

City Plan 2040



Topic Paper Tall Buildings Evidence Base

January 2024

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i. INTRODUCTION

i.i The City of London Corporation is preparing a new Local Plan to replace the current Local Plan which was adopted in 2015. The Proposed Submission of the draft Local Plan, titled 'City Plan 2036', was published for Regulation 19 consultation in March 2021. In response to the draft City Plan consultation, a total of 1,327 formal representations were received from 171 respondents which covered a wide range of topics, though a main theme related to the impact of growth and intensification on heritage assets and the City's character.

i.ii The City of London Corporation is preparing a new Local Plan to replace the current Local Plan which was adopted in 2015. The Proposed Submission of the draft Local Plan, titled 'City Plan 2036', was published for Regulation 19 consultation in March 2021. In response to the draft City Plan consultation, a total of 1,327 formal representations were received from 171 respondents which covered a wide range of topics, though a main theme related to the impact of growth and intensification on heritage assets and the City's character. The Mayor of London in his response indicated some differences between the policy approach to tall buildings in the draft City Plan and the adopted London Plan 2021, which led to a conclusion that the draft City Plan 2036 was not in general conformity with Policy D9 of the adopted London Plan 2021. The Mayor requires changes to two key areas to address the general conformity issue:

- Tall Buildings – the City Plan should identify which areas of the City are appropriate for tall buildings and, within these areas, indicate appropriate building heights to provide necessary guidance on tall building development and accord with the London Plan.
- The Tower of London World Heritage Site (WHS) – the City Plan should consider potential negative impacts on The Tower of London WHS from the development of tall buildings and provide clear guidance to manage down building heights in proximity to the Tower and its setting.

i.iii Further observations relating to tall buildings and the future of the City Cluster were made by Historic England stating that the City Plan does not adequately reflect national or strategic policy. That the tall buildings proposals were likely to continue to come forward in locations and at heights that would cause serious harm to the significance of key heritage assets. The Plan should offer mechanisms to adequately protect the City's historic environment. There were also concerns raised by nearly 70 individuals expressing support for the London Sephardi Trust and the Spanish and Portuguese Sephardi Community in relation to the potential impact of tall buildings on the setting of Bevis Marks Synagogue.

i.iv The current evidence on office demand and development also needs to be updated in light of consultation comments on the Covid-19 pandemic impact on development activity and future demand for office floorspace, including demand for office floorspace within tall buildings. It is therefore considered that material changes are required to produce a post-Covid Plan – that supports sustainable growth, provides a robust framework for future office growth and addresses the concerns raised by the Mayor of London and other respondents. The City Corporation intends to revise the draft City Plan and then reconsult on a revised Proposed Submission Draft Plan. The revised City Plan will have an extended period up to 2040 to ensure alignment with

the City Corporation's Climate Action Strategy and provide a framework for a 15 year period.

Purpose of the topic paper

- i.v The purpose of this topic paper is to demonstrate how the following policies relating to Tall Buildings in the Proposed Submission Draft City Plan 2040 have been developed and evidenced:
- Strategic Policy S12: Tall Buildings identifies areas where tall buildings are inappropriate and sets out the requirements for tall building development.
 - Strategic Policy S13: Protected Views seeks to protect and enhance significant City views and strategic London views of important buildings, townscape and skylines.
- i.vi This Topic Paper sets out justification for the City Corporation's tall building policy approach and evaluates options and potential impacts in relation to the location and height of tall buildings. The main objectives are:
- To identify appropriate locations, in principle, for tall buildings within the City of London.
 - To determine building height range within the tall building areas
- i.vii By doing so, the topic paper will address the concerns raised by the Mayor of London and other respondents, thus ensuring that the Draft City Plan is compliant with the London Plan 2021.

Structure and Approach to the Topic Paper

- i.viii The approach taken is reflected in the structure of this topic paper which is summarised below:

Section 1 – Background

City of London Context

- i.ix This section provides a contextual overview of the City with regard to its strategic location and role within the wider London region. It provides a broad understanding of the City's changing character with insight about the growth in tall building development.

Policy Context

- i.x This section provides a robust understanding of the policy context in relation to tall buildings. It outlines national, regional and local level policies along with a detailed review of the City Plan approach towards tall buildings. Other important planning guidance reviewed includes Historic England's Advice Note 4 on tall buildings, The Mayor of London's World Heritage Sites SPG and planning guidance on the Tower of London World Heritage Site.

Section 2 – City of London Heritage Significance

i.xi This section provides a broad understanding of the historic environment of the City of London setting out a high level statement of heritage significance. It provides a summary of the City's history, highlighting the how tall buildings were perceived over London's development. A brief analysis of the core City heritage typologies is given, highlighting specific building types characteristic of the City. In addition, the heritage significance of the strategic landmark heritage assets within the City is defined, including St Paul's Cathedral, The Monument and The Tower of London. This includes a summary of how setting contributes to an appreciation of this significance. An overall statement of the significance of City of London is then given, broken down into a series of traits. The relative sensitivity of each aspect outlined above to tall building development is also identified.

Section 3 – Character Area Sieving Exercise

i.xii The overarching aim of the paper is to identify those areas which have the greatest sensitivity to the potential impact of tall buildings. For the purpose of this analysis, the City is broadly divided into 8 Character areas which share common underpinning characteristics which makes them distinct. Section 3 undertakes an initial sieving exercise, with areas either sieved in or out, based on a more granular assessment of sensitivity to tall buildings.

i.xiii The following criteria are applied for the sieving exercise in order to assess an area's sensitivity to tall building development:

- *Character and Appearance* – an assessment of the character area's core characteristics such as its historic evolution, topography morphology, urban structure, built form, heights and uses.
- *Strategic Townscape & Skyline* – a general assessment in relation to strategic level townscape and views, comprising those pan-London, City of London and neighbouring borough strategic views and the visual impact on core strategic landmarks.
- *Heritage Significance* – a broad summary of the heritage significance of the character area is set out, noting designated heritage assets of interest and highlighting those traits which have been found to contribute to the significance of the City of London as a whole, as identified in Section 2.

i.xiv Areas found to be very sensitive to tall buildings are accordingly sieved out.

Section 4 - City of London Tall Building Strategy and Assessment

i.xv In this section, areas with tall building potential that are sieved-in are subject to further sensitivity analysis which refines the extent of their perimeter boundaries and determines acceptable building heights within these areas. A detailed assessment is then undertaken, assessing the identified areas and heights for potential impact against a defined Selected Criteria comprising Strategic Views and Heritage policies and guidance. This takes the form of Heritage Impact Assessments, as well as a Strategic Visual Impact Assessment.

SECTION 1 – BACKGROUND & CITY OF LONDON CONTEXT

Strategic location

- 1.1. The City of London covers just over one square mile and is located strategically within the central area of London sharing its boundaries with the adjoining London Boroughs of Islington, Hackney, Tower Hamlets, Southwark, Westminster, Camden, and Lambeth. The City is physically well-connected and has the highest level of Public Transport Accessibility (PTAL) with a rating of 6b. It is served by an extensive public transport network which includes six mainline railway stations, 12 underground and DLR stations and an extensive network of bus routes. The opening of the Elizabeth Line with two stations in the City at Farringdon and Liverpool Street has resulted in improved connectivity in the City with access to more people than ever by public transport.



Figure 1. Rail and Underground Network.

- 1.2. The coronavirus pandemic led to widespread disruption and change to the nature of travel. The public transport demand in the City reduced significantly due to behavioural changes in relation to working from home and a shift towards more localised travel. Post-pandemic, there still remains some uncertainty regarding travel patterns and full time return to office, however, Transport for London (TfL) figures as shown in the graph below indicate considerable growth in ridership in the recent months from the pre-pandemic levels.

- 1.3. The monthly passenger volumes across London Underground and buses have clearly experienced strong growth in 2022 indicating a growing uptake with more and more workers and visitors returning to the City.

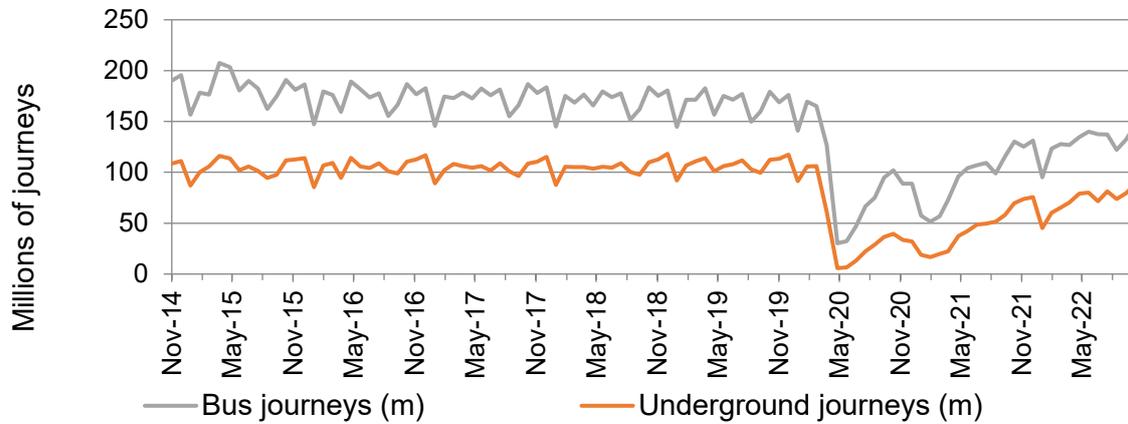


Figure 2. London Underground and Bus Journeys (source: TfL)

City of London’s historic character and change

- 2.1. The City of London is a place with distinct character and special significance. It has a rich and long history being home to some of the most iconic architecture both historic and modern – from medieval architecture and churches including Wren’s iconic St Paul’s Cathedral, houses and Livery Halls, majestic Victorian buildings and post-war architecture including the Brutalist style Barbican Estate to the most striking modern architecture which includes The Gherkin, The Cheesegrater and many more prominent tall buildings on the City’s skyline – intermingled with stretches of the original Roman Wall. The City’s character is hence layered and reflected in its buildings and spaces and its 800-year role as a major international financial centre having large areas devoted to strongly defined specialised functions with strongly defined architectural character. These factors have resulted in a townscape of great complexity and diversity. Despite being one of the most special places within London that continues to evolve and change, the inherent character and significance of the City has been sustained throughout hundreds of years.
- 2.2. The City of London consists of a large number of designated heritage assets with over 600 listed buildings along with 27 conservation areas, 48 scheduled monuments and 4 Historic Parks and Gardens. The City also provides a backdrop and setting to the Tower of London which has been inscribed by UNESCO as a World Heritage Site (WHS) of Outstanding Universal Value (OUV). Furthermore, the City of London and its surroundings contain many important landmarks and heritage assets which are visible both within and beyond the City’s boundaries – the views of the City’s skyline from the River Thames as well as many historic landmarks such as St Paul’s Cathedral, the Monument and the Tower of London are particularly noteworthy and add to the City’s cultural identity and World Class status. This architectural palimpsest of the City landmarks, listed buildings and other heritage assets is best appreciated through the City streets where the silhouette of St Paul’s is seen amongst the varied outlines of the post-war towers and spires of churches and religious houses and many new modern tall buildings creating surprising juxtapositions and vistas. The strategic townscape and

heritage views and historic skyline features of the City are protected by an integrated range of national, regional and local policies.

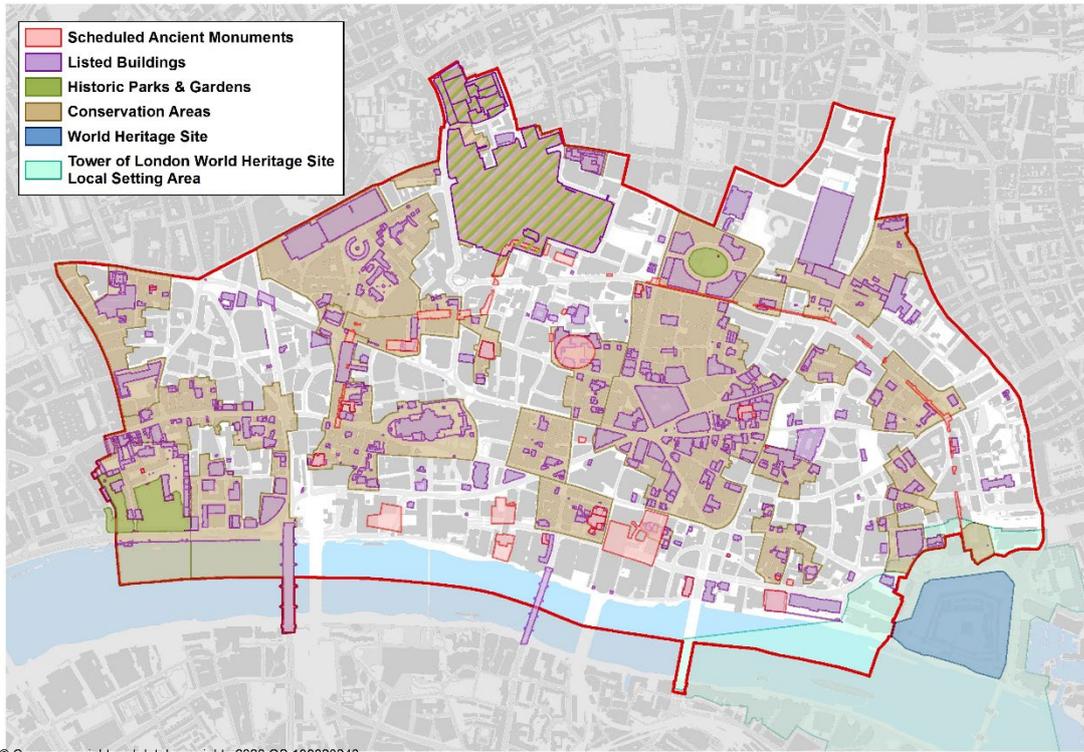


Figure 3: Designated Heritage Assets and Conservation Areas

Changing character of the City's built environment

- 3.1. Though the character and heritage sensitivities within the City creates a restricted opportunity for new development particularly tall buildings, the City is still undergoing continuous change., The development of tall buildings which are defined as over 75m in the City of London has increased significantly over the last decade.
- 3.2. Table 1 shows the number of tall buildings permitted and completed in the City in the period from 2011/12 to 2021/22. These statistics show that there has been a steady rise in tall building development, both new permissions and new completions in the City since 2011/12

	No. of tall buildings permitted or completed	Site addresses for completed tall buildings
2011/12	7 permitted, 1 completed	New Court
2012/13	1 permitted, none completed	-
2013/14	1 permitted, 2 completed	5 Moor Lane; 6 Bevis Marks
2014/15	2 permitted, 3 completed	122 Leadenhall Market; 70 Mark Lane; 20 Fenchurch Street
2015/16	3 permitted, 1 completed	5 Broadgate
2016/17	1 permitted, 2 completed	New Fetter Lane; 1 Creechurch Place
2017/18	2 permitted, 1 completed	1 Angel Court
2018/19	2 permitted, 4 completed	60 St Mary Axe; London Wall Place; 1 New Street Square; 120 Fenchurch Street
2019/20	1 permitted, 2 completed	100 Bishopsgate; 52 Lime Street
2020/21	1 permitted, 3 completed	22 Bishopsgate; 150 Bishopsgate; 80 Fenchurch Street
2021/22	4 permitted, none completed	-

Table 1: Tall buildings permitted or completed in the City from 2011/12 to 2021/22

- 3.3. The east of the City contains a cluster of tall buildings including some of the most extraordinary skyscrapers such as the Gherkin and the Leadenhall Building (as shown in Figure 3). The Eastern Cluster or the City Cluster forms a distinctive skyline and has the highest density of commercial activity within the City particularly known for its financial and insurance services. The City Cluster is expected to accommodate a significant proportion of the City's future growth in office floorspace, together with other complementary land uses. Of the 14 tall buildings that are in the development pipeline as of 2021/22, 7 tall buildings are located within the City Cluster.

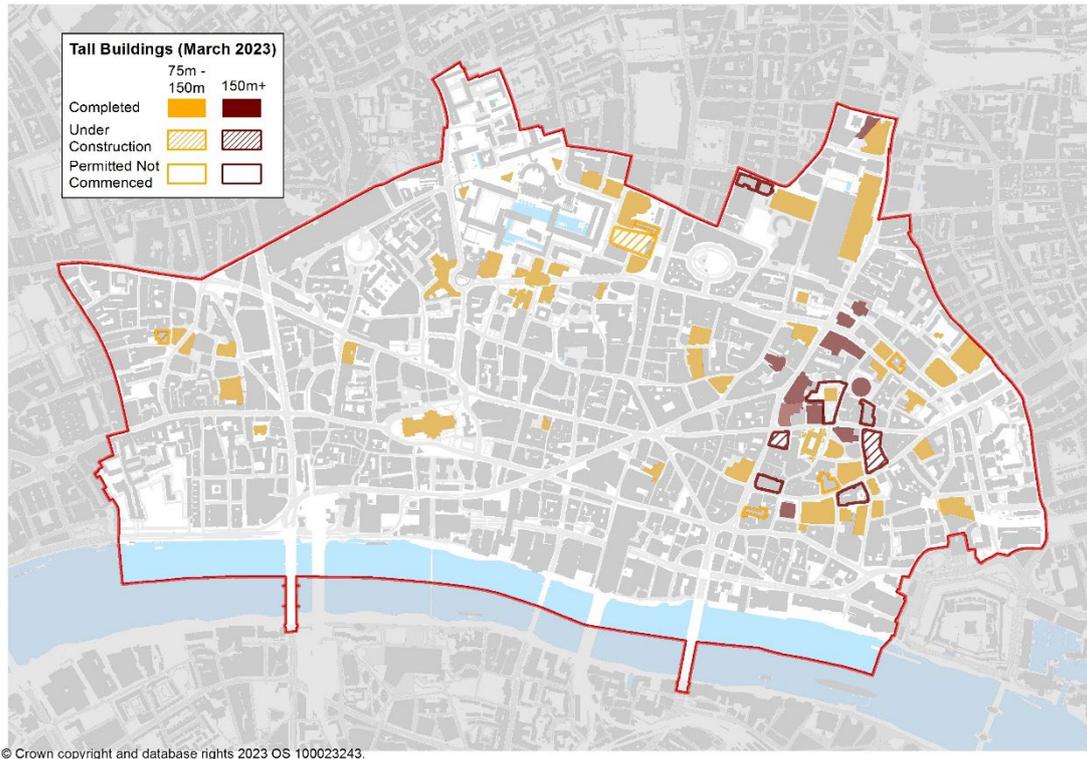


Figure 3. Tall building distribution within the City of London (2022)

- 3.4. Tall buildings impart the City of London a World City status to compete globally and to be open to business. Clusters of tall buildings can allow for concentration and agglomerations of businesses and related economic activity while also providing higher densities and creating a more defined impact on the overall City skyline.

- 3.5. It is, however, important to consider that inappropriately sited tall buildings can have an adverse impact on the significance of designated heritage assets or protected parks and gardens, and their settings. They can undermine the character of a place, or intrude into, and undermine cherished views of landmarks or urban skylines. They can also cause adverse environmental impacts such as reduction in daylight and sunlight, wind shear and overshadowing. It is therefore critical to determine appropriate areas and heights for tall buildings in order to respond to the opportunities that tall buildings may provide whilst also addressing and responding appropriately to the issues that they may create.

City of London's strategic commercial role and Covid-19 impact

- 4.1. This section sets the backdrop for the City's strategic and commercial role within the wider London region, nationally and internationally; and outlines the impact of Covid-19 on the commercial activity within the City in the last few years. This section, however, will not provide justification of the need for office provision as the basis of new tall building development. This will be covered separately in evidence papers prepared to support the City Plan.
- 4.2. The City of London has the largest concentration of office-based employment in London located entirely within the Central Activities Zone (CAZ). Being a key driver of the London and the UK economy, it is renowned for its financial, insurance and legal sectors. It has seen a rapid increase over the years in serviced and co-working workspaces which offer more flexible workspace options and attract a more diverse range of occupiers including technology, creative enterprise and media companies.



Figure 4. The City of London's location within the Central Activities Zone

- 4.3. The London Plan 2021 identifies City as a strategically important, globally-orientated financial and business services centre, whose commercial functions should be protected and enhanced. Residential development is considered inappropriate in the commercial core area of the City of London and, in other parts of the City, offices and other CAZ strategic functions should be given greater weight relative to new residential. This strong

protection for office development is also reflected in the City Corporation's long-standing planning policy approach which seeks to enhance City's strategic commercial role.

- 4.4. The GLA Interim Employment Projections (October 2022) are used to inform the London Plan, and borough Local Plan, policies. These projections are based on historic productivity trends and assumptions about long term economic output. At a borough-level, employment is projected to increase in all London boroughs over the 2019-2041 period, with the City of London, and the boroughs to its south and east (Hackney, Tower Hamlets, Newham, Greenwich and Southwark), together accounting for over half of the 842,000 increase in jobs projected over this period. Overall, inner London boroughs are projected to grow faster than outer London boroughs, at 0.7% a year (adding 664,000 jobs in total).
- 4.5. For the City of London, total employment over the period 2016 – 2051 is projected to increase from 557,000 to 731,000, an increase of 174,000, or 31.2%. Over the period of the City Plan, the GLA projections suggest an increase in total employment from 2016 to 2041 of 176,000, or 31.6%. The 2022 projections suggest a steeper rise in City employment in the period up to 2031, followed by a levelling off and a slight fall after 2041. The steeper rise during the 2020s is a reflection of the significant amount of new office floorspace that has either been permitted or has a resolution to permit since 2019 and is therefore contained within the London Employment Sites Database which underpins the projections. The projected employment however levels off post 2031 in line with the wider trend for the whole of London.
- 4.6. There has been a constant development pressure on the City as the land availability is constrained and there is an increasing desire for higher quality office floorspace, which better meets more stringent environmental performance standards and delivers a higher quality of working environment, including in tall buildings.
- 4.7. The overall office floorspace target of 1,200,000m² is derived from the estimated growth in office employment between 2021 and 2040 and represents a 13% increase in floorspace. The demand target is the central of three projections of the Arup's office demand study, and is based on different scenarios for office attendance, office densities, occupancy rates and employment projections. The central target is aligned with GLA 2022-based long term employment projections for London and the Square Mile. The report concludes that future office floorspace requirements in the City are likely to be significant, with little evidence of long term adverse impacts on growth as a result of the pandemic.
- 4.8. Capacity modelling study has been undertaken to assess the City's potential capacity, especially in the tall building areas which could potentially help meet the future office floorspace needs. The study demonstrates that meeting the office targets heavily relies on developing potential sites in the City Cluster area, along with additional capacity in other parts of the City.
- 4.9. Traditional office-based jobs are the dominant sector in the Square Mile, representing 59% (346,000) of all jobs in 2021, but emerging office-based firms are faster-growing, consisting of 41,600 new jobs (+62% between 2015 and 2021). There were 22,300 businesses and 590,000 workers in the City in 2021 and employment is projected to continue to grow over the long term. The City accommodates 440,000 office-based jobs

in an estimated 5.3 million m² (Net Internal Area) of office space. Over 99% of all the City businesses are Small and Medium Enterprises (SMEs) with fewer than 250 employees; 80% have fewer than 10 employees.

- 4.10. In 2023, 29% of take-up of office floorspace in the City of London was from media and tech firms, compared to 19% from financial companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers. This broader range of occupiers is creating requirements for a broader range of office types.
- 4.11. Demand for Incubator, Accelerator and Co-Working (IAC) floorspace is predicted to continue to grow across London and this type of accommodation is seen as important to the growth of SMEs. Delivering these types of workspaces within the City will meet the needs of smaller businesses in particular and help to grow both the City and the wider London economy.
- 4.12. As well as providing flexible space, it is important to ensure that there is floorspace that is affordable to start-up and growing businesses. Accommodation costs are a major overhead for new businesses and rents in the City can be prohibitive to new occupiers. The City has seen substantial growth in the serviced and co-working office market in recent years and flexibility of lease arrangements provides a range of opportunities to accommodate both new and growing businesses. Developers and building owners are also encouraged to consider a range of leasing structures, including below market rents to ensure that a range of affordable workspaces are available to meet demand, in particular from new and emerging sectors of the economy and creative industries.

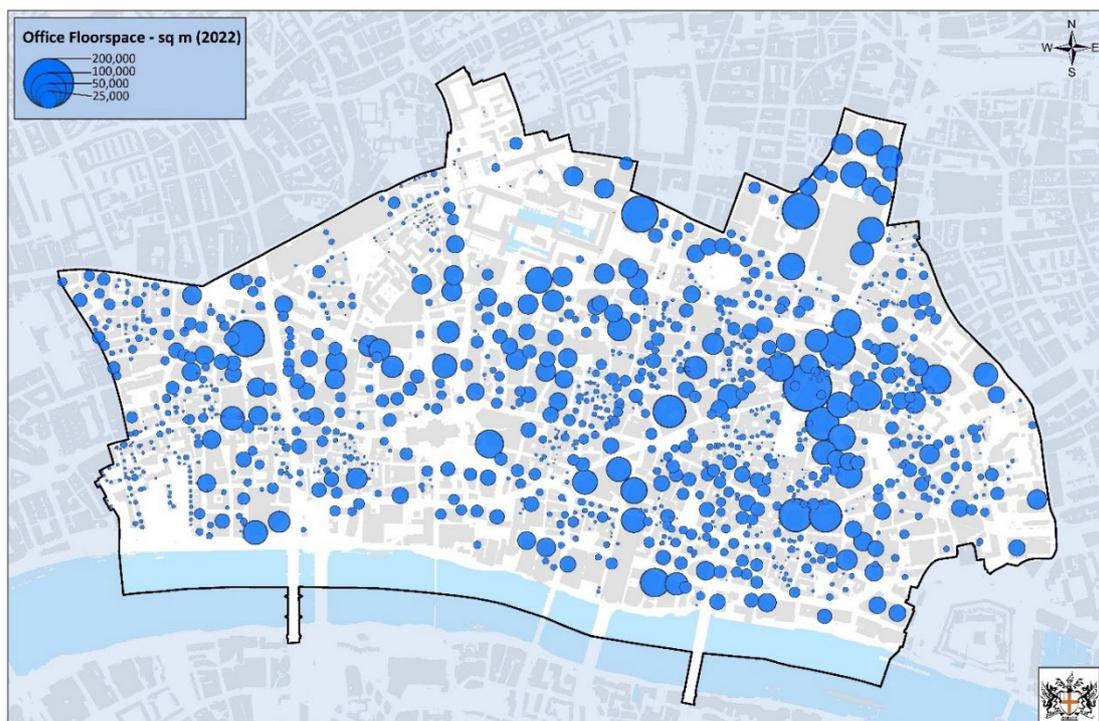


Figure 5. Office distribution

Policy Context

National Policy Context

- 5.1. The national policy context is provided by the National Planning Policy Framework (NPPF) which was published in 2012, updated in 2023, and the National Planning Practice Guidance (PPG). There is no specific guidance in the NPPF on tall buildings, however, Plans should be positively prepared and provide a positive vision for the future of the area. Paragraph 86 highlights that planning policies should set out a clear economic and vision strategy and proactively encourage sustainable economic growth.

NPPF Chapter 12: Achieving well designed and beautiful places, indicates that the creation of high quality buildings and places is fundamental to the planning and development process. Good design is a key aspect of sustainable development. Paragraph 132 of the NPPF states that it is important that local authorities should develop robust and comprehensive policies setting out the quality of development that will be expected in their area. These should be based on a clear vision for the future of the area and upon a detailed evaluation of the characteristics that define it.

- 5.2. The NPPF promotes an urban design led approach which expects new development to positively respond to the context in which they are located. Whilst the development needs to be “sympathetic to local character and history, including the surrounding built environment and landscape setting”, it is also important to achieve the right balance by not “preventing or discouraging appropriate innovation or change” (NPPF, paragraph 135 c).

- 5.3. NPPF Paragraph 135 states that planning policies must ensure that new developments:

- Function well while adding to the quality of the area
- Are visually attractive due to good architecture, layout, landscaping
- Are sympathetic to local character and history
- Establish a strong sense of place
- Optimise potential with appropriate amount and mix of development
- Create places that safe, inclusive and accessible and promote health and well-being

- 5.4. The National Planning Practice Guidance does not specifically address tall buildings, but indicates that guidance on design should be read alongside the National Design Guide published by MHCLG in October 2019. The National Design Guide states:

“69 Well-designed tall buildings play a positive urban design role in the built form. They act as landmarks, emphasising important places and making a positive contribution to views and the skyline”

” 70 Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character.”

The London Plan 2021

- 5.5. The London Plan published in March 2021 is the statutory Spatial Development Strategy for Greater London. All of London's boroughs local development plans should be in general conformity with the policies included within this document. The London Plan forms part of the statutory Development Plan for the City of London, alongside the current City of London Local Plan and is therefore a material consideration in the determination of planning applications.
- 5.6. London Plan Policy D9 Tall Buildings sets out the policy approach to tall buildings across London. The policy requires that:
- A Definition: Local Plans should define what is considered a tall building for specific localities, based on local context.
 - B Locations: Boroughs should determine in Local Plans where tall buildings may be an appropriate form of development.
 - C Impacts: Development proposals should be considered against visual impacts, functional impacts, environmental impacts and cumulative impacts.
 - D Public access: Free to enter publicly accessible areas should be incorporated into tall buildings where appropriate.
- 5.7. In identifying locations where tall buildings may be an appropriate form of development, boroughs should undertake a sieving exercise, assessing potential visual and cumulative impacts to consider where tall buildings could have a role in contributing to the emerging character and vision for a place; determine the maximum height that could be acceptable and identify these locations on maps in the Local Plan.
- 5.8. London Plan Policy HC3 Strategic and Local Views set out the Mayor's approach to the protection of strategically important views and landmarks.
- 5.9. Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- 5.10. The London Plan 2021 and the London Views Management Framework supplementary planning guidance designates 4 types of Strategic Views, London Panoramas, River Prospects and Townscape Views (including Linear Views). The views that are relevant to sites in the City include:
- London Panoramas – views of St Paul's Cathedral from Alexandra Palace, Parliament Hill, Kenwood, Primrose Hill, Greenwich Park and Blackheath Point.
 - River Prospects- views from Tower Bridge, London Bridge, Southwark Bridge, Millennium Bridge, South Bank (Gabriel's Wharf), Waterloo Bridge and Hungerford Bridge.

- Townscape Views – view of the Tower of London from the Queen’s Walk at City Hall. This includes a “protected silhouette” of the White Tower. In addition, the background view from St. James’ Park to Horse Guards Road could be also relevant.
- Linear Views – views of St. Paul’s Cathedral from Westminster Pier and from King Henry’s Mound, Richmond Park.

5.11. The LVMF identifies landmarks within designated views that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer’s understanding and enjoyment of the view.

5.12. It also identifies Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. The LVMF seeks to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista.

- Landmark Viewing Corridor – is the area between the viewing place and a Strategically-Important Landmark that must be maintained. Development that exceeds the Viewing Corridor threshold plane should be refused.
- Wider Setting Consultation Area – is the area enclosing the Landmark Viewing Corridor in the foreground, middle ground and background of the Protected Vista. Development above a threshold height in this area could compromise the viewer’s ability to recognise and appreciate the Strategically-Important Landmark. Therefore a Qualitative Assessment should be undertaken to analyse the impact of the proposed development on the Protected Vista.

5.13. Each element of the vista will require a level of management appropriate to its potential impact on the viewer’s ability to recognise and appreciate the Strategically-Important Landmark.

5.14. The London Plan seeks to protect aspects of views that contribute to a viewer’s ability to recognise and appreciate a World Heritage Site’s authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.

London Plan Policy HC4 London View Management Framework

5.15. This policy seeks to ensure:

- Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers’ ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.
- Development proposals in designated views should comply with the following:

- London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole. The management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically-Important Landmark in the foreground, middle ground or background where appropriate;
 - River Prospects should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context;
 - Townscape and Linear Views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.
- Where there is a Protected Vista:
 - development that exceeds the threshold height of a Landmark Viewing Corridor should be refused.
 - development in the Wider Setting Consultation Area should form an attractive element in its own right and preserve or enhance the viewer's ability to recognise and to appreciate the Strategically-Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor.
 - development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not.
 - development in the foreground of the wider setting consultation area should not detract from the prominence of the Strategically-Important Landmark in this part of the view.

London View Management Framework (LVMF) Supplementary Planning Guidance (SPG) 2012

- 5.16. The LVMF SPG was published in March 2012 in support of the London Plan 2011 policies 7.11 London View Management Framework and 7.12 Implementing the London View Management Framework, but remains relevant and is applied to revised policy in the 2021 London Plan. The SPG contains Management Plans for all the Designated Views which provide a description of the condition, attributes, composition and key features and landmarks of each view. The Management Plans also contain Visual Management Guidance which sets out general principles for managing development in the foreground, middle ground and background of the view and for managing the Viewing Location.

- 5.17. The SPG seeks to protect and manage development impact on the Designated Views of London and its major landmarks. New development is required to make positive contribution to the characteristics and composition of the Designated Views.
- 5.18. Any change to the Designated Views should be managed in a way that does not harm the composition of the view or key elements of its character. New development that will be visible in a Designated View should be of appropriate height and incorporate excellent architectural design quality. It should safeguard the setting of landmarks (including Strategically Important Landmarks and World Heritage Sites) New tall buildings should ideally contribute to the development or consolidation of clusters of tall buildings that contribute positively to the cityscape.

Historic England – Tall Buildings (Advice Note 4)

- 5.19. Historic England's Tall Buildings advice Note 4 (HEAN 4), published in March 2022 provides advice on planning for tall buildings within the historic environment. This Advice note supersedes 'Historic England Advice Note 4: Tall Buildings, first edition (2015) and updates Historic England's advice in light of changes to the national planning policy and guidance, and increased demand for tall buildings within the urban built environment.
- 5.20. HEAN 4 adopts a positive approach towards tall building development and the impact that appropriately located tall buildings can have, stating that *'In the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment'*.
- 5.21. The new guidance recommends local planning authorities take a plan-led approach that is based on a robust evidence base and in consultation with developers and other stakeholders. It particularly emphasises the need for early stakeholder engagement given the potential impact of tall buildings, due to their inherent height, bulk and widespread visibility. This is described as the most effective way of successfully delivering tall buildings which are contextual and make a positive contribution to the historic environment.
- 5.22. A key consideration when planning for and designing a tall building is its potential impact on surrounding views, as well as on the setting of heritage assets in the vicinity. This requirement is clearly stated in HEAN 4 along with a series of case studies which provide an overview of effective local policies.
- 5.23. Another major consideration highlighted in HEAN 4 is the need for high quality design. A vital aspect of this is an understanding of and appropriate response to the local context, including its historic character and heritage significance. The guidance note further states that not all tall buildings need to be landmarks, and that 'a restrained architectural response is more appropriate in terms of the likely impact on the historic environment'. This approach acknowledges that while creating an urban marker may be a factor in the location of a tall building, it is not always an appropriate contextual response or good design practice for tall buildings to be conceived as landmarks.
- 5.24. Support for clusters of tall buildings can also be found within the advice note, which states that *'Strategically planning for tall buildings in clusters can bring townscape benefits while avoiding or reducing the potential impacts upon the historic environment'*.

- 5.25. Historic England's HEAN 4 recommends local planning authorities draft tall building policies that are informed by a design framework which should consider:
- Those elements that create local character (Historic England's Characterisation Thesauri including the recently published London Characterisation Thesaurus provides useful guidance on characterisation of the urban historic environment).
 - Important features such as views, skylines, streetscape, building scale and materials, landmark buildings, and heritage assets.
 - Opportunities where prominent or tall buildings may be appropriate and enhance overall townscape legibility.
 - Sites where the removal of harmful tall buildings could enhance the historic environment.
- 5.26. The note emphasises the need for a strong evidence base to support tall building policies which should include, a Statement of Heritage Significance, Conservation Area Appraisals, Characterisation Studies, Urban design and Townscape analysis, Three dimensional modelling and View studies. The advice note also emphasises the need to consider the 'National Design Guide' and 'National Model Design Code' including guidance notes for the Design Codes. The Design Code sets out a baseline standard of quality and practice which local planning authorities are expected to consider when developing their own local design codes and guides, and controlling planning applications that deal with tall buildings.
- 5.27. The advice note further states that assessments of impact should include an assessment of cumulative impact, including the impact upon any existing clusters of tall buildings. In weighing any public benefits offered by a tall building proposal, the note directs specific attention to paragraphs 8 and 9 of the NPPF stating that benefits should be mutually supportive and contribute to protecting and enhancing the built, natural and historic environments. It is suggested that this assessment may involve the examination of alternative designs or schemes that might be more sustainable in that they deliver public benefits while avoiding harm to the built environment.

World Heritage Sites SPG (2012)

- 5.28. The Tower of London World Heritage Site within the London Borough of Tower Hamlets is located on the eastern edge of the City of London and is deemed to be of Outstanding Universal Value (OUV). Policy HC2 of the London Plan 2021 requires all boroughs with World Heritage Sites and their neighbouring authorities to protect and enhance the OUV of the World Heritage Sites and their settings. Any development proposal within the World Heritage Sites and their settings should not compromise the ability to appreciate their OUV, integrity, authenticity or significance. The main aim of the World Heritage Sites SPG is to support the implementation of London Plan Policy HC2 by providing:
- a consolidated source of information on understanding World Heritage Sites and their settings in the context of London;

- a discussion of the elements of setting that contribute to the appreciation of Outstanding Universal Value that should be considered by policy makers, developers and other stakeholders to ensure World Heritage Sites and their settings are conserved and enhanced;
- an assessment framework with a stepped approach to assess the effect of development proposals and proposals for change in plan making on London's World Heritage Sites and their settings.

5.29. This SPG is further complemented by other London Plan Supplementary Planning Guidance as well as World Heritage Site management plans which have been prepared for each of the sites and which set out actions for safeguarding and enhancing their Outstanding Universal Value.

Tower of London World Heritage Site (WHS) Management Plan (2016)

5.30. The Tower of London WHS management plan provides a framework for effective management of the world heritage site. A key objective of the plan is to preserve and enhance the local and wider setting of the world heritage site. It sets out the Statement of Outstanding Universal Value (OUV), its attributes and associated components, including statements on its integrity and authenticity. This was agreed with the World Heritage Committee in 2013.

