the Cathedral is given the same weight in law as its fabric (s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, see Appendix 2, p.168). To assist in the discharge of this statutory duty, this report provides a robust, evidence-based assessment of the ways in which setting contributes to the Cathedral's significance and to the appreciation of that significance. This evidence can be used in plan making and in the development and determination of proposals that have the potential to affect the heritage significance of St Paul's.
- 1.2 The contents of the report equate to steps 1 and 2 in Historic England's *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2nd edition, 2017), and provides information and analysis to inform the preparation of steps 3 and 4.

Relationship to policy

- 1.3 This is not a planning policy document. It is evidence to assist the implementation of policy and the formulation of new policy. Although, in the report, views are considered to illustrate particular contributions made by setting to significance, this is not a views study (see paragraphs 1.9-1.12) and the document does not identify new viewing places to add to the many that already exist as part of planning policies regarding views (see Appendix 3 p.170).

Endorsement

- 1.4 St Paul's Cathedral and Historic England will use the study as an evidence base for comment and advice on plan making and development proposals affecting the setting of the Cathedral.
- 1.5 The City of London and GLA were consulted during the preparation of this document. They have welcomed its substantial contribution to improving public and professional understanding of the Cathedral's setting, but this version of the report (v10) does not represent their views or form part of the formal suite of development plan documents.

Version status

- 1.6 This version of the report was issued for the Regulation 19 consultation on the City Plan 2040. A final version of the report will follow at a later date. This will add case studies (Part Three) and additional photographs and images, but no substantive changes to the wording of Parts One, Two and Four are planned.

Wider interest

- 1.7 In addition to its primary role, the evidence base and case studies provide a wealth of information for people who are interested in how the physical context of the Cathedral, including different aspects of its setting, have changed over time.

The Technical Summary

- 1.8 In this first part of the study, the Technical Summary, the reader will find an explanation of the report's structure, a statement of the Cathedral's heritage significance and the summary analysis of the contribution made by setting to significance. This part of the report also contains concluding remarks, and an explanation of the methodology followed in its preparation.

The difference between setting and views

- 1.9 This report is about the setting of St Paul's. Views are considered as part of this analysis, but the two are not one and the same. It is important therefore to understand the distinction between setting and views as they apply to heritage assets:
- 1.10 **Setting** is more comprehensive. It is the surroundings in which a heritage asset or place is experienced and perceived today, and includes the relationship of an asset to its surroundings both in the present and in the past. It is not only visual but can include other environmental factors like noise and historical connections such as land use and architectural intent.
- 1.11 **Views** are a defined visual impression of a place or asset, and not every heritage asset will have significant views associated with it. Nonetheless, views can make a vital contribution to understanding and appreciating the setting of heritage assets and can constitute part of an asset's significance.
- 1.12 See Appendix 1 on p.166 for further discussion of this subject.

2.0 Report structure

PART ONE: Technical Summary, p.6

An overview and summary of the study, the analysis and findings, encapsulating what matters and why.

PART THREE: Case Studies. p.161

Three case studies will follow in the final version of the report. The case studies will be selected as a tool kit to illustrate how the contribution of close, intermediate, and distant setting to the Cathedral's heritage significance can be assessed using the four step process recommended by Historic England.

PART TWO: Evidence Base, p.34

The baseline analysis, first of the Cathedral (chapter 8), then of the historical evolution of its setting (chapter 9) and finally of the present contribution of setting to the building's heritage significance (chapter 10).

These chapters provide a detailed examination of the subject. They also contain summary boxes that present this analysis in a concise form. A list of these summary boxes and links to them can be found on p.26.

PART FOUR: Appendices, p.164

Part Four contains useful background information:

- an explanation of the difference between the concepts of setting and views in the planning system;
- the legislation and policy for the management of heritage assets, their setting, and views in London;
- relevant Local Plan policy; and,
- a bibliography and list of sources.



3.0 Background

- 3.1 St Paul's Cathedral is first and foremost a focus for faith in London and beyond. It has been an enduring symbol of Christian worship on this site for c.1,400 years and it continues to play a powerful role in the lives of individuals and the nation. But it has always also been universally acknowledged that the Cathedral is, perhaps equally, a place of exceptional cultural importance. Such national and international significance requires careful management to sustain.
- 3.2 From the time of its completion until the middle of the 20th century, the Cathedral literally and symbolically dominated London. It became central to the identity of the capital as a world city, and the majestic silhouette of the dome and the west towers became embedded in our national consciousness.
- 3.3 The ability to appreciate the distinctive outline and form of the Cathedral remains for many the most tangible way to engage with and understand its architectural, historic and cultural importance. It is a mark of this special importance that protection of the silhouette has been embedded in planning policy for almost a century, predating nationwide statutory protection of setting by decades.
- 3.4 Once the City adopted this pioneering policy, St Paul's Heights, in 1938, its concern proved prescient. Though the physical and cultural context of the Cathedral had always evolved, until the middle of the 20th century its dominance on the skyline remained largely unchallenged. However, over the last 70 years, and particularly in the last two decades, the speed and scale of redevelopment around the Cathedral has radically accelerated, challenging its pre-eminent position.
- 3.5 One response has been to acknowledge the importance of the building as one of only three strategic landmarks in London, the other two being World Heritage Sites (the Palace of Westminster and The Tower of London), and by doing so affirming the significance of St Paul's in both a national and international context. However, the mechanisms for managing change to its significance as a landmark as come to be seen largely through the lens of maintaining specific views, an approach initiated with the St Paul's Heights methodology.
- 3.6 The sophistication of such views management has increased over recent years and advances in technology, such as verified views and digital modelling, has provided some greater certainty when attempting to