

CITY OF LONDON – DRAFT CITY PLAN 2040

URBANSAPCE PLANNING LTD ON BEHALF OF HISTORIC ROYAL PALACES

ADDENDUM HEARING STATEMENT – MAIN MATTER 7 - Heritage and Tall Buildings (Policies S11 to S13 and HE1 to HE3)

MAY 2025

Introduction

- 1.1 This statement addresses the Updated Evidence Base Documents published by the City of London in respect of Main Matter 7 of the Local Plan – Heritage and Tall Buildings. This statement is prepared on behalf of Historic Royal Palaces and should be read alongside Historic Royal Palace’s Hearing Statement (March 2025) and Regulation 19 consultation response prepared by Urbanspace Planning Ltd.
- 1.2 In summary, the amendments to the contours (and supporting information) proposed by the City of London are not considered to address the significant harm that has been identified to the Tower of London World Heritage Site and its OUV from the current draft Plan, whilst resulting in additional harmful impacts in respect of the view from within the Inner Ward and the heritage significance of the Tower of London.
- 1.3 It is however considered that amendments to the profile and reduction in height of the contours in respect of tall buildings to the eastern edge of the cluster, and new contours associated with proposed buildings between 20 and 50 Fenchurch Street, could reduce the levels of harm to an extent that the draft Plan could be found sound, without significant impact on deliverable office floorspace.
- 1.4 Details of the assessment of the additional material is set out below (Paragraphs 1.5 to 1.18), together with further details of the amendments requirements to enable the plan to be considered Sound (Paragraphs 1.19 to 1.21).

Addendum SVIA

- 1.5 The Addendum Strategic Visual Impact Assessment provides a review only of the changes to the contours and the visual impacts compared with the Regulation 19 submission, rather than an assessment against the existing townscape. This is not a sound basis of assessment as the Regulation 19 contours and visual impact has not been established or accepted, and the assessment fails to assess the visual impact against the existing environment and condition.

- 1.6 In respect of View 1 (LVMF 10A.1) it is evident that whilst the additional City Cluster massing now proposed will sit against the backdrop of the existing/proposed cluster, the cluster as shown with the heights and contours proposed will continue to lead to substantial harm to the ToL World Heritage Site and its significance; negatively affecting the conservation and enjoyment of the historic environment; and irreversibly impacting on the Outstanding Universal Value of the ToL heritage asset. This is in direct conflict with national policy and guidance, and London Plan policies D9, H1-H4. 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, remain necessary in order to address these matters and deliver a sound City Plan, as set out in our Regulation 19 response.
- 1.7 The SVIA confirms in respect of View 1 (LVMF View 10.A) the potential for adverse effects at the eastern edge of the cluster on the World Heritage Site (Para. 6.11 page 19), however it is considered that the potential is high and the impact to be significantly adverse, as per the assessment set out within our Regulation 19 response. In any event, given the harm that has already resulted to the setting of the Tower of London and its OUV, it is evident that any potential level of additional harm will cumulatively culminate in an unacceptable further negative impact, and result in a significant adverse effect.
- 1.8 In respect of the additional tall building proposals at 30 Fenchurch Street and 1/2 Minster Court, it is evident from the Strategic Views within the addendum SVIA that the proposed contours will lead to the potential for further significant adverse visual impacts and substantial harm to the World Heritage Site and its Outstanding Universal Value.
- 1.9 View 32 (Page 86 and 87), 33 (Page 88 and 89) and 36 (Page 94 and 95) demonstrates that development within the extended contours would further detrimentally erode the sky space around the St Peter ad Vincula Bell Tower, and deliver a continuous extent of solid form of new development above the roofscape of the Inner Ward of the Tower of London. This would impact further on the appreciation of the Tower, its landmark significance and its position of hierarchy within the city, which make up key elements of its OUV.
- 1.10 Paragraph 6.147 highlights the sensitivity of the foreground of this view in terms of scale of development, however this is not addressed through the amendments proposed to the contours. The change to the contours adds more bulk, height and massing, which has an angular and projecting form towards the Tower of London,

and provides a further awkward interruption within the skyline in this view. This results in an abrupt and uncomfortable visual intersection with the existing rooftop of the Inner Ward, harmful to the appreciation and setting of the Tower of London. The text in Paragraphs 6.148 and 6.149 simply describe the position of the new massing, but provides no assessment of this impact resulting from the revised contours on the view itself.