5.31. An aim of the Management Plan is ensuring that local planning policy provides a complementary, detailed planning policy framework capable of managing the Outstanding Universal Value of the tower and its setting. This is to ensure that development proposals that would have an effect on the setting of the Tower by virtue of their location, siting and scale are identified and the nature of the effect is assessed at an early stage to inform decision-making.

Tower of London World Heritage Site (WHS) Local Setting Study (2010)

5.32. The Tower of London WHS Local Setting Study describes the character and condition of the Tower's local setting and sets aims and objectives for conserving and enhancing appreciation of the OUV. It draws out the special historic characteristics of the place providing a baseline against which improvements can be measured and recommended by the surrounding boroughs. The study sets out an overall vision for the local setting of the Tower which seeks to create a coherent environment that enhances the quality of people's experience of it and their ability to appreciate. It sets out a series of overall aims to be developed for achieving this vision. These are:

- Ensure that the Tower is the dominant building from within the local setting;
- Encourage built development that respects the setting of the WHS and enhances appreciation of its OUV;
- Protect, enhance and where possible recover lost and historic routes within the local setting;

- Provide an intuitive and easily accessible environment for pedestrians;
- Create a coherent identity for the local setting through consistency of materials, street furniture and signage;
- Introduce visual thresholds that reflect the historic transition between the local setting and surrounding city.

5.33. This study particularly addresses Objective 3/Aim C of the Tower of London WHS Management Plan which seeks to “preserve and enhance the local and wider setting” of the WHS and provides part of the proposed framework for decision-making on the conservation and enhancement of the Tower and its setting. It sets out guidance for decision makers for assessing the potential impact of development on the setting of the Tower, including visual management guidance associated with built context and the public realm (section 4), approaches and arrivals (section 5), pedestrian experience (section 6) and views to and from the Tower (section 7).

London Boroughs Tall buildings Policy Context

Tower Hamlets Local Plan (2018-2023)

Policy D.DH6: Tall buildings

- 6.1. This policy seeks to guide and manage the location, scale and development of tall buildings in the borough. Buildings of more than 30 metres, or those which are more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building.
- 6.2. Part 1 of the policy sets out the criteria against which all development involving tall buildings will be assessed. The criteria will guide the visual and contextual development of tall buildings in the borough. Proposals involving tall buildings will need to demonstrate how any adverse impacts on the microclimate will be mitigated.
- 6.3. Part 2 of the policy identifies a series of tall building zones to indicate where tall buildings will be directed. The Aldgate tall building zone is located at the edge of the City of London boundary. The key principle for tall building development within this zone is to ensure the background to views of the Tower of London World Heritage Site from the Queen’s walk is preserved. Proposals involving tall buildings on the edge or within the vicinity of tall building zones will be expected to follow the step down approach and demonstrate how they will avoid the merging of existing clusters and be sensitive to the surrounding context.

Policy S.DH5: World heritage sites

- 6.4. This policy seeks to ensure that development safeguards and does not have a detrimental impact upon the outstanding value of the UNESCO world heritage sites including the Tower of London and its setting.
- 6.5. In addition, proposals affecting the wider setting of the Tower of London or those impinging upon strategic or other significant views to or from these sites (particularly

around Tower Hill and Aldgate) will be required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage site.

Hackney Local Plan (2033)

Policy LP1: Design Quality and Local Character

- 6.6. Policy LP1 Part B of this policy relates to taller buildings in the borough. In Hackney, a taller building is defined as any building or structure which is taller than its neighbours (50% taller than the prevailing building height) or which significantly changes the skyline or is 30 metres or more in height.
- 6.7. Policy LP1 Part B states that the development plan documents such as AAPs will provide further requirements for each of the places identified in the Growth Strategy which are potentially suitable for taller buildings. These plans will include a heights strategy and where appropriate identify sites suitable for development for taller buildings for each area. The draft Shoreditch AAP is underway and it sets out a vision with policies to guide and manage future development and investment in the area. The boundary of the Shoreditch AAP is adjacent to the City of London boundary towards south however there are no tall building sites allocated within the edge of the City neighbourhood area identified in the AAP.
- 6.8. Policy LP1 Part A and Part C sets out criteria based on design quality and local character against which tall building proposals will be assessed.

Islington Local Plan (2019)

Policy DH2: Heritage Assets

- 6.9. Part J of this policy identifies a number of local views (LV1-8) including important views towards St Paul's Cathedral which must be protected and enhanced. Proposals involving the redevelopment of buildings that currently adversely impact a protected view must take all reasonable steps to enhance the view and remove any existing infringement on the view. In addition, development proposals must provide appropriate supporting material – including 3D modelling to verify the visual impact of proposed development on protected views.

Policy DH3: Building heights

- 6.10. Tall buildings within the borough are defined as buildings which are more than 30 metres height or those that are more than twice the contextual height of the surrounding context.
- 6.11. Policy DH3 identifies locations suitable for tall buildings over 30 metres. It further sets out maximum permissible heights for each location, as well as some specific design principles, including guidance on siting, height within the context of the site/area boundary.
- 6.12. The City Fringe Opportunity Area which includes parts of Islington and Kings Cross and Pentonville Road area have been identified as tall building areas which are adjacent to the City of London boundary. Policy DH3 sets out criteria seeking all tall building proposals to consider both individual and cumulative impacts.

Westminster City Plan (2019-2040)

Policy 40 Part F (Westminster Views)

- 6.13. Policy 40 Part F states that any new development affecting strategic and local views (including local views of metropolitan importance) should contribute positively to their characteristics, composition and significance and will remedy past damage to these views wherever possible.
- 6.14. The Metropolitan Views SPD identifies and describes the significance of views of metropolitan importance including views that are enjoyed from well-known public spaces and those featuring an exceptional townscape or landscape, including visually prominent landmarks. The adjoining boroughs need to ensure that the impact of development on these protected views is carefully managed; potential impacts on views should be identified through visibility analysis, supported wherever possible by the use of 3D digital modelling.
- 6.15. Following metropolitan views towards City Cluster and other important landmarks and heritage assets including St Paul's Cathedral are most relevant to this study:
- Metropolitan View V42 A&B (Waterloo Bridge looking downstream & upstream);
 - Metropolitan View 25 (Lambeth Palace from Lambeth Bridge);
 - Metropolitan View 34 (Horse Guards and Whitehall Court from St James's Park);
 - Metropolitan View 18 (Churches of St Clement Danes and St Mary-le-Strand)
- 6.16. Policy 40 identifies locations where tall buildings would be appropriate and in all locations proposals for tall buildings will need to satisfy design and locational principles set out in Part B, C and D.

Policy 41 (Building height)

- 6.17. Tall buildings are defined as buildings of twice the prevailing context height or higher or those which will result in a significant change to the skyline.

Lambeth Local Plan (2020-2035)

Policy Q25 Views

- 6.18. Policy Q25 seeks to resist harm to the significance of strategic views (defined in the LVMF) and secure improvements within them in accordance with London Plan policy HC4.
- 6.19. Policy Q25 (Part B) identifies views of local interest and seeks to protect their general composition and character from harm. The Local Views referred to in adopted Policy Q25(B) that are relevant to this study are listed below:

Panoramas

- Panorama (i) Views NNW from Brockwell Park to
 - (a) Lambeth Town Hall's tower and
 - (b) St Matthew's Church tower; and

(c) views N and NNE to the city

- Panorama (ii) View NNE from Norwood Park (across LB Southwark) to the city;
- Panorama (iii) View N from Gipsy Hill (across LB Southwark) to the city;
- Panorama (iv) View N from Knights Hill (across LB Southwark) to the city;
- Panorama (viii) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral;
- Panorama (x) View W from the level 4 terrace of the Royal Festival Hall to the North Bank of the Thames including the Westminster World Heritage Site.

Landmark Silhouettes

- Landmark Silhouette (xiii) a) View E from Victoria Tower Gardens and (b) SE from Member's Terraces of Houses of Parliament to the Lambeth Palace complex (including St Mary's Church tower)
- Landmark Silhouette (xvi) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark

Southwark Plan 2022

Policy P17 Tall buildings

- 6.20. This policy identifies areas where tall buildings are expected. These areas include Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be appropriate have been identified in the site allocations. Part 2 and 3 of this policy sets out criteria relating to potential impacts and design against which tall building proposals will be assessed.

Policy P22 Borough views

- 6.21. The policy identifies borough views of significant landmarks and townscape and seeks to preserve and where possible enhance these views. Views relevant to this study include:
- View 1: The London panorama of St Paul's Cathedral from One Tree Hill;
 - View 2: The linear view of St Paul's Cathedral from Nunhead Cemetery;
 - View 3: The linear view of St Paul's Cathedral along Camberwell Road;
 - View 4: The river prospect of River Thames and its frontage, Tower Bridge and St Paul's Cathedral from Kings Stairs Gardens

City of London Tall buildings policy context

- 7.1. Tall buildings policy in the City of London dates back to prior to the 1948 Town and Country Planning Act. The following brief description of the development of policy in the City provides a useful context to Core Strategic Policy S14 in the adopted 2015 Local Plan and emerging Strategic Policy S12 in the City Plan 2036.

London Building Acts

- 7.2. Prior to the 1948 planning system, the height of buildings were for several centuries controlled by the Building Acts. Their main aims were fire prevention and structural stability, and height was largely restricted to the length of the Fire Brigade's ladders. This ensured relatively low-rise development until the early 20th century, with only St Paul's Cathedral, the numerous church towers and spires and a few civic buildings rising above the roof-line. A new Act in 1930 raised the maximum height of building from 80 feet to 100 feet. The London County Council, which administered the Acts, increasingly granted waivers permitting some structures higher than this limit.

St Paul's Heights (1938)

- 7.3. Following the 1930 London Building Act, several tall buildings were constructed in the City of London, notably Unilever House, the Faraday Building and Vintry House. These blocked cherished views of St Paul's and gave rise to public concern. The City Corporation asked the Surveyor to the Fabric of St Paul's Cathedral, to put forward measures to preserve important views of the Cathedral. The Surveyor proposed building height limits to maintain views of St Paul's from the South Bank of the Thames, the Thames Bridges from London Bridge to Hungerford Bridge, as well as views along streets, including Fleet Street and Farringdon Road environs. The system was expressed as a grid, showing a maximum building height in each 50 foot square. The height limitations were endorsed by the City Corporation in 1938 and became known as "St Paul's Heights". They carried no statutory force and for several decades were applied through informal agreement with developers. Since 1981 and 1984 they have been incorporated into successive statutory Development Plans for the City.

Reconstruction in the City of London (1947)

- 7.4. The City Corporation appointed Dr C. H. Holden and Prof. W. G. Holford to prepare a plan for the post-war reconstruction of the City, completed in 1947. The plan contained policies that directly and indirectly affected building height, including 'height and cover' clauses, which limited the height of buildings according to the width of adjoining streets, plot ratio controls and daylighting standards. Generally, the plan envisaged that the future height of development in the City would continue the existing pattern. The Plan was approved by the City Corporation, although when the Town & Country Planning Act came into force in 1948 responsibility for preparing the Development Plan transferred to the London County Council.

County of London Plan (1951 & 1962)

- 7.5. The London County Council (LCC) prepared a Development Plan for its area, which included the City of London. The plan was adopted in 1951 and reviewed in 1962. The County of London Plan contained a number of policies that influenced the location of tall

buildings, the most significant being plot ratio. The main aims of plot ratio control were limiting the physical bulk of buildings and constraining the density of employment with the intention of preventing congestion in the immediate surroundings of the building and the wider transport system. Varying plot ratios were set out in supplementary guidance, notably "A Plan to Combat Congestion in Central London" 1957. In the City the zones ranged from 2:1 to 5½:1, although most of the area was zoned at 3:1 and 5:1. Plot ratio controls limited the total floorspace on a site but did not constrain the form of development and so did not restrict the height of buildings. The County of London Plan designated Comprehensive Development Areas where there had been extensive war damage and streets and buildings were radically replanned. Street width standards were applied and many City streets were proposed for widening. Much of this widening was achieved when buildings were redeveloped, with frontages being set back from previous building lines. These measures had significant effects on the appearance and character of many streets and on building heights, as accommodating floorspace on residual sites after road widening led to taller buildings. The plan did not contain explicit policies for tall buildings. Nevertheless, many such buildings were proposed and constructed during the life of the plan, and the locations of these were considered according to informal guidelines. Within the City tall buildings were not permitted in sensitive areas such as the setting of St Paul's Cathedral or near the River Thames, with the result that they were mainly confined to the north and east of the City. The County of London Plan remained in force in the City until superseded by London boroughs' local plans. In the City these were the Smithfield District Plan, adopted in 1981, and the City of London Local Plan 1989.

Greater London Development Plan (1976)

- 7.6. The Greater London Council (GLC), established in 1963, superseded the London County Council. It had a duty to prepare a Greater London Development Plan (GLDP) to provide a strategic framework for the London boroughs' plans. The GLDP was approved in 1976. The GLDP was the first plan to include a policy for tall building proposals. It divided London into three categories: "areas in which high buildings are inappropriate"; "areas which are particularly sensitive to the impact of high buildings"; and "areas where a more flexible or positive approach is possible". The GLDP included an 'urban landscape diagram' that showed the City falling within the first two categories, but not the last. The plan set out criteria for the consideration of proposals for tall buildings in each of the categories of area. The GLDP was required by legislation to define 'areas of special character': several of these areas were in the City, including 'Thames and Thames-side', 'the City', 'Tower of London area', and 'Royal Courts of Justice, Inns of Court, etc'. The plan referred to important long-distance views, which included those of St Paul's Cathedral from Greenwich, Primrose Hill and Hampstead. The areas of special character and long-distance views were shown on the urban landscape diagram and were important determinants of the location of the tall building categories. The GLDP continued plot ratio controls, although referring to the need eventually to replace them. The GLDP did not replace the LCC's County of London Plan, and the two plans were in force concurrently. The GLC was abolished in 1986 and GLDP remained in force until the issue of the Secretary of State for the Environment's Strategic Planning Guidance for London 1989.

Smithfield District Plan (1981)

- 7.7. The Smithfield District Plan (SDP) was a local plan prepared by the City of London Corporation for the Smithfield area and adopted in 1981. The SDP incorporated the St

Paul's Heights policy, adding two additional protected views from Myddleton Square/Amwell Street and St John Street in Islington, and continued the plot ratio standard. It did not envisage tall buildings in the Smithfield area, but contained a proposal for the construction of a new road north of Little Britain, the achievement of which resulted in the construction of an associated tall building at the western end of London Wall. The SDP was superseded by the adoption of the City's Unitary Development Plan in 1994.

City of London Local Plan (1989)

- 7.8. The City of London Local Plan covered the entire City except the area covered by the Smithfield District Plan and was adopted in 1989. The plan included a policy for tall buildings and several other policies indirectly affecting tall development. The policy for tall buildings conformed with the GLDP, interpreting its requirements for the City's local context. It defined protected views and conservation areas as inappropriate for tall buildings. The remainder of the City was considered sensitive to the impact of tall buildings and the plan set out criteria for consideration of proposals in these areas.
- 7.9. The Local Plan included a policy for St. Paul's Heights giving it formal status. It introduced a policy for the protection of views of and from the Monument, defining a local setting where the height of surrounding buildings should not compromise the dominance of the Monument, and a number of view corridors seen from its gallery. The plan included a policy for the protection of the setting of St Paul's on the skyline, which in addition referred to the backdrop to the St Paul's Heights views and the strategic views included in the GLDP as well as the view from Richmond Park, which was protected by statutory direction. It continued the plot ratio standard, replacing the varying zones with a 5:1 ratio applying across the whole of the City. The Local Plan contained policies to guide development in conservation areas, which were first designated in 1971. The Local Plan remained in force until the adoption of the Unitary Development Plan in 1994.

City of London Unitary Development Plan (UDP) (1994)

- 7.10. The City became a unitary authority with a duty to prepare a UDP on the abolition of the GLC in 1986. The Secretary of State for the Environment issued 'Strategic Planning Guidance for London Planning Authorities' in 1989 to provide a framework for the London boroughs' UDPs. In 1991 "supplementary guidance for London on the protection of strategic views" (RPG3a) was issued by the Secretary of State. This required the protection of long-distance views that crossed borough boundaries and included eight views of St Paul's Cathedral from Richmond Park, Primrose Hill, Parliament Hill, Kenwood, Alexandra Palace, Westminster Pier, Greenwich Park and Blackheath Point. These views were protected by defined view corridors and wider settings and backdrops to the views. The City of London's UDP policy for tall buildings largely continued that of the Local Plan, identifying conservation areas and protected views as inappropriate locations for tall buildings and the rest of the City as being sensitive to their impact. It also included more detailed criteria for considering proposals within the sensitive areas. The UDP continued the Local Plan's policies for St Paul's Heights and Monument views and included a policy for the protection of strategic views of St Paul's in accordance with Strategic Guidance. A further policy sought the protection of views of buildings, townscape and skylines, and an appendix listed historic skyline landmarks within and near the City. A significant change was the exclusion of a policy for plot ratio, control of the bulk and volume of buildings instead being achieved through the general policies for building design. The 1994 UDP was replaced by the UDP 2002.

City of London UDP (2002)

- 7.11. The Secretary of State for the Environment issued revised Strategic Guidance for London in 1996 (RPG 3). In 1997 “strategic planning guidance for the River Thames” was published; among its policies was a requirement for all riparian local authorities to define a ‘Thames Policy Area’. The City Corporation commenced a review of the 1994 UDP, and the new UDP was adopted in 2002. The policy for tall buildings in the 2002 UDP continued to recognise protected views and conservation areas as being inappropriate for tall buildings and the remainder of the City as sensitive to such development. The policy recognised that the areas not covered by protected views and conservation areas had potential for the construction of new tall buildings, and that these areas comprised an “eastern cluster” and a “north central area”. It set out criteria for assessing proposals in these areas. The 2002 UDP included policies for St Paul’s Heights, strategic views, Monument views and townscape views, as well as the listed historic skyline landmarks, carried forward from the 1994 UDP. In accordance with the requirement of strategic guidance, the UDP designated a ‘Thames Policy Area’, and set out policies for this area, including one requiring a high standard of design appropriate to riverside locations. The UDP 2002 was accompanied by supplementary planning guidance (SPG), including “St Paul’s and Monument views” and “Riverside appraisal of the Thames policy area”. These gave detailed guidance on the implementation of the relevant policies in the UDP. In 2007, several UDP policies lapsed, including that for strategic views which was not saved due to the need to avoid unnecessary duplication. The Government’s guidance on strategic views had become the responsibility of the Mayor of London and new London-wide strategic views policy had been set out in the adopted London Plan.

City of London Core Strategy 2011

- 7.12. The City of London Core Strategy was adopted in 2011. It was the first of the new style of Local Development Frameworks for the City of London brought in by the 2004 Planning & Compulsory Purchase Act. The policy approach to protected views and tall buildings in the Core Strategy was an evolution of the policies in the 2002 UDP.

Policy CS13: Protected Views

- 7.13. This policy sought to protect and enhance significant City and London views of important buildings, townscape and skylines. The policy implemented the Mayor’s strategic guidance on views protection. It continued the longstanding protection of local views of St Paul’s Cathedral, through the St Paul’s Heights code and sought to secure an appropriate setting of and backdrop to the Tower of London World Heritage Site which adjoins the City. The policy was supplemented by the City of London Protected Views Supplementary Planning Document adopted in 2012. This supplementary guidance remains in force.

Policy CS14: Tall Buildings

- 7.14. This policy identified those areas of the City that were considered to be inappropriate for further tall building development, defined as conservation areas, the St Paul’s heights area, the St Paul’s protected vista viewing corridors, and Monument views and setting. All other areas of the City were identified as being sensitive to tall building development, with development only acceptable having consideration to the potential effects on the City

skyline, the character and amenity of their surroundings including the relationship with existing tall buildings, the significance of heritage assets and their surroundings and the effect on historic skyline features. The Eastern Cluster area of the City was identified as an area where tall buildings would be permitted on suitable sites, but the north central area identified in the 2002 UDP was not carried forward.

Protected Views Supplementary Planning Document 2012

- 7.15. The SPD provides supplementary guidance on the implementation of the Core Strategic Policy CS13 which has been carried forward into the 2015 Local Plan, as set out below. The SPD provides a comprehensive summary of the policy requirements for the St Paul's Heights, LVMF Strategic Views, Monument Views and the Tower of London World Heritage Site. It also includes information on the application of the St Paul's Depths, protected under the St Paul's Preservation Act 1935. Chapter 6 of the SPD provides a listing of identified City Landmarks and Skyline Features, views thereof being protected under Core Strategic Policy CS13.

City of London Local Plan 2015

- 7.16. The 2015 Local Plan sets out more detailed development management policies to support the strategic policies in the 2011 Core Strategy. Core Strategic Policies CS13 and CS14 were carried forward into the 2015 Local Plan with no amendment. The supporting text to the Protected Views policy was amended to clarify the approach to development in the City of London which has the potential to impact on the Tower of London, emphasising the importance of the Protected Vista for the Tower of London in the Mayor's LVMF and the need for development in the Wider Setting Consultation Area in the background of this Protected Vista to preserve or enhance the viewer's ability to recognise the landmark and appreciate its Outstanding Universal Value. The 2015 City of London Local Plan remains in force.

Proposed Submission Draft City Plan 2036

- 7.17. Tall buildings and protected views policies are set out in Proposed Submission Draft City Plan 2036 Policies S12: Tall Buildings and S13: Protected Views. The approach to tall buildings and protected views in Proposed Submission Draft City Plan 2036 is an evolution of the long standing approach as set out in the adopted City of London Local Plan 2015 and previous adopted local plan and strategic planning documents.

Strategic Policy S12: Tall Buildings

- 7.18. Tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD).
- 7.19. Tall buildings of world class architecture and sustainable and accessible design will be encouraged on suitable sites, having regard to:
- the potential effect on the City skyline, the wider London skyline and historic skyline features;
 - the character and amenity of their surroundings, including the relationship with existing tall buildings;

- the impact on the significance of heritage assets and their immediate and wider settings;
 - the provision of a high-quality public realm at street level; and
 - the environmental impact the tall building may have on the surrounding area, including the capacity of the City's streets and spaces to accommodate the development.
- 7.20. Where tall buildings are acceptable in principle, their design must ensure safe and comfortable levels of wind, daylight and sunlight, solar glare and solar convergence within nearby buildings and the public realm within the vicinity of the building. Tall buildings should not interfere with telecommunications and provide appropriate mitigation where this is not feasible. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants.
- 7.21. New tall buildings will be required to enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space or other facilities within the building and its curtilage, including at upper levels, available at no charge.
- 7.22. Tall buildings must not adversely affect the operation of London's airports, nor exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.
- 7.23. New tall buildings will be refused in inappropriate areas comprising conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; the protected vista and White Tower protected silhouette of the Tower of London; and Monument views and setting; all as defined on the Policies Map.

Strategic Policy S13: Protected Views

- 7.24. The City Corporation will protect and enhance significant City and strategic London views of important buildings, townscape and skylines by:
- implementing the Mayor of London's London View Management Framework SPG to manage designated views of strategically important landmarks (St. Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.
 - protecting and enhancing: significant local views of St. Paul's Cathedral, through the City Corporation's "St. Paul's Heights" code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill Processional Route; the setting and backdrop to the Cathedral; significant local views of and from the Monument and views of historic City landmarks and skyline features.
 - securing an 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).

SECTION 2: CITY OF LONDON HERITAGE SIGNIFICANCE

Introduction

- 8.1. As London's original core, the City of London necessarily has the longest continuum of built history within the capital. First settled by Romans in the 1st century AD, structures, buildings, spaces and streets accumulated over 2,000 years can be encountered in the City at every turn.
- 8.2. All this means the City's townscape is remarkably eclectic, its historic environment remarkably rich and varied. Having developed within just a square mile of land, and having always been a prosperous centre for commerce and finance, development of the City's building plots and roads has been intensive and uncoordinated, dictated by the prevailing needs of individual owners or occupiers rather than any masterplan.
- 8.3. This individualism coupled with sheer lack of space means there have been few instances of coherently planned, neat townscapes such as those created in the 18th and 19th centuries that characterise the West End. Townscapes of a consistent period and style are the exception in the City, not the norm. The City does have a few such enclaves; but its prevailing character is of extreme and endlessly surprising variety in built form, with the majority of the Square Mile characterised by a great intermingling of building styles, heights, uses, and periods.
- 8.4. The City's skyline has been internationally famous since the sixteenth century, when panoramas of the City from the South Bank began to be drawn and circulated. In these views the exceptional density and piety of the medieval City was apparent – around 120 churches contained within the walls. Their multifarious skyline presences – a mixture of spires and towers – combined with the majestic presence of Old St Paul's made for a pleasing and internationally famous spectacle, which only grew in stature after the Great Fire of 1666 and the subsequent rebuilding of the Cathedral and of the City churches by Wren. It all added up to an architectural tour de force which existed largely unchanged in skyline scale for several hundred years until the twentieth century, when advances in technology and changes in regulation saw secular buildings increasingly challenge the spires. Today, the City has become internationally famous as much for its high-rise architecture as for its Wren skyline features and the marriage of the two produces a unique dynamic.
- 8.5. By any standard or measure, the City of London has a remarkable historic environment. It's remarkable in its concentration of designated heritage assets, including the highest concentration of grade I and II* listed buildings in Britain. Deeper than this is a remarkable tradition of continuity and change inherent in this fabric. It is a place which is simultaneously ancient and cutting-edge. This is at the heart of the City's significance.

Historical Development

Roman

- 9.1. The City is the creation of the Romans, who founded it shortly after the Roman invasion of AD 43. Londinium was as prone to fluctuations in fortunes and periods of expansion and contraction as anywhere else: it stood at the edge of an empire, in a province, Britannia, so outlying that it was inevitably vulnerable to whims and changes of direction happening at the centre.
- 9.2. Laid out from the lowest convenient crossing point of the river at the tidal watershed, on the site of Old London Bridge/Fish Street Hill, the City's early development focused on the two areas of high ground, Cornhill, directly north of the bridge, and Ludgate Hill to the west, overlooking the tidal river valleys of the Walbrook and the Fleet. This natural topography is still apparent in many areas of the City: for instance, the elevated position of St Paul's Cathedral above the former Fleet valley remains plain, as does the falling gradient of City towards the river, which is particularly pronounced in the streets running north-south down to the river.
- 9.3. The flavour of early Londinium was a timber-built mercantile settlement, with strong military overtones, as befitting a frontier town on the edge of the Roman empire. The focal point was Cornhill and the Basilica-Forum (the centre of civic and mercantile administration) built north of the fording-point. Following the initial founding of the town in the AD 40s came a flurry of building activity in the early 50s and 60s, encompassing the Bridge, quays, waterworks, baths and suburban development.
- 9.4. By the early 2nd century, though punctuated by the destruction of the Boudican revolt of AD 60, Londinium had become a major centre of European trade and commerce. The first Basilica-Forum was demolished and rebuilt on the same site, but four times larger. To the north-west had arisen a military-administrative nucleus of fort, baths and amphitheatre. Industry developed along the Walbrook valley; temples arose within the city, and cemeteries developed to the west and east beyond the city limits. Many of the timber public buildings were remodelled in stone. The town ditch was cut and its wall erected, thereafter defining the shape of Londinium and incorporating six gates on the principal routes.
- 9.5. However, Londinium's prosperity appears to have waned towards the end of the 2nd century, with evidence of inactivity, neglect of public infrastructure, amalgamation of plots (lower density) and relocation outside the walls. This period of contraction was arrested under the Severan administration of the third century, when Londinium was again rebuilt in grand style, including the restoration of the port and the rebuilding of the City wall. It had the flavour of a reassertion of romanitas. This lasted until the second half of the third century, which saw an abrupt and dramatic shift in the town's fortunes. The port (quays and landing stages) were reduced to their foundations, the Basilica-Forum dismantled, and the baths demolished. This continued in the fourth century, with the dismantling of public buildings and the conversion of their sites to industrial use; but the wall was still maintained.
- 9.6. By this time, governance had shifted, broadly speaking, from public buildings to private villas; it was seemingly from the latter that the affairs of the town were directed. The

pattern of London life in these latter stages remains mysterious; the town was abandoned rather hurriedly by the beginning of the fifth century.

Legacies

- Many sections of the Roman City wall and bastions remain standing above ground, including in the Barbican and Golden Lane, Bank and Eastern City Fringe Character Areas.
- The earliest streets in the City are, of course, Roman in origin: Bishopsgate and Gracechurch Street reflect the Roman routes over Old London Bridge, which was Roman in origin and slightly further downstream than its successor. Fleet Street is the original Roman street west out of the City.
- Temple of Mithras; Billingsgate Bathhouse

Relative perception of tall buildings

- Taller structures were developed during this period for their important defensive advantage. Elevated vantage points enabled surveillance, but also symbolised military and political strength.
- Sacred structures would have been distinguished through their relative mass and height. The use of scale here would have expressed religious importance as well as giving a magnitude to the piety of worshipers.
- Buildings used by the wider public such as baths or amphitheatres would have possessed a scale necessary to serve the wider community, most likely creating an appreciable architectural hierarchy and emphasis to public buildings in the city interior.

Saxon

- 9.7. There was great change in the 6th and 7th centuries as northern European and Scandinavian influences began to be felt in Britain. Walled Londinium had been designed for Roman governance and urban culture, and in their absence the city entered a time of obsolescence. Anglo-Saxon settlers had very different cultural and social requirements consequently establishing a more open settlement centred upon the area of the Aldwych and Strand. Lundenwic, as it came to be known, was in existence by the early 7th century and had grown prosperous enough by the early 8th century to be described by Bede as the capital of the East Saxons and the “market of many peoples coming by land and sea”.
- 9.8. This thriving settlement to the west provided a sharp contrast to the quieter, more tumbledown city to the east. During this period the intensive type of development associated with large-scale settlement was refocused chiefly within the new Saxon centre of Ludenwic. St Paul’s Cathedral was founded within the walls by Bishop Mellitus in AD 604, and a number of City churches have their roots in the Saxon period. After immediate post-Roman decline, the walled town may have become an ecclesiastical precinct, green with orchards and gardens and peppered with the forms of churches. Elite residences

were often to be found in such places, and the walled city may have had a dual religious/royal character.

- 9.9. Booming at the height of the 8th century, Lundenwic entered a period of decline in the 9th century and Viking incursions led Alfred the Great to order the re-colonisation of the Roman city, which was accomplished by AD 886. This was a significant reversal in the relationship between the two settlements, with Lundenwic now the disused, older place; Aldwych, the area's name today, can be interpreted as meaning 'old wic'. The walled city, now called 'Lundenburh', entered a period of uninterrupted growth in commercial prosperity and influence. Queenhithe, Dowgate and Billingsgate were public harbours that were essential to the City's success and were established early on: Queenhithe is first recorded in AD 899, and appears to have served local trade while those further downstream handled overseas commodities. Land reclamation from the Thames continued, re-using the Roman quays and extending further into the river. Remains of timber quays and revetments have survived exceptionally well in the waterlogged conditions beneath 19th and early 20th century buildings south of Upper and Lower Thames Street.
- 9.10. The Roman street layout survived in some places; in others it was disregarded in favour of other routes. Contrasting with the bustle of the waterfront, the inner re-occupied city was gradually invigorated as new timber buildings were constructed within the jigsaw of overgrown Roman survivals. By the later Anglo-Saxon period the City had assumed the skeleton of the street layout surviving today and enjoyed widespread trade and commercial success.
- 9.11. From the later 9th until the mid-11th centuries a place of royal residence and governance within the City is thought to have been located near the Guildhall around present-day Aldermanbury; its name deriving from the Anglo-Saxon term 'ealdorman' used to describe a senior official or administrator. This changed in the mid-11th century, when Edward the Confessor built a royal palace alongside his abbey church of St Peter at Westminster. The distinct roles of the City of London and Westminster were thus cemented: commerce and trade in London and monarchy and government at Westminster.

Legacies

- Unsurprisingly given its vacancy for much of this period, there are few Saxon remains in the City. All Hallows by the Tower incorporates Saxon walling; the form of Queenhithe and the siting of Billingsgate derive from Alfred's refounding of the City; parts of the street pattern, especially connected to the quays. Perhaps most importantly, the siting (if not the eventual form) of St Paul's Cathedral.

Relative perception of tall buildings

- The visual influence of church towers over the Saxon city would have been strong during this period, as above, signalling both a call to prayer for the devout as well as symbolising the theocratic nature of city society. Hierarchies of religious importance, from monastic complexes to parish churches would also have been distinguishable through their relative scale.
- The maximisation of topography to elevate high status buildings would have been clear within the historic streetscape (see typologies section: tall buildings.)

- Centres of governance and seats of monarchy would also have used scale and height to visibly express a sense of jurisdiction and wealth.
- The reinforcement of defensive boundaries to monastic settlements as well as the city walls would have used height to establish an appreciable sense of enclosure and safety.

Norman/Medieval London, 1066-1540

- 9.12. By the 8th century, the Venerable Bede referred to London as a 'mart of many peoples'. London suffered in the 9th century from incursions from the Danes, but under King Alfred and his immediate successors – who promoted urban development all over their kingdom – it began to recover prosperity and prestige. By the 11th century it was again a great European trading centre growing in importance. The wall was still an important feature and was rebuilt and adapted for changing requirements.
- 9.13. While William the Conqueror granted the citizens of London a charter in 1067 upholding the privileges they had enjoyed under the Anglo-Saxons, he ordered the re-fortification of the City as a reminder of its subjugation under a new authority. These acts mingled acknowledgement and wariness of the political power possessed by the prosperous City citizenry. Reinforcements were made to the Roman city walls. To the west were built Montfichet's Tower and Castle Baynard, named from their respective owners, while the east of the city was commanded by the White Tower, which with its Chapel of St John has been described as "one of the most poignant pieces of evidences of the Early Norman spirit".
- 9.14. The entanglement of church and state in the Norman period is reflected in the architecture, where both castles and churches have a muscular simplicity, sometimes enriched for high status buildings. St Helen's Bishopsgate and St Bartholomew-the-Great at Smithfield are intact enough to convey something of the forceful piety of the time, and can be compared with elements of the White Tower. Unfortunately, nothing survives of the Norman work at St Paul's Cathedral, which was commenced following the destruction of the 3rd Saxon Cathedral by fire in 1087. For the first time since the Roman period stone was used in quantities within the walled City.
- 9.15. There were a veritable flood of religious foundations in the 12th and into the 13th centuries: hospitals, priories, nunneries and monastic houses. Most survive only in later boundaries, alignments, tenures and place names. For instance, Minories to the east of the City is named from the Franciscan convent of the Holy Trinity of the Minoresses (founded 1293), while to the west the name and appearance of Blackfriars resulted from the Dominican friary established there (founded 1276) on the site of the aforementioned Norman castles. As well as this later influence on today's streetscape, these religious establishments wielded much influence the layout and appearance of the medieval City.
- 9.16. In the 11th and 12th centuries the government of the City assumed a shape still recognisable today. Ward boundaries coalesced and from these administrative units were elected representatives to the Court of Aldermen and the Court of Common Council. Meanwhile, the City Livery Companies emerged from the craft guilds and charitable foundations, with widespread powers to promote and regulate trades. Their architectural legacy is still felt in the numerous Livery Halls, many of them splendid and many of which owe their origins to this period. The Tower underwent significant expansion and by the

13th and 14th centuries held the layout of the complex recognisable today. The present Guildhall, at least the third on its site, was completed in the 15th century overseen by the mason John Croxton. The appearance of higher-status accommodation at this time is suggested by Barnard's Hall, built originally as a mansion in the 15th century.

- 9.17. The throne had been sited at Westminster in the 11th century. Aside from the Tower, the City was without a royal architectural presence until the 15th and 16th centuries when Castle Baynard was built by Henry VII in 1487 and Bridewell Palace by Henry VIII between 1515 and 1523. Bridewell remained in occasional royal use until given to the City in 1533, when it degraded into a workhouse and prison. Castle Baynard, much used by Henry VIII, hosted the coronation of later monarchs and survived until all but one tower was destroyed by the Great Fire.
- 9.18. During the Middle Ages, the suburbs of London and Westminster inched towards one another but were unified only in the 16th century. Once a favourable place for villas in the Roman period, the environs of the Strand and Fleet Street developed a distinctly aristocratic character, studded with the large houses, gardens and orchards of prominent figures for whom it was conveniently located between the axes of political and commercial influence. Increasingly, the area of Holborn and Fleet Street/Strand to the river became the centre for legal services. Repaired and extended in the 14th and 15th centuries, the wall remained defensible and was crenelated during the Wars of the Roses. It effectively contained the City, marking a clear division between London and the countryside, the western suburb excepted. The gateways were irregularly renewed; a new gateway was created at Moorgate in 1415 to give immediate access to the 'Moor' on the decision to lay it out for cultivation.
- 9.19. Traders associated with the Hanseatic League received privileges to operate in England in the 13th centuries. Their base was the Steelyard, a large complex of warehouses fronting the Thames under what is now Cannon Street. The power of this organisation was such that it for a time competed directly with City merchants in the trade of fabrics including wool, a key English industry. It was suppressed by Elizabeth I in 1598.
- 9.20. London's population would appear to have risen to an apparent peak shortly after 1300, estimated at between 40,000 and 50,000. Following plague in the mid-14th century, evidence suggests that population levels did not recover until later in the 16th century, with growth concentrated in the western suburbs during this period. The City in the later middle Ages was still a distinctly fine-grained place, where large and small gardens furnished the populace with food, as visible on the early 'Agas' map of London, drawn c.1570.

Legacies

- The Guildhall and profusion of Livery Halls throughout the City; concentrated chiefly in the Bank Character Area, but also found to varying degrees in all the other Character Areas.
- The Processional Route from Westminster to St Paul's along the Strand, Fleet Street and Ludgate Hill (Fleet Street and the Temples Character Area)
- The sites and, in some cases, the forms of the City Churches; the majority of the City Churchyards (all Character Areas); the siting and vestiges of the other medieval

religious establishments such as the Greyfriars, the Blackfriars, the Whitefriars, the Augustinian Priory of St Bartholomew, Holy Trinity Priory.

- The foundation/siting of Smithfield Market, Leadenhall Market, the Custom House, the Temples and other Inns such as Staple and Barnard's Inns
- The intricate and fine-grained street pattern, growing from and enriching the pre-existing Roman and Saxon routes; the City's street pattern can be fairly described as mostly medieval in extent, cut through with some later ways (see below) – (all Character Areas)
- The upper works of some sections of the City wall, notably the brickwork crenelations of the section at St Alphage, London Wall (see above)

Relative perception of tall buildings

- The high gothic architectural style of this period aspired to an overt defiance of gravity, with architectural devices such as the pointed arch, rib vault and flying buttress allowing a seemingly weightless architectural form. Consequently, spires and pinnacles adorned buildings of commercial, civic or religious importance.
- The defensive qualities of height would have continued to be observable, with the number of 'Towers' within the city representative the evolution and scale of fortress architecture during this period. As outlined above, the use of height here would have established a visual dominance over the surroundings commensurate with political and military power.
- The distinction between taller religious structures and lower timber dwellings would have been overt.
- The maximisation of natural topography would continue to be used to enhance the above characteristics.



Figure 6. View of Cheapside in the time of Henry VIII, showing St Paul's Cathedral and St Mary-le-Bow. 1921. Brewer, Henry William. London Metropolitan Archive.

Early Modern, C16 & C17

- 9.21. From the 16th century, London emerged as a dominant city in Britain and Europe. Key to this was the intertwining of politics and commerce and the geographical advantages of its location. Under the Tudors there was comparative stability in the country's affairs, enabling a mercantile focus that saw a massive boom in foreign trade. The influence of provincial British cities on national affairs waned as London grew central to the life of the nation. Activity was frenetic, to the music of foreign languages: the City drew closer to its persona today.
- 9.22. Signalling the trade boom, rebuilding of the Customs House took place in 1559. The first iteration of the Royal Exchange was completed in 1570 at the joint behest of Sir Thomas Gresham and the City. Gresham was a prominent City merchant who with the Exchange seized an opportunity to rout lucrative Flemish trade through London instead of Antwerp, which was being undermined by the Dutch Wars of Religion. Ironically the building was designed by an Antwerpian and modelled on that city's Exchange. It was opened for business by Queen Elizabeth in 1568, symbolising the links between monarchy, politics and commerce.

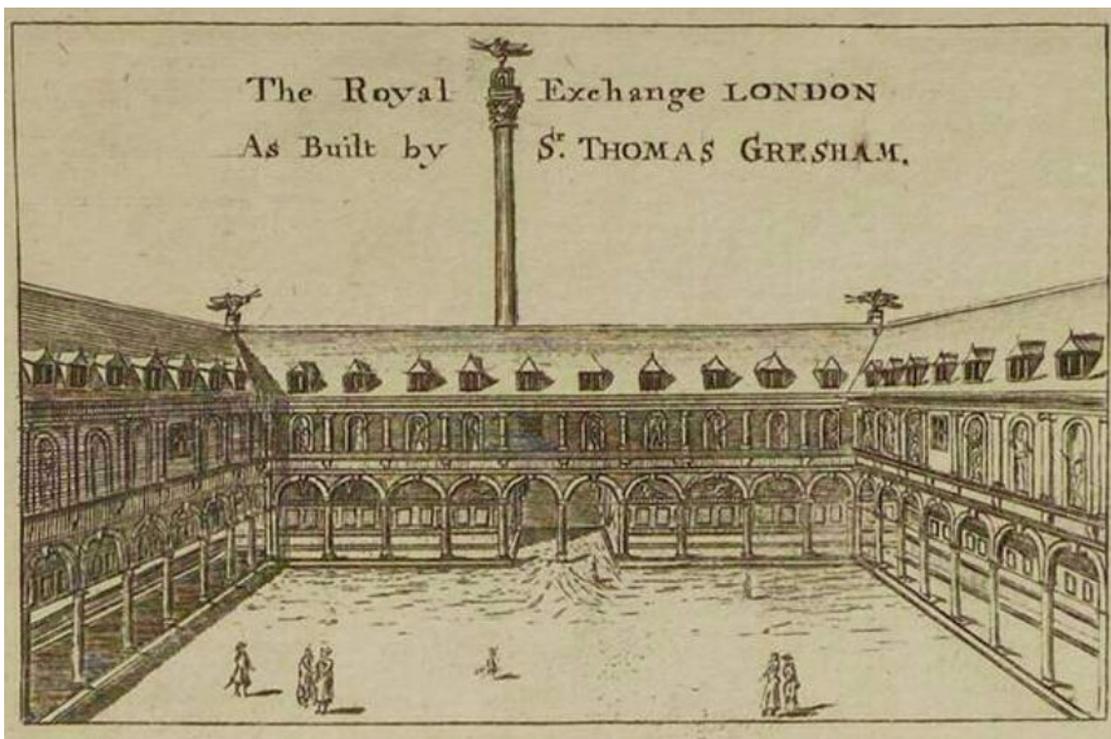


Figure 7. The Royal Exchange.

- 9.23. Economic growth engendered physical expansion. The City at this time was a bustling warren enclosed by its ancient walls; these traditional limits began to be flouted as demand on land increased. Settlements developed eastwards along the highways and the Thames, some growing in association with expansion of the Navy. There were sporadic, ineffective attempts to control the quality of buildings and urban sprawl in general. Some industries left the City for more land and less regulation. Theatres were established in the late 16th and early 17th centuries, first to the north and then to the

south of the City. Alongside commercial success was cultural achievement in the works of Shakespeare and his contemporaries.

- 9.24. Most houses in the City were timber-framed and many grew renaissance encrustations in imitation of more prestigious buildings that had adopted the style. A rare, much-altered survivor of this period is the north range of Staple Inn on High Holborn. The Inner Temple Gateway of 1611 on Fleet Street is another example, with notable strapwork ceiling decoration.
- 9.25. At the beginning of the 16th century there was significant religious presence in the City. Monasteries, nunneries, hospitals, friaries and priories were numerous and a significant spiritual presence within the walls. The scale of these stone buildings would have dwarfed surrounding largely timber dwellings, creating a clear sense of distinction. The mid-16th century English Reformation, in which these institutions were dissolved and their assets allocated to the Crown or favoured individuals, had an enormous effect on the atmosphere of the City. Outward signs of religious life decreased and the lands and properties of the former institutions were intensively subdivided into mansions and tenements. A new kind of accommodation, vital in housing the City's burgeoning population, was formed in what had once been sacred places.
- 9.26. As if prompted by the trauma of the reformation (but more likely driven by long-term neglect), nearly half of the City churches were renewed or rebuilt in the early 17th century. This was also the time of Inigo Jones, architect of the first true classical buildings in Britain, an architectural style that would dominate the country for centuries afterwards. The City was too densely developed for the grand statements of this style seen elsewhere (for example at Covent Garden), but Jones was able to reface the west front of St Paul's Cathedral with a portico, a visitation of the future among the crowded timber gables of the City.
- 9.27. By 1605 the City's population had risen to c.190,000 people, following a period of major economic expansion. London in its entirety at this time totalled c.225,000. The accompanying demand for space, satisfied partly by the lands of the monasteries after Dissolution and the occupation of gardens and open spaces helped to create the concentrated, fine grain and intricate form and character of the City of London. There are few buildings surviving from this period, though the re-use of original stone foundations and basements often happened.
- 9.28. By the time of the Great Fire in 1666 London had suffered spasmodic outbreaks of the plague. Despite several unsuccessful attempts to control the quantity and quality of City development, the predominant timber-framed building fabric was over-developed and under-maintained; collapse and fire was common. The Fire destroyed 400 acres inside and 63 acres outside the City wall. With the Great Plague of 1665, the Fire led to a fundamental shift in the character and use of the City.
- 9.29. Boundaries and tenures were rapidly reinstated; the detailed Ogilby and Morgan plans of 1676 reflect the appearance of the City immediately pre- and post- conflagration. Despite enlightened plans for wholesale reconfiguration, in some cases deriving from continental or classical models, the City grew up again along its old crooked lines. Nevertheless, the opportunity was seized to propose and in some cases realise a series of improvements. The Rebuilding Acts required all new construction be of stone or brick. Wherever possible buildings were constructed to earlier plot and plan form, but allowance was made for the widening of many streets, and a corresponding building height specified. A hierarchy of

four authorised house types was related to four main street widths, with restraint on external design for the 'ornament of the City' a guiding objective.



Figure 8. 'An exact surveigh of the streets, lanes and churches comprehend within the ruins of the City of London'. Copy 1666 John Leake. Metropolitan Archive.

- 9.30. While the tightly-knit grain of the City and its street pattern were reinstated, the creaking irregularity of its timber frontages was replaced with a far more uniform streetscape. This was principally in brick, with the use of stone for more important buildings. Built by Nicholas Barbon in 1667, the brick frontages of Nos. 5 & 6 Crane Court are examples of one of the new building types seen everywhere in the post-fire City. Brick was also used by Barbon at the Inner and Middle Temples, for barristers' chambers that still survive today. The College of Arms on Queen Victoria Street (1677) is another example of a post-fire building executed in this material.
- 9.31. The Acts provided for the creation of new markets, re-siting of some public buildings, the paving of streets and targeted local improvements. These included the creation of the Processional Route of King Street and Queen Street between the Guildhall and the river; to the west the Fleet Canal, occupying the present sites of Farringdon and New Bridge Streets, was constructed as a commercial avenue to local distributors. Although some improvements to the riverfront were achieved, including the redevelopment of the

Customs House by Wren in the 1671, the grand scheme for a Thames Quay went unrealised.

- 9.32. Of the utmost importance to the lasting character of the City was Wren's contribution to the skyline: the ingeniously conceived family of steeples are the fruit of his ideas for the City in their third dimension. Of the 87 churches destroyed or severely damaged, Wren and his colleagues designed and rebuilt 51 of them, as well as St Paul's Cathedral and the Monument, one of the principal landmarks of that era and still the largest free-standing classical column in the world. In doing so one of the most highly regarded and recognisable skylines in contemporary Europe came into being.
- 9.33. It is now understood that Wren not only conformed closely to the confined medieval church sites and plans, but economised by incorporating original medieval foundations and fabric, a fortuitous preservation. A great appetite for expertise, labour and materials came into being as a result of the great rebuilding, creating major economic and demographic stimuli in London with a knock-on effect on the fortunes of Britain and Europe.
- 9.34. By 1700, London's population estimate stood at 575,000-600,000 (10% of the nation's total) and it was the largest City in Western Europe. Much of this expansion was accommodated by the rapid development of the West End from the late 17th century. Unconstrained by the ancient walls of the City or other restrictions the creation of large developments espousing new ideas of space, form, symmetry and harmony were possible. A blend of chic residential, entertainment and shopping facilities were created that attracted the wealthy, whose move in that direction was undoubtedly hastened by the destruction of their City properties in the great Fire.

Legacies

- The siting of the Royal Exchange and clustering of early financial institutions in the Bank Character Area
- The forms of St Paul's Cathedral (Fleet Street and the Temples), the Monument (The Riverside) and the majority of the surviving City churches (throughout, with a particular clustering in the Bank and Fleet Street and the Temples Character Areas).
- Rare post-fire architecture such as 41-42 Cloth Fair (Smithfield CA), Crane Court (Fleet Street and the Temples CA).
- Early specialisation in office buildings: Barristers' Chambers at King's Bench Walk (Fleet Street and the Temples CA).

Relative perception of tall buildings

- The limitation of building heights in relation to street widths would have created a more defined and regular spatial hierarchy to the city interior. These restrictions would have enabled a greater emphasis to grander buildings, where a more generous plot allowed for increased scale of development.

- Sir Christopher Wren's utopic vision for the rebuilding of the Cathedral and city churches is indicative of how tall buildings were at the time conceptualised as one part of a wider ceremonial and symbolic cityscape. This is evidenced in surviving panoramas which depict the sky line and illustrate how buildings contributed to a larger urban composition.
- The commemorative potential of tall buildings is indicated in the design of the Monument, its importance as a commemorative structure definitively expressed through its height.

Georgian – early C18 to 1837

- 9.35. There had been a distinction between the areas of the City and Westminster since Anglo-Saxon times. This related largely to commercial power or intensity of occupation, but from the 18th century onwards the role of fashion, or taste, in this relationship became marked. When considered against the emergence of a new, stylish West End, the City defined itself as a ruggedly individual, a commercial enclave with its own customs, traditions and practices. As such the city resisted the more sweeping transformations seen nationally within characteristically Georgian cities such as Bath. As the newer development, the architecture of the West End embodied social stratification, expressed architecturally in the urban context.
- 9.36. The city remained a place of concentrated diversity, with residential and commercial activity frequently combined within the same building. A banking house, for instance, was literally a building in which bankers worked on the lower floors and inhabited the upper. Many lived over their premises, with rich and poor in close proximity.
- 9.37. Within in the City, the urban realm remained multifunctional, with no zoning of residential and commercial uses as seen in its neighbour. In most respects the City closely reflected the medieval scale and the multiplicity of business and residential interests, as well as ownerships renewed after the Fire.
- 9.38. Development in the Georgian City was incremental and in contrast with the West end there were few developments of any formality. Devonshire Square was developed on the site of a mansion by Nicholas Barbon between 1678 and 1708. One of the most notable was the Crescent, Circus and America development (Dance the Younger, 1767) that marked the first appearance of these devices (pioneered in Bath by the Woods) in London. There was a trickle of others: Frederick's Place (Adam Brothers & Samuel Dowbiggin, 1778) and Finsbury Circus (Mountague, 1817).
- 9.39. Various Building Acts of the 18th century gave the City a relatively cohesive urban fabric that was made distinctive by modest blooms of architectural fashion. It generally stuck to homegrown architects and more fashionable outsiders like William Kent or John Nash did not build within the walls. The post of Clerk of Works/Surveyor to the Corporation became influential with the appointment of George Dance the Elder, who transformed it from a sinecure to a role of great proactivity in City planning and building. He designed and built the Mansion House (1758). The quality of the streets was improved through comprehensive paving.
- 9.40. With the opening of Westminster Bridge in 1749 the monopoly of London Bridge was directly challenged, prompting the clearance of the latter's buildings and its widening. The

first Blackfriars Bridge, designed by Robert Mylne, was opened in 1769 together with its new approach along Farringdon and New Bridge Streets, building over the line of the Fleet Canal.

- 9.41. The 18th century also saw the incremental removal of the City wall and subsequently the gateways, apart from the Temple Bar on Fleet Street. The Bishopsgate section of the wall was the first to be removed in 1707, with Newgate the last gateway pulled down in 1777 when Dance's Newgate prison was built. Since the Roman period the wall had been a cornerstone of the City's identity. Its removal was a seismic event for a place so long defined by it; this move signalled a shift in character and a new relationship between the City and the surrounding lands.
- 9.42. Several purpose-built banking, exchange and company buildings were established towards the close of the era, heralding the future pattern of City development. The height and scale of these buildings began to define entire city blocks, contrasting to the finer grain of the historic streetscape. The London Custom House, rebuilt by David Laing in 1818, saw the emergence of purpose-built suites of offices arranged around lightwells in each of its wings (it was rebuilt after partial collapse by Smirke in 1825). Another early example of the early office building is Atlas House, Cheapside, originally built in 1836 for Atlas Assurance.

Legacies

- Expansions of the City beyond its walls, engulfing the select establishments (e.g., Smithfield) and suburbs which had previously stood without; the removal of the gatehouses and the walls themselves.
- Early specialisation in office buildings (Bank, Fleet Street and Riverside Character Areas), hospital buildings (St Bart's, Smithfield CA), warehouse buildings (Former PLA warehouses in Devonshire Square)
- Town planning: Finsbury Circus (Bank CA), Crescent, Circus and Square (Eastern City Fringe CA), Princes and King William Streets (Bank CA). The relocation of London Bridge (Riverside CA).

Relative perception of tall buildings

- The arrival of architectural set pieces such as Finsbury Circus, of a scale which defined the whole streetscapes, created a sense of composition to the wider urban realm. Crescendos in height and mass were deliberately used for dramatic or picturesque effect, providing variety, interest and focal points in short and medium views.
- The arrival of the Georgian terrace house, with prescribed height and mass according to a series of 'rates', cemented areas of consistent height where they were built. When perceived against these terraces, taller buildings with a more elaborate roof structure became more readily identifiable.

- Height continued to be used to express commercial success and political influence, with material wealth signalled through the sheer scale of elaborate decorative façades.



Figure 9. A view of Cheapside. 1823. Dwyer, W. London Metropolitan Archives.

Victorian – 1837 to 1901

- 9.43. Further upheaval came in the 19th century. As the capital expanded at an unprecedented rate the City was transformed into a specialist office and commercial centre, displacing many of its less economically competitive activities, including housing. People began to move out. The resident population of the City in 1801 was 128,000, with a total across wider London of one million. Between 1831 and 1891 this had fallen from 125,000 to 30,000. Development for commercial premises replaced about 80% of the City's buildings between 1855 and 1905.
- 9.44. Railways arrived in the Victorian period, heralding a change in the City's economic, social and cultural character. First was Fenchurch Street in 1840-2, then Blackfriars in 1864, followed by Liverpool Street Station in 1874. Below ground, the first sections of the Metropolitan and District Railways emerged in 1863 and 1869, and the first deep level underground in 1890. In addition to the new railway stations and bridges the City waterfront saw the replacement of Blackfriars Bridge (1869) and London Bridge (1831) and the new Southwark Bridge (1819) and Tower Bridge (1894). These feats of engineering introduced to the City the rapid advances in engineering and technology made since the Industrial Revolution.
- 9.45. An area comparatively unaffected by this upheaval was the City riverfront, which remained entirely devoted to maritime trade, transport and the storage of goods despite the increasing prosperity of new dockyards downstream. Substantial warehousing occupied most of the frontage. Many of them specialised in particular goods or particular suppliers, recalling the ancient specialisms of the Anglo-Saxon quays.
- 9.46. Zeal for "improvement" was a characteristic of the Victorian period and the City Corporation's civic activities were no different. The City's ancient markets were cleaned up, reordered and given sumptuous new complexes like those at Smithfield, Leadenhall and Billingsgate visible today. Many of these improvements and buildings are now integral to the character and identity of many parts of the City. Leadenhall Market, for instance, through the vitality inherent in its combination of fresh produce and other shops and places to eat within a setting of characteristic Victorian architectural flamboyance. Smithfield continues to offer a visceral contrast between graceful architecture and butchery.
- 9.47. Roads were broadened, lengthened or created where there had previously been none. Between 1829 and 1835 Moorgate and King William Street were formed to link the centre and the north of the City with the new London Bridge, situated slightly to the west of the original (which ran parallel with Fish Street Hill). Cannon Street was widened and extended westwards to St Pauls. To improve the permanently congested routes to Westminster, Victoria Embankment was created and linked to Bank along the new Queen Victoria Street. New Bridge and Farringdon Streets widened in association with the construction of Holborn Viaduct over the Fleet valley, with new sections of street linking the new Holborn and Ludgate Circus. Wholesale redevelopment was connected with the opportunity to widen many streets, such as Fleet Street, Ludgate Hill, Gresham Street and Eastcheap.
- 9.48. Two significant sites in the City were laid out afresh. At Whitefriars, a tangle of medieval lanes, wharves, slums and the City gasworks were swept away in favour of an orthogonal grid of streets between the new Embankment and Tudor Street. The Central Meat Market

at Smithfield imposed the huge market blocks across a similarly ancient street pattern. The Central Meat Market included an underground rail connection and spiral ramp for wagon access. Other new streets included Throgmorton Avenue and Lloyds Avenue. Electric street lighting replaced gas lighting across the City in 1887.

- 9.49. Victorian improvements were largely superimposed upon the City's existing street pattern, though in some cases more sensitive integration was achieved. New and widened streets, remodelled junctions and characteristically Victorian triangular sites were formed at the intersections of old and new thoroughfares, creating not merely the opportunity for new commercial building frontage, but a spur to Victorian architectural imagination and ingenuity. The character inherent in the City street pattern was acknowledged and complemented by these dramatic interventions, carried out with a strong sense of civic pride and awareness.
- 9.50. Intensive use of the street block was made during the Victorian rebuilding of the City. Floorspace increased by c.50%; simultaneously, the new headquarters and speculative office buildings had accommodation that was much more intensively used than previously. Though the scale of development had changed, the new Victorian buildings rarely exceeded 4-5 floors or occupied more than three medieval plot widths. A perceptible though limited increase in building scale was reflected in the nature of improvements to the existing street pattern.
- 9.51. Architectural exuberance replaced Georgian simplicity; despite upheaval, the City retained its close-knit and intimate urban grain and character. Narrow, medieval plots were given frontages in a dizzying array of styles. Stylistically there are good examples of the variety of Victorian architectural expression: the 'palaces' of commerce tended to favour interpretations of the classical style.
- 9.52. The commercial wealth and national prestige of the Victorian and Edwardian period were reflected in the competitive embellishment of the City, seen in the range and quality of style, enrichment and materials, all used to impressive townscape effect. Late Victorian eclectic architecture ceded to an Edwardian reaction favouring Baroque-inspired robust classical styles, accompanied by an identifiable increase in building scale in some instances. By the closure of the 19th century the purpose-designed specialist building type (e.g., offices, banking hall, market) had almost completely replaced the mixed-use premises of the Georgian period.

Legacies

- Railway stations at Fenchurch Street, Blackfriars, Liverpool Street, Cannon Street (Riverside, Liverpool Street and Broadgate CAs);
- Urban remodelling: Holborn Viaduct, Queen Victoria Street, Monument Street, Bank Junction, Blackfriars Bridge;
- Intensive renewal of the City's fabric in an eclectic variety of styles;
- Advances in specialised building typologies, e.g., the railways station, the office, the archival building (Former Public Records Office on Chancery Lane);

Relative perception of tall buildings

- Pugin's writings espousing the neo-gothic style as a force for moral good proved hugely influential and created a renewed emphasis on the 'spire' as a decorative motif. An increase in architectural eclecticism during this period spurred on the creation of elaborate skyline presence and dramatic roofscapes for new buildings;
- Innovations in engineering and the standardisation of materials increased building heights. With it came a recognition of the potential ill-effects of tall buildings, notably Queen Victoria's objection to Queen Anne's Mansions, which obscured her view of the Houses of Parliament from Buckingham Palace in Westminster;
- The scale of infrastructure development and urban remodelling during this period made important landmarks of railway stations and bridges. Industrial buildings such as breweries would have also held an important skyline presence, through their scale and mass experienced along the street front.

Twentieth Century

- 9.53. London's origins were as a settlement on the very limits of an ancient empire; as the 19th century rolled into the 20th it had become the heart of an even larger, contemporary empire then at the height of its power. The City was a key piston in its success. By 1901 it had a daily working population of c.400,000 served primarily by the new railway systems. Buildings came down and were rebuilt with unprecedented speed: almost one fifth of the buildings in the City were replaced between 1905 and 1939.
- 9.54. Prompted by a greater degree of site amalgamation, the relaxation of the Building Acts relating to the permissible height of buildings and the constructional flexibility associated with the use of the steel frame, the City townscape acquired many substantial, stone-clad buildings, with the majority being quiet essays in the classical tradition. A new building scale, enabled by the change in building regulations, was heralded in the thirties by Unilever House and Faraday House, 'lofty edifices' the construction of which spawned policies to protect the clarity of the dome of St Paul's on the skyline, thought to be some of the earliest (if not the earliest) formal view protection policies in the world.
- 9.55. This was the age of prestige bank buildings and company headquarters. Among the finest survivors is Britannic House, Finsbury Circus (1925) designed by Lutyens for the Anglo-Persian Oil Company. Buildings such as these became potent expressions of the power and riches pouring into Britain through the imperial network. Others include Electra House (Belcher & Joass, 1903), aforementioned Unilever House and the former Midland Bank on Poultry (Lutyens, 1929). The individual and combined contributions of these buildings to the character of the City's conservation areas are of major significance.
- 9.56. About the only significant manufacturing industry left in the City at this time was Fleet Street's thriving newspaper industry, which saw the creation of a significant architectural legacy to the west of the City. Associated Newspapers' former works and premises around Whitefriars and the Daily Telegraph and Daily Express buildings on Fleet Street are potent examples. The latter's Modernist stylings appeared at Ibe House, Minorities (1937) and 115 Cannon Street (Gropius and Fry, 1936). Otherwise, such designs were relatively uncommon in the City.

- 9.57. A substantial increase in the office floorspace of the period took the daily 1901 working population of 400,000 to c.500,000 by 1939, served principally by an improved and expanded underground system. The increase in building scale intensified the perceived density and sense of enclosure of the tight and intricate City street pattern. Old photographs show extraordinary volumes of people using them.
- 9.58. Despite the apparent improvements achieved by many buildings in the inter-war period, the quality of office services and the working environment came to be regarded after the war as substandard. This conclusion was reached in comparison with (and spurred) radical post-war philosophies in alternative architectural and planning forms, in the pursuit of higher standards of light, air and efficiency.
- 9.59. A 1942 photograph of the area around Cheapside taken from St Pauls shows a devastated but still largely low-rise City. The war made considerable tracts ruinous, and the task of reconstruction that lay ahead was compared with what happened after the Great Fire. The scale of the destruction gave rise to the belief in some quarters that this opportunity to replan the City should be seized; early plans were sufficiently radical to contemplate its imminent total reconstruction.



Figure 10. View of Cheapside from St Paul's Cathedral. 1942. London Metropolitan archive.

- 9.60. The architects, planners and politicians of the immediate post-war period were unencumbered by the property-related constraints on replanning during Pepys' time. New planning powers came into existence, designed to smoothen the way for comprehensive rebuilding. A series of comprehensive development areas, centred on the most damaged quarters of the City, were identified as the first priority – and were to be replanned on completely new principles of the substantial and simplified orthogonal block. The aspirations of the time are evident in the broad expanse of London Wall – and the slab

blocks (now almost completely demolished) that lined it, creating a thoroughly futuristic streetscape.

- 9.61. Surviving buildings were to be removed where their presence would impede such progress. Despite a careful recognition of the character of the City in the early post-war plans it was felt that the retention of a limited number of the more historic buildings would be sufficient character reference.
- 9.62. Equally radical proposals for an improved street pattern, including the creation of several major new streets, widespread widening lines and separate high level pedestrian walkways were approved, and provision was made when redevelopment opportunity arose; many of these widening lines were later to be abandoned. Vestiges of these initiatives can be seen at the Barbican, a brutalist residential complex designed by Chamberlain, Powell and Bon that raised a flattened part of the City and demonstrated the Corporation's commitment to attracting more residents.
- 9.63. The density of comprehensive development was, however, generally balanced by substantial provision for public space. Prime functional considerations of light, air vehicular servicing and pedestrian segregation and safety were manifest architecturally in a variety of prescribed simple geometric building configurations on the scale of entire street blocks.
- 9.64. The form of much of the development adopted a transformative approach to urbanism anti-urban in the manner in which it snubbed the characteristics of traditional buildings, streets and spaces. The Modern anonymity of the office block became an 'acceptable and indeed pleasurable' objective in itself. Nikolaus Pevsner, writing in 1962, doubted the need for a 'display of individuality' in the office building, comparing it favourably with the anonymity of Georgian housing.
- 9.65. A number of earlier post-war developments, however, recognised City traditions and continued a classical theme in Portland stone and brick, e.g., Lloyds and the former Bank of England building on New Change. In many cases, where they departed from this theme, they maintained the use of traditional materials. The "excellent principle" of the slab, and the podium and tower forms of development upstaged this more characteristic arrangement. In what Pevsner later described as the 'Americanisation of the English townscape', the office tower was seen in 1957 as the necessary '20th century substitute for Wren's steeples'.
- 9.66. Post-war development tended to submerge the identity of the non-office uses within the expression of the office building. The prevailing architectural canon required a strict avoidance of any form of 'eccentricity', embellishment or decoration in favour of a mechanically repetitive pattern. This created a 'sheer' quality to street frontages, which in the absence of embellishment, in turn created an emphasis on their inherent materiality. Initial post-war use of brick and Portland stone was increasingly replaced by a vogue for flush glass and metal curtain walling and polished granite. Whilst overtly contemporary in form, these structures frequently adopted historic building lines, creating a continuation in the street front.
- 9.67. Particular quarters of the City were strongly identified with specific trades or industries before the war. Despite the provision for continuation of this in post-war plans, the displacement of trades through war damage and the changing nature of many trades or industries themselves prompted substantial relocation outside the City; only the newspaper industry stuck to its location on Fleet Street. Alongside this, the decline of the

importance of the City riverside in London's maritime trade combined with the form of new development to create the impression of an anonymous mono-cultural office identity in many parts of the City.

- 9.68. There has been a recent widespread recognition of the shortcomings of the earlier post-war period and the rejection of many of these principles in favour of more characteristic forms of development that address the pre-war street pattern more closely and use more traditional materials.

Legacies

- Palatial, Portland stone-clad office blocks
- Rare outbursts of modernism (e.g. Ilex House)
- Increases in height above the prevailing average across the City
- Post-war redevelopment – Barbican and Golden Lane Estates and Route XI a bold new arterial route to the north of St Paul's. I
- Emergence of radical and innovative architectural styles in the Lloyd's Building;
- Furores over certain development proposals e.g., aforementioned Faraday House, No. 1 Poultry that exemplified a conservationist outlook in a City context.
- Barbican Towers listed Grade II, Blake Tower listed Grade II, Great Arthur House listed Grade I.

Relative perception of tall buildings

- A new baseline for roof heights across the city became established as buildings were rapidly replaced in the pre-war city. As a response, specific restrictions assessing the impact on viewing corridors towards St Pauls emerged.
- Post-war, the adoption of modernist architectural principles, combined with increased demand for office space and continued innovations in engineering, enabled new single use buildings to achieve dramatic heights. Height in these buildings can be interpreted as an overt celebration of the break from classical architectural forms, seeking to bring innovation to work and housing. These buildings were frequently experienced as disrupting rather than adding to the existing architectural hierarchies within the city.

Late C20 & C21

- 9.69. In the 1980s the financial markets were deregulated in a process now known as the 'Big Bang'. Technological advances enabled remote trading, meaning a site near the Stock Exchange and Bank of England was no longer strictly necessary for business. Banks were given more freedom to trade in a manner that matched existing conventions in America and elsewhere. While this upset established City business practices it gave it the required competitive edge in the new financial world. The impact upon the City Skyline

was to be transformative, reflecting a period of dramatic political, economic, and social change.

- 9.70. Large new buildings were subsequently constructed to accommodate massive, open-plan dealing floors that banking and trading now required. These were often arranged around an internal atrium, an originally American device that further indicated the shift away from established practice. Emphatically horizontal in scale, these buildings tended to eschew the finer grained historic streetscape pattern; the speed of deregulated growth created an appetite for development in which size rather than sensitivity was often the priority.
- 9.71. A typical example is the large development for J.P. Morgan in Whitefriars on the former site of the City of London School; of a bold post-modernity, its forceful bulk is a departure from the scale of its neighbours. The Broadgate development near Bishopsgate is perhaps the best example of the rapid development of large buildings required for the new methods. Undoubtedly the most controversial and well-known building of this period is James Stirling's No. 1 Poultry at Bank junction, the product of an extremely contested series of planning applications in the 1990s. This building embodied the post-modern return to ornament, with a noted use of colour and more playful approach to massing. Buildings of this era are just now of an age for consideration for listing, with the full significance of these structures yet to be exhaustively calibrated.
- 9.72. Not all post-modernism in the City was on such a large scale, with many smaller buildings redeveloped to receive the new style then in vogue. These have dated with varying degrees of success but have some importance in the overall character of the City as examples of its willingness to yield to new architectural styles matching changes in the way business was done. The influx of new, futuristic building styles is best represented by the grade I listed Lloyd's building, designed by the Richard Rogers Partnership and opened in 1986.
- 9.73. The era of tall buildings in the City began with the completion of Tower 42 to designs by Richard Siefert in 1981. 'Tall' here means skyscraper, of sufficient height to make an impact on the wider skyline of London. Until 2009 it was the tallest building in the City, only surpassed in that year by the Heron Tower. Meanwhile taller buildings began to emerge in the east of the City in the area now identified as the 'City Cluster', grouped around the vicinity of Bishopsgate and Leadenhall Street. This area remains at the heart of the City's planning policy for tall buildings and is set to accommodate more, with the completion of a series of striking towers including 120 Leadenhall Street, 22 Bishopsgate and 20 Fenchurch Street.
- 9.74. Though the City's conservation areas are less representative of large scale post-1945 development, there are examples within or adjacent to them that emphasise the contrast between the traditional and characteristic forms of the City and alternatives adopted later; the newest, the Barbican and Golden Lane Conservation Area, celebrates how successful the new Modernism and Brutalism could be in shaping new residential quarters.
- 9.75. Many of the City's conservation area boundaries are tightly and abruptly defined by the contrasting scale and forms of post-war and late twentieth century development. There is richly evident contrast between the more modern, high-rise eastern part of the City and the more consistently historic, predominantly low-rise western area. Developments such as the Bloomberg complex on Queen Victoria Street demonstrate the sensitivity required of proposals within or near historic contexts.

- 9.76. The City of London has long been characterised by phases of considerable renewal of its fabric. Despite an under-representation of earlier buildings, until the post-war period the character of the City could be said to have been enriched in many ways by this process. Generally, it has evolved, building incrementally within and upon a perceptible continuity of scale, architectural language and materials, rather than disregarding it and attempting to move on as it did in the initial post-war decades.

Legacies

- As the most recent phase of development within the city, it is acknowledged that many of the buildings of this era are only just now 'of age' for consideration for designation. A truer understanding of where the cultural, political, economic and social transformations during this period are best exemplified in built form is only now beginning to crystallise.
- Notwithstanding this, the arrival of a recognisable skyscraper 'city cluster' during this period remains at the heart of how the city is presently conceptualised within the public imagination. Such is the strength of this architectural identity, nicknames for the best-known tall buildings have rapidly entered the common discourse, for example 'the gherkin' for 30 St Mary Axe is now a globally recognised moniker.

Relative Influence of Tall Buildings

- The emergence of the true skyscraper archetype became established in the city. These buildings were of a such a scale that their individual architectural identities were experienced beyond the square mile, visible across the entire extent of London. A duality to the city's urban form consequently gained clarity, with a sense keen sense of contrast between these bold new forms and remaining historic fabric.

Historic Map Regression

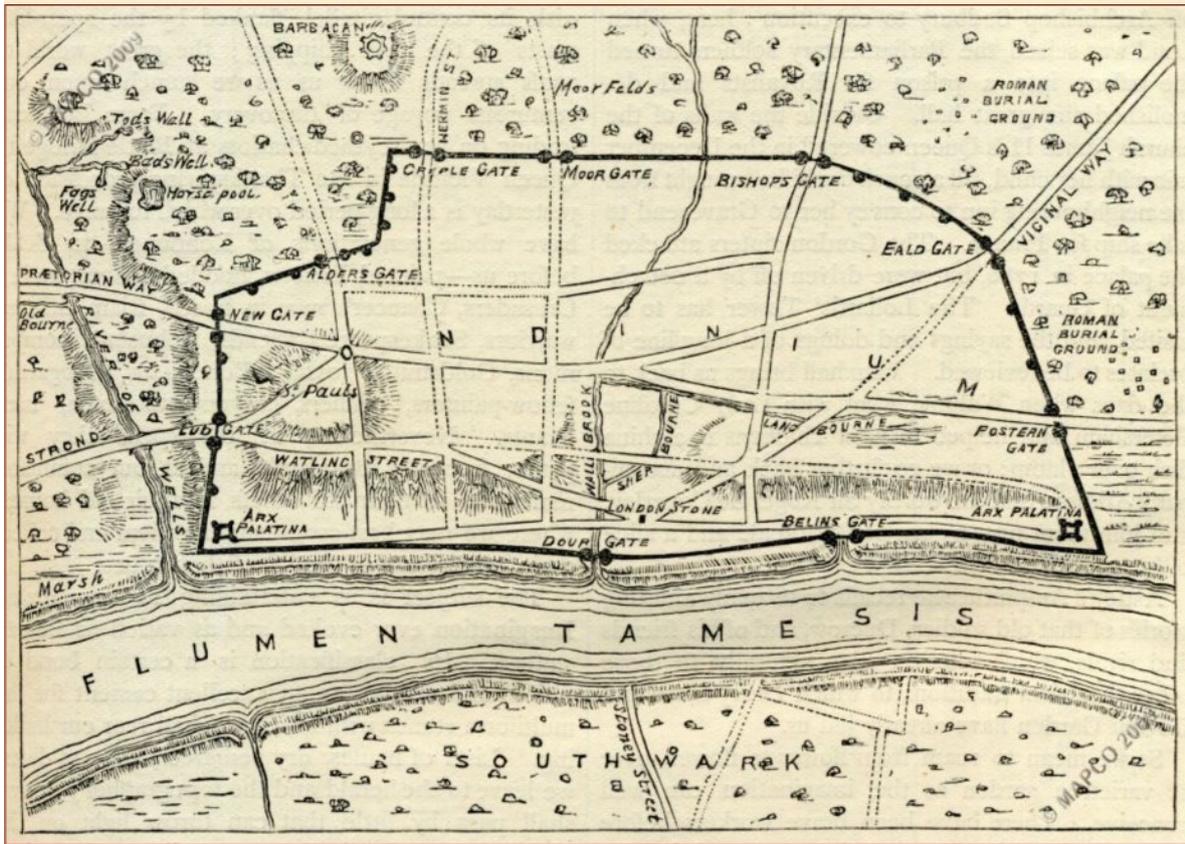


Figure 11. Plan of Roman London. 'Old and New London. A Narrative of Its History, Its People, And Its Places.' 1897, Walter Thornbury.



Figure 13. 'Historic Town Atlas. London c. 1270.' 2023, British Historic Town Atlas.



Figure 14. Extract 'Civitas Londinum'. 1561, Attrib. Ralf Agas. Metropolitan Museum of London.



Figure 15. Visscher Panorama of London. 1616. British Library.



Figure 16. Extract 'River Thames. Perspective view of the river front along its lower reaches with enlarged insets of the districts of Greenwich, Woolwich, Erith and Gravesend'. 1662, Jonas Moore. National Archives.