- 1.11 The harmful additional impact is further evident in View 33 (Page 88 and 89). Paragraph 6.152 acknowledges the creation of a denser backdrop to the Chapel and sensitivity around scale in this location in respect of the impact on the Inner Ward. However, no assessment of the impact of the additional massing on the view from the Inner Ward is included in Para. 6.153. The visual on Page 89 however demonstrates that the additional form created within the revised contours would completely subsume the Bell Tower of St Peter Ad Vincula, with no sky space maintained to the sides of the tower to its full height, significantly eroding the ability to appreciate the outline of the tower. The full extent of the roofscape of this part of the Inner Ward would result in a solid form as its backdrop, impacting further on the hierarchy of the Tower of London and its visual significance within the townscape. The contours proposed have a major adverse impact on the existing view and completely erode appreciation of the roofscape of the Tower, with the presence of a denser backdrop creating the potential for significant harm. The extent of new development provides less articulation of the cluster by providing a continuous solid form without the existing breaks and sky views. These existing breaks and views of the tower against the sky line enable the appreciation of the roofscape of the Tower of London and are an important visual elements of maintaining its status and hierarchy within the city in respect of its OUV from these views.
- 1.12 In respect of View 36 (Page 94 and 95) Paragraph 6.165 confirms that the contours result in an increased backdrop and would have a quantitative effect in respect of this view, which is considered to result in significant additional harm to the Tower of London and its OUV. Paragraph 6.166 further shows that the changes to the contours further infills the current open space around the Bell Tower and removes remaining sky space, against which it can currently be seen and be appreciated. In respect of Paragraph 6.167 it is agreed that the proposed contours would further infill the space between 20 and 50 Fenchurch Street, which would have an additional harmful impact by providing a more continuous solid form of development, removing any sky spaces above the roofscape of the Inner Ward and impacting the appreciation of the Inner Ward and hierarchy of the Tower in its City setting, which is a key element of its OUV.

Addendum HIA

- 1.13 In respect of the Heritage Impact Assessment, the addendum provides an overly simplistic review and assessment of the potential impact on the WHS. It is evident that the proposed additions between 30 and 50 Fenchurch Street would have a further substantial harmful impact on the setting and OUV of the Tower of London. The increased form, scale and angular arrangement of the additional built form resulting from the revisions to the cluster will provide a denser form of development in the backdrop of the Tower in views from within the Inner Ward. The erosion of sky space above the roofscape of the Tower, the increased sense of enclosure by modern buildings and the continuous backdrop of new development in these views will have a significant harmful impact in respect of both Landmark Siting and Physical Dominance of the Tower. It is evident that the conclusions set out in the HIA Addendum are not 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.
- 1.14 Cumulatively with the significant heritage impacts identified as a result of the height and profile of the contours to the eastern edge of the cluster on the White Tower (as demonstrated within our Regulation 19 Response and Hearing Statement), the proposed contours are neither justified or effective, and as a result the Plan as currently drafted is not Sound.
- 1.15 For the reasons summarised above we strongly disagree with the City of London's conclusion within the addendum that that the proposed contours shown as part of the 'contour line policy' mechanism minimises the possibility of harm to the settings and OUV/Significance of the Tower of London.
- 1.16 In respect of the eastern end of the City Cluster, there is no material change to the assessment, position and conclusions as set out in our March 2025 Hearing Statement and Regulation 19 response as the height and resulting profile of the proposed contours continue to result in the possibility of significant harmful impacts on the World Heritage Site and its Outstanding Universal Value.
- 1.17 Furthermore, in respect of the impact on the Inner Ward of the Tower of London it is evident from the additional assessment work that the revised contours deliver the potential for further harm to the Tower of London World Heritage Site and its Outstanding Universal Value, such that the revised contours and associated tall

building policy would set a context in which additional substantial harm would result as currently drafted.

- 1.18 The proposed contour lines as shown within the policy will result in the possibility of harm to the settings and OUV/significance of the Tower of London, and as a result the Plan is not effective or consistent with National Policy or Legislation and is therefore not sound.

Proposed Amendments to Deliver A Sound City Plan 2040

- 1.19 As confirmed in 4.2 of the (ED-HTB36) Tall Buildings Policy – Evidence Base Addendum (May 2025) the proposed amendments will result in an uplift in office accommodation and more floorspace capacity being generated. It is evident that through minor changes to the contours to address the substantial harm identified to the setting of the Tower of London and its OUV, the possibility of substantial harm to the heritage significance of the World Heritage Site and its OUV could be significantly reduced and the City Plan 2040 considered by HRP to be Sound.
- 1.20 This could be achieved through reconsideration of the heights and profile of the contours within the City Cluster Tall Building Area to 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.
- 1.21 This would require:
- A 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 delivers 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.
- Associated re-profiling of the contours of the site at 100 Leadenhall Street, where the previously approved scheme has not been delivered, to address the relationship of potential future new development of the site with the Tower of London WHS and reduce the harm on its Outstanding Universal Value, particularly in LVMF View 10a.1.
- Reduction in the height of the contours proposed in respect of 30 Fenchurch Street and 1/2 Minster Court to deliver forms appearing below the existing roofscape of the Inner Ward in Views 32, 33 and 36 and further articulation to avoid the angular and abrupt relationship of the proposed contours with the Tower of London, as has been worked through and achieved in respect of the proposed Broadgate Tall Building allocation.
- To seek to positively address the current impacts and provide an appropriate approach to the height and profile of the contours to the eastern end of the Cluster, HRP has been working in partnership with Historic England to review the contours and associated massing model. From further assessment undertaken by HE it is understood that amendments to the contours which deliver heights

approximate to those shown in Image 1 above would result in a minor reduction in overall volume and floorspace capacity, but which together with the uplift achieved through the amendments would continue to deliver an increase in overall capacity compared with the Regulation 19 version of the Plan. This minor change to the eastern edge of the Cluster would however significantly reduce the harm to strategic views and heritage harm currently identified as resulting from the proposed building heights contours in respect of the Tower of London World Heritage site and its OUV.

- Whilst these changes would not mitigate completely the effects on the OUV of the Tower of London, it is HRPs view that this compromise could achieve a balance in respect of new economic development and heritage harm, which if incorporated into the Plan could allow for it to be found Sound.