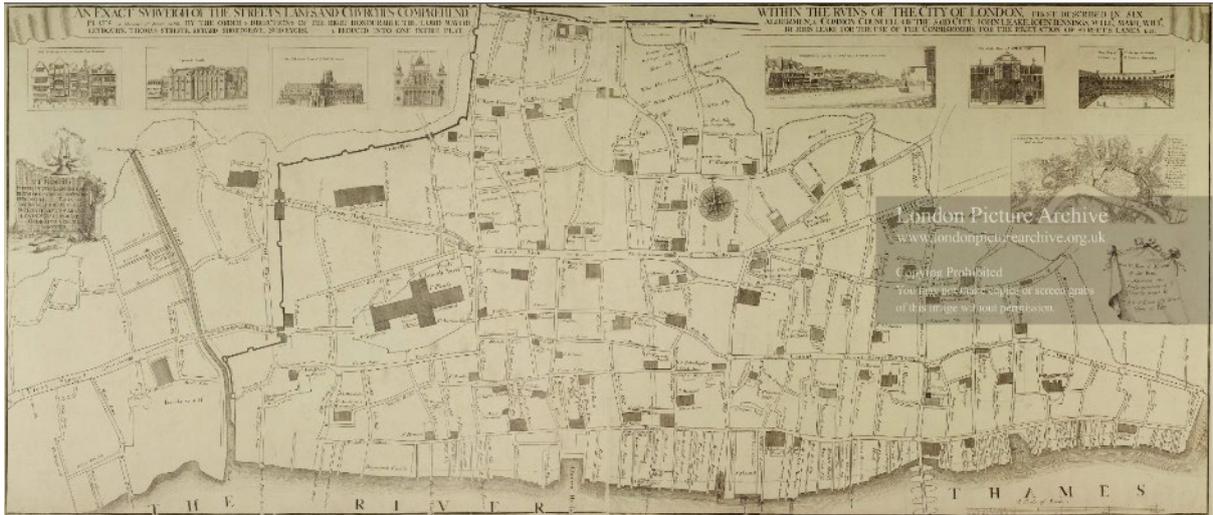


Figure 17. 'An exact survey of the streets, lanes and churches comprehended within the ruins of the City of London' 1666, After John Leake. London Metropolitan Museum.

A LARGE AND ACCURATE MAP OF THE CITY OF LONDON:
topographically delineating all the Streets, Lanes, Alleys, Courts, Yards, Churches, Halls and Houses, &c. Actually Surveyed and delineated. By JOHN OGILBY: Imp: His Majesty's Cartographer.



Figure 18. 'Ogilby and Morgan's Large Scale Map of the City As Rebuilt By 1676'. British History Online [accessed 7 February 2023].



Figure 19. Extract. 'A plan of the cities of London and Westminster, and borough of Southwark'. 1746. John Roque. British History Online [accessed 7 February 2023].



Figure 20. Extract. Map of London. 1799. R. Horwood. British Library.



Figure 21. OS Maps, 1893-1896. National Library of Scotland.



Figure 22. *Bomb Damage Map of London 1945*. London Metropolitan Archives

Core City Heritage Typologies

High Finance

- 11.1. Historic Character Thesaurus (HCT): Commerce/Bank Branch/Office Development/Office Premises. Historic England Selection Guidance: 'Commerce and Exchange Buildings' December 2014.
- (i) Character Areas: Bank (principally), City Cluster, Fleet Street & St Paul's
 - (ii) Key elements of setting which make a contribution to significance:
 - i.) Clustering of related businesses, in particular around keynote buildings such as the Bank of England and Royal Exchange, Lloyd's Registry etc
 - ii.) Perception of a common architectural language in the wider townscape character, creating a cohesive appearance to the streetscape which expresses their interlinked use.
 - iii.) Contrast between gravitas of HQs and smaller associated commerce, creating an architectural and decorative hierarchy.

Banking

- 11.2. The City has perhaps the highest quality and quantity of historic buildings designed for these activities anywhere in the world; in this regard its collection is of international significance. Although the earliest examples do not survive, the architectural development of the Banking Hall/Headquarters building can be easily followed here. Unsurprisingly as befitting its status as a major international financial centre from the early modern period, the City was the place in which pioneering developments were made in the type of building designed for the holding, processing and exchange of money. The nation's bank, the Bank of England, began life in the seventeenth century in Sir John Houlton's City mansion on Threadneedle Street before transferring to purpose-built headquarters designed by George Sampson, later reimagined by Soane, in the eighteenth century. Private and provincial banks are well-represented too; among them the earliest thought to survive in Britain (Hoare's, Fleet Street) and the most opulent (Midland Bank, Poultry).
- 11.3. The high concentration of historically significant buildings associated with banking creates a distinctive functional townscape and architectural ecosystem. Examples include Hoare's Bank, Fleet Street (grade II*, 1830), the earliest thought to survive in Britain, with a fine, classical sandstone frontage. It incorporated residential apartments for the Hoare family in the manner of a 'counting house'. Smaller, less famous firms are represented too, such as the Prescott, Dimsdale, Cave, Tugwell and Co. Bank headquarters at 50 Cornhill (grade II, 1892). This incorporates a brick frontage above a stone plinth with opulent stone dressings. More grandly, the former National Westminster Bank at 41 Lothbury (grade II*, 1931) and the former Midland Bank headquarters on Poultry (grade I, 1924) exemplify the Portland stone-clad, opulent banking palaces of the early C20. Post-Big Bang premises tend not to be listed but survive across the City; an example is Peterborough Court (unlisted, 1991), for Goldman Sachs, incorporating former Daily Telegraph HQ (grade II, 1928).

Potential Vulnerability to Tall Buildings

- Erosion of a more granular urban form which still expresses the historic banking architectural ecosystem.
- Loss of intervisibility, obscuring a perception of group value, where clusters of banking buildings remain.
- Diminishment of the grand, high-status character of many banking HQ's through altering the existing streetscape hierarchy.

Exchanges

- 11.4. The Royal Exchange (1844, grade I listed) has occupied its site at Bank Junction since Sir Thomas Gresham's foundation of it in the mid-late 16th century, establishing London as a rival international financial centre competing directly with Antwerp. The present building incorporates the central exchange hall with ancillary offices and retail units, reminiscent more of wholesale market rather than financial premises, that were common to them all. The royal exchange presently forms a centrepiece in views east from Bank Junction, creating a focal point in the surrounding neo-classical townscape, as well as within views towards the city cluster to the east. Other exchanges included the Corn on Mark Lane, the Coal on Lower Thames Street and the Stock at Mansion House. None now survive.

Potential Vulnerability to Tall Buildings

- Unbalancing of the composition around Bank junction in which the Royal Exchange is currently experienced as the focal point.

Insurance

- 11.5. Insurance broking began in C17 coffee houses, most famously Edward Lloyd's on Tower Street. None of these survive, but various architectural iterations of Lloyd's subsequent premises survive. Pre-eminent is the current Lloyd's Building on Leadenhall Street, a dramatic essay in steel, concrete and exposed services, completed in 1986 and listed at grade I. It incorporates the façade of Cooper's earlier building to Leadenhall Street (grade II, 1930). The premises of other insurance firms survive, though these look less distinctive and more like other office buildings of their era. An early survivor is the headquarters of Atlas Assurance on Cheapside (grade II, 1836), with a similar small-scale Regency prettiness as Hoare's Bank on Fleet Street. The Scottish Provident Building, Lombard Street (grade II, 1915) has a similar style and architecture to other offices of its date.

Potential Vulnerability to Tall Buildings

- Loss view points which take in positive juxtapositions with other buildings of high architectural quality, such as seen between the Lloyd's Building and Leadenhall Market, described by Historic England as "wonderfully incongruous".
- As above, loss of a finer grained streetscape, potentially obscuring the historic origins of insurance industry.

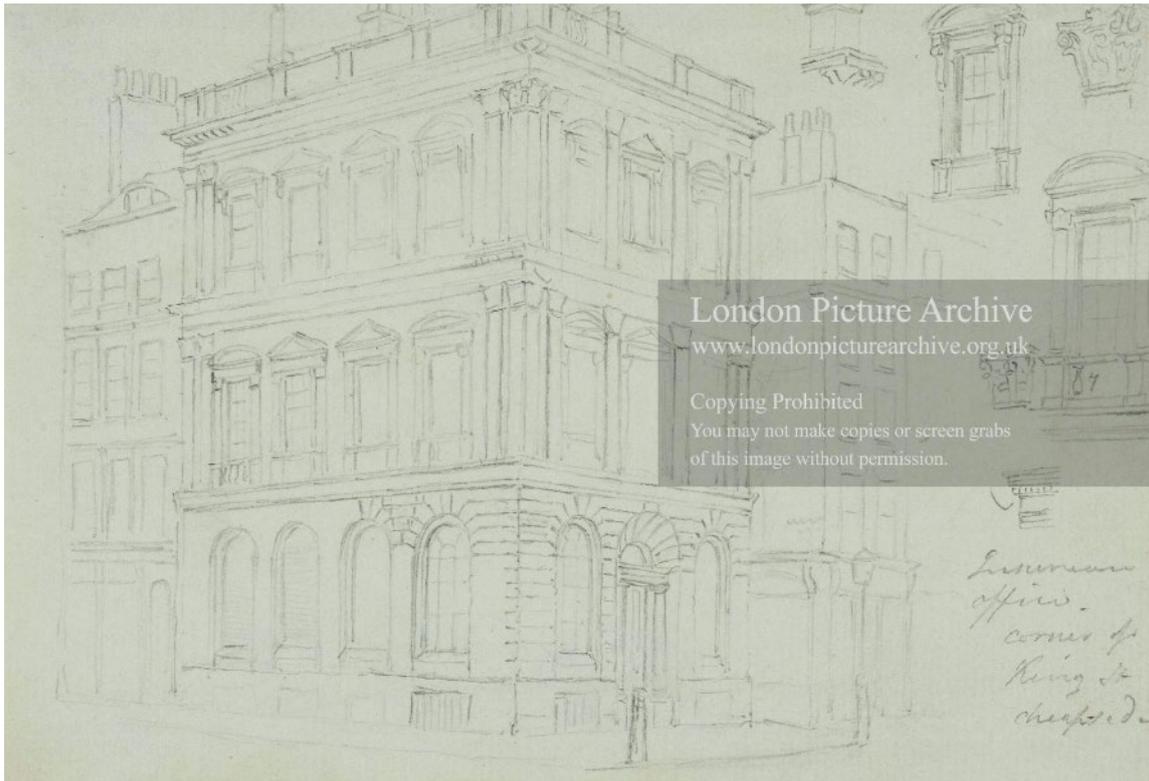


Figure 23. 'Insurance Office, Kings Street and Cheapside'. C.1855. Shepherd, Thomas Hosmer (1793-1864). London Metropolitan Archive.

Offices

11.6. HCT: Commerce/Office Development. Historic England Selection Guidance: 'Commerce and Exchange Buildings' December 2014. Historic England Selection Guidance: 'Commerce and Exchange Buildings' December 2014.

- Character Areas: Bank (principally), City Cluster, Fleet Street & St Paul's
- Key elements of setting which may contribute to significance:
 - i) Preserved areas of Victorian townscape contemporary to the emergence of purpose built office buildings.
 - ii) Sight lines where the landmark quality of late twentieth century offices is appreciable.
 - iii) Retention of defined building lines which adhere or respond to historic structures and street alignments.
 - iv) Proximity to other office buildings identified as innovative or particularly early examples, creating a group value in which the evolution of the purpose built office building type is appreciable.
 - v) Long range views of tall buildings which create a sympathetic composition when viewed together.

11.7. Closely allied to, yet often distinct from the aforementioned financial buildings is the office building where, again, the City possesses a uniquely fine and multifarious collection of historic examples in which it is possible to trace the development of the office as architecture and its associated services in heating, lighting and comfort/prestige.

- 11.8. Scattered and much-altered examples of combined premises/residences survive from before the development of the purpose-built office building. An example is No. 4 Frederick's Place, built c.1778 by Samuel Dowbiggin as a warehouse/premises on the ground floor with fine residential apartments above.
- 11.9. Similarly, the City is rich in purpose-built Barristers' Chambers, of which highly significant examples survive in the Temples from the C17 onwards. These early examples on King's Bench Walk and elsewhere were not quite purpose-built, for they combined spaces from which Barristers could practice with living quarters, but they do illustrate well the development of a distinctive and specialised strand of predominantly office building.
- 11.10. Of the purpose-built office, an early and very important example is the Custom House (grade I, 1817). It may be the earliest purpose-built suite of offices to survive in London, but for Somerset House. Of prestige headquarters none survive from before the nineteenth century with the exception of much-altered parts of the Bank of England. The aforementioned Hoare's Bank and Atlas Assurance give a flavour of early nineteenth century offices. The City has a vast array of mid-late nineteenth century purpose-built offices for specific firms, illustrating great variety in architectural style and specification, such as No. 7 Lothbury (grade II*, 1867), a splendid Venetian gothic style for the General Credit Company. Speculative office chambers also survive in great numbers, such as 60 Mark Lane (grade II*, 1864) and 23 Finsbury Circus (grade II, 1894).
- 11.11. On a larger scale were the early C20 office buildings of steelwork and Portland stone, grand monuments to the high watermark of the City at the zenith of its power in the late Victorian/Edwardian period. Examples include No. 1-5 London Wall Buildings (grade II, 1901), Electra House, Moorgate (grade II, 1903, as prestige headquarters for the Eastern Telegraph Company) and St Martins House (grade II, 1925) - prestige premises for a textile company, incorporating showrooms and warehousing. More unusual examples include Holland House (grade II*, 1916) of ribbed faience by the Dutch architect H.P. Berlage for a Dutch shipping firm.

Potential vulnerability to tall buildings

- Loss of open sky setting to landmark structures.
- Erosion of historic street patterns which may have informed an office building's design.
- Loss of cohesion where an office forms part of a unified historic townscape.
- Loss of intervisibility with particularly innovative or early type office building.
- Creation of an unbalanced composition in long range views where an office building forms part of a considered group.

Civic/and_Institutional

- 11.12. HCT: Civic Provision/Association/Guildhall. Historic England Selection Guides: 'Law and Government Buildings' (December 2017); 'Education' (December 2017).

- Character Areas: Bank (principally), Fleet Street & St Paul's;
- *Key Elements of Setting which make a contribution to significance:*
 - i) Sense of exclusivity and enclosure, for example to interior yards where a consistent historic character is preserved and distinct.
 - ii) Relationship to remaining medieval street patterns.
 - iii) Group value where additions over time create a multi-layered and functionally interconnected structure, as seen in livery hall complexes.

11.13. As befitting its status as the nation's financial rather than royal centre, the City has a unique grouping of prestige buildings strongly flavoured by commerce and business rather than the monarchy: the many guildhalls, or 'Livery Halls' in which various trades coalesced and from which they were directed in the medieval period; again, this typology is not unique to the City, guilds of trades being found in other medieval English cities – but what is uniquely of the City is the sheer quantity and quality of them.

11.14. Often they are undemonstratively located set back from the street. Virtually every architectural period and style from the medieval onwards is represented in the Livery Halls, both as a group and often within the fabric of individual sites. For instance, Merchant Taylors Hall (grade II*) off Threadneedle Street contains significant medieval fabric as well as work from the seventeenth, nineteenth and twentieth centuries. Other notable examples include Apothecaries Hall (grade I, 1670 and 1786), Goldsmiths Hall (grade I, 1835), Drapers Hall (grade II*, late C19), Salters Hall (grade II, 1976) and Leathersellers Hall (unlisted, C21). Presiding over them all is the City Corporation's Guildhall (grade I, early C15), of strongly medieval Gothic character.

11.15. Other notable institutional buildings include Middle Temple Hall (grade I, c.1562-73), the Mansion House (grade I, 1753), the City of London Club (grade II*, 1834) and the Institute of Chartered Accountants (grade II*, 1870s and post-war).

Potential vulnerability to tall buildings

- Loss of enclosure and privacy within interior yards.
- Erosion of finer grained historic street pattern particularly where this is of a consistent date with an institution's founding.
- Encroachment within views where landmark qualities or open sky setting are appreciable.

Ecclesiastical and City Churchyards

11.16. HCT: Civic Provision/Religion/Cathedral, Church, Synagogue. Historic England Selection Guidance Criteria: 'Places of Worship', 'Commemorative Structures'.

- Character Areas: Bank, Fleet Street & St Paul's (principally); City Cluster; all
- *Key Elements of Setting which may contribute to significance:*
 - i) Relationship with associated open space and/or consecrated grounds.
 - ii) Landmark quality residing in views towards and from towers or spires, and opportunistic placement on areas of high ground.
 - iii) Contribution to a symbolic or Processional Route.
 - iv) Longer range and river views where remnants of the mediaeval & seventeenth century sky-line remain appreciable.
 - v) High status presence within the streetscape, where the deference of surrounding structures is appreciable.
 - vi) Group value with other places of worship.

11.17. The City has few rivals nationally and arguably internationally in the quality and extent of its religious buildings, representing the density and piety of its ancient phases of development, and modern recognition and appreciation of their architectural and historic value.

11.18. Pre-eminent is St Paul's Cathedral, the mother church of Anglicanism and of London, which has been an internationally famous landmark of the City since the medieval period. Its significance is given in more detail below.

11.19. The City has an exceptional density of churches, illustrating the size and density of the medieval population and matchless in the UK. Today, there are few parts of the City more than one hundred metres from a church, yet at the end of the Middle Ages the number of churches and religious buildings, and their dominance in their setting was far greater. The effects of the Reformation, fire, bombing and demolition have greatly reduced their number, but 39 remain – of the highest architectural, historical and archaeological significance individually and, just as importantly, collectively. The majority of them are by Sir Christopher Wren and his office, one of Britain's greatest architects and, collectively, are a sublime, masterly grouping of endless variations on baroque architectural themes, many of them resting on and defined by the medieval foundations of their predecessors, all combining to create a spectacle that is uniquely of the City and cannot not be found anywhere else. As well as these, there are a number of surviving pre-Fire churches which form an instructive and characterful counterpoint to the Wren churches, such as Temple Church (C12), St Andrew Undershaft (C15) and St Katherine Cree (1631). Some churches incorporate or are founded upon the remains of the religious houses once proliferating in the medieval City, the monasteries, abbeys, friaries and nunneries abolished at the Reformation, of which an outstanding architectural example is Christchurch Greyfriars, a Wren tower grown from the remains of the Greyfriars, one of the wealthiest and largest houses.

11.20. No less important, but of a different character and significance, are the other City's other places of worship. Bevis Marks Synagogue is the oldest synagogue in the UK in continuous use. This remarkably intact survivor of 1701, and its discreetly retired setting

in a secluded courtyard off the main street, speaks powerfully of the importance and influence of the Jewish community in the City's history. There are numerous other places of worship, fascinating contrasts with the Anglican churches, such as St Mary Moorfields (Roman Catholic), the City Temple (Nonconformist) and the Dutch Church.

- 11.21. The City Churchyards are a highly distinctive part of the City's townscape, unique to the City. Often partly or wholly concealed from the street, these open spaces are of a series of diminutive shapes and sizes and are often adorned with attractive historic features including walls, gates and railings, trees, monuments and tombstones. They create intimacy at a human scale; their number and location illustrate both the centrality of faith and the population density of the medieval city.
- 11.22. Together, those ecclesiastical buildings with a skyline presence form the most famous and enchanting features of the City skyline, the significance of which is discussed in more detail below.

Potential vulnerability to Tall Buildings

- Encroachment of landmark or open sky quality associated with towers and spires.
- Potential to diminish group value where the historic density of sacred spaces in the city remains appreciable, both in long and short range views.
- Intrusion into the intimate character or enclosed views from within sacred spaces associated with prayer, including church yards.

Markets

- 11.23. HCT: Commerce/Market/Meat Market, Fish Market, General Purpose Market. Historic England Selection Criteria: 'Commerce and Exchange Buildings' December 2017
- Character Areas: City Cluster, Riverside, Smithfield (principally)
 - Key Elements of Setting which may contribute to significance:
 - i) Contribution to cohesive or intact Victorian townscape.
 - ii) Functional relationship with wider historic infrastructure including railways and viaducts.
 - iii) Contribution to a planned rather than fortuitous streetscape, including creation of focal points within short and medium term views.
- 11.24. The City has several historic market buildings by the Sir Horace Jones, previously the City Surveyor, which reflects the Corporation's management of London's wholesale markets for hundreds of years. These include the buildings at Smithfield Meat Market (1860s, grade II*), Billingsgate (1870s, grade II), Smithfield General Market (unlisted, 1870s), Leadenhall (grade II*, 1881). They are the latest descendants of ancient predecessors on their sites and retain a strong architectural and corporate group identity which handsomely illustrates the City's proud tradition of local government and act as significant local landmarks.

Potential vulnerability to Tall Buildings

- Interruption of views where relationships with wider Victorian townscape is appreciable.
- Diminishment of landmark quality within local streetscape through increased sense of scale.

Retail and Hospitality

11.25. HCT: Commerce/Hospitality/Retail. Historic England Selection Criteria: 'Commerce and Exchange Buildings' December 2017

- Character Areas: All
- Key Elements of Setting which may contribute to significance:
 - i) Proximity to specific industries historically associated with a particular pub or coffee house's clientele.
 - ii) Finer grain historic streetscapes which enhance an appreciation of a pub's longevity within the surroundings.
 - iii) Association with railway infrastructure, where the hospitality use has been intentionally located to serve travellers into the city.
 - iv) Commemorative function, indicating the location of lost buildings or communities, such as the Black Friar.

11.26. These building types have to an extent been covered in other sections. However, within this category there is one building typology that is very important to the City's character and identity – the public house. A remarkable array of them exist within the Square Mile to serve the working population, and many have ancient origins and associations with famous characters (e.g., Dr Johnson at the Mitre Tavern), particular professions (e.g., The Lamb Tavern in Leadenhall Market and insurance brokers) or City traditions (e.g., the Hand and Shears in Cloth Fair and the piepowder ceremony). Many of them are small, packed at peak times – standing room only – and are characterised by atmospheres of haste and turbulence which capture the pace and distil the essence of a C21 world financial centre inhabiting an ancient city. They exhibit great variety, with some in post-Fire buildings and others in repurposed banking halls. Many are of high architectural quality and/or age in their fabric and are listed accordingly. Notable examples include the Cheshire Cheese on Fleet Street (late C17, grade II), the Hoop and Grapes on Aldgate High Street (late C17, grade II*), The Old Wine Shades (late C17, grade II), Simpson's Tavern (late C17 or early C18, grade II), the East India Arms (c.1830, unlisted), the Viaduct Tavern (1875, interior 1900, grade II) and the Black Friar (1875, remodelled 1905 and 1917, grade II*).

11.27. Hotels are far fewer in number, and not particularly representative of the City; nevertheless, the former Great Eastern Hotel (1884 and 1901, Grade II*) is a fine

example of a railway hotel representing the apogee and opulence of such buildings associated with the height of the railway's fortunes.

Potential vulnerability to Tall Buildings

- Loss of finer grained historic streetscape, eroding an in-tact quality to a historic setting.
- Erosion or loss of buildings where a cluster of a particular use type was known to form the clientele of a specific pub.
- Dominance or intrusion within views which are presently a characterised by a more intimate sense of scale associated with a pre-war setting.

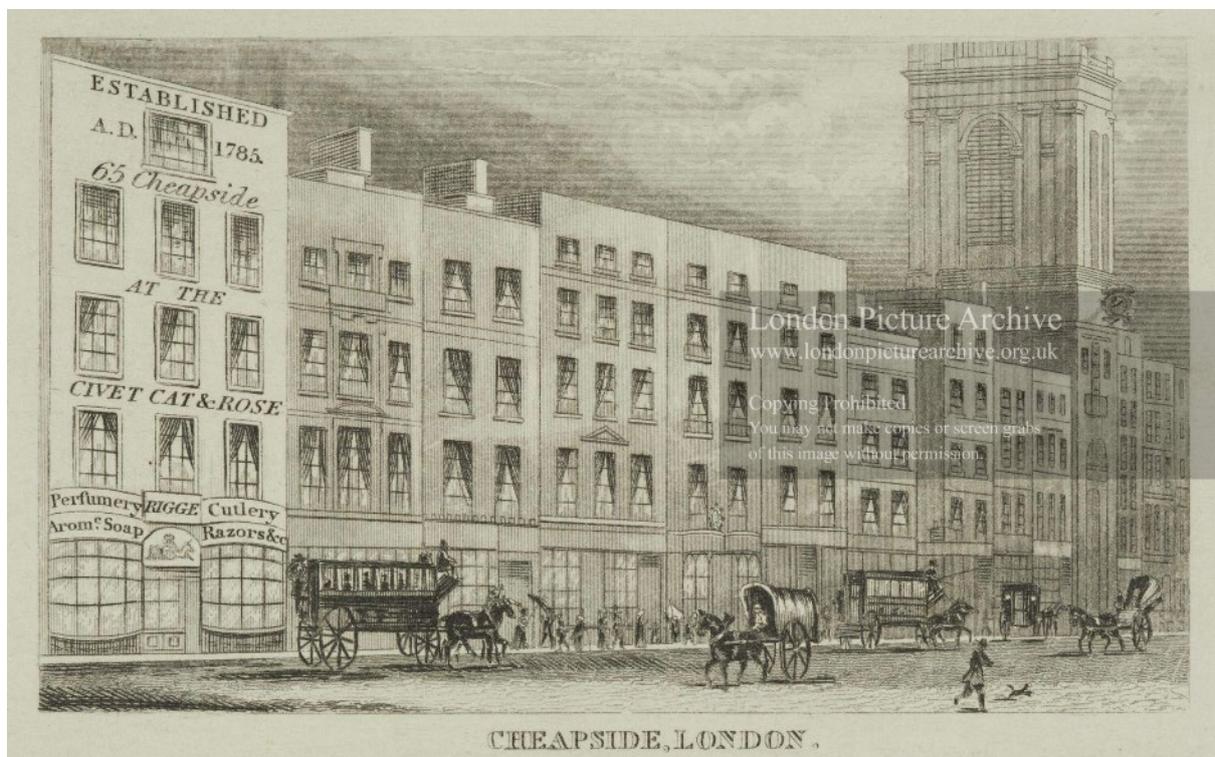


Figure 24. 'View of the south side of Cheapside from St Mary-le-Bow Church to no. 65. 1850, Anon. London Metropolitan Archive.

Residential

11.28. HCT: Urban Settlement/Dwelling/Flats and Apartments/Housing Estate. Historic England Selection Criteria: 'Domestic House' Vols 1, 2 & 4. December 2017

- Character Areas: Barbican and Golden Lane (principally); isolated examples in Bank, Fleet Street and the Temples's, Riverside.
- Key Elements of Setting which may contribute to significance:

- i) For post war buildings, contribution to a designed estate, such as the Barbican. This includes any relationship to any designed viewpoints within the local streetscape.
- ii) Where residential buildings are pre-war in date, a more intimate sense of scale to the street front.
- iii) Group value with offices of a related industry, where specific accommodation and housing for employees forms part of a wider complex, such as at the inns of court.
- iv) Consistency within the urban realm in terms of heights and street widths, specifically where this may reflect categorisation according to the Georgian 'rate' system.
- v) Relative spaciousness of plot size where related to the remains of a grand mansion.

11.29. With the arrival of the railways in the C19, which made extramural, suburban living and commuting possible and desirable for the majority, the City gradually shed its residential character; consequently, purpose-built residential buildings are under-represented in its building stock, as their sites were increasingly redeveloped for purpose-built offices, market buildings and others. Perhaps the most famous, and most anomalous, is the Mansion House (1753, Grade I). Aforementioned examples of combined residential and office premises survive in the City at the Temples and at Hoare's Bank on Fleet Street. Early purpose-built houses are rare and are exemplified by the C17 41-42 Cloth Fair (Grade II*) and 7a Laurence Pountney Lane (C17, Grade II). Residential units are frequently to be found in converted buildings, such as around Devonshire Square and Creechurch Place.

11.30. The standout residential areas of the City are, of course, the Golden Lane (1957-62, listed at grade II and grade II*) and Barbican (1956-1981). These seminal post-war housing Estates illustrate evolving trends in architecture, spatial and urban planning and Modernism in general. They are defined by pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary. They represent a new approach both to residential architecture and spatial planning as well as the reintroduction of residential uses to the City.

Potential vulnerability to Tall Buildings

- Loss or intrusion into designed views.
- Interruption of a consistent scale where appreciable within the street front.
- Sense of encroachment within local views where spaciousness to plot sizes are/were illustrative of a house's status.

Warehouses

11.31. HCT: Maltings/Breweries/Metalworks/Shipyards/Dockyard/boatyard/timberyard/ironworks/tanneries. Historic England Selection Criteria: 'Industrial'. December 2017.

- Character Area: Liverpool Street, Bank, City Cluster, Riverside, Eastern City Fringe
- Key elements of setting which may contribute to significance.
 - i) Group value with buildings of an associated industry, including market buildings where they may form an appreciable group.
 - ii) Proximity to the riverside, or railway indicating access to trading routes.
 - iii) Location away from principle or residential streets.

11.32. Warehouses comprised a large proportion of the river frontage for much of the city's history, reflecting the importance of the river to trade and commerce. Further within the city's interior, this building type was more scattered, groupings however developed including those surrounding Devonshire Square, associated with the Port of London Authority, east and south of Bishopsgate and within Eastcheap. Many early warehouses combined residential and commercial uses, with homes generally built above a warehouse at ground floor. Proximity to market buildings often dictated the location of this building type, whilst the reduction of a residential population in the nineteenth century enabled warehouse building on an increasingly large scale. This building type is now largely converted, often into residential use.

Tall buildings

11.33. HCT: Business/ Bank Branch/Business Park/Landmark Commercial Building / Office Development/ Office Premises/ Apartments/Housing Estate

- Character Areas: Barbican and Golden Lane, City Cluster (Principally), New Street Square.
- Key Elements of Setting which may contribute to significance:
 - i) Landmark quality appreciable in long distance views, which may reveal a particularly unique, epoch defining or otherwise iconic character.
 - ii) Contribution to a balanced and/ or composed tall building cluster, either designed or fortuitous.
 - iii) Responsive street-level character, showing consideration of historic street alignments or buildings of conspicuous architectural or historic interest.
 - iv) Sight lines from viewing platforms which taking in skyline and/or distant views, as well as enabling unique perspectives on surrounding townscape, both historic and contemporary.

11.34. Since the earliest times the City has been characterised by tall buildings, with the most famous of the earliest being the Tower of London; there has been a trend for building tall throughout the City's history, best exemplified in the Cathedral and City Churches (discussed above), but also in the lost, private medieval towers of wealthy merchants

studding the skyline which could be interpreted as the forerunners of modern secular tall buildings. The opportunities afforded by typography to exert a greater visual influence over the surroundings often dictated location, for both secular and religious buildings alike.

- 11.35. Early secular tall buildings with skyline features that survive include the towers of the former Public Records Office (1855, grade II*) Cannon Street Station (1866, grade II), and the Central Criminal Court (1907, grade II*). Thereafter came a new type of tall, steel-framed office block that transcended the traditional building lines of the City without adding deliberately conceived skyline features to the City. Examples include the aforementioned Unilever House, Adelaide House and the now-notorious Faraday House (1933, unlisted).
- 11.36. After the Second World War tall buildings proliferated and began to equal or transcend the heights of the City church towers and spires. Surviving residential examples include Great Arthur House (1957, grade II) and the Barbican Towers (grade II). The office tower as a distinct typology began to emerge, a rare survivor from this period being the former Commercial Union Tower (1969, COI); many of these post-war towers, such as the Kleinwort Benson tower at 20 Fenchurch Street, were undistinguished in form and architecture and have subsequently been redeveloped. A landmark in the journey away from randomly sown mediocrity and towards the creation of the City Cluster was the Natwest Tower (1980, unlisted); this direction of travel was cemented with the completion of No. 30 St Mary Axe ('the Gherkin', 2003, unlisted).
- 11.37. Since then, the City has experienced a boom in tall buildings, focused within the City Cluster, including: 110 Bishopsgate ('the Heron', 2011), 122 Leadenhall Street ('the Cheesegrater, 2013), 20 Fenchurch Street ('the Walkie-Talkie, 2014), the Scalpel (2018) and 22 Bishopsgate (2020). With the Natwest Tower, these towers have collectively formed a dynamic and compelling cluster of tall buildings to the east of the City. While predominantly office-driven (encompassing high finance, insurance, commercial and legal activities), they are mixed-use buildings incorporating retail activities at ground floor and (most of them) publicly accessible spaces at their upper levels; the latter is now enshrined in policy and is pivotal to unlocking the City's skyline for present and future communities in the City and from beyond.

Potential vulnerability to Tall Buildings

- Loss of a deliberate sense of composition or architectural quality in long range views towards existing clusters.
- Overly obtrusive encroachment within sight lines presently offered by existing viewing platforms.
- Loss of a historic grain at street level, where currently appreciable.
- Erosion of clear sky line presence where this contributes to architectural interest.

City Skyline

- 12.1. This section outlines the evolution of the city skyline, demonstrating its historic, cultural, and architectural significance. Where relevant, viewpoints are cross-referenced with those identified within the London View Management Framework (LVMF). The relationship between the LVMF viewpoints and individual character areas of the city is individually assessed within section 3.
- 12.2. The City's skyline has long been, in of itself, an internationally famous spectacle. The vast majority of the tall buildings seen on it before the C19 were 'public in one sense or another and therefore symbolic of authority' (Saint) – but also of piety, and of public munificence. The vast majority were also beautiful, their forms rooted in ancient architectural responses to clear sky.
- 12.3. The character and visual strength of the city skyline is intimately connected with the natural topography of the Thames river basin. Higher ground was advantageously used to amplify the symbolic prominence of particular buildings, such as St Peter Upon Cornhill, or for defensive military advantage and surveillance, as at Parliament Hill (LVMF 2) and Blackheath Point (LVMF 6). The relative prominence of buildings perceived within the city skyline wax and wane with the rise and fall of the pastures and hills which surround the Capital. This creates viewpoints with discrete and distinctive characters-- the content of these skyline views varying considerably. For example, distant panoramas, such as from Leith Hill in Surrey, take the entirety of the City, which is seen against a verdant backdrop of hills to the north and south. In contrast, river views from the bridges and Southbank are more kinetic in nature (LVMF 10-22,25). Here, the bend in the river creates a series of unfolding vistas, where the composition and density of buildings within the field of vision expands and contracts, creating considerable change in the foreground.
- 12.4. Additionally, developments in cartography and photography have also resulted in the changing selection and importance of specific viewpoints overtime, with the quality and content of skyline depictions evolving considerably. Relatedly, shifts in artistic taste, such as a preference for views where a sense of the dramatic, romantic or picturesque maybe more acutely felt, has also informed which views which have gained a wider cultural importance. These cultural and technological forces have necessarily impacted the selection of how and from where the city's Skyline was depicted and consumed.
- 12.5. Specific viewpoints are also known to have defined historic associative significance, often via a recorded connection to monarchy or association with a particular historic structure. For example, the view from 'King Henry's Mound' is associated with the apocryphal but vivid story of King Henry VIII seeking to glimpse the signal from the Tower confirming the execution of Anne Boleyn (LVMF 9). The use of the vista towards the city as an expression of the reach and wealth of a royal or aristocratic estate was also common, such as at Kenwood (LVMF 3) or Greenwich. In the latter, distant city views afforded from One Tree Hill have been continually depicted over the centuries (LVMF 5). The fame of particular viewing platforms, such as at The Monument, The Adelphi or Southwark Cathedral, create additional architectural significance, which is further amplified by the relative historic nature of the structure itself.

12.6. The evolution of the city skyline overtime and its relative perception is outlined below.



Figure 25. Visscher panorama, detail.

- 12.7. The medieval skyline of the City was dominated by the vast spire of Old St Paul's Cathedral – the tallest in Britain – and the medley of steeples and towers of the medieval City churches, rising out of the timber-framed and jettied gables of the medieval City, with the whole abruptly bookended to the east by the Tower of London; among them, too, were the private, secular towers of wealthy City merchants such as that at Coldharbour II and Pulteney's Inn. This spectacle was captured in panoramas by Wyngaerde (1543), Visscher (1616) and Hollar (1647, 1660) – depictions that were widely published.
- 12.8. The popularity of these panoramic views from the sixteenth century on shows the cultural importance of the city 'skyline'. While individual landmark structures create distinct anchor points within these views, the ability of skyline to represent the city as a whole, imbues them with a particular significance. Beyond a simple tool for wayfinding, these depictions hold a symbolic value, with the commercial and military power of the city at large communicated through the grandeur of its architecture. As such skyline panoramas can be understood as avatars for London's political, cultural and historical identity, with the rise of the printing press and engraving techniques enabling this image to spread globally.



Figure 26. Late 17th century. 'One Tree Hill and the Queens House' Jan Griffier the elder. Distant views of the city seen right.

- 12.9. After the Great Fire of 1666, the City's skyline features were rebuilt by Wren and his office in classical form, intensifying and creating an enchanting spectacle, with a distinctive, secular new skyline feature, the Monument, as a reminder of the cause. The resultant panorama – of the majestic Portland stone mass of St Paul's surrounded by Wren's delicate, jewel-like steeples and towers, rising above the brick and tile street buildings below, was universally admired. In the late 1740s, a few decades after St Paul's and the City churches had been completed, it was immortalised by Canaletto. The rise of the 'Grand Tour' as an educational tool for the elite classes, saw Romantic depictions of urban 'vistas' gain popularity, with cultural tourism creating an interest in the production and possession of cityscapes which advertised the worldly education of the owner.



Figure 27. 1809 Joseph M W Turner, 'London From Greenwich Park'. Tate Britain.



Figure 28. 1829, John Heaviside Clark. View of London from the Adelphi. London Metropolitan Archive.

- 12.10. The Romantic movement often depicted the urban and rural realms in counterpoint, with representations of the City Skyline frequently used to capture this dynamic relationship. While William Wordsworth's 'Composed Upon Westminster Bridge' (proximately associated with LVMF 8) describes views of the city and depicts a tranquil relationship between nature and the urban, the rapid expansion of the city during the eighteenth and nineteenth century was also often lamented. For example, JMW Turner's 'View from Greenwich Park' (Figure 27) shows a distant city, just visible within parkland under a stormy sky. Turner was no lover of the intensified urban environment that was being built. The painting included a poetic annotation where Turner describes the city as a 'world of care' beneath a 'murky veil' of cloud, offset by the 'gleams of hope' offered by its architecture.
- 12.11. Views which show the city skyline as perceived from a green setting outside the city also hold a valuable illustrative and evidential interest, demonstrating the gradual expansion and conglomeration of the cities of London, Westminster and Southwark. Comparing present day views to these historic images reveal the extent of change over time.

- 12.12. The enjoyment of 'taking in the view', as a specific leisure activity associated with parks and open space is also recognised, particularly from the regency period onwards. For example, the views from Primrose Hill and Alexandra Palace, public parks since 1841 and 1863 respectively, had a recognised recreational value, with distant views of the City Skyline creating a sense of civic ownership (LVMF 1, 4).



Figure 29. 1832, G Barret. *Panorama of London Viewed from Highgate*. London Metropolitan Archives.



Figure 30. 1848. Carl Haag. *Panorama of London from the top of the monument*. London Metropolitan Archives.

- 12.13. The view from King Henry's Mound in Richmond was protected by an act of parliament in 1902 with the City skyline of Wren and his office enduring until the twentieth century – a period of three hundred years or so. However, with changing building acts and constructional technologies, new, taller buildings became feasible. Unilever House (1932) and Faraday House (1933) exemplified the new breed of taller, stone-faced commercial buildings which began to challenge the dominance of the Cathedral and the churches on the skyline – the latter prompting the formation of the St Paul's Heights policy to avert others near the Cathedral. A further eight 'protected view corridors' were implemented in 1938.



Figure 31. 1928, Panoramic View of London, Parliament Hill Fields. London Metropolitan Archives.

- 12.14. The pace of change on the skyline accelerated after World War Two. Many of the City churches were felled by bombing and not replaced, thinning out the number of jewel-like spires and towers on the skyline. In addition, new, modern architectural trends, redevelopment of bomb-damaged sites, innovations in constructional technologies and a willingness to embrace modernistic ideas of development resulted in, in the immediate post-war decades, in a series of tall buildings constructed in largely random locations across the City. Some of these, such as the Route XI development south of the Barbican, involved conscious efforts to re-plan sections of the City; others were merely opportunistic hi-rise development of individual sites. The result was an incoherent panorama when viewed from the south, west or east, and clashing badly in some instances with the City church spires or the Cathedral itself. Writing in 1973, Nikolaus Pevsner observed:
- 12.15. 'I had written in 1962 that the next few years were to change drastically the skyline of London. They have done it, and it is wholly to the detriment of London. Go to Waterloo Bridge or stand in Fleet Street and look towards St Paul's. The dome now has to compete with more upstarts than one can count or easily recognise. These skyscrapers are not as high as those of America and they rarely come in Clusters. So the result is not dramatic; it does not remind one of New York or Chicago, but of some medium-sized city of the Middle West. That, in my opinion, is the greatest and saddest change'.
- 12.16. In the second half of the twentieth century, the City's skyline was affected by tall buildings that were anonymous in character, opportunistically sited, generally of a low design quality, and wholly devoted to private office uses, without public access. Examples include the former Kleinwort Benson tower at 20 Fenchurch Street, and Sudbury House near St Paul's. In recent decades two strategies have been pursued to better shape the City's skyline. Firstly, the suppression of the heights of the worst intruders into the settings of St Paul's, such as Sudbury Houses – in total, eight post-war office buildings have been replaced by lower development in this vein. Secondly, the clustering of tall new office buildings in the east of the City, out of strategic view constraints, many of them incorporating public spaces at their summits. Policy constraints used to protect views to and from The Tower of London, as well as the Thames river vistas were implemented during this period. In 1976, selected views were additionally protected by planning policy as part of the Greater London Development Plan.
- 12.17. The result is a pronounced increase in drama upon the skyline when viewed from the south and west. St Paul's and the City Cluster are the dominant presences on the skyline: the former holding its own to the west, the latter a sublimely dramatic foil to it in the east. Between and about them are distributed the surviving City church towers and spires, and an assortment of modern tall buildings located mainly in the northern areas of the City. Of the latter, some have attained iconic status, such as the Barbican towers, and are of evident quality though their siting may clash with the Cathedral, while others have a more

malign effect upon, and their removal would enhance, the City's skyline. Views of the midnight City in particular are often used to express its vibrant global nature.

- 12.18. Today, the City's skyline has markedly improved from the nadir of the post-war decades. Now, it is dramatic, remains internationally famous, and captures and transmits, aerially, the arresting contrast between venerable historic buildings and sublime new architecture which is its defining characteristic.

Vulnerability to Tall Buildings

- 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.
- Screening of views from viewing platforms of note, including both historic and modern examples.

Strategic Landmark Heritage Assets

- 13.1. The City's skyline is anchored by the presence of three highly significant historic Strategic Landmarks: St Paul's Cathedral, the Monument and (now extramurally) the Tower of London. The vulnerability of these landmarks to tall buildings is summarised below and expanded within section 3 through the assessment of individual character areas.

St Paul's Cathedral

Summary of Significance

- 13.2. The local, national and international significance of St Paul's is well established and described in the St Paul's Cathedral Conservation Plan (2003). London's and one of the nation's most famous landmarks, it was London's first Cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's three strategically important landmarks, being also the seat of the Bishop of London, the mother Cathedral of the national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of persons central to the national story. A place of national commemoration celebration, the Cathedral has become one of the best known examples of classical architecture in Britain, and symbolic of the restoration of London post great fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative commerce spiritual and symbolic). Imagery of the Cathedral Dome, rising fearlessly from the smoke of World War Two has long been recognised for its symbolic resonance. This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

- 13.3. St Paul's Cathedral is a grade I listed building.

Summary of setting and contribution to significance

- 13.4. The following principal elements of setting make a substantial contribution to an understanding and appreciation of heritage significance:

- i) Local Setting, Including St Paul's Churchyard, Cheapside, Cannon St etc:**
 - a. At heart of local and strategic route structure.
 - b. Historic relationship with churchyard as place of procession and contemplation.
 - c. Associative value with historical events,
 - d. Commemoration to the St Paul's Cross and association with political/religious discourse.

ii) The Processional Route to the Cathedral

- 13.5. Of all the views of and ways to the Cathedral, the Processional Route is undoubtedly the most prestigious and unique. It is not just a view but an experience, subtle and felt in addition to being seen. It possesses enormous significance distinct from and in addition to its role as an element of the setting of St Paul's Cathedral.
- a. The Route's antiquity and relationship to London's oldest place of worship makes it unique in the capital. A multi-layered experience, the Route and its destinations embrace three powerful societal forces: church, state and commerce. It is a superb distillation of what London is and always has been. And it epitomises the fusion, characteristic of London, of the organic and the planned.
 - b. The existence and continuing use of the Route had a major influence upon Sir Christopher Wren's designs for the Cathedral's west front, which was designed to dominate this approach (as the previous Cathedral had done).
 - c. All this means that views of the Cathedral along the Route have an iconic quality, demonstrated by their countless depictions across many art forms, from paintings to ephemera such as biscuit tins and puzzles. The sheer number and diversity of these demonstrate how deeply these views are ingrained in national and international perceptions of London and the Cathedral. Views of the western front taking in both the Dome and Western towers have particular resonance.
- 13.6. For all these reasons, the Processional Route makes a very high contribution to the overall significance of St Paul's Cathedral and its setting. More widely, the Route is an essential part of London's unique city character and image. The conservation and enhancement of the Processional Route and its views are of fundamental importance to London's image as a city and the stewardship of its landmarks in the twenty-first century. Therefore, the pristine sky setting of the Cathedral's silhouette makes a very high contribution to the significance of the Cathedral, its setting and the perception of London both domestically and globally.

iii) Relationship with the River Thames

- 13.7. As has been demonstrated, Wren invested great care in the design of both the Cathedral's west front and its silhouette so that it would have a unique presence on the skyline.
- a. The interplay between the Dome and the western towers is the architectural highlight of the exterior of the Cathedral. This is best appreciated in westerly views from the Processional Route and also in south-westerly views from the South Bank and the bridges, where the Cathedral is perceived as the central focal point of the City's skyline.
 - b. When seen from the river, the Cathedral dominates the City's hinterland and appears as the supreme parent of the other jewel-like City towers, steeples and spires.

iv) Clear sky setting

- a. Self-evidently, domes, spires and other skyline features are designed to be seen against clear sky and this was Wren's original design intent. Accordingly, the maintenance of this pristine sky setting is not only about the setting of St Paul's Cathedral but also about the proper appreciation of his architectural concept.

v) Wider Civic Views:

- a. For example, the various panoramas from which it is famously viewed central to the Thames Basin and within the context of the green and wooded hills of said basin to the North and South, seen rising above the foreground suburban setting. These distant views are captured within the LVMF.

Potential Vulnerability to Tall Buildings

- Disruption of the existing highly sensitive architectural hierarchy with the churchyard.
- Loss of pristine sky setting to Cathedral's silhouette.
- Loss or intrusion into views towards the Cathedral along the Processional Route.
- Unbalancing of the Cathedral's primary status within skyline views from the river and bridges.
- Disruption of the relationship between the Cathedral and City Churches.
- Erosion of the extent of visible fabric of the Cathedral.
- Diminishment of Wren's architectural composition through encroachment within views of the Dome.



Figure 32. St Pauls from Waterloo Bridge (LVMF View 15.B2)

The Monument to the Great Fire of London ('the Monument')

- 13.8. Built by Sir Christopher Wren and Robert Hook in 1671-77 The Monument to the Great Fire, to give it its full name, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland stone, the largest free-standing classical column in the world, crowned with a gilded flaming orb, supported atop a large cuboid pedestal bearing inscriptions and bas-reliefs describing the circumstances of its conception. The Monument is of exceptional architectural/artistic and historic significance as a City/London-wide Landmark. As a purpose built public viewing gallery, the Monument retained particular interest as a form of civic architecture.
- 13.9. The following are considered therefore to comprises elements of its significance:

Historic interest:

- (i) As a public monument pre-dating the Georgian era;
- (ii) For its associative and illustrative relationship with the post-Fire rebuilding of the City of London, specifically with regard to the connection with Sir Christopher Wren and his lead role overseeing the reconstruction of the city churches and St Paul's Cathedral;
- (iii) As the tallest free standing classical column in the world;
- (iv) Associative interest with scientist and theorist Robert Hooke, who informed the design.

Architectural interest:

- (v) Considerable rarity value as an example of a colossal column in Britain, subsequently influential in the proliferation of this building typology, thought to influence the design of the Column of Victory, Blenheim Place; the memorial to Charles, 2nd Earl Grey in Newcastle upon Tyne; Nelson's Column, Trafalgar Square and the Elveden War Memorial in Suffolk.
- (vi) Associative interest as an example of a design by Sir Christopher Wren, one of Britain's most well known architects.
- (vii) As an example of English Baroque architecture, and subsequent group value with Wren's designs elsewhere within the city, most notably including St Paul's Cathedral and the city churches.
- (viii) Distinctive material palette in the use of Portland stone, particularly associated with late seventeenth century civic buildings.
- (ix) Through the sculptural quality of the carved panels on the plinth, and use of narrative within the overall design to enhance the commemorative quality.
- (x) For the scale of the design, intended to be dominant within the surroundings, and establish a London-wide presence;
- (xi) For the internal spiral stair providing access to the gallery at finial level, evidencing structural and engineering advances of the era; and
- (xii) For the use and function of the building as a visitor attraction and public viewing gallery.

Artistic interest

- (xiii) The carved panels on the plinth and the sculptural finial; and
- (xiv) Association with numerous artistic representations including drawings, paintings, engravings and prints in the eighteenth century.

Archaeological Interest

- (xv) There remains potential surviving evidence of the early occupation of the site.

Contribution of setting

- 13.10. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. This contribution is particularly enhanced by its function as a viewing gallery, and as such the Monument can be considered to draw specific interest from its location and proximity to the City centre and riverside, illustrated through the expansive views from the top. Symbolically sited near Pudding Lane where the Fire began, this location is of particular historic interest, also positioned on a near axial alignment with the Old London Bridge, a crossing associated with the founding of the City in Roman times. Alongside the re-built City church towers/spires, the Monument is a prominent feature of many representations of the London skyline, recognisably forming part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge contributing to a sense of gravitas and grandeur within a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.
- 13.11. Therefore the following principal elements of setting are considered to make a substantial contribution to an understanding and appreciation of heritage significance. These elements are cross referenced where appropriate to identified views in local policy:
- i) *Wren-era views of the Monument***
 - a. The Monument has a general skyline presence in views from the South Bank, principally from the SW,S and SE. In these it appears dramatically as Wren's only secular foil to the charismatic clustering of steeples on this skyline.
 - b. From Fish Street Hill and Gracechurch Street (view 3 Monument Views SPD), looking north and south respectively, longer urban views of the Monument are possible, where it reads as a particularly important part of the arrival experience into the City centre.
 - ii) *Subsequent views of the Monument***
 - a. The view south-east down Princes Street/King William Street (View 1 The Monument Views SPD) is an early C19 diagonal vista aligned on the Monument, with particularly fine long oblique views of it from the top of Princes Street. Built as part of a scheme involving the demolition of Old London Bridge, which removed a key Wren-era view of the building and removed its status as part of the 'arrival experience'; these new views of

the Monument are almost compensatory, though clearly created incidentally.

- b. Monument Street was formed in the early 1880s as part of street improvements/relieving traffic to/from Billingsgate. It offers an unusual long-range urban view of the entire structure, from base to top, the upper two-thirds against clear sky (View 2 The Monument Views SPD). This view is indicative of the enduring landmark status of the monument which continued to influence interventions in the City Streetscape.
- c. The Monument continues to have a powerful presence in riparian views in the west from Waterloo Bridge (where the orb is seen commanding clear sky) to from as far away as Greenwich Hill, where it can be seen in conjunction with St Paul's and Tower Bridge. Whilst comparatively diminutive in these views which take in the heights of the modern City Cluster seen to the west, its distinct form retains a symbolic power. Despite the evolution of the city around it, these dramatic changes have continued to ensure its long ranging visibility, evidencing its importance as a City landmark which has been protected over time. Many of these views are identified within the London View Management Framework.

iii) Views from the Monument

- a. The use of the Monument as a viewing platform enabling dramatic panoramic views over the Thames is well established. This enhances an appreciation of its commemorative function and dedication to the City surveyed below. These views are protected through the Monument Views Policy SPD 2020, and identified in the map below. These include views south west and south overlooking the Thames and the City as it meets the waters edge, the City's bridges, as well as the Southbank on the far side of the river (Views 4,3 and 2). View 1 looks south east towards the Tower of London World Heritage Site and Tower Bridge. View 5 looks west towards St Paul's Cathedral. Views north towards the City Cluster are also highlighted within the SPD as of interest, forming a spectacular panorama of diverse City buildings. Views are drawn into the Bank Conservation Area and the City Cluster creating a sense of dynamic movement and interest in the streetscape.

Potential Vulnerability to Tall Buildings.

- Loss of prominence within views from the South Bank and perceptible relationship with steeples of the city.
- Occlusion or loss of clear sky setting or prominence within views from the Wren era, signalling arrival into the city.
- Occlusion within or loss of clear sky setting or prominence within nineteenth century views, particularly along Monument Street.

- Loss or diminishment of visibility within distant views of the orb, seen as part of the wider skyline from the river and further afield.
- Occlusion of or overly dominant intrusion within views from the Monument viewing platform.



Figure 33. The Monument seen from Waterloo Bridge (LVMF view 15B.2)

- 13.14. The World Heritage Site Management Plan further defines the significance of the Tower through identifying specific 'attributes' of Outstanding Universal Value (OUV). These attributes and their related components are outlined below, alongside the contribution of setting.

Summary of setting and contribution to significance

- 13.15. The setting of the Tower is divided, in the Management Plan, into three concentric parts: the immediate, local and wider setting. The former two are defined geometrically, the latter qualitatively. The extent to which the defined attributes of OUV, and their related components, draw upon a contribution from this setting is outlined below:

Attribute I. 'An internationally famous monument'

13.16. *Components:*

- i. The iconic White Tower, its physical form and visual dominance;
- ii. The Tower's distinctive silhouette as seen in the world-famous view from the south bank of the Thames (LVMF protected view 25A.1-3).
- iii. The property is internationally recognised, and the silhouette of the White Tower has become an iconic image of London used in publicity by organisations such as Visit Britain;
- iv. The concentric defences around the White Tower as seen particularly in the semi-aerial view of the Tower from Tower Bridge, and now from the Shard;
- v. The property's close relationship with the Thames, which provides its principal setting and the foreground in iconic views of the Tower from the south;
- vi. The Wharf and the historically famous Water (or Traitor's) Gate, known world-wide from its depiction in literature and pictorial representations;
- vii. The historic traditions of the Tower, including the Yeoman Warders and the ravens, which are fundamental to its identity as a national icon.

13.17. *Contribution of Setting: High.*

- a. The open quality of vistas from the Southbank, enhance an appreciation of its physical form, including views towards its most iconic elevation comprising the southern façade of the White Tower, with the open space amplifying its visual dominance.
- b. The close relationship with the River itself equally makes an important contribution, providing the foreground setting to the iconic views noted above and facilitating their open quality.

Attribute II. 'Landmark Siting'

13.18. *Components:*

- i. The visible elements and line of the Roman wall;
- ii. The Tower's relationship to the City;
- iii. The wharf/river wall;
- iv. Key views of the Tower up, down, across and from the river;
- v. The Tower's skyline (silhouette) as seen from the river and from across the river;

- vi. The open quality of the Liberties (on the Tower's landward sides).

13.19. *Contribution of Setting: High.*

- a. The setting reflects the military and strategic advantages of a highly visible riverside location to the east of the city, providing a gateway to the capital and enabling surveillance over the surrounding land and waterways.
- b. The relationship with the wharf, river wall and the Liberties legibly forms a subservient and defensive/militarised landscape, in which the White Tower is appreciated as the principal building.
- c. The tower's landmark defensive function, guarding the entrance into the city proper, is made overt through views north which take in the City Cluster, now seen in the backdrop, signalling the tower's proximity to the national capital.

Attribute III. 'Symbol of Norman power'

13.20. *Components:*

- i. The fabric of the White Tower, particularly the Caen and other types of stone used in its construction;
- ii. Its plan and three-dimensional form;
- iii. Its relationship to the adjacent foundations of the remains of the Roman land and river walls.

13.21. *Contribution of Setting: High.*

- a. The imposing mass of the tower is appreciated through direct views across the river, with the sense of its sheer bulk enhanced by the contrasting openness of the setting.
- b. The spatial relationship with the surrounding defences also reflects a highly developed example of the 'fortress palace', representing the height of Norman military and ceremonial architecture.

Attribute IV. 'Physical dominance [of the White Tower]'

13.22. *Components:*

- i. The fabric and physical form of the White Tower;
- ii. Its iconic silhouette against the sky from within its local setting, and particularly from the lower-level viewpoints of the river itself and its south bank.

13.23. *Contribution of setting: High*

- a. While the contrast in scale between the Tower and the buildings of the City, seen within the wider setting, has reversed over time, the retention of the Tower's silhouette preserves a sense of physical dominance over its immediate environment.

Attribute X. 'Concentric defences'

13.24. *Components:*

- i. The visible structure and three-dimensional form of the concentric defences (walls, including gates, towers and bulwarks; earthworks, including the moat and its retaining walls;
- ii. The remaining structure and form of the barbican;
- iii. Buried archaeological remains of components superseded or altered;
- iv. Presence of the wall-walks and their visual linkage with the surrounding cityscape and river, which demonstrate use and function.

13.25. *Contribution of setting: Moderate.*

- a. The appreciable formation of a defensive medieval military structure is expressed through the interrelated spatial settings of its component parts.
- b. Views from wall-walks to the surrounding city centre are also of importance.

Attribute VI 'Surviving medieval remains'.

13.26. *Components*

- i. The surviving buildings, which, as well as the White Tower and towers and gates of the concentric defences, include the remains of early 13th century royal lodgings, and the Chapel of St Peter ad Vincula;
- ii. Buried remains, particularly those of the medieval palace;
- iii. Tangible links with the state institutions established in the Tower, including Mint Street (between the inner and outer concentric defences) and the remains of the mint, and the Royal Armouries.

13.27. *Contribution of setting: Moderate*

This attribute is evidential and archaeological in nature, however an appreciation of the remaining buried and extant medieval structures, including their functional relationship, is expressed through:

- a. Their proximity and more generally their spatial relationship.
- b. The sense of a preserved medieval group, unique in function.
- c. The retention of a church yard setting to St Peter as Vincula, located upon the green, with views towards the chapel taking in its tower.

Attribute VII – 'Physical (historical) associative evidence'

13.28. *Components*

- i. The dungeons and cells, illustrating how historic prisoners were confined and tortured;
- ii. The Royal execution site, depicted in many contexts and representations and associated, particularly, with the execution of Anne Boleyn;
- iii. The Water (Traitor's) Gate, symbolically the gateway to incarceration and potential execution;
- iv. Historic graffiti left by prisoners, providing a unique record of their experiences;

13.29. *Contribution of setting: Moderate.*

While this attribute represents associative interest, many of the components draw upon:

- a. The sense of a preserved historical immediate setting, contemporary to the imprisonment of the individuals noted above and;
- b. The ensemble of the tower prison accessed through its river gateway, forming the macabre staging in which the historic events outlined above took place.

Vulnerability to Tall Building

- Dilution of the iconic status of the White Tower, through an encroachment within views of its open sky setting, or occlusion of its silhouette.
- Disruption of the existing architectural hierarchies appreciable in views towards the Tower from the river and South Bank.
- Interruption of intervisibility to and from the river and along its length, including any erosion of the open quality of these vistas.
- Loss of views from Tower Bridge or the Shard where the concentric defences are appreciable.
- Erosion of a sense of curation, emphasis and composition within views of the City Cluster, where the tower and cluster are appreciated together.
- Diminishment of the distinctive materiality of the tower, and its arresting 'white' facades.
- Loss of views from the wall-walks to the surrounding city centre.
- Competition with the Tower in its local setting, disrupting the existing hierarchy where it is appreciated as the principal structure.

City of London Heritage Significance

- 14.1. The following Statement of Significance is articulated using the values espoused by the National Planning Policy Framework (2021). Within them, the City's heritage significance is further broken down into a series of broad traits. Each trait of significance is related to the relevant Character Area(s) to which they make a significant contribution, and the relative contribution of setting defined. The vulnerability to tall building development is also summarised.

Historic interest

- 14.2. **AGE.** As the capital's ancient core, the City has immense historical significance in a London context. It was the place where urban settlement was founded by the Romans shortly after AD 43 and, barring a few centuries of early medieval vacancy, has been intensively occupied and developed ever since. Only a few Roman towns have continued in use in this way, and none were or continue to be more important to the nation's economic fortunes than the City of London. This is appreciated through the physical fabric of the city's buildings, but also in the wider street pattern, with Victorian arterial routes overlaid upon Medieval and Saxon courts and alleys. The continued use of markets, the ceremonial theatre of the Processional Route, as well as the Lord Mayor's Show, all evidence the length of occupation within the city walls.
- 14.3. Character Areas: All, in particular Riverside, Smithfield and Bank.
- 14.4. Contribution of setting:
- a. Areas of consistent historic townscape, particularly where designed or idiosyncratic views remain appreciable, considerably enhance an appreciation of the city's historic interest.
 - b. The over layering of development over time from the Roman period on has created a particular palimpsest of different architectural styles and eras, deepening the sense of history within the city interior and experienced in comparison to its wider surroundings.
- 14.5. **COMMERCE.** Although not the first Roman city (Colchester), Londinium quickly became the most important, particularly for trade with the continent; the City has remained a commercial centre to the present day. It has been hugely influential on an international level, a place in which practices of high finance, insurance, banking and associated disciplines were pioneered, were evolved and refined, and came to an ascendancy in the C19/C20. Subsequently London is known to be the home of major international companies, including the East India Company, Lloyd's of London and latterly Goldmansachs and Bloomberg. Uniquely, the City can claim to be the birthplace of a number of professions, perhaps the most important being that of insurance. This trait is physically expressed by the institutional architecture of the Royal Exchange, Bank of England and Stock Exchange. In addition, the density of Livery Companies and their

Halls, which set the trade standards and 'Hallmarks', create a unique townscape within the European and International context.

14.6. Character Areas: All, in particular, Bank and the City Cluster.

14.7. Contribution of setting:

- a. The relative abundance and close proximity of commercial and financial buildings establishes the sense of dense financial architectural ecosystem, which draws upon setting through an appreciation of the tight knit spatial relationship between relevant building types.

14.8. **PEOPLE.** The City has associations with huge numbers of influential historic figures, too numerous to name in full, across spectrums of politicians (e.g. Thomas Cromwell, William Beckford), businessmen (e.g. Sir Thomas Gresham, the Rothschild dynasty, John Julius Angerstein), clergy (e.g. John Donne), architects (e.g. Sir Christopher Wren, Sir George Dance), literary figures (e.g. Chaucer, Shakespeare, Samuel Pepys, Samuel Johnson), rebels (e.g. Boudicca, William Wallace, Wat Tyler, James Somerset). Relatedly, St Paul's had come to act as a pantheon for great national figures, including Nelson, Wellington and Wren, to name a few.

14.9. Character Areas: all, in particular Fleet Street and the temples's.

14.10. Contribution of setting:

- a. The contribution of setting here is associative in quality, relating to the known locations where these figures of note lived, worked and died.

14.11. **COSMOPOLITANISM.** The City was founded as an outpost of an empire; over intervening centuries it gradually became the centre of another, and by the C19 was the centre of the British Empire. More than any other part of Britain, the City has had from the beginning of its existence an international reach and reputation. The City has distinctive associations with certain communities – Liveries, Jewish community, international groups of professionals from Lombardic bankers to Hanse (Baltic) merchants. The creation of a tall building cluster has also come to be representative of a city with a global reach, with views towards the cluster enhancing an appreciation of this trait.

14.12. Character Areas: all, but notable Bank for Lombardic financiers and Riverside for the Hanse merchants; City Cluster and Eastern City Fringe for the City's post-C17 Jewish community.

14.13. Contribution of setting:

- a. Views towards the City Cluster enhancing an appreciation of London as a global city.
- b. The variety of building types specific to certain communities, when appreciated as a group, creates a diversity within the setting which also amplifies the sense of the cosmopolitan city.

14.14. **PAGENTRY & EVENTS.** The City has association with a number of famous and seminal events, including Boudicca's (c.AD 61) and the Peasants' (1381) Revolts, the Great Plague of 1665 and the Great Fire of 1666, Nelson's (1806) and Wellington's (1852) funerals, the Big Bang of 1986, and the Bishopsgate bombing of 1993. The Processional Routes to St Paul's and between the Tower and Westminster, all animate the city streets bringing a tangibility to these historic traditions and folklore. Similarly, the pageantry associated with Livery traditions, including the election of Sheriffs and Lord Mayors and multifarious customs like the Lord Mayor's Show, the Beating of the Bounds, the Trial of the Pyx and Doggett's Coat and Badge Race create a unique experiential interest.

14.15. Character Areas: Fleet St/St Paul's, Bank, the Riverside.

14.16. Contribution of Setting:

- a. Symbolic Processional Routes and the sites of pageantry necessarily draw upon setting, through the creation of an architectural 'theatre' of interrelated streets, lanes, passages and squares where these events play out.

Vulnerability of Historic Interest to Tall Buildings:

- Loss of historic fabric and the sense of a fine grain to the street pattern.
- Occlusion or loss of views where areas of historic townscape are appreciable.
- Redevelopment of locations where figures of renown are known to have lived, worked or died.
- Erosion of building clusters where shared, tight-knit uses and distinct architecture ecosystems remain appreciable.
- Loss of a sense of composition and curation to the City Cluster, diluting the sense of a leading Global City.

Architectural/Artistic Interest

14.17. On a national and possibly even international level, the City is a unique example of a City of Classical origin which retains its original purpose as a commercial centre. The evolutions of commerce and high finance mean that the City's street pattern, buildings and skyline are subject to continual development pressure; the scarce land available means the result is a highly idiosyncratic urban entity, with development compressed, clustered and grown from barely a square mile in the heart of London. Unique to London is the appreciable retention of a historic street pattern, and the subsequent responsive curation of its tall building cluster which has been developed with reference to the City's

historic interest but remains equally a strong part of its architectural identity. This creates a distinct hybrid quality of note within both the national and international contexts.

14.18. Character Areas: All, in particular Bank, St Pauls, Fleet Street.

14.19. Contribution of setting:

Setting makes an essential contribution to this trait, with London and the tall building cluster in particular perceived in numerous long distant views.

- a. The surrounding hills and parklands create a verdant backdrop which offsets the pronounced urbanity of the city, typified by the cluster.
- b. These views have been represented in numerous paintings, engravings and photographs, creating specific attendant artistic and historic interest. The important contribution of these views is often reflected through their identification within the LVMF.
- c. The riverside setting is also of profound historic importance, beyond the creation of a pleasing waterside foreground. The river itself can be understood as a physical manifestation the trade routes which caused the city to thrive. Equally the river provides an experiential route via which the unfolding vistas of the city are seen in context with Westminster and Southwark.

14.20. **STREET PATTERN.** The City's ancient origins are immediately recognisable in its street pattern. Barring a few planned enclaves and newer streets of the nineteenth and twentieth centuries, the street network remains largely medieval and evolutionary in character, and several Roman and Saxon streets survive in recognisable form. It is the most extensive of its kind in the UK and exerts a powerful influence upon the City's character.

14.21. Character Areas: all, to varying degrees; from the fine-grained richness of Bank to the more diluted modern grain of Eastern City Cluster.

14.22. Contribution of Setting:

- a. Major historic arteries such as A1 etc all leading to the City (in particular the original Forum,
- b. The remaining influence of the city walls creating a sense of contrast between street grains within and without the cities roman wall,
- c. Connected Processional Routes from Westminster and other centres of religion during the medieval period.

14.23. **TYOLOGIES.** The City has a unique collection, in quality and quantity, of certain building types both ancient and modern. The profusion of churches and Livery Halls demonstrate the piety and prosperity of the medieval City; the dramatic skyscrapers of the City Cluster demonstrate the continuity of the City's commercial and high financial character. Above all, the development of the purpose-built office building can be closely

followed and understood, in all its phases. Nowhere else in Britain has quite the same collections of these buildings.

- 14.24. Character Areas all; contribution of setting, see section above.
- 14.25. **VARIETY & DIVERSITY.** The City's built form is overriding characterised by variety, heightened by the tight confines of its geographical area – leading to what has been described as 'endless surprising juxtapositions and vistas'. This quality stems from the later phases of the City's existence and is testament to the continuity of its ancient commercial purpose; nowhere else in Britain can this largely successful combination of ancient monuments and hypermodern buildings be seen together to quite the same extent.
- 14.26. Character Areas: City Cluster best exemplifies this trait, but it is found in others, chiefly those fringe areas such as New Street Square, Barbican and Golden Lane, and the Easter City Fringe
- 14.27. Contribution of setting:
- a. Vistas towards and juxtapositions between the City Cluster, New Street Square, Barbican and Golden Lane Estates, the Eastern City Fringe and the city centre.
 - b. Identified views protected by local, neighbouring borough and strategic policy, which have controlled and curated these juxtapositions, so that new and old are perceived in harmony, and the distinctiveness of buildings of note are maintained.
- 14.28. **ARCHITECTURAL CALIBRE** The City's historic and modern architecture is generally of the highest quality, with a consistent level of quality of facades, materials and design rivalled only by a few other British cities, e.g., Oxford and Cambridge, but none of these ancient rivals can match the quality of modern developments the City also possesses, from the completeness and success of the post-war Barbican to the sophisticated glass façade systems of 22 Bishopsgate. As with the insistent variety, the sheer calibre of the City's built form testifies to its historic and ongoing commercial success, itself a source of significance.
- 14.29. Character Areas: Exemplary historic architecture is particularly concentrated in Bank, Fleet Street & St Paul's and Smithfield (though examples are to be found in all of them); exemplary modern architecture is (unsurprisingly) more concentrated in the newer areas such as Barbican and Golden Lane, City Cluster, Eastern City Fringe and New Street Square.
- 14.30. Contribution of setting:
- a. Where appreciable, the planned response to an existing historic setting, particularly where newer buildings such as at New Street Square seek to reinforce historic street patterns.
 - b. The creation of architectural set pieces such as at the Barbican Estate, Finsbury Circus and Bank Junction, with individual buildings contributing to a wider townscape composition appreciated from beyond the city's limits.

- c. Numerous vistas and glimpses in which decorative detail and façade design are specifically framed and set-off.
- d. Perceptible group value, where the quality of an individual building is enhanced by the related high calibre of its neighbours.

14.31. **SKYLINE & HEIGHT** From the earliest times, the City's confined street plan has resulted in tall buildings, both secular and ecclesiastical; more than any other place in Britain, the appetite for and skill at building tall has continued undimmed down to the present day, giving the City a pedigree for and relationship with architectural height unique in a national context. Resultingly, the City's skyline has been famous since the early modern period, particularly in views from the South Bank of the Thames, which have been drawn and depicted from the C16 and from the Processional Route between Westminster and the City. At the heart of this renown is the presence of and relationship between St Paul's Cathedral and the many City Churches, both in their pre- and post-Great Fire guises. C20 and C21 buildings of comparable scale have joined them on the skyline adding, in general, a new dynamic which speaks now of the City's ongoing commercial success. Nowhere else in Britain has a skyline so anciently famous that remains a dynamic, living entity.

14.32. Character Areas: Historic heights are most closely clustered in Bank and Fleet Street & St Paul's, though historic skyline features are to be found in all CAs; modern height is most concentrated in the City Cluster and, secondly, Barbican and Golden Lane and New Street Square all; with regards to Skyline specifically of critical importance are Fleet Street & St Paul's and the City Cluster (for forming the key iconic components of the City skyline); the others may be said to play crucial supporting roles in maintaining a lower scale to amplify their qualities; but the truth is that each Character Area is dependent on the others for their skyline setting, and that the City's skyline is a cumulative product of the whole.

14.33. Contribution of Setting:

- a. The unique collection of Wren steeples in their local and wider riparian setting.
- b. The dominance of St Paul's.
- c. The dominance of the Tower of London on the edge but not lost in the City and its eastern gateway from the sea.
- d. The principles of High Finance in the City Cluster.
- e. Relationship with wider civic monuments around the River Thames, in particular Westminster.
- f. Wider civic views back over the City from raised land of the surrounding Thames basin providing both a viewing location and historic backdrop.

Vulnerability of Architectural/Artistic interest to Tall Buildings.

- Overly dominant intrusion within identified strategic or historic views, so that the existing harmonious relationship between new and old is disrupted, and the distinctiveness of buildings of note are diminished.
- Loss of sense of composition and curation to the City Cluster eroding its distinct urban character, as appreciated in contrast to London's wider verdant setting.
- Erosion of intervisibility with wider civic monuments around the River Thames, in particular from Westminster.
- Disruption within wider civic views from the Thames, interrupting existing architectural hierarchies.
- Diminishment of the dominance of St Paul's and its relationship to the Wren City Churches and the Processional Route.
- Loss of visibility towards and from the Monument.
- Loss of prominence of the Tower of London, perceived as the eastern gateway to the City.
- Interruption of views within, to and from designed/in-tact architectural set pieces such as the Barbican.
- Threat of redevelopment for older buildings which may possess a high architectural character.

Archaeological interest

- 14.34. The archaeological potential of the City remains of international importance and continues to shed new light on the Roman world in Britain, as well as considerable detail of life in later periods. Although there has been considerable redevelopment and excavation within the City, there remains much potential for the City's archaeology to reveal information about and deep understanding of period in its history spanning two millennia.
- 14.35. Some of the archaeology is visible – such as the elements of the Roman and medieval City wall exposed above ground or revealed in development sites, or the remains of the amphitheatre below the Guildhall.
- 14.36. Contribution of Setting:
- a. Spatial relationships with above ground, as well as known and un-known buried remains illuminate the function, use and overall significance of archaeological remains.

Vulnerability to Tall Buildings:

- Loss or damage of unidentified or otherwise un-assessed remains through above and below ground earthworks.

Setting

- 14.37. London's position on the crucial bend of the Thames, at the head of its tidal navigation and therefore easiest crossing-points, remains clearly legible. There is an important juxtaposition with the City of Westminster (crown upstream, commerce downstream) and the London Borough of Southwark, which shares the City's Roman origins, being connected to it by London Bridge from that time. The City Cluster is distantly seen across the entirety of the capital-- the height of these structures signalling the city's location from the surrounding boroughs.
- 14.38. Views of the City's skyline are therefore critical in locating London within its ancient and significant context, particularly with regards to the appreciation of the Strategic Landmarks which make a uniquely recognised contribution. As outlined above, the City's setting makes a significant contribution both to its historic, architectural and archaeological significances, with each defined trait drawing upon setting to some degree. The specific vulnerability of setting to Tall Buildings has also been defined in reference to each trait, with an appreciation of the wider skyline determined to be very sensitive to tall building development.
- 14.39. Section three expands on the above, exploring each Character Area's specific relationship with and vulnerability to Tall Buildings. This section will specifically assess each Character Area's relationship with the city cluster, views from adjoining boroughs, as well as determining how the setting of strategic landmarks and the wider skyline is presently appreciated.

SECTION 3: CHARACTER AREA SIEVING EXERCISE

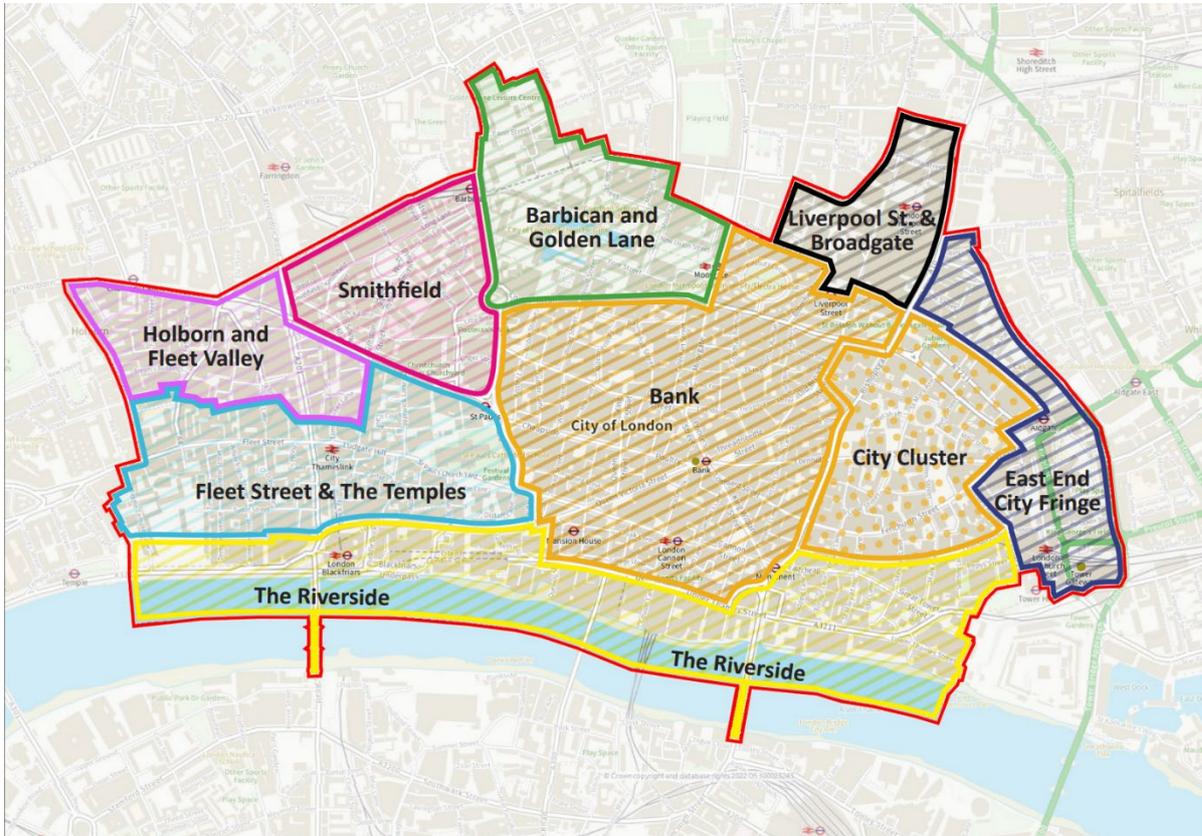


Figure 35. Map outlining the character areas considered within this sieving exercise.

Rationale

- 15.1. This section assesses the sensitivity of the City of London to further tall building development, seeking to satisfy London Plan policy D9:B1, determining if and where tall buildings may be an appropriate form of development, notwithstanding other national and local policy requirements.
- 15.2. For the purposes of assessing its sensitivity to tall buildings, the City has been divided into discrete Character Areas. For the most part these reflect obvious boundaries between areas of differing character: for instance, Gracechurch Street and Bishopsgate form an obvious dividing line between the chiefly historic Bank Character Area and the more dynamically modern City Cluster Character Area. For other areas, the boundaries are more nuanced, such as the southerly boundary between Holborn and Fleet Valley and Fleet Street & The Temples.
- 15.3. The Character Areas have been drawn as far as possible to reflect the differing senses of place found throughout the City: the historic High Finance of Bank; the pageantry and ecclesiastical focus of Fleet Street & The Temples; the modern environs of Holborn and Fleet Valley; the ancient extramural institutions of Smithfield. It is recognised that these boundaries do not precisely delineate areas of utterly differing character, but rather denoting lines across which the City's character transitions from one place to the next.

15.4. The Character Areas are then assessed under three main factors:

Character and Appearance – the ‘look and feel’ of each area; their existing shape and form. Here are considered the areas’ height, landmarks and tall buildings; their morphology, topography and urban structure; their built form and mix of land uses; and any relevant local views. A conclusion is then formed as to the level of sensitivity of the area’s existing urban form to tall buildings.

Strategic Views, Townscape and Skyline - This sets out the implications of tall buildings in each area for the wider City and pan-London skyline. Each area is considered in relation to the setting of St Paul’s Cathedral (relevant LVMF views and St Paul’s Heights); the City Landmarks and Skyline Features they may possess; the settings of the Monument and the Tower of London World Heritage Site; and the locally designated views of other neighbouring boroughs. A conclusion is then formed as to the area’s sensitivity to tall buildings in respect of its place on the skyline.

Please note:

- This section is a bespoke exercise, providing only a summary of how new tall buildings within a specific character area may have an impact upon certain aspects of setting. In general, this assessment focuses on those aspects of setting which relate to skyline character, including quality, focus and composition.
- A full impact assessment of the proposed new policy upon the strategic assets identified in section 2 is carried out in section 4, with reference to highlighted vulnerabilities as defined in Sections 2 and 3. This includes aspects of setting beyond those that relate to skyline and views.
- Notwithstanding this, where a potential harm to the significance of an asset, through a diminishment in the contribution of setting has been identified, this has been given additional weight when considering the overall sensitivity of the character area.
- The potential impact upon other heritage assets, outside the character area, whose settings maybe wholly or in part be illustrated in the identified views will also be highlighted where feasible but this does not preclude the need for individual tall building proposals to undertake a full assessment of impact upon the setting and contribution to an appreciation of significance of all potentially affected heritage assets to fulfil the requirements of the NPPF and 1990s Planning Act (Sections 16, 66 and 72).

Heritage Significance – the special architectural interest of each area, and how this contributes to the City’s overarching heritage significance as defined in section 2. Here is considered the areas’ historical development; their quantity and quality of designated heritage assets; the Core City Heritage Typologies they exemplify; and how all of these support the Core City Significance Traits. A conclusion is then formed as to the implications for tall buildings in the Area on (i) its heritage significance and (ii) the City’s overarching heritage significance.

Please note: It is noted that the purpose of this report has been to satisfy the requirements of policy D9 of the London Plan, identifying where tall buildings *may* be

appropriate. An assessment of how each character area contributes to the setting of *all* heritage assets and how this may be impacted by tall building development, is outside the scope of this study.

Accordingly, this section does not preclude the need for a full assessment of how individual tall building proposals may impact the setting of heritage assets, and how this contributes to an appreciation of any asset's significance.

15.5. An overall conclusion is then formed as to the sensitivity of the area to tall buildings. If found to be **very sensitive**, it is sieved out of the exercise; if found to be **sensitive**, it is taken forward for further assessment in section 4.

15.6. The structure of each character area assessment is as follows:

- Introduction
- Historical Development
- Character and Appearance
 - Heights, Landmarks and Tall Buildings
 - Morphology, Topography and Urban Structure
 - Built Form and Uses
 - Local Views
 - Conclusion
- Strategic Views, Townscape and Skyline
 - London View Management Framework
 - St Paul's Heights
 - City Landmarks and Skyline Features
 - The Monument
 - Tower of London World Heritage Site
 - Neighbouring Borough Views
 - Conclusion
- Heritage Significance
 - Overview of Heritage Assets
 - Core City Typologies
 - Core City Significance Traits
 - Conclusion
- Overall conclusion: Sensitivity to Tall Buildings

Character Area - Fleet Street & The Temples

Introduction

- 16.1. The character Area is one of the most richly historic and iconic places in London. St Paul's Cathedral is of exceptional and international significance. The Cathedral is a symbol of worship and a defining image of London, particularly the views of it along the ancient Processional Route of Fleet Street and Ludgate Hill at the heart of the character area. The area is, perhaps, the most influenced by the St Paul's Heights policy, nearly all LVMF Protected Vistas & River Prospect qualitative assessments as well as views from the Monument.
- 16.2. Like all other places in the City, Fleet Street and the Temples's is exceptionally well-connected (PTAL 6), with stations on the Central Line (St Paul's) and the National Rail network (City Thameslink). Numerous bus routes traverse Fleet Street, Ludgate Hill and Farringdon Street/New Bridge Street and a TfL Cycle Superhighway runs along Farringdon Street.
- 16.3. The Character Area possesses an outstanding and immersive historic environment, illustrated by the extent of heritage designations within the Character Area including four conservation areas in whole or in part. Moreover, an ancient street plan, the Processional Route and St Paul's Cathedral, a heritage asset of international renown. Accordingly, buildings, streets and spaces in the Character Area remain recognisable historic and conform to a traditional sense of scale, architecture and materiality.
- 16.4. Fleet Street and The Temples defining character is as one of the City's, and more widely London's, most famous and exceptional historic destinations.

Historical Development

- 16.5. The development of this character area is intrinsically linked to its topography, comprising the valley of the Fleet River and Ludgate Hill, a low plateau which slopes downwards towards the Thames foreshore. Fleet Street itself most likely dates to the Roman period, reflecting the western exit from the city 'Lud Gate' constructed in c200AD, with the road continuing on its east-west alignment into the city centre. Fleet Street became a key road during the Saxon period, connecting the old Roman City to the new settlement of 'Ludenwic', later Westminster, to the west. St Paul's Cathedral was established in approximately its current location by 604D, later replaced in 1087, with further Gothic additions in 1250. The Cathedral dominated the surrounding townscape, the largest and finest Cathedral in England.
- 16.6. In the early medieval period defences were added to the Roman Wall following the Norman invasion, and these included Montfitchet's Tower, constructed in the late eleventh century. Fleet Street began to develop an institutional and ecclesiastical character at this time, still outside the city walls but described as a 'populous suburb' by the 12th century. The many narrow building frontages along Fleet Street are the legacy of this period. The religious institutions of the New Temple (Knights Templar, 1185) and

Carmelite Friars (Whitefriars, 1241) were founded to the south. The street pattern surrounding the Cathedral was also completed at this time, with many of the street names such as 'Ave Maria' and 'Amen Court', denoting the stages in the procession of clergy on feast days. In 1275, Montfitchet's Tower and the surrounding lands were given over to the Archbishop of Canterbury, prompting the foundation of the Blackfriars monastery and the demolition of the tower.

- 16.7. From the 14th century Fleet Street became associated with the legal profession, when Serjeants Inn and other legal enclaves were founded. The Middle and Inner Temples were leased to lawyers after the Templars were suppressed in 1312, with each Inn possessing its own hall, library, chambers gatehouse and gardens. The surroundings of the Cathedral by this time included a chapter house as well as a dense complex of buildings enclosed by a high wall. A river wall dating to the 14th century was also constructed, narrowing the channel of the Thames, with the land reclaimed for use.
- 16.8. The Reformation saw the conversion of many of the buildings surrounding the Cathedral to secular use, the densification of development at Whitefriars, and the founding of 'Blackfriars Playhouse' within the grounds of the earlier monastery. Whitefriars at this time was outside of the city's jurisdiction and became known for criminality and squalor, as well as the Whitefriars and Salisbury Court Theatres. At this time Fleet Street's location between Westminster and the heart of the City would prove useful in newsgathering and reportage, with the presence of legal and educational establishments furthering the need for the printed word. Accordingly, the printing and publishing professions proliferated in the area from the 16th century on. Alongside this, taverns serving travellers to and from the City grew and Fleet Street began to acquire a cosmopolitan character.
- 16.9. By the 17th century much of the remaining open space surrounding Fleet Street was developed, creating a dense urban grain with riverside land parcelled up into tenements. The Stationers and Apothecaries Company Halls were established during this period, incorporating earlier built fabric. Just prior to the Civil War a programme of rebuilding to the Cathedral was commenced by Inigo Jones, including recladding and addition of a 12 metre high portico which responded directly to the approach from Ludgate Hill. The Great Fire in 1666 obliterated these works, as well as two-thirds of Fleet Street and the greater proportion of the environs, including the majority of the Inner Temple and Whitefriars area. Rebuilding works to the historic street grain largely followed the same plots as before. St Paul's Cathedral and many of the City Churches were rebuilt by Royal Commissions to which Sir Christopher Wren was appointed Surveyor. The design of the Cathedral combining a classical dome with a medieval-style long nave and transepts, finished in 1710. The Middle and Inner Temples were also reconstructed during this period, to a collegiate plan. Some remnants of the late 17th century buildings to Fleet Street survive including, the Tipperary (c.1667) and Old Bell (rear part c.1669) public houses and Nos. 5 & 6 Crane Court (c.1670) by Nicholas Barbon. The Cheshire Cheese was formed out of two 17th century houses, while No. 17 Gough Square, Dr Johnson's house, was built in c.1700 for a City merchant.
- 16.10. By the early 18th century, Fleet Street's religious and institutional houses had been largely replaced by commercial and residential buildings. The street became known for taverns, coffeehouses and places of entertainment. At this time Fleet Street was a scholarly and literary hub, notable for its associations with eminent figures across the

sciences and the arts. A house in Crane Court was the meeting-place of the Royal Society until 1780. In 1760 the Ludgate was demolished, along with much of the City wall and the Fleet River partially covered by 1733. In 1766 the remaining part of the river down to the Thames was channelled underground, under what is now New Bridge Street.

- 16.11. In the Victorian period the area became more dominated by finance, commerce and industrial uses at the expense of a diminishing residential population. Major Infrastructure and public building works led to upheaval in the townscape during this period. The City gasworks and Whitefriars Glass Company arrived in the south near the river. Cannon Street was extended to reach the Cathedral churchyard in 1847 and Ludgate Hill was widened. Ludgate Circus was formed on the site of the Fleet Bridge between 1864-9, creating a significant new element on the ceremonial route to St Paul's Cathedral. St Bride Street and Queen Victoria Street were laid out in 1871 and Ludgate Hill Station, accessed by new railway laid over a viaduct arrived in 1864, now the City Thameslink Station. Improvements to the nineteenth century Whitefriars area included gas-lit streets which attracted institutions such as the City of London Girls and Boy's Schools as well as the Guildhall School of Music, Sion College and the Metropolitan Asylum's Board.
- 16.12. Road widening required the re-fronting of many of the buildings, whose medieval timber or Georgian brick facades were replaced by richly decorated frontages within the same medieval plot widths. Among these narrow and tall frontages, banks and insurance businesses were constructed with wide and grand facades, visibly intensifying the street's commercial character. The eastern church yard of the Cathedral was also redesigned in this period. The newspaper trade grew in vitality and stature and began to more fully dominate the commercial activity of Fleet Street. The reduction in residential populations allowed the creation of larger consolidated plots for warehouses to the south of the Cathedral, with purpose-built printing works beginning to appear with the offices fronting Fleet Street and the printing works located to the rear creating large sites. Writing in 1879, Charles Dickens junior remarked: 'A tavernstreet, as well as a literary centre, Fleetstreet was and is'.
- 16.13. A pocket of residential buildings however remained in Amen Court, the nineteenth century improvements and additions incorporating Seventeenth century housing incorporating. Additions and redevelopment to the Temples also occurred during this period, including the Mitre Court, Dr Johnson and Paper Buildings as well as Middle Temple Gardens. The construction of the Victoria Embankment in 1864-70 extended the size of the Inner and Middle Temple gardens.
- 16.14. The pace of change accelerated in the 20th century, which saw the boom of the newspaper industry on Fleet Street. Large headquarters, such as Unilever House, the Daily Telegraph and the Daily Express buildings (built between 1928-31, the former in the Graeco-Egyptian style, the latter in the Modern), combined offices and printing works, resulting in very large floor plates that would be echoed by later developments in the area. In response the first policy protection of views towards St Pauls arrived in 1901. During the Second World War most of Fleet Street escaped serious bomb damage but the areas immediately north and south were badly hit, including the immediate surroundings of the Cathedral beyond the church yard, as well as to the Temples. The 1947 report by Holden and Holford resulted in the creation of Paternoster Square, the building of New Change to the east, the realignment of the church yard and the building of Colonial Mutual House on the north side of Ludgate Hill. Festival Garden, designed by Sir Albert Richardson was created to the east of the Cathedral in 1951, and a new choir

school added in 1962, incorporating the tower and spire of St Augustine Watling Street and screen the Cathedral from development at New Change. The second half of the 20th century also saw the consolidation of building plots along Fleet Street, as the Newspaper industry declined and the rebuilding of the Middle and Inner Temple buildings.

- 16.15. Resistance to the scale of wholesale redevelopment during this period crystalized in the 1970s onwards, with much of these areas of post-war rebuilding redeveloped at the end of the century and on into the present day. The eighties and nineties saw the dispersal of the newspaper industry from Fleet Street to sites in the Docklands and in other parts of London. In their place came other businesses who built large headquarters on the extensive sites left by the newspapers. These buildings were controlled by the arrival of the St Pauls Heights policy, with much of the townscape shaped in response to this as well, reinforced by the LVMF views towards the Cathedral. Recent interventions into the townscape of the character area include a greater emphasis on pedestrian permeability and deference to views to and from the Cathedral, including the redevelopment of Paternoster Square and creation of One New Change, the rehousing of Temple Bar within the city on the site of the Chapter House and the creation of an Axial link between Tate Modern and St Paul's over the Millennium Bridge.
- 16.16. Further detail can be found within the St Pauls, Temples, Whitefriars and Newgate Conservation Area Management Plans.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 16.17. Reflecting its proximity to St Paul's Cathedral, building heights are remarkably consistent and low-rise throughout the Character Area, with buildings generally between 3 to 9 storeys. There is a more domestic scale of building in the Seventeenth Century Chambers of the Temples and in the lanes and courts running off Fleet Street, especially to the north, with larger buildings to be found fronting the principal streets of Fleet Street, Queen Victoria Street and the Paternoster Square development.
- 16.18. The only buildings higher than this are the spires and towers of the many churches in the Character Area and the Cathedral itself.
- 16.19. There are a number of Landmarks and Skyline Features as identified by the City's Protected Views SPD (2012) – these are discussed below. St Paul's Cathedral is the obvious landmark (Strategically Important) and focal point of the Character Area.
- 16.20. There are no tall buildings in the Character Area except for the Cathedral with the landmark quality of the buildings note above extremely sensitive within this area to buildings of any significant height.

Morphology, Topography and Urban Structure

- 16.21. The topography of the Character Area has a pronounced fall north-south, reflecting its original position as just above the shoreline of the Thames before later land reclamations, and a pronounced fall and rise west-east along Fleet Street and Ludgate Hill, reflecting

the eminence of Ludgate Hill as one of the two hills on which Londinium was founded (the other being Cornhill to the east).

- 16.22. Much of the street pattern in the Character Area is ancient and evolutionary, recognisably so. Fleet Street originated in the Roman period and the veins and capillaries running of it developed from the late medieval period as the area beyond the walls was increasingly occupied. The fine grain of the courts and alleys off Fleet Street and south of Ludgate Hill most evocatively expresses these ancient roots. The street pattern in general is finely grained and elaborate.
- 16.23. To the north of the Cathedral is the planned new development of Paternoster Square, in which the buildings and routes are more formally arranged on an orthogonal grid, which nevertheless is sympathetic to and frames views of the Cathedral, including the perspective of the north transept down Queen's Head Passage/Canon Alley. To the south of the Cathedral the street pattern has become coarser and more modern in form following bomb damage in WW2.
- 16.24. The Character Area is, then, largely finely grained, reflecting an urban commercial and retail centre which contrasts with the deliberate contemplative atmosphere of the inner and middle temples and ceremonial spaces associate with the Cathedral; nevertheless, the area's prevailing character is of a densely developed, historic piece of City.

Built Form and Uses

- 16.25. The Character Area is extremely rich in architectural variety, materiality and detailing, yet united in an immersive and comprehensive historic townscape, with only a few buildings of overtly break from a well-defined building line and consistent roof height. The ancient origins of the area are apparent in the narrow frontages of many of the buildings, even when refaced in later times. The obvious architectural summit is St Paul's Cathedral, with its superlative Baroque style echoed in the City churches throughout the Character Area. Genteel domesticity is reflected in the Temples and the surviving houses such as Dr Johnson's at Gough Square; and is contrasted with a profusion of eclectic Victorian commercial architecture, lining Fleet Street in all manner of classical styles and combinations. More modern buildings, largely office buildings, are to be found to the north and south-east of St Paul's Cathedral, but these have generally conformed to the prevailing character of traditional scale, solid to void ratio and materials.
- 16.26. For centuries Fleet Street had a potent association with the newspaper industry, being the place from which the majority of national titles were conceived and published; this industry departed in the later Twentieth century, but the associations linger in the form of buildings like the Telegraph and Express headquarters, since repurposed as components of banking headquarters. Uses today are largely commercial, especially in Paternoster Square, supplemented with mixed retail and hospitality businesses. The other historic use in the Character Area, the legal profession, continues to operate from the Temples, while the ecclesiastical uses continue in the Cathedral and the City churches, albeit to a different pattern than before. There are high numbers of residential units across the Character Area, mainly focused in the upper floors of historic buildings, and particularly concentrated to the south of the Cathedral. There are also a number of hotels and a youth hostel in the area. The area's prevailing character is of a mixed-use place in which commercial and legal uses sit alongside tourism and supporting retail and hospitality.

- 16.27. Tall buildings in this area would have severe implications for how the fine or distinctive grain which have arisen from the different clusters of historic uses are understood and retained, as well as the formality of the architectural hierarchy flowing from the Cathedral.

Local Views

- 16.28. The most sensitive is, the Processional Route; see below. In addition, views to and from the gardens associated within the Temples, create a verdant setting which compliments the secluded and unfolding nature of views within the Temples themselves. Along Fleet Street, the gradual unfolding of views towards the Cathedral contribute strongly to the character of the area, as do more intimate views from and within the alleys to the north and south. Tall buildings risk unbalancing of the architectural hierarchy appreciable in these views and would threaten the landmark quality of the Cathedral.
- 16.29. Views from the Cathedral including those from the west portico, north and south transepts, as well as the Stone and Golden Gallery levels, are also of particular importance and sensitivity, revealing a breadth of vision which is experienced as illustrative of the Cathedral's symbolic, spiritual and historic importance. Any tall buildings in the character area would appear particularly dominant and conspicuous within these views, competing with the primacy of the Cathedral in the London wide setting .
- 16.30. Within the Whitefriars area, the grid of streets enables linear views north/south/east/west along the compass points between streets. Of particular note are views across the river and west to the Temples. Tall buildings risk erosion of this secluded and private character.
- 16.31. The following views are specifically identified within the Whitefriars Conservation Area Summary and Management Strategy SPD:
- View into the Temple gardens from opposite Hamilton House.
 - View north up Temple Avenue from the Embankment.
 - View north up Carmelite Street from the Embankment
 - View north up John Carpenter Street from the Embankment
 - View of Unilever House from the northern end of Blackfriars Bridge
 - View towards Blackfriars Bridge from No. 13 New Bridge Street
 - View west along Tudor Street from New Bridge Street
 - View north up Bridewell Place from Tudor Street
 - View east along Tudor Street from the boundary with the Temples
 - View south down Temple Avenue towards the Embankment
 - View south down Carmelite Street towards the Embankment
 - View south down John Carpenter Street towards the Embankment
 - View east along Tallis Street from Temple Chambers
 - View west along Tallis Street from John Carpenter Street
- 16.32. The following views are specifically identified within the Temples Conservation Area Summary and Management Strategy SPD:
- View east from the Cheshire Cheese (No. 145) towards St Paul's Cathedral
 - View west from Ludgate Circus towards St Dunstan-in-the-West
 - View east along Fleet Street from Child's bank (No. 1)
 - View south from Fetter Lane towards Mitre House (No. 45)

- View of St Dunstan-in-the-West and No. 180-186 from across the street 6. View into Salisbury Court from the corner of Fleet Street and Shoe Lane
- View of St Bride's spire framed by No. 85-88 Fleet Street
- View of St Bride's east end framed by entrance to Bride Lane
- View into Bride Lane from New Bridge Street
- View south down Wine Office Court from outside No. 7
- View of Dr Johnson's House from the east end of Gough Square
- View east of Bolt Court from its north-west corner
- View north of No. 18 Red Lion Court from the Fleet Street entrance
- View of the east side of Crane Court from its northern entrance
- View into Falcon Court from Fleet Street
- View into Old Mitre Court from No. 5
- View south of Ludgate Circus from St Bride Street
- View south along New Bridge Street from Farringdon Street
- View of No. 1-13 St Bride Street from No. 1-6 Farringdon Street
- View of St Bride's spire from the north-east quadrant of Ludgate Circus
- View north from Salisbury Square to Fleet Street
- View south through the Inner Temple Gatehouse from Fleet Street

16.33. The following views are specifically identified within the St Paul's Conservation Area Summary and Management Strategy SPD:

- A series of views east to St Paul's Cathedral from Ludgate Hill.
- View east of St Martin Ludgate and St Paul's Cathedral from Ludgate Hill, with the narrow spire acting as an important foil to the dome.
- View west to St Bride's Church steeple from Pilgrim Street.
- View north to Stationers' Hall from Ludgate Hill
- View of St Martin-Within-Ludgate from junction of Pilgrim Street.
- View north to Temple Bar from St Paul's Churchyard.
- View south from Ludgate Hill along Ludgate Square.
- View north along Old Bailey to the dome of the Central Criminal Court.
- View west along Ireland Yard to the rear of Apothecaries' Hall.
- View south-east from St Andrew's Hill to St Andrew-by-the-Wardrobe.
- View west from Amen Corner along Amen Court.
- View south along Godliman Street to St Benet Welsh Church, Paul's Wharf.
- View south from Peter's Hill to the Millennium Bridge and Tate Modern.
- View south-east from Cannon street /Old Change Court to the Church of St Nicholas Cole Abbey.
- View north-east to St Paul's Cathedral from Dean's Court. From outside the conservation area boundary:
- View to St Paul's Cathedral and the tower of St Augustine Watling Street from Watling Street.
- View south from Newgate Street, along Queen's Head Passage, to the north transept of St Paul's Cathedral.
- View over the St Paul's Cathedral and churchyard from the public roof terrace of One New Change.
- View east to St Martin Ludgate and St Paul's Cathedral from Fleet Street.
- Views north-west to St Paul's Cathedral from Cannon Street.
- View west from Cheapside to the Conservation Area

Conclusion

- 16.34. **Very sensitive** to tall buildings in respect of: the Character and Appearance of the conservation areas within the character area, the fine grain and sense of seclusion to areas of distinct historic character, consistently low building heights and most pertinently, the setting of the Cathedral.

Strategic Views, Townscape and Skyline

London View Management Framework

- 16.35. The Character Area contains St Paul's Cathedral, the Strategically Important Landmark and focal point of all the London Panoramas (except 2A.2, 2B.1 and 4A.2), Linear Views 8 and 9, and those River Prospects in which the Cathedral is the focal point of the views (the majority of them). The convergence of so many London Panoramas and Linear Views means that practically all of the eastern half of the Character Area is covered by Landmark Viewing Corridors, in which there is a policy presumption to refuse tall building proposals. The western half of the Character Area is less overlain by LVCs or the Wider Setting Consultation Areas, but this section containing the Processional Route is perhaps the most important element of the Cathedral's setting, and tall buildings here would have implications for the many River Prospects in which the Cathedral is experienced as primary.
- 16.36. Because the Character Area encompasses the immediate setting of the Cathedral, including its ancient, formal Processional Route, and because of the proximity of all the sites in the Character Area to the Cathedral, it is considered that tall buildings within the Character Area would have serious implications for the primacy of the Cathedral in these LVMF views, and could engulf its clear sky setting and directly conflict with its silhouette. This would be in direct conflict with the management guidance of the LVMF, diminishing the ability to 'recognise and appreciate' identified landmarks, as well as diminish the contribution of setting to significance of the Cathedral.

St Paul's Heights

- 16.37. The Character Area lies within the St Paul's Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in strategic townscape and riparian views identified in the Protected Views SPD (subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD). Much of the eastern half of the Character Area lies within the policy area, approximately from Ludgate Circus/Farringdon Street to the Character Area boundaries. St Paul's Setbacks also apply to buildings lining the immediate environs of the Cathedral. Within the Character Area is Faraday House (1933) on Queen Victoria Street, the height of which, and subsequent impact of which on the Cathedral's setting, prompted the creation of the policy area.
- 16.38. The Policy Area imposes height limitations of c.32 – 53m on buildings in the eastern half of the Character Area, around the environs of the Cathedral, in order to preserve views of the Cathedral from northerly viewpoints in Islington and in the famous riparian views from the South Bank. Further tall building development in the Character Area would be apparent in and directly undermine the primacy of the Cathedral in these views.

Processional Route

- 16.39. The Policy Area also seeks to preserve the seminal views of the Cathedral which unfold along the Processional Route from the junction of Fleet Street and Fetter Lane. These views make an immensely important contribution to the significance of St Paul's Cathedral and form a key part of its setting.
- 16.40. These views of St Paul's are experienced from the ancient Processional Route between Westminster and the City on nationally and internationally significant occasions, during which St Paul's is perceived as a supreme destination unchallenged on the skyline.
- 16.41. Within the local setting of the Cathedral, they are the most generous and dynamic views of Sir Christopher Wren's ingenious juxtaposition of the Dome and Western Towers, which have retained their pristine sky setting for over 300 years. These elements are the most acclaimed individual architectural elements of St Paul's Cathedral and are at the heart of its international architectural significance.
- 16.42. The views have been successfully protected ever since tall buildings became feasible, by St Paul's Heights and successive policies, and therefore are an exemplar of what Protected View policies can achieve whilst ensuring growth. Further tall building development within the Character Area would pose a high risk to these nationally important views of the Cathedral and the setting of the Processional Route.

Cannon Street

- 16.43. The Character Area is also prominent in the views of St Paul's from Cannon Street, in which the South Transept, Apostles and Western Towers can be perceived against clear sky with great clarity. Again, further tall building development within the Character Area, especially in the northern half, could risk undermining the primacy and legibility of the Cathedral in these views.

King Edward Street/St Martin's Le Grand

- 16.44. Paternoster Square lies in the northern foreground of the Cathedral, under the path of identified views from King Edward Street and St Martin's Le Grand within the policy area. Further tall building development on these sites would have implications for these views and those from the Islington vantages.

City Landmarks and Skyline Features

- 16.45. The Character Area is exceedingly rich in City Landmarks and Skyline Features identified by the City's Protected Views SPD:
- 16.46. St Dunstan-in-the-West – grade I listed, 1833 by John Shaw Senior and Junior. The octagonal tower with its delicate, pierced latticework is an iconic feature of the Processional Route, of the Fleet Street conservation area and the City's skyline seen from the South Bank and the bridges.
- 16.47. St Bride Fleet Street – grade I listed, 1684 by Sir Christopher Wren. The most famous of Wren's City church steeples, with its tall, tiers of octagons and a conspicuous skyline

feature of the Processional Route/Fleet Street environs and the wider City skyline seen from many vantages, not least the South Bank and the bridges.

- 16.48. St Martin Ludgate – grade I listed, 1687 by Sir Christopher Wren. One of the most memorable skyline relationships in the City is that between the simple needle like spire of this City church and the sublime elaboration of the western towers and dome of St Paul's; when seen from the Processional Route, they appear to 'dance' together in a most striking and harmonious fashion. A conspicuous and highly significant component of the Processional Route.
- 16.49. St Andrew by the Wardrobe – grade I listed, 1695 by Sir Christopher Wren. A simple but fine brickwork tower rather than a spire, and an important and prominent part of the skyline of the local environs.
- 16.50. St Nicholas Cole Abbey – grade I listed, 1681 by Sir Christopher Wren. A distinctive leadwork spire like an upturned trumpet, conspicuous and important in many views from the South Bank and the bridges, as well as the local environs.
- 16.51. St Augustine Old Change (tower) – grade I listed, 1696, tower by Sir Christopher Wren and spire by Nicholas Hawksmoor. Spire rebuilt postwar. The closest of the Wren churches to the Cathedral, with which it has a striking familial relationship; if the spire of St Martin's conducts an elegant dance with the western towers and dome, the spire of St Augustine's shelters protectively under the soaring bulk of the Cathedral. As well as this, a conspicuous presence in river views, particularly from Millennium Bridge, and rarity value as a skyline feature designed by Hawksmoor.
- 16.52. Central Criminal Court (Old Bailey) – grade II* listed, 1907 by Mountford. Neo-baroque dome with figure of Lady Justice is a prominent landmark upon the City skyline, both in local views around the Smithfield/Fleet Street/St Paul's environs and in wider views from the South Bank and the bridges.
- 16.53. Further tall building development within the Character Area is likely to have implications for the local skyline silhouettes of these landmarks and their wider presence on the City skyline. They are as important as a group within a fairly small locality of the City as they are as individual skyline entities; as a group on the skyline, they speak evocatively of the City's filigree skyline before the advent of taller commercial buildings (such as Faraday House) in the interwar years.

The Monument

- 16.54. The Character Area does not lie within the scope of views of the Monument as identified in the City's Protected Views SPD (2012). However, it does lie within the scope of Monument View 5 identified *from* the viewing platform. In this view the upper skyline parts of the Cathedral are already partly compromised by buildings in the New Street Square Character Area; nevertheless, further tall building development within this Character Area would have further implications for the legibility and setting of St Paul's in this view.

Tower of London World Heritage Site

- 16.55. Located in the westernmost part of the City, the Character Area lies at some remove from the Tower of London World Heritage Site. The upper dome and lantern of the Cathedral can be perceived in LVMF 10A.1, but seen at some distance from the WHS. While further tall building development within the Character Area might in theory be visible in such river views of the WHS, any such tall buildings would have to be very tall and, in any case, the distance of the Character Area from the WHS means they would be unlikely to affect its setting or significance to any meaningful degree.

Neighbouring Borough Views

Islington

- 16.56. The Character Area has a presence in the following locally protected views from the north identified by the London Borough of Islington:
- LV1: View from Farringdon Lane / Farringdon Road / Clerkenwell Road to St. Paul's Cathedral
 - LV2: View from St. John Street to St. Paul's Cathedral
 - LV3: View from the Angel to St. Paul's Cathedral
 - LV4: View from Archway Road to St. Paul's Cathedral
 - LV5: View from Archway Bridge to St. Paul's Cathedral
 - LV6: View from Amwell Street to St. Paul's Cathedral
 - LV7: View from Dartmouth Park Hill to St. Paul's Cathedral
- 16.57. The coverage of these protected viewing corridors over the City almost exactly corresponds with that of the St Paul's Heights policy area over the Character Area. Accordingly, further tall building development within the Character Area would have the same implications as set out in paras above.

Southwark

- 16.58. The London Borough of Southwark has designated the following views from South London of St Paul's Cathedral as locally protected views.
1. One Tree Hill
 2. Nunhead Cemetery
 3. Camberwell Road
 4. King's Stairs Gardens
- 16.59. The coverage of views 1-3 corresponds with that of the St Paul's Heights policy area over the swath of the City's townscape to the south of the Cathedral. View 4 is particularly fine perspective from the eastern part of the borough looking west towards Tower Bridge, with the dome and lantern of the Cathedral visible just to the right-hand side of it in the view. Further tall building development within the Character Area would be likely to appear around the Cathedral in this view, conflicting with and/or occluding its skyline silhouette and also challenging the northerly setting of Tower Bridge.

City of Westminster Views

- 16.60. The City of Westminster has designated the following views from positions immediately west of the City in which the Character Area could have a presence:

- 16.61. V18 Churches of St Clement Danes and St Mary-le-Strand – the seminal view eastwards down the Strand of these highly significant churches. These two churches are grade I listed, by seminal architects Sir Christopher Wren and James Gibbs respectively, and are therefore of the highest architectural and historic significance. Moreover, they are situated on the Westminster section of the ancient Processional Route between Westminster and St Paul's, itself a highly significance approach and series of vistas.
- 16.62. The view of the churches, with St Mary in the foreground and St Clement's behind is 'linear and is framed by the buildings fronting onto the Strand. The expanse of sky which provides the backdrop to the steeples is of great importance.' Further tall building development within the Character Area could encroach upon this clear sky backdrop and affect the settings of these highly significant heritage assets.
- 16.63. V21 St Paul's Cathedral from Victoria Embankment outside Somerset House & V22 Dome of St Paul's from Somerset House River Terrace -- Both of these views capture the dome of the Cathedral unexpectedly hovering above treescapes against clear sky. They are captured from differing levels of the areas south of Somerset House: the river terrace above and the Victoria Embankment below.
- 16.64. Further tall building development within the Character Area could affect these fine views of the Cathedral dome by either appearing its presently unencumbered sky silhouette or even occluding it completely.

Conclusion

- 16.65. **Very sensitive** in Strategic Views, Townscape and Skyline terms. The Character Area is crossed by a significant number of pan-London, City of London and neighbouring borough protected views, all focused on St Paul's Cathedral as the Strategically Important Landmark. This means any further tall building development within the Character Area would likely have adverse implications for the skyline setting of the Cathedral and its silhouette.

Overview of Heritage Assets

- 16.66. Reflecting its rich and ancient history, designated heritage assets are plentiful within the Character Area.

Listed Buildings

- 16.67. **Grade I** – over 20, the highest of any Character Area. Includes St Paul's Cathedral, the churches of St Dunstan-in-the-West, St Bride Fleet Street, St Martin Ludgate, St Andrew-by-the-Wardrobe, St Augustine, St Nicholas Cole Abbey, Temple Church, the College of Arms, various Chambers in the Middle and Inner Temples, and Stationers' Hall.
- 16.68. **Grade II*** - 16, including Hoare's Bank, Child's Bank, various Inner and Middle Temple buildings, the former Daily Express building, the Central Criminal Court and the Chapter House.

- 16.69. **Grade II** – over 60, including various buildings in the Temples, the former Daily Telegraph building, pubs including the Cockpit and the Rising Sun, the former Reuters Building, the former Northcliffe House.
- 16.70. The exceptional density of Grade I listed buildings, is indicative of an acute sensitivity within the character area and that historic fabric prevails throughout. Further tall building tall building development in this character area would therefore almost certainly mean the potential for the significant amount of fabric loss and loss of fine grain urban structure.

Scheduled Ancient Monuments

- 16.71. Six in total including:
- Inner Temple Buttery
 - Remains of Ludgate and the Roman and Medieval City Wall
 - Apothecaries Hall
 - Stationers' Hall
- 16.72. The ground works associated with tall buildings would have severe implications for remaining below ground structures as well as intrusion into how these assets are perceived as part of an intact historic functional group, as is the case with the Inner temple Buttery.

Tree Preservation Orders

- 16.73. Seven in total Including:
- Four in Middle Temple
 - Four in St Paul's Churchyard

Registered Parks and Gardens

- 16.74. Middle Temple Garden (grade II) – that part north of Middle Temple Hall (the remainder is within the Riverside Character Area).

Conservation areas

- 16.75. Again, reflecting its ancient roots, the Character Area is largely covered by conservation area designation. Only certain sites between Fleet Street and Tudor Street, between Carter Lane and Queen Victoria Street, and Paternoster Square lie outside conservation areas.
- 16.76. Current City of London Local Plan policy states that conservation areas are inappropriate locations for tall buildings (policy CS14:2) meaning that there would be a presumption to refuse any tall building proposals in much of the Character Area.

Conservation Areas within the Character Area include:

- 16.77. *Fleet Street* - The character and appearance of this conservation area is summarised in the adopted SPD (2015) comprising: the ceremonial grandeur and commercial bustle of Fleet Street and its pivotal role in wayfinding, providing the broad, main route running east to west through the City; An intimate and evocative historic network of streets, lanes

and alleys either side of Fleet Street, seen together with a variable urban grain, including contrasts between the broad main street, subsidiary alleys and formally planned Circus; An exceptional richness and variety in architectural styles and building ages, including 17th century timbering, narrow Victorian eclecticism, understated Georgian domestic frontages, dignified commercial architecture, and monumental 20th century newspaper buildings. The highly significant grade I listed churches of St Dunstan-in-the-West and St Bride's; The views of St Paul's Cathedral from Fleet Street and of St Dunstan-in-the-West backed by the Royal Courts of Justice from Ludgate Circus, both of which create a strong sense of ceremony; A long-lived association with the newspaper industry, nationally significant literary figures such as Dr Johnson and Oliver Goldsmith and medieval institutions such as the Knights Templar, Whitefriars, the Inns of Court and the clergy, as well as current associations with the legal quarter;

- 16.78. Tall buildings in this area risk a dilution of the sense of an intact historic grain to the street, as well as overbalancing existing architectural hierarchies and contrasts between the enclosure along lanes and alleys in contrast to the main street. The sense of focus around the Cathedral could also be threatened. Where appreciable clusters of a particular use or industry remain, tall buildings may erode this group value through dislocation of one group of buildings from another.
- 16.79. *St Paul's Cathedral* – character and appearance is summarised in the adopted SPD (2013) and comprises: An area of international significance, a focal point of the City of London, part of a major Processional Route and a focus of national celebration; The setting of St Paul's Cathedral, a building of international historic, architectural and cultural significance and one of England's most important classical buildings and a seminal building in the history of English architecture;
- 16.80. An area of great architectural significance, including one of the largest concentrations in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous non-designated buildings of high architectural quality from different periods; An area where the urban grain varies from tightly knit historic streets and alleys to open spaces around St Paul's Cathedral and churchyard; An area associated with nationally significant religious, cultural and historic events and notable people, including the burial places of numerous historic figures.
- 16.81. Tall buildings in this area, would appear drastically incongruent with the sacred setting of the Cathedral, and the symbolic or religious importance of the majority of the buildings within the conservation area. An appreciation of the Cathedral, in many ways, as the principal building of the city is likely to be diluted through any tall building development of tall buildings within the conservation area.
- 16.82. *Temples (part)* – The character and appearance of the conservation area is summarised within the Conservation Area Character Summary SPD (2002) and comprises: One of the most distinctive conservation areas, with a specificity of urban grain intrinsically linked to its associated use with the legal profession. Architectural and historic interest resides in the remaining 14th century fabric which date to the occupation of the area by the Templars, as well as the later 17th century collegiate structures housing the inns of court. It has a private quality that is emphasised by its gated entrances and most buildings are designed to face the interior of the Temple, it appears to turn its back on the noise and bustle of the City. The verdant setting with gardens to the south towards the river front

also makes an important contribution. It is a subtle combination of buildings and spaces with a character and environmental quality that is reminiscent of the collegiate atmosphere of Oxford and Cambridge. While phases of rebuilding works post the Great Fire and World War Two have occurred, the overall townscape is harmonious and upholds a specificity of architectural character.

- 16.83. Tall buildings within this area would be disruptive, breaking from the particularity of the architectural character and intrude upon the evident secluded and private quality of the urban space.
- 16.84. *Whitefriars (part)* – character and appearance summarised in the adopted SPD (2017) comprising: An array of consistently high-quality late Victorian and Edwardian commercial and institutional buildings; A planned street layout uncommon in the City, set against the more evolutionary pattern of adjacent areas; Highly varied historic land use, including Whitefriars friary precincts, domestic tenements, industrial glass and gasworks and corporate headquarters; Associations with newspaper production, most palpably with the Harmsworth empire; A unique sense of place created by the quiet grandeur of the Victoria Embankment and buildings, openness of the Thames and proximity of the Temples; The set-piece created by the transport arteries of the Victoria Embankment, New Bridge Street and Blackfriars Bridge; Foreground to St Paul’s Cathedral and the wider City when viewed from the South Bank and other key viewing locations.
- 16.85. The area is seen within the foreground of views towards the Cathedral and tall buildings risk interrupting the planned nineteenth century layout and hierarchy to the street patterns, as well as sense of balanced massing to the embankment frontage.

Core City Heritage Typologies

- 16.86. The Character Area exhibits many of, and is particularly rich in, the core heritage typologies identified in section 2. Of all the Character Areas it best expresses the following three typologies:
- 16.87. *Ecclesiastical and City Churchyards* - Foremost within the Character Area is the commanding presence of St Paul’s Cathedral, which, with its Processional Route along Fleet Street. The Wren and later churches which cluster around and nearby the Cathedral are of immense group value with the Cathedral and contribute very highly to its and to each other’s settings. The 12th century nave of the Temple Church is also of note.
- 16.88. *Offices* – The specific office type associated with newspapers and publishing including the C20 Express and Telegraph building, as well as in the inns of court and seventeenth century barristers chambers.
- 16.89. *Retail and Hospitality*- Numerous Public Houses of note including Tipperary (c.1667) and Old Bell (rear part c.1669)
- 16.90. *Residential* – Remnants of housing including the 18th century Dr Johnson’s House, 17th century houses in Crane Court, residences in Amen Court.

Additionally, the following typologies are also well represented:

- 16.91. *Civic/Institutional* - 17th century Apothecaries and Stationers' Livery Halls.
- 16.92. *High Finance* - Insurance Hoare's Bank, amongst others.
- 16.93. As set out in section Two, these typologies are sensitive to tall buildings through: The potential erosion of a more granular urban form, the diminishment of high status buildings; loss of viewpoints between buildings of high architectural quality; loss of enclosure and private character; loss of clarity/legibility of symbolic or sacred contribution within a wider religious or institutional context.

Core City Significance Traits

- 16.94. Through its extensive designated heritage assets across a range of Core City Heritage Typologies, the Character Area is considered to support the following traits of the City's overarching Heritage Significance identified in section 2:
- 16.95. **AGE** the Character Area reflects built heritage from the earliest phases of development within the city, including Roman remains. The alignment of Fleet Street and its position in relation to the moved 'Ludgate', as well as the retention of medieval plot widths is also of note. Remaining fabric dating to the occupation of the riverbank by the Templars is also of exceptional rarity value. The site and surroundings of the Cathedral also illustrates a powerful sense of continuity as a religious centre dating from London's early history.
- 16.96. **COMMERCE** the specificity of commercial and office buildings and office connected to the printing and legal industries has created a unique commercial character which contributes greatly to the architectural and historic interest of the area. While not one of the two primary commercial centres, important examples of buildings associated with commerce such as livery buildings, as well as the presence of the associated with insurance create a unique commercial history particular to the area.
- 16.97. **PEOPLE** the Character Area has high associative value, linked with Dr Johnson, James Boswell, David Garrick, Oliver Goldsmith amongst others including notably, members of the Royal Society.
- 16.98. **COSMOPOLITANISM** Fleet Street became known as a meeting place, attracting a diverse range of politicians, businessmen, scientists, lawyers and journalists. The association with the Templars and other religious sects historically established a mix of communities, complimented by the partial location outside of the city walls. This has created a diversity of spatial characters.
- 16.99. **STREET PATTERN** The Character Area has well preserved medieval street pattern, expressed in the narrow plots to Fleet Street. The unique collegiate layout of the Temples is also of interest. The Processional Route to the Cathedral is of huge symbolic importance and significant cultural value.
- 16.100. **TYPOLOGIES** As above. The Character Area has outstanding examples of six Core City Typologies. It therefore offers fine insight into the typologies that typify the City's uniqueness.

- 16.101. **VARIETY** The City's architectural variety is well felt in the Character Area, with a rich and nuanced mix of buildings from the medieval period onwards and exhibiting great variety in styles, materials and detailing. The distinctive urban character associated with the various conservation areas creates unique diversity of urban form.
- 16.102. **CALIBRE** Similarly, the Character Area is one of the richest in the city with regards to the high quality of architecture, a very high proportion of which is historic.
- 16.103. **SKYLINE & HEIGHT** The Character Area expresses the nuanced hierarchies associated with the Processional Route, accentuated by the rise towards Ludgate Hill. St Pauls Cathedral is appreciated as a landmark building, through its height, which is experienced across the character area. The protection of this character has limited the heights of the surroundings so that the overall character and expression of height is more generally one of consistency.

Conclusion

- 16.104. **Very sensitive in respect of Heritage Significance.** The Character Area is one of the most richly historic in the City and the level of survival of its historic streets, buildings and spaces is very high, amounting to an immersive experience, and is reflected in the plethora of designated heritage assets within the boundary. Further tall building development within would have serious implications for the immersive quality of the historic sense of place conveyed by this Character Area.

Overall conclusion: Sensitivity to Tall Buildings

- 16.105. The Character Area is **very sensitive** to tall buildings. Much of the eastern half around the Cathedral is blanketed by LVMF, LVCs and WSCAs and the St Paul's Heights policy area; the western half is within the immediate setting and therefore potentially highly visible in the River Prospects; conservation area designation covers most of the Character Area.

Character Area: Riverside

Introduction

- 17.1. The Character Area spans the breadth of the City and provides the crucial, strategic foreground to views of the City from the South Bank and south-east London, as well as the background in panoramas of the capital from the hills to the north.
- 17.2. The area is, like the rest of the City, well connected by all forms of transport. It has a TfL PTAL rating of 6b, the highest level of public transport accessibility in the capital. This includes bus routes along Lower Thames Street and London Underground, Thameslink and National Rail trains from Blackfriars, Cannon Street and Tower Hill, with nearby DLR trains from Bank/Monument and Tower Gateway. The Cycle Superhighway runs along Lower and Upper Thames Street E-W and N-S across Blackfriars Bridge, connecting to the capital's strategic cycling network. The Riverside itself, now comprising a continuous walking path between the Victoria Embankment in the west and the Tower of London in the east, is part of the Thames Path National Trail, a strategic national walking route.
- 17.3. Aside from an exceptional historic environment at either end, in the Temples, Whitefriars and the Tower of London and associated Upper Pool of London, landmarks such as the Custom House, the historic environment in the Character Area is generally fragmentary; the character of building generally comprises 6-9 storeys, largely modern blocks fronting the river. There are a significant number of geometrically defined strategic viewing thresholds. Heights in the Character area are some of the lowest in the City and there are no tall buildings located here. The Character Area forms the immediate setting and foreground to strategic landmarks, namely St Paul's Cathedral and the Tower of London.
- 17.4. The defining character is of the enclosed Thames Path offering a (nearly) continuous riverside walk and the visual and sometimes functional relationship between the City and the river Thames.

Historical Development

- 17.5. The Claudian Invasion of 43 AD was in south-east Britain; after they landed, the Romans forged north, approaching the site of what would become Londinium from the south. Thus, they encountered proto-Southwark first, at the point where the Thames at low tide could be forded. These simple facts lay behind the establishment of London Bridge in its historic location, and the earliest roads in the City (Fish Street Hill/Ermine Street) leading from it. The nucleus of the early City was thus this section of riverbank around the northern bridgehead. No evidence has so far been recovered for pre-Roman structures or development along the riverbanks, although it is known that the river held great significance for late Iron Age Britons and was the frequent recipient of their votives; the very word 'Thames' derives not from Latin, but an earlier Celtic tongue.
- 17.6. For the Romans, as for every subsequent period, the river was an absolutely vital transport artery and remains an important place of transit, recreation and sanitation. Examples of known infrastructure created during this period includes an early Roman bridge which marked the approximate limits of the tidal Thames and navigation for larger, ocean-going vessels. What would become the Pool of London received stoutly built quayside structures, many of which have been revealed in excavations along the waterfront. These were probably lighthouses at the eastern edges of the City, or similar

aids to navigation. Londinium was a thriving centre of commerce, importing and selling olive oil, wine, pottery, glass and marble. North of Cannon Street Station, a Roman Governors Palace is thought to have been located. Valleys associated with the rivers Fleet and Walbrook are thought to have attracted more industrial activities, making use of the running water source.

- 17.7. A large wall was constructed along the riverside, remained in place until the collapse of the Roman administration in the West. Little is known of this structure, including of the extent of its permeability, although sections of it have begun to be identified on development sites in the City.
- 17.8. During the period 5th-9th centuries the walled City was abandoned, and Saxon occupation was focused on 'Lundenwic', west of the City around what is now Aldwych. Although some activity occurred within the deserted walls, at least partly ecclesiastical in character, it is not known if and how the Roman quays and riverside wall were used.
- 17.9. This situation changed in the 9th century when Alfred the Great reoccupied the City; one of his first acts was to revive the quays. Queenhithe Dock became one of the earliest areas of reoccupation, with a market known to have been associated within the dock itself. Transportation, the trade of fish, grain, salt, timber, and eventually also iron and coal ensured the riverside remained a key area of trade and industry until well into the twentieth century. It is from the Saxon period that the distinctive street pattern of threadlike north-south routes linking the waterfront with the city's hinterland. The riverside defences were repaired, and harbours were established at Queenhithe, Dowgate and Billingsgate, which may have been where gaps in the Roman riverside wall occurred; Thames Street later developed in the C11 probably to link these wharves.
- 17.10. The construction of the Tower of London in 1076 radically changed the nature of the eastern end of the Character Area. The scale of the new fortress created a domineering presence on views of the riverside, recognised in nearly all subsequent depictions of London. Similarly, the first iteration of Baynard's Castle, east of the present Blackfriars bridge would have established a similarly militarised presence on the waterfront.
- 17.11. The built environment along the riverfront began to see the influence of consolidations within trading bodies. The most influential perhaps being the Hanse merchants, who enjoyed considerable royal protections in recompense for regulating measures of goods for sale and more reliable delivery. Beginning as an alliance of individual merchants who traded overseas, their headquarters was known as the 'steelyard' located on the river front close to present day Cannon Street, comprising a series of stonewalled yards.
- 17.12. The western extent of the riverfront at this time was also closely associated with enclosed yards belonging to various religious orders, including the Whitefriars, Inns of Abbots and Bishops, Templars (who had a mill on the Fleet) and Blackfriars, often with each encompassing their own wharves to the waterfront. The most significant of these was the Blackfriars. Around 1300 a large area of waterfront was reclaimed, with the extension of the river wall along the river Fleet following on, this included the site of the first Baynards Castle, thought to have been demolished by this time and only partially rebuilt. The earlier Baynards Castle was rebuilt slightly to the south east on the newly reclaimed land, as a mansion for the Dukes of York.

- 17.13. The density of wharfs along the river front increased further to the east, resulting in tight series of north south streets towards the riverfront, occasionally broken by larger areas associated with markets, such as the fishmarkets of Queenhythe and grain market at Billingsgate. The street grain opened out after Billingsgate, with large extents of warehousing facing the river.
- 17.14. A series of bridges over the Thames south of St Magnus the Martyr were recorded through the 11th century onwards, replacing the earlier Roman pontoon crossing. At least four iterations of London Bridge are recorded during the Norman period. Reconstruction works occurred in the reign of Henry II, in part as a monument to Thomas Becket. A central chapel dedicated to the former Archbishop included a river level entrance, and the bridge also included a drawbridge and tower and stone arch. Houses occupied the bridge from an early period, and rapidly London bridge became an important street for trade and shopping.
- 17.15. The Reformation was a period of transformation along the waterfront as earlier religious estates were redeveloped. The Great Fire of 1666, and the almost complete devastation of the character area is indicated in the Leake survey of 1669. Notable rebuilding works included the (short-lived) new Customs House, designed by Sir Christopher Wren. The Monument, located north of London Bridge, provided a new landmark along the riverfront. Other buildings of note included the Navy Office, constructed at the junction of Crutched Friars and Seething Lane. The rebuilding of the City Churches and St Paul's Cathedral, gave rise to an iconic skyline viewed from the south bank. Houses along London Bridge began to be rebuilt from 1680.
- 17.16. During the Georgian period, the rise of England as a global Maritime force is reflected in the built environment in along the riverfront, with organisations associated with the either the administration, regulation or welfare of Mariners of increasingly national importance. The construction of Trinity House, a maritime guild founded to regulate ship traffic along the Thames, now Grade I, reflects this as well as the rebuilding of Custom's House close to Tower Hill.
- 17.17. In 1778-80 the Company of Watermen, formed in 1555 to regulate 'watermen and wherryman carrying passengers by boat under oars on the River Thames', built a new hall on St Mary at Hill, by William Blackburn. It is now the only surviving Georgian Livery Company Hall in the City. The first fixed crossing at Blackfriars opened in 1769, designed in an Italianate style by Robert Mylne using semi-elliptical arches of Portland stone.
- 17.18. The influence of trade and commerce continued with the construction of warehouses associated with the East India Company, as well as an early iteration of the Coal Exchange, constructed near Idol Lane. Billingsgate Market was also replaced in 1799-1800 with a new building designed by Dance the Younger, before rebuilding works occurred again in 1848-52 by Sir Horace Jones.
- 17.19. London Bridge had been cleared of houses by the end of the eighteenth century however gradual repairs and rebuilding and consolidation of the central arches had left significant structural flaws. An architectural competition led to 'new' London Bridge opened in 1831, alongside a re-planning of the approach roads. These works included the loss of Fishmongers Hall, later replaced to new designs by Henry Roberts opened in 1834.

- 17.20. The bridge was to become the most congested point in London by the end of the century. The new technology and construction methods of the industrial age enabled wider reaches of the Thames to be built over, resulting in the Blackfriars Road and Rail Bridges. The first bridge was opened in 1864 and was designed by Joseph Cubitt for the London, Chatham and Dover Railway the second bridge opened in 1886, designed by John Wolfe-Barry and Henry Marc Brunel completed in wrought iron. Cannon Street Bridge was designed by Sir John Hawkshaw and originally opened in 1866. The first Southwark Bridge was opened by 1819, known as 'The Iron Bridge' for its three large cast-iron spans.
- 17.21. The Victoria Embankment, built to relieve traffic from Fleet Street and improved sanitation, was complete by 1870, transforming the river frontage west of Blackfriars bridge. In 1882-84 Eastcheap was widened on the south side to accommodate the Metropolitan District Railway extension, with buildings demolished and the railway line constructed using the cut-and cover method. Despite these largescale interventions an intricate threadlike grain of wharves and narrow lanes survived between Blackfriars Bridge and the Tower.
- 17.22. In the early twentieth century new Southwark Bridge arrived, with other large scale works including the construction of Adelaide House. This building was the first in the city to use a steel frame, becoming the tallest office in the capital. Designed by Sir John Burnet and Thomas Tait, the façade features Egyptian motifs thought to be influenced by the discovery of Tutankhamen's tomb. Modern amenities included central ventilation, with telephone switchboards and electricity at every floor. A roof garden included a golf course, beehives and fruit trees.
- 17.23. As with much of the City, World War Two saw large areas of waterfront destroyed, resulting in the clearance of the central and eastern portions of the character area. The large scale replanning of the area included a new road isolating St Benet's with the creation of White Lion Hill and a number of stark brutalist buildings to the waterfront on the site of Baynard's Castle. Lower and Upper Thames Street became associated with a much larger grain of development and generally more fragmented architectural character. The arrival of the St Paul's Heights policy in 1937 however curtailed this redevelopment, limiting height which would impede views of St Pauls entablature and above.
- 17.24. The City of London School for Boys took possession of a large site on the waterfront, designed by City of London architect Thomas Meddings in 1986. Built in red brick, The building was designed using a structural grid and relieving the internal walls of load bearing to allow flexibility for adaptation. The cubic form to the massing with large areas of flat brickwork created an emphasis to the materiality, seen in contrast on the river front with the pale stone of St Pauls rising above.
- 17.25. The 1980s were another time of great change with the general decline of heavy industry. Billingsgate Market had stopped receiving deliveries by water in the 1950s and was closed and relocated. Disused warehouses to either side of Lovat Lane were redeveloped in the early 1980s as part of the City Village scheme. Waterfront development east of the Boys School to Cannon Street, adopted a more post-modern character, in contrast to the brutalism surrounding Puddle dock. A greater emphasis on brickwork and a polychromatic approach to establish interest prevailed. Heights remained relatively consistent in the most part building to the upper limits of the St Pauls Heights policy.

- 17.26. The Millennium bridge, designed by Fosters and Partners, typified the high-tech movement, executing the bridge using a suspension system with low slung cables supported on a Y frame structure. The siting of the bridge was chosen as a direct response to views towards St Pauls from the south bank, framing what has become an iconic vista from Tate Modern.
- 17.27. The Thameslink extension of Blackfriars station over the Thames using the piers of the historic bridge was completed in 2011. Designed by Will Alsop, the platform roof is created by a saw tooth, glass and steel structure, housing photovoltaic panels.
- 17.28. East of Cannon Street the architectural character of the waterfront is varied, and mostly reflects contemporary development with the exception of Customs House and Old Billingsgate Market.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 17.29. The Character Area contains no tall buildings. Unilever House has been considered tall in this setting and, with Faraday House in the Fleet Street & St Paul's Character Area, seriously harmed the strategic setting of the Cathedral. They triggered the adoption of the Heights in the first instance, the first formal view protection regime in the world.
- 17.30. Buildings in the Character Area are between 4 and 14 storeys, with Minister Court (5-14 storeys) in the east marking the transition into the foothills of the City Cluster from the Character Area. Heights to roof level generally range from 20m to 45 M AOD, with the exception of some notable detractors. Minster Court rises to 74 metres, and so only marginally falls below the tall building threshold.
- 17.31. Defining landmarks (and tall buildings in their own right) include the Wren parish churches of St Margaret Pattens (72.6 AOD) and St Dunstan in the East, the former Port of London Authority building at 10 Trinity Square, the former City of London School for Boys and the historic twin towers of Cannon Street Station. The general lowness of building heights in the Character Area allows these important historical and cultural landmarks to have a skyline presence. Modern developments tend to be of a larger scale and form but not generally exceeding 10 storeys.

Morphology, Topography and Urban Structure

- 17.32. Historically, the Character Area had an intricate and distinctive layout entirely focused on the river. To the west of the Blackfriars, the openness of the Temples and ecclesiastical and aristocratic Inns prevailed, perpetuated today by the surviving Temple gardens. East of Blackfriars prevailed an extraordinarily fine, linear grain of narrow lanes leading up from the river between wharves and their associated long, narrow plots of tenements. These ran all the way to the Tower, interspersed by the larger, inset docks of Queenhythe, the Steelyard, Billingsgate and Custom House.
- 17.33. The overall effect was of an extremely porous waterfront, with interchange of cargoes taking place throughout. This fine grain prevailed until the C20, when extensive WW2 bomb damage and rebuilding, together with the cessation of much of the City's ancient river traffic, combined to coarsen this grain with amalgamated plots and replacement of wharves with impermeable riverside walls. The north-south routes running up from the

river do survive in many places but are now not as numerous as they had one been. This fundamentally reshaped the character of the Area; so, did the widening in the 1970s of Upper and Lower Thames Street, which saw a single-carriageway road of historic proportions widened significantly to take two carriageways of traffic in either direction. At once this created a hard physical and psychological barrier between the body of the City and the waterfront.

- 17.34. A pocket of finer historic grain survives between Eastcheap and Custom House, useful in illustrating the sort of street pattern which once prevailed throughout the Character Area. In summary, the Character Area now has a relatively coarse, modern grain, although with its fundamental historic 'bones' and many vestiges of its original historic fineness still extant. An area of relatively tall structures remain south of Fenchurch Street

Built Form and Uses

- 17.35. There is great architectural variety within the Character Area, from the pale elegance of the Wren churches to the vivid, petrol-blue tiered form of the later C20 Northern Shell building; no overall style or typology prevails, but instead a fascinating array of forms of all kinds.
- 17.36. Architecturally there is much eclecticism: sheer Gothic (found in the C19 vinegar warehouse along Eastcheap and the 1980s Minster Court), Classicism (Custom House, Fishmongers Hall, Vintners Hall), Art Deco (Adelaide House), even Brutalism (Baynard House). There are also many quieter modern buildings of simpler architectural treatments, though mainly solid rather than glazed in appearance.
- 17.37. Much of the built form has a strong functional and/or aesthetic relationship with the river. The ensemble of the Custom House and its quayside and Billingsgate Market at the Upper Pool is a unique survival and one of the most important historic urban riverside set-pieces in London. The Fishmongers' Hall is prominent and has an obvious relationship with the river, while Sion Hall (former theological college) and the former City of London School for Boys were built with elaborate skyline features and riverside frontages to reflect their civic status and functions. The Temples and their grade II registered landscapes are a unique survivor of the medieval arcadian Thames in central London (albeit framed by the Victorian Embankment). Interspersed amongst these valuable historic survivals are the blockier forms of post-war and later development, which tend to present broader and more abstract frontages to the river.
- 17.38. Land uses are mixed, albeit principally comprising office-led development, with a mix of retail at ground level with office above; there is the quintessentially 'City' studding of Livery Halls and City Churches. There is a use bespoke to this Character Area: Walbrook Wharf, the last operational wharf in the City and on the north bank for some distance.
- 17.39. There are a number of calmer, more tranquil spaces along the North Bank which have flourished due to a lack of commercialisation, such as the garden containing the ruins of St Dunstan in the East or the Inner and Middle Temple Gardens, or the raised public terrace at St Magnus House, a fragment of the post-war 'pedway' plan with spectacular views.
- 17.40. Because of the strong sense of severance from the body of the City created by Lower and Upper Thames Street, the waterfront and its hinterland, incorporating the Thames

path, have a different feel to the rest of the City being a place for promenading, lingering and riverside contemplation.

Local Views

- 17.41. The Eastcheap Conservation Area SPD identifies a series of representative views within that part of the Character Area. These include:
1. View west from Idol Lane along St Dunstan's Lane to the Monument.
 2. View north from St Mary at Hill to St Margaret Pattens Church.
 3. View south from the junction of Eastcheap and Lovat Lane to the tower of St Mary-at-Hill Church.
 4. View south from Lovat Lane to Billingsgate Market.
 5. View east along Botolph Alley to St Mary-at-Hill Church.
 6. View west from the junction of Monument Street and Lovat Lane to the Monument.
 7. Oblique view west along Eastcheap to Nos. 11-19 Eastcheap.
 8. View east along Eastcheap and Great Tower Street to All Hallows-in-the-East Church.
 9. View east along Great Tower Street to the Tower of London.
 10. View north from the junction of Lower Thames Street and Idol Lane to the tower of St Dunstan-in-the-East.
 11. View to the conservation area from the Monument viewing gallery.
- 17.42. Views towards the river from the Temples and Whitefriars Conservation Areas are also of note, acknowledging only their very southern extremes falls within the character area.

Conclusion

- 17.43. The character area is reflective of nearly every phase of development found within the City at large. The influence of the riverfront clearly appreciable, resulting in specificity with regards to aspect and a consistent south facing frontage which takes advantage of more distant views across the water. The implementation of St Pauls heights has protected the prominence of the city churches, which remain identifiable on the waterfront. This has created a specific nuance to the character area, with a clear hierarchy which, in the main, respects the dominance of St Pauls on the skyline, albeit north of the character area itself. This distinctive riverside quality is **sensitive** to tall building development and a consequent loss of this nuanced character.

Strategic Views, Townscape and Skyline

London View Management Framework

- 17.44. The Character Area is a pivotal component of virtually all LVMF views featuring the City and St Paul's Cathedral/Tower of London WHS as Strategically Important Landmarks.
- 17.45. London Panoramas & Linear Views - The Character Area has a presence in all LVMF views where the City can be seen. Much of the waterfront and its immediate hinterland lie under the geometric protection of Landmark Viewing Corridors, moreover the character area falls within Wider Background Setting Area in the views from the northern hills. Consequently, tall buildings proposed in the Character Area could result in significant breaches of these corridors, causing substantial conflict with strategic local and pan-

London views. The riparian settings of the Tower of London World Heritage Site and St Paul's Cathedral, in addition to the skyline setting of the Monument would be harmed. Tall buildings in the Character Area would have substantial implication for the integrity and quality of all linear and panorama views in which the City figures, and by this metric alone is therefore considered very sensitive to tall buildings.

- 17.46. River Prospects - As might be expected, the Character Area is extremely prominent in these views, featuring in every River Prospect of the City. These prospects are very sensitive to change, in particular from tall building proposals, because the Character Area is prevailing low and midrise and, as such, provides the immediate foreground context for numerous elements of the City's strategic identity (within and beyond the Character Area's boundary), including: the openness of the River Thames, the pre-eminence and strategic townscape role of St Paul's Cathedral and the Tower of London as Strategically Important Landmarks, and numerous identified landmark features which include, but are not limited to, Tower Bridge, the Monument, St Bride's Church, the former PLA building, the Cannon Street Station Towers, the Old Bailey and Somerset House, the latter falling outside of the character area but a prominent feature in views from it. This is in addition to the important strategic riparian/skyline setting of other landmarks which contribute to the strategic character of London, including the Temples, the Royal Courts of Justice, Old Billingsgate, Custom House, and river views of many notable Wren churches. Tall buildings proposed in the Character Area could cause substantial conflict with the preservation and enhancement of the compositions and characteristics of those strategic views, their landmark elements and the ability to recognise and appreciate those Strategically Important Landmarks as designated by the LVMF.
- 17.47. Townscape Views- There are two defined townscape views which tall buildings in the Character Area could affect: those of the Tower of London from the South Bank and those of Whitehall from St James's Park.

25A.1-3 – Queen's Walk

These assessment points are among the finest places from which to appreciate the Tower of London World Heritage Site. The views are identified in the ToL WHS Management Plan (7.3.22) as the most iconic of the Tower, and excellent opportunities to appreciate its landmark siting, architectural forms and relationships with the river and the City. A Protected Vista is included from 25A.1 and a Protected Silhouette is applied to the White Tower between Assessment Points 25A.2-3. The Character Area meets the western border of the WHS, and forms a crucial piece of middle ground setting to the immediate west of the WHS. Tall buildings in this part of the Character Area could cause substantial conflict with the setting of the WHS, bringing tall modern development much closer to the WHS and eroding its relationships with the City and the river including the sense of precious openness around the WHS which prevails at this point.

26A – St James's Park – Blue Bridge

This is another iconic London view and one of the best examples of the English Picturesque, with a distinctive London mix of landscape and townscape. The Character Area is not directly visible in the view, being some distance away, but tall buildings within it could have substantial implications for the integrity of the view by appearing behind either the fantastical roofscape of Whitehall Court or the grandeur of the Foreign and Commonwealth Office.

St Paul's Heights

- 17.48. Risk to the views of St Paul's Cathedral from the South Bank is what promoted the formation of the Heights. A considerable swath of the Character Area lies under the Heights policy area, from the western end at the Temples to Cousin Lane/Angel Lane. This controls the heights of development in these areas via a geometrically defined grid which, over the Character Area, prescribe heights of 30-40m AOD. On a technical level, breaches of the grid would conflict with local plan policies safeguarding the heights and the setting of St Paul's. The Character Area, particularly the western half as described, forms an absolutely pivotal riparian setting for the Cathedral, which is pre-eminent in views from the South Bank, rising proud of the modern development in the foreground. Tall buildings in the Character Area would be anathema to these views, the riparian setting of the Cathedral and the very principles of the Heights. Even the more easterly areas of the Character Area outside the boundary of the policy, tall buildings would be highly visible and cause substantive conflict with the aims and principles of the Heights.

City Landmarks and Skyline Features

- 17.49. Views of City Landmarks and Skyline Features are subject to Local Plan Policy CS13 / City Plan Policy S13, which seeks to preserve and enhance views of them. Of particular relevance is the recognition and appreciation of that unique ensemble of re-built Medieval historic Parish 'Wren Churches', and their strategic riparian setting in the immediate context of the Cathedral and an important element of its heritage significance. The St Paul's Heights has assisted in preserving their strategic skyline setting from the River Thames, in which the Riverside Character Area provides the important foreground setting. Tall buildings in the context would have a major effect on the setting of numerous City Landmarks and Skyline Features, namely: St Paul's Cathedral, St Bennet Paul's Wharf (Grade I), the Old Bailey (Grade II*), St Martin's Ludgate (Grade I), St Augustine's tower remains (Grade I), St Nicholas Cole Abbey (Grade I), St Mary Somerset (Grade I), St Mary le Bow (Grade I), St Mary Aldermary (Grade I), St James Garlickhithe (Grade I) and St Michael's Church Paternoster Royal (Grade I), which possess some of Wren's most iconic steeples and spires. Tall buildings could have a substantial impact on the preservation and enhancement of City Landmarks and Skyline Features.

The Monument

- 17.50. The Character Area contains the Monument and its setting. As well as this setting of listed building, there are views of and from the Monument viewing platform (geometrically defined in the latter case) as identified by the City's Protected Views SPD (2012) (subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD).
- 17.51. The setting of the Monument is identified as the four street blocks that surround the listed building; development on these sites should not impinge on the general open character of the space around the gallery (i.e., not approach, equal or exceed it in height). The Character Area is substantively covered by Monument views 1-4 as located from the viewing platform. Development should not obstruct them by virtue of height or position or detract from them through inappropriate bulk and massing. This in effect means that tall

buildings under any of the geometrically defined views would be resisted, and any proposed adjacent to these geometric definitions would be extremely sensitive.

- 17.52. Inevitably much of the Character Area forms the middle and background to views of the Monument identified in the Protected Views SPD and is correspondingly sensitive to tall buildings.

Tower of London World Heritage Site

- 17.53. The Character Area forms the immediate setting to the west of the World Heritage Site and as a result the TOLWHS would be extremely sensitive to tall building development.

Neighbouring Borough Views

- 17.54. The Riverside is affected by strategic local views from neighbouring riparian Boroughs from the west and east which are sensitive to tall buildings, in particular:

Southwark

- 17.55. Borough View 4: Kings Stairs Gardens, River Prospect;

Lambeth

- Panorama 2iii.) View N from Gipsy Hill (across the LB Southwark) to the City
 - Panorama 2viii.) View N and E from the Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral.
 - Landmark Silhouette xvii.) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary.
- 17.56. The loss of visibility of the river itself as well as strategic landmarks such as St Paul's make these views sensitive to intensification of tall buildings within the character area.

City of Westminster:

- View 21 (St Paul's Cathedral from Victoria Embankment outside Somerset House)
 - View 22 (Dome of St Paul's from Somerset House River Terrace)
 - View 42B (Waterloo Bridge looking downstream)
 - View 43A (Golden Jubilee Bridge looking downstream)
- 17.57. In these views the Riverside Character Area provides an essential foreground setting to strategic monuments and landmark silhouettes, in particular of St Paul's and Tower Bridge, amongst others, such as the Monument and other Wren Churches such as St Bride's and St Mary le Bow. These would be very sensitive to tall built development in the foreground and middle ground.

Conclusion

- 17.58. The Character Area is considered to be **very sensitive** to tall buildings, which if proposed within the area could have a substantial impact on the preservation and enhancement of

strategic London and local views, and the significance and setting of heritage assets of the highest order.

Heritage Significance

- 17.59. The character area contains moderate number of listed buildings, reflecting the substantial damaged sustained during World War Two. Listed buildings include:

Listed Buildings

- 17.60. **Grade I** – The Monument, St Magnus, Custom House, St Dunstan in the East, All Hallows, St Olave Hart Street, Trinity House, St Mary at Hill, St Margaret Pattens, Vintners' Hall,
- 17.61. **Grade II*** - Former PLA building, Fishmongers' Hall, Watermans' Hall
- 17.62. **Grade II** – Blackfriars Bridge, Southwark Bridge, Southern buildings of King's Bench Walk
The majority of these retain a landmark quality, responding to more expansive views along the waterfront. Tall buildings risk the loss of prominence of these structures, with the potential to harm their wider settings.

Scheduled Ancient Monuments

- 17.63. Part of the Roman Governors' Palace, Queenhythe, Billingsgate, sections of Roman riverside wall, Livery Halls

Conservation Areas

- 17.64. *Temples (part) and Whitefriars (part)* - The character area terminates the southern end of both conservation areas, with tall buildings development potentially eroding the open aspect, and longer-range views south over the waterfront.
- 17.65. *Eastcheap* - The conservation area retains an irregular layout of medieval streets either side of the principal thoroughfare of Eastcheap, leading down to the River Thames. Strong historic connections to Billingsgate Market and the Thames, underscore the importance of the river to the local economy, trade and industry. The area retains significant survivals of post-Fire development including three Wren churches, characterised by commercial and warehouse buildings. Tall buildings would risk the loss of a preserved street grain and historic warehouse character, as well as potentially limit an appreciation of proximity to the Thames.
- 17.66. *Trinity Square*- The principal interest of the conservation area is the dominance of the former Port of London Authority building (10 Trinity Square), Trinity House and the Church of St Olave. The area reflects an intact group of mostly early 20th Century buildings with a distinctive Imperial character unified by the use of Portland stone with a high level of decorated and Classical details. Tall buildings could potentially disrupt the southern open aspect over Trinity Gardens.

Core City Typologies

- 17.67. *Offices.* The offices are well represented in the area offices, with many historic structures along the riverfront originating as national headquarters, with a waterside location a clear signal for status and influence. A diminishment of status through tall building development would have a harmful effect on the appreciation of these structures.
- 17.68. *Legal.* While only partially represented, the open aspect of the Temple Gardens creates a break in development along the waterfront which again is communicative of the permanence of the legal profession in this location, successfully resisting development through the early consolidation of land ownership in the area. As identified above, the loss of this open aspect through tall building development would be harmful in townscape and heritage terms.

Civic and Institutional

- 17.69. The Guildhalls and Customs House, City of London Boys school, Blackfriars station and the bridges are all dominant architectural forms along the waterfront. Intensification of tall buildings in the area could result in a loss of their visual prominence.

City Churchyards

- 17.70. Despite the great fire and World War Two damage the area has retained a number of city churches whose spires contribute greatly to the specificity of architectural character. A loss of visibility of individual spires, as well as view where their perception as a group is appreciable would be of detriment.

Markets

- 17.71. Old Billingsgate market retains residual interest as a site of commerce. Tall buildings which disrupted an appreciation of this building's important commercial relationship with river trade would be harmful to an understanding of its historic significance.

Warehouses

- 17.72. Principally the Nineteenth century vinegar warehouse within Eastcheap.

Core City Significance Traits

- 17.73. **AGE** Proximity to the Thames was for much of London's history the driver of its success, and this is reflected in the variety of building types of all ages which have flourished along its length, each trying to maximise the potential of a waterside location. The riverside is therefore reflective of all the major architectural, economic and social movements which have affected and characterise the capital, with remnants from Roman times sitting alongside contemporary development. Tall buildings pose a risk to this sense of temporal and spatial continuity, potentially creating barriers from one stretch of river front to the other.
- 17.74. **COSMOPOLITANISM** The diversity of merchants brought a number of specific European enclaves to the riverfront. While this is no longer readily apparent, it remains a key part of London's social history.

- 17.75. **STREET PATTERN** The remnants of narrow wharfs aligned north south along the river front is an important part of the historic character within the city and should be protected. A tall building development would potentially consolidate any remaining fine-grained areas, losing this important quality to the character area.
- 17.76. **HEIGHT & SKYLINE** The riverside has an iconic skyline reproduced throughout history and remains very sensitive to significance additions, such as tall buildings.

Conclusion: Overall Sensitivity to Tall Buildings

- 17.77. **Very Sensitive** to tall buildings. As set out above, tall buildings are effectively precluded by the prevalence of this character area within the majority of views of the city identified within the LVMF. The setting of both St Pauls, the Monument and Tower of London would all be very sensitive to development within this area, with considerable risk to a loss of visibility towards these strategic assets. It is noted that the area nevertheless contains pockets of more recent development, some of which includes taller structures, such as the upper portions of Minster Court, which marginally falls below the threshold of a tall building. The height of this building is such that it currently reads as part of the City Cluster and should be considered with regards to how this will contribute to any future cluster form. However as per the assessment above, the character area is scoped-out substantial impact on the preservation and enhancement of strategic London and local views, and the significance and setting of heritage assets of the highest order.

Character Area: Barbican and Golden Lane

Introduction

- 18.1. The Character Area is, like the rest of the City, well connected by all forms of transport. It has a TfL Public Transport Accessibility Level of 6b, the highest level of public transport accessibility in the Capital. Moorgate Station is a key interchange between the Elizabeth Line and the London Underground Hammersmith and City, Circle, Metropolitan and Northern Lines. Numerous bus routes serve City Road, London Wall and Aldersgate Street. Cycle Route II passes through the Character Area.
- 18.2. The Character Area has a strongly modern character. The prevailing period is postwar and the architectural language and scale of most of the area is modernist (and post-modernist) and bold. The Barbican and Golden Lane estates occupy the majority of the Character Area; both Estates are listed, are registered as designed landscapes and are designated as a conservation area. To the east and south are large modern blocks interspersed with fragmentary survivals of monuments (for instance the Roman and medieval wall) and historic buildings of a finer scale and grain such as the Brewery conservation area and the group of C19 buildings at Moorgate junction.
- 18.3. The scale of development is generally of mid-rise, modern blocks which fall below the datum of 75 m AOD, however these also incorporating taller elements, sometimes taking the form of towers. Barbican & Golden Lane's defining character is of a strongly mixed-use area beyond the financial core. These were conceived as singular mega structures within the wider urban realm, utilising a consistency of material language as well as height to create a deliberately striking sky-line presence. The residential use of these estates creates a quality of contrast with the surrounding commercial enclave of mixed architectural character and period.

Historical Development

- 18.4. The Character Area lies outside the original Roman and medieval City walls, meaning that it had a suburban and less intensively developed character for much of its history until the C17 and C18, when the City began to grow beyond its walls.
- 18.5. In the Roman period it lay to the north of the Fort, built in the late first or early second century AD, and to the east of the cemetery located at Smithfield. It's likely that the Character Area remained relatively sparsely populated through the Roman and Saxon periods. Following the Norman Conquest of 1066, the area remained defensive in character, with a 'Barbican' established here by the early medieval period, though the suburbs north of the wall gradually became more densely developed.
- 18.6. By the late C17 the Character Area was fully built-up with a dense network of squares and courts connected by principal thoroughfares such as Aldersgate, Red Cross and White Cross Streets. The majority of it escaped the Great Fire of 1666, lying as it did outside the City walls. The area swiftly became the centre of tailoring and dressmaking businesses, the rag trade in London as well as home to many fabric merchants; the Whitbread Brewery on Chiswell Street was an enduring presence from the C18 onwards.

Other notable buildings included Bridgwater House (demolished after fire damage in 1688, subsequently a square) and St Giles Cripplegate. In the C19 the railway was driven through the Character Area between Aldersgate Street and Moorgate.

- 18.7. Perhaps the most pivotal event in the history of the Character Area was the Blitz of 1940-1, in which virtually the entire area was destroyed by bombing. This destruction was the biggest influence in the appearance of the Character Area today. Subsequent post-war reconstruction saw the radical reconfiguration of the western half of the Character Area into the Barbican and Golden Lane Estates, with the disappearance and replacement of the vast majority of the previous street plan, as well as the more evolutionary redevelopment of the eastern half of the Character Area.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 18.8. Immediately after the Second World War the Character Area was seen as an appropriate area for tall building development, becoming the location of a number of early high-rise buildings in the City: Great Arthur House on the Golden Lane Estate (briefly the tallest residential building in Britain), the Route XI masterplan, in which a series of towers lined the new westerly extension to London Wall, and the Barbican towers.
- 18.9. Resultingly the scale and prevailing height of buildings in the Character Area is generally modern – of mid to high-rise level. The majority of the Character Area features large buildings, on large plots. There are several towers: the four on the Barbican Estate (Shakespeare, Cromwell, Lauderdale and the Blake), as well as the later ‘Heron’ and City Point towers to the east. Alban Gate straddles the boundary of the CA across London Wall, while the taller element of London Wall Place lies just along London Wall to the east. 100 Aldersgate, Bastion House (just) and Moor House also meet the tall building threshold of 75 meters AOD.
- 18.10. The Barbican Estate’s slab blocks, which comprise most of it, are good examples of the kind of ‘mid-rise’ scale prevailing across the Character Area. There are isolated examples of historic, traditional scale of building. The Brewery Conservation Area contains C18-C19 industrial and domestic buildings of a lower scale, while the group of C19 buildings at Moorgate junction again exemplify a historic domestic scale. But these are fragmentary drops in scale – otherwise the prevailing heights across the Character Area are modern.
- 18.11. Several of the earlier towers associated with post war reconstruction, hold a landmark quality, within the Character Area boundary and in the wider City townscape, including views from the river. The principal tripartite Barbican tower composition, seen prominently in views from the North, signpost the location of twentieth century transformation and an internationally recognised cultural destination. This composition is also enjoyed from the South bank, Queens Walk and Thames Path. The original Route XII elevated walkway now only survives in an altered and partial state, with the sense of a complete post-war townscape now eroded.

Morphology, Topography and Urban Structure

- 18.12. Little of the historic pre-WWII street pattern survives. As seen today, the Character Area has been almost entirely shaped by the late C19 and C20: the arrival of the railway

through Moorgate, then redevelopment of land destroyed by WW2 bombing, comprises much of the Character Area. The exception is the way the streets and plots are arranged on a skewed, approximately NW-SE axis, an alignment which originates in the shoulder of Roman Fort Wall preserved within the southern section of the Barbican Estate.

- 18.13. The result is a section of the City that is quite unrepresentative and in the case of the Barbican Estate unique in terms of British Architecture at the time of its construction. There remains the pocket of surviving historic street pattern around Bridgewater Square between the Estates, the little group at Moorgate junction and in the Brewery Conservation Area. The street plan otherwise consists of large, mostly orthogonal plots arranged around some retained but rationalised historic streets and new arteries such as the London Wall extension (formerly known as Route XI and flanked by towers).
- 18.14. The partial survival of the City's 'pedway' reestablished a smaller scaled route through the character area and remains one of London's better examples of the post war move to segregate vehicular and pedestrian traffic. Restoration works south of the Barbican have provided new stretches of elevated walkway successfully.
- 18.15. There is a strongly tectonic and man-made modernist topography which plays with the sense of scale and space. Enclosed streets raised podium gardens, sunken gardens and the picturesque revealing of retained pieces of the Roman/Medieval wall all combine to form a very different built environment which contrasts to the majority of the city. The character area as a whole retains a strong sense of boundaries, with the consistency of material palette throughout the Barbican in particular creating a strong border to this area.
- 18.16. London Wall/Moorgate/Aldersgate are major arteries which define the area to the S, E and W. In the Museum of London rotunda and Moorgate junction the Character Area has two major nodes. The Character Area is also rich in open spaces and public realm, again, largely due to the waves of post-war rebuilding which sought to find a new formula for planning residential inner-city districts, with emphasis placed on planting, trees, water features and open spaces between residential blocks, which is typical of the Barbican/Golden Lane Estates and was also a key principle in the later London Wall Place development. The result is an urban grain healthily interspersed with broad plazas, squares and other forms of open space.

Built Form and Uses

- 18.17. The Character Area consists mainly of C20 architecture and is dominated by the Barbican and Golden Lane Estates. The former comprises various modernist apartment blocks redolent of Le Corbusier and incorporating lightweight ribbon windows, pilotis and colourful spandrels; Crescent House features pick-hammered concrete to anticipate the Barbican. The latter estate is marked by a singularity of composition, enormity of scale and sublimity of effect: vast planes of bush-hammered concrete, timber framed openings and plum-hued tiles, with hard edges and horizontal emphases.
- 18.18. In contrast, the Brewery Conservation Area is a characterful pocket of C18-C19 industrial brick building to a smaller scale. To Chiswell Street, it is characterised by Georgian uniformity – brickwork frontages, rectangular sash windows, mansards, doorcases. These are of domestic scale, intermixed with the former industrial brewing buildings in a similarly restrained material palette – light brown brickwork, pale stone, cobbles, slate roofs. There is a degree of intactness and simplicity of form/material palette.

- 18.19. At Moorgate junction is a pocket of early C19 and later domestic-scale buildings with retail below and accommodation above, of brickwork and stucco with sash windows and a striking C20 shopfront at Fox Wines.
- 18.20. Lining London Wall is a more haphazard grouping of modern buildings, including the Museum of London and Bastion House both executed in a post-war palette of concrete, tile, glass and curtain walling, while the adjacent London Wall Place development comprises metalwork cladding and tiling on stacked geometric forms. Here, earlier buildings and structures such as the Roman and medieval wall, Ironmongers' Hall, St Mary Elsing Spital tower are incorporated into a strikingly modern setting.
- 18.21. The remainder of the Character Area is taken up with large, modern blocks of varying heights, materials and architectural characters, ranging from the City Point tower set on an open plaza to the expressed steelwork structure and dynamic form of 21 Moorfields. Building uses are characterised chiefly by a strong mix of residential, cultural and commercial, with subsidiary retail uses and a heavy transportation presence in the form of the Elizabeth Line station.

Local Views

- 18.22. Key views are identified in the Barbican and Golden Lane Conservation Area SPD (2022).
1. Outside north side of Blake Tower, looking north-east towards Great Arthur House
 2. Views of Crescent House along Aldersgate Street from the south
 3. From junction of Fann Street/Golden Lane looking north along Stanley Cohen House
 4. From Fann Street looking north between Cuthbert Harrowing and Bowater Houses
 5. From Baltic Street looking south at Hatfield House
 6. From the centre of the Golden Lane Leisure Centre looking west
 7. From the centre of the Golden Lane Leisure Centre looking east
 8. From west end of Beech Gardens looking east
 9. From west end of Beech Gardens looking north-east
 10. From east end of Beech Gardens looking west
 11. From northerly corner of Seddon Highwalk through 'arrow slits' from Seddon Highwalk onto Aldersgate Street
 12. From the centre of Gilbert Bridge looking west
 13. From the centre of Gilbert Bridge looking east
 14. From south end of Gilbert Bridge looking north-west
 15. From podium under Shakespeare Tower looking up
 16. From St Giles Terrace looking south
 17. From St Giles Terrace looking west
 18. From St Giles Terrace (near north gravestones) looking north
 19. From Thomas More Highwalk looking east
 20. From Thomas More Highwalk looking north
 21. From Lakeside Terrace (centre) looking south
 22. From Lakeside Terrace (centre) looking north
 23. From Lakeside Terrace (west end) looking north
 24. From Andrewes Highwalk (centre) looking north

- 25. From Andrewes Highwalk (centre) looking west
- 26. From the west end of Wallside looking south
- 27. From the east end of Wallside looking north

Conclusion

- 18.23. The Character Area is **sensitive** to tall buildings in Character and Appearance terms. A sense of completeness to the urban form has been established through the sheer scale as well as a material and decorative consistency across the Golden Lane and Barbican Estates. Further tall buildings which fall outside the post-war idiom are likely to have a disruptive quality, including to longer range views along the river front, in which the Barbican Towers can be appreciated as a distinct composition. However, it is acknowledged that there is an established post-war tradition of tall buildings in this location, and the overall character of the area is variable and modern in terms of its built form and urban structure. Notwithstanding the limitations outlined above there maybe opportunities for further or replacement tall buildings that improve the relationship with the wider context, and Cathedral in particular but this is likely to be extremely limited.

Strategic Views, Townscape and Skyline

- 18.24. The main sensitivity here is St Paul's Cathedral, and particularly an appreciation of its silhouette against an open sky to the west. The Character Area has an established presence in these views and further tall building development has the potential to affect the setting and the silhouette of the Cathedral (as defined in section 2), as well as the church spires clustered about within these views. The Character Area is distant from the Tower of London and, as such, does not lie within the setting or key views of the World Heritage Site. As such, the WHS is not considered to be a sensitive in respect of the Character Area.

London View Management Framework

- 18.25. The character lies within a number of the wider setting consultation area as defined within the LVMF SPD of a number of linear views as well as seen more prominently within the river prospects. The character area is visible and perceived seen within the wider surroundings of a number of Strategically Important Landmarks including St Bride's and the Old Bailey as well as the Temples and Whitefriars Conservation Areas. The sensitivities of each view are outlined below.

Linear Views

- 18.26. Linear View 8A.1 (Westminster Pier) – Wider Setting Consultation Area
The Character Area lies in the Background of the WSCA, which covers the south-easternmost corner of the area – the site of Moor House (an existing breach), the Elizabeth Line OSD, the group of listed buildings and the open space in front of the Globe. Further tall building development on these sites or adjacent to the WSCA would have implications for the sky silhouette and setting of the Cathedral in this view.
Relevant SPG Paragraphs: 170 &171
- 18.27. Linear View 9A.1 (King Henry VIII's Mound, Richmond Park) – Wider Setting Consultation Area. As above, but with lesser coverage – the Background WSCA just clips the south-east corner of the Character Area. Further tall building development within or adjacent to

the WSCA could have implications for the clarity of the skyline silhouette and setting of the Cathedral in this view. Relevant SPG Paragraphs: 175 & 176

River Prospects.

- 18.28. The Character Area has an existing presence, to varying degrees, in these River Prospects: the Barbican Towers, City Point and Moor House in particular can be perceived in many of them. Depending on the location of the River Prospect, the towers are seen in the west or east sky setting of St Paul's Cathedral. The location of the Character Area means that further tall building development here could visually 'bleed' into those in the Liverpool Street and Broadgate Character Area, risking the appearance of a mass of towers appearing in the setting of St Paul's from the west creating an overly dominant effect.
- 18.29. 12A.1 – Southwark Bridge. The western edge of the Character Area appears in this view, with the Barbican towers visible to the extreme east of the view. Further intensification of tall building development therefore would be unlikely to negatively impact the primacy of the Cathedral in this view. Relevant SPG Paragraphs: 211 & 214
- 18.30. 13A.1 & 13B.1 – Millennium Bridge. The Character Area has an existing presence on the skyline in these views, directly east of the Cathedral peristyle and dome. The Barbican Towers form prominent landmarks with other towers in the Character Area visible further east of the Cathedral: Alban Gate, The Heron, City Point and Moor House. As well as the easterly sky setting of the Cathedral, there are further sensitivities in the presence of the spires of many City churches: St Augustine New Change, St Vedast, St Nicholas Cole Abbey, St Mary Somerset and St Mary Le Bow. The towers of the Character Area are perceived as a background element of their settings. Further intensification of tall buildings in the Character Area could begin to affect the primacy and easterly skyline setting of the Cathedral with implications for how the Cathedral is perceived amongst a family of smaller city churches. Individual tall building proposals would need to undertake an assessment of impact upon these assets, in accordance with the NPPF. Relevant SPG Paragraphs: 227-228 & 234-235
- 18.31. 15B.1 & 15B.2 – Waterloo Bridge, Downstream Pavement. The Cathedral is seen slightly off-axis from the south-west, with a great tranche of forest – the trees of the Inner and Middle Temple gardens – immediately foregrounding it, while the towers of the Cluster rear up to the east in one of the most dramatic and powerful views. The Character Area towers form prominent elements further to the west, seen beyond the Broadgate Tower in the Liverpool Street & Broadgate Character Area. The figure of Justice upon the Old Bailey is seen against clear sky, while the spire of St Bride is seen partially against modern background development. Further intensification of tall buildings in the Character Area, particularly in the eastern half, could have serious implications for the westerly sky setting of the Cathedral, and greatly risk merging visually with the existing Broadgate Tower and other towers in the LB Hackney, creating an unintended nucleus of tall buildings in the centre of the view which, together, could overwhelm the Cathedral to the west. This effect would be a risk to both assessment points. In 15B.2 there is a risk that further tall building development could dominate the sky setting of St Bride's. Relevant SPG Paragraphs: 252-257 & 262-267
- 18.32. 16B.1 & 16B.2 – South Bank, Gabriel's Wharf. The Character Area is present in these views immediately to the west of the Cathedral. While the Barbican Towers stand at some

remove to the west, City Point tower is uncomfortably close to the western towers and Moor House appears within the Cathedral's sky silhouette, between the western towers and engaging with the base of the south-western tower. Further tall buildings in the Character Area, particularly in the eastern half, would risk bringing tall buildings too close to the Cathedral to the west, and risk direct conflict with the sky silhouette or overwhelming its westerly sky setting. Relevant SPG Paragraphs: 273-272 & 280-283

- 18.33. 17B – Golden Jubilee/Hungerford Footbridge. Much the same issues as those for the Waterloo Bridge views – please see above commentary. Relevant SPG Paragraphs: 301-305
- 18.34. 18B.1 – Westminster Bridge (downstream) The Barbican Towers are just visible through the spokes of the Eye, with only the top of the towers seen above the Royal Festival Hall; the eastern half of the Character Area is occluded behind development in the foreground. Due to distance and limited, partial visibility the recognisability of the Barbican Towers is reduced, and this view is not considered to make more than an incidental contribution to the Tower's setting and appreciation of its significance. Having regard to the additional constraints in the western half of the Character Area, it is unlikely that further tall building development in the Character Area could affect this view or draw focus from the London Eye, County Hall and the Shell Centre, seen prominently in the foreground. Relevant SPG Paragraphs: 313-317

St Paul's Heights

- 18.35. The character area is not in the St Paul's Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in those strategic riparian views identified in the Protected Views SPD and are the subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD. The character area is in the visual scope of the backdrop setting of the Cathedral in those same views, from Hungerford, Waterloo and Blackfriars Bridges, in addition to the kinetic sequence along the South Bank Queen's Walk between Waterloo and Southwark Bridges. The sensitivities here in view terms are as outlined in the 'River Prospects' section above.

City Landmarks and Skyline Features

- 18.36. The Character Area contains five City Landmarks, as identified in the City's adopted Protected Views SPD (2012), as follows:
- 18.37. Great Arthur House Relatively diminutive height compared with the Barbican towers, but the tallest high-rise in Britain when it was completed in the early 1950s. Further tall building development within the Character Area could affect the setting of the building in local views.
- 18.38. Barbican Towers (Shakespeare, Lauderdale, Cromwell and Blake) The distinctively jagged silhouettes of these three hi-rise elements of the Barbican Estate are now established and recognisable skyline features, admired in their own right despite the way in which they compete for prominence in certain views with St Paul's Cathedral. They are grade II listed and located within the Barbican and Golden Lane Conservation Area. The lower Blake Tower is less prominent in skyline views than the other three. Further tall building development within the Character Area would have implications for the existing presence of these towers on the skyline, legibility of their group value and careful siting.

- 18.39. St Giles Cripplegate Largely hemmed in from wider views by the Barbican Estate, and already perceived as such as 'set apart' from the modern City beyond the confines of the Estate. Other skyline features nearby include All Hallows London Wall, St Alban Wood Street, St Sepulchre

The Monument

- 18.40. Certain views from and to the Monument are the subject of CS13(2) and emerging Policy S13(2) and associated guidance in the Protected Views SPD (2012). The Character Area is situated some distance from the Monument and, as such, further tall building development is unlikely to meaningfully affect views of the Monument, in such a way that has an impact upon its significance, recognising some potential visual change may occur within the backdrop of views from Tower Bridge. The Character Area has prominence in the 'Northern Views' specified from the Monument along King William Street, which leads the eye into the Bank Conservation Area. The Barbican towers are prominent at the end of this vista. Further tall building development within the Character Area could have cumulative implications for this vista by forming an overwhelming and distracting background to this sensitive foreground setting.

Tower of London World Heritage Site

- 18.41. The Character Area is distant from the Tower and not present in any key views of the World Heritage Site, either because of this distance or through being occluded by intervening development such as the City Cluster. As such, further tall building development within the Character Area is not considered raise consistency issues with the OUV of the WHS, its authenticity and integrity.

Neighbouring Borough Views

City of Westminster

- 18.42. V42 B Waterloo Bridge Looking Downstream and View 43 A Downstream. Identified by Westminster City Council as part of their protected Metropolitan Views. The existing character is defined as 'dominated' by the City's financial district, with the dome of St Paul's retaining its prominence. Intensification of tall buildings within this area has the potential to be seen in the backdrop, and potentially obscure views of the Barbican towers.
- 18.43. V18 Churches of St Clement Danes and St Mary-Le-Strand. Churches of St Clement Danes and St Mary-Le-Strand dominate eastern views along the Strand. The interplay between the two spires as the viewing position is identified as of interest. The barbican towers are presently visible in this view. Further intensification of tall buildings within the area could disrupt or obscure the perceptible relationship between the focal churches in the view as well as screen views of the barbican tower.

Lambeth

- 18.44. A series of views are identified, which show the city skyline and St Pauls seen distantly from the south and backdropped by the tall buildings of the cluster and wider city. These are:
- i. Views NNW from Brockwell Park to views N and NNE to the city (clause c).

- ii. View NNE from Norwood Park (across LB Southwark) to the city;
- iii. View N from Gipsy Hill (across LB Southwark) to the city;
- iv. View N from Knights Hill (across LB Southwark) to the city;

18.45. These possess long range views of the city skyline, with intermittent visibility of the Cathedral. New tall buildings within the character area could potentially be visible, however given the established backdrop of tall buildings, these views are considered less sensitive to further tall building development within the character area.

- viii. View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral;

18.46. These views show the riverside skyline along the north bank, showing the city cluster together with St Paul's. As above tall buildings within the character area are potentially visible here. The barbican towers are seen at a distance to the west of the Cathedral, and further tall building within the south of the character area is likely to obscure this visibility.

18.47. xviii. View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark.

18.48. The Cathedral is here seen prominently within its riverside setting, seen in this kinetic view against a backdrop of tall towers, including that of the City Cluster. The character area and specifically, the barbican towers are seen to the west of the Cathedral at some distance, although the intervening gap fluctuates as the view progresses from west to east along the walk. The barbican towers are readily appreciable within this view and are sensitive to further development in the character area which make obscure their visibility from the river front.

Islington

18.49. LV2 St John Street, LV3 Angel and LV4 Archway Road The above are all narrow slot views of the Cathedral, with the character area providing the immediate eastern edge. Additional tall building development could therefore encroach upon the open sky setting of the Cathedral.

Southwark

18.50. The LB of Southwark have five designated Borough Views. Views 1, 2 3 are inclusive of Protected Vistas of St Paul's Cathedral. The Character Area is located to the right of the central axis towards St Paul's within these views and falls outside the defined viewing corridor. Overall, further tall building within the character area maybe visible within these views but will not impact upon the visibility of St Paul's or its open sky setting in accordance with Policy P22 and the associated visual management guidance. There remains sensitivity to tall building development within the character area that may create a canyon like effect either side of these views or through any considerable increase in height to the extent that it would pull the focus of these views away from the Cathedral.

Conclusion

- 18.51. The Character Area is **very sensitive** in terms of Strategic Views, Townscape and Skyline, chiefly for the way in which further tall building development could affect the westerly sky setting and silhouette of St Paul's Cathedral in views from the bridges and the South Bank. The Barbican Towers (GII and City Landmarks/Skyline Features) are identified as landmark in relevant LVMF views and are seen as a skyline composition denoting an important cultural civic district and could be eroded.

Heritage Significance

Overview of Heritage Assets

- 18.52. The Character Area is dominated by the groups of listed buildings which are also conservation areas (and registered landscapes): Barbican and Golden Lane and Brewery. Beyond these self-contained entities, there are only an isolated scattering of listed buildings: to the south of the Barbican. Sections of the Roman and medieval City wall run across the south of the Character Area, and these are designated as Scheduled Ancient Monuments.
- 18.53. A summary of designations is given below:

Listed Buildings

- 18.54. **Grade I** 1 Church of St Giles.
- 18.55. **Grade II*** 2 The partners house, Whitbred brewery, Crescent House
- 18.56. **Grade II** 42 Including Salters' Hall, St Mary Elsing Tower, Moorgate Station, 19th century buildings at the junction with Moorgate/London Wall (grade II), The Golden Lane estate.

Registered Park and Garden

- 18.57. Barbican Grade II*

Scheduled Ancient Monuments

- 18.58. Sections of the Roman and medieval City wall run across the south of the Character Area and these are designated as Scheduled Ancient Monuments.

Sensitivity to tall buildings

- 18.59. The sense of a planned townscape remains appreciable with the almost complete transformation of this locality still felt in the comprehensive level of change in terms of levels, consistency of materiality and planned vistas. Tall buildings have the potential to disrupt what remains as the vision for the area as well as disrupt views towards landmark buildings such as the Barbican Towers or St Giles Church.

Conservation areas

- 18.60. There are two conservation areas within the Character Area: Barbican and Golden Lane and Brewery. Both are consistently immersive sectors of historic architecture – twentieth

century in the former, eighteenth-nineteenth century in the latter – within tightly drawn boundaries.

- 18.61. Much of the western half of the Character Area comprises the Barbican and Golden Lane CA, which covers the two estates. As well as this designation, the two Estates are also listed and are designated as Registered Landscapes. This overlapping series of designations, illustrate the particular significance of these heritage assets with different implications and considerations. As a consequence, this, effectively rules out further tall building within the boundaries of the conservation area and therefore the western half of the Character Area.
- 18.62. There is a pocket of land between the two estates which lies outside the conservation area boundary, comprising mostly postwar buildings, one listed building (Cripplegate Institute) and one non-designated heritage asset (Jewin Church). Tall buildings here are likely to create a harmful impact upon the contribution of setting to significance for the two estates.
- 18.63. The Brewery conservation area is, like Barbican and Golden Lane, informed by the physical limits of plan forms associated with a well-defined group of C18-C19 industrial, commercial and domestic listed buildings. Again, the overlapping series of designations and small size of the conservation area effectively rules out further tall building development within its boundary which would be overly disruptive of the cohesive plan form and appreciable shared historic use described above.
- 18.64. The settings of these conservation areas are already defined by the existing mid-high rise buildings within the Character Area. These are considered to make, in general, a neutral contribution to the setting and significance of the conservation areas, via an increase in height and density, underscoring the city centre location of each, which is also a core part of their respective significances. In this regard, further tall building development on the modern plots outside these boundaries, particularly to the east, could potentially augment/reinforce this existing element of setting to the benefit of the conservation areas' significances, dependant on the detailed design and responsiveness of the individual schemes.

Core City Typologies

- 18.65. The Character Area exhibits very strong examples of the core heritage typologies identified in section 2.
- 18.66. *Residential* – The character area best represents this typology of all the city character areas, most clearly in the Barbican and Golden Lane Estates. Sensitivity to tall building is reflected in the potential of significant increases in height disrupting what remains of an appreciably designed wider streetscape, eroding the sense of a comprehensive mid-twentieth century character.
- 18.67. *Civic and Institutional* – The Barbican cultural centre is internationally recognised as an Arts venue. This quality is physically expressed by the iconic nature of the centres' architecture, which remains deliberately prominent within the immediate locality, underscoring its important public offering. Tall buildings which could compete with the

towers for prominence could undermine the landmark quality of the estate as it is currently experienced.

- 18.68. *Tall Buildings*- The character area holds some of the earliest tall buildings in the city, and this quality of height is often recognised as characteristic of the dense twentieth century residential development for which the area is well known. As above, additional tall buildings which compete with the existing towers within the character area could potentially disrupt the sense of composition and wayfinding within the area.

Core City Significance Traits

- 18.69. The Character Area is considered to support the following traits of the City's overarching Heritage Significance identified in section 2. The sensitivity of these traits in relation to additional tall buildings within the character area are outlined below.
- 18.70. **AGE** The character area reflects several key phases of development within the city, the most transformative of which was the post-war rebuilding works. This is seen together with remnants of Roman Wall, and the sense of contrast between the two underscores the survival, evolution and snapshot of the city at a particular point in time in a palpable way. Further tall buildings within the character area should be limited to avoid a loss of this sense of contrast, particularly with regard to protecting what remains of the aspirational and egalitarian post-war vision for the new housing estates.
- 18.71. **HEIGHT** The Barbican towers and Golden Lane developments used height as a powerful architectural statement, integral to their wider design and as a counterpoint to the generous open areas enfolded within their boundaries. This use of height within residential built forms in particular, is idiosyncratic to their time of construction. This expression therefore has historic interest and can be understood as reflective of the aspirational intentions behind both estates' design. Further tall buildings which could erode this landmark quality through competing forms should be avoided.
- 18.72. **VARIETY** The character area represents one of the strongest examples of architectural variety, with the dramatic step change in scale and grain creating a moment of drama as the pedestrian moves into the area transformed by large scale twentieth century city planning.

Conclusion

- 18.73. The Character Area is considered to be **sensitive** in Heritage Significance terms. While it contains some designated heritage assets, they cumulatively create only a fragmentary historic environment, and their settings are already defined by the tall buildings of the Character Area; the two largest, the Barbican and Golden Lane Estates, are considered to be resilient and complete modernist set-pieces which are capable of juxtaposition with other forms of tall modern development without detriment to their significance.

Conclusion: Overall Sensitivity to Tall Buildings

- 18.74. The Character Area is, overall, considered to be **very sensitive** to tall buildings, chiefly because further development of this kind within the character would have implications

for and could overwhelm the skyline setting of St Paul's Cathedral in the aforementioned River Prospects, merge detrimentally with the existing and consented tall buildings in the Liverpool Street and Broadgate CA, and even directly clash with the Cathedral's skyline silhouette. There could also be implications for the settings of the City church spires in views from the South Bank, an integral part of the Cathedral's setting. Within local views, despite tall buildings being an integral and established part of the CA, a sense of cohesion within the residential estates, together with a generosity of open space all could be threatened by further delivery of intensification of height. Where pockets of older Historic Environment remains, this too could be lost through any consolidation of plot and introduction of a large-scale development.

Character Area: City Cluster

Introduction

- 19.1. This Character Area is unique in a City, pan-London, British and even international context: as the heart of a high-rise, global financial centre in an ancient Roman city. It is the area in which the City's status as a global financial centre is most visible and obvious – due mainly to the distinctive, modern and highly idiosyncratic assemblage of tall buildings which are widely recognised: 'the Gherkin', 'the Cheesegrater', and 'the Scalpel' to name but a few. What is most striking is how these ultramodern tall buildings rise from ground of the highest archaeological importance in an area of the City established early in the Roman occupation of Britain. There is a unique sense of continuity, with its origins as the location of the centre of mercantile Londinium, the Roman Forum-Basilica. The area has remained a centre of global trade and finance ever since. While the juxtaposition between old and new is experienced across the City, it is most acutely appreciable within the City Cluster.
- 19.2. Like everywhere else in the City, the Cluster is well-connected by all forms of public transport. It has a TfL PTAL rating of 6b, the highest level of transport accessibility in the capital. This includes several bus routes along Gracechurch Street and Bishopsgate from the river crossing passing Liverpool Street Station just outside the Character Area. It is within a short walk of this National Rail station and Fenchurch Street to the south-east; and Bank/Monument, Cannon Street and Aldgate Underground stations lie close by.
- 19.3. As mentioned, the Character Area encompasses the mercantile and administrative centre of Roman London. located just to the north of the Upper Pool, proximity to the sea, enabled both a long established importance in maritime affairs, seaborne trade, nautical insurance and latterly global financing. With regards to finance in particular, major global players in these fields continue to occupy premises in the Cluster. The iconic spectacle of its tall buildings are often used in the media to portray business Britain, or 'UK Plc', and can lay claim to having become part of London's brand at a global level. This in turn is emblematic of the City as the epicentre of the UK's financial services market.
- 19.4. And as might be expected, the character and appearance of the City Cluster is very diverse, though generally experienced towards the modern rather than the historic. The product of significant bomb damage in World War Two and subsequent post-war and later comprehensive development, it nevertheless retains a fascinating and complex network of historic routes, lanes and alleys, amongst which the Cluster's tall buildings are encountered in arresting and frequently sublime juxtapositions.

Historic Development

Early History

- 19.5. The Character Area encompasses an area of high ground to the east of the Walbrook river valley, one of the first areas settled by the Romans in London. the first Basilica and Forum were established in the vicinity of Gracechurch Street, later replacing it in c.140 AD with a larger, aisled successor. This later iteration sprawled from Fenchurch Street to Cornhill and was the largest of its kind north of the Alps. A large courtyard – the forum – was enclosed by a quadrangle of two storey high buildings with the basilica, or administrative offices, located in a taller range to the north. The massive external walls

were of ragstone with regular tile bonding courses. A fragment may be seen in the basement of a hairdressers on Gracechurch Street.

- 19.6. To the north, in the shadow of this imposing edifice, a road led north to the City gate and onwards towards Lincoln and York; then called Ermine Street, today called Bishopsgate. It ran north from the first bridge (at Fish Street Hill). These were some of the earliest streets in Londinium. The street was gated in the second century as part of the fortification of the City at that time; stretches of the Roman wall survive along Camomile Street/Bevis Marks/Duke's Place. Excavation along its length revealed decorative mosaic pavements, indicative of the high status of its occupants as well as the decorative richness of architecture within the City at this time.
- 19.7. Londinium continued to evolve, changing its urban form including the dismantling of the Basilica-Forum in the late third century. In common with other areas of the City, the collapse of the Roman Empire in the West in the early fifth century saw the City enter a period of abandonment, with the focus of occupation by incoming Angles and Saxons shifting west to 'Ludenwic', modern-day Aldwych. However, the nature of the use of the City at this time is mysterious and has at least partly an ecclesiastical character: Bishop Erkenwald restored the Bishopsgate in the seventh century (hence the name), while the dedication of St Ethelburga just to the south was to his sister of that name. Though the church is first recorded in the twelfth century, this association strongly hints at an early foundation.
- 19.8. In the 9th century, London was several times raided and partly occupied by Danes. They were driven out by King Alfred, who retook the old walled City in 886, refortifying and making it habitable again. New streets and buildings were added to the remains of the Roman city and the riverfront was overhauled to accommodate trade. By 1000, the old river crossing had been rebuilt, re-establishing the important transport artery through the City of which Bishopsgate was a key part.

Medieval

- 19.9. The Character Area in this period was, like the rest of the City, densely populated within the walls and strongly mixed-use, with noxious industries like limeburning and bellfounding coexisting with religious houses, shops, and, notably, the elegant mansions of the City's elite that began to spring up along Bishopsgate within and without.
- 19.10. By 1270 Lime Street, Fenchurch Street and Cornhill had sprung from north-south Roman spine of Gracechurch Street/Bishopsgate. Lime Street is so named for the lime burners and sellers once living and working here; Fenchurch Street is thought either to derive from a reference to faenum (hay) or from the fen-like ground by the banks of the Langbourn river.
- 19.11. In this period, too, are first recorded the churches of the Character Area, the fabric of three of which remains (at least in part) medieval: St Helen Bishopsgate, which originated out of the Priory of St Helen, St Ethelburga and St Andrew Undershaft. There were more in the Character Area, since lost including St Mary Axe, pulled down in the late C16 and St Dionis Backchurch, made redundant and demolished in the late C19, and St Katherine Coleman.
- 19.12. Of great significance among the City's religious houses was the Holy Trinity Priory, which was founded just inside the City wall near Aldgate in either 1107 or 1108 by Queen Matilda, wife of Henry I. It occupied the Creechurch district to the east of the Character Area, the land now bounded by Bevis Marks, Leadenhall Street, Bury Street and Algate. It was one of the first Augustinian monastic houses in England, and from the outset

especially high-status and popular with the elite and was used for royal burials. The Priory of St Helen was a similarly sprawling precinct to the west of the Character Area.

- 19.13. Livery Companies located in the area including the Ironmongers, adjacent to Billiter Street, the Fullers' and Shearmens' Hall (later Clothworkers') off Fenchurch Street. The Leaden Hall was a 13th century lead-roofed mansion owned by Sir Hugh Neville and a market was first recorded in its grounds in 1321. It stood approximately in the existing quadrant of the existing market site. For meat and poultry Leadenhall Market took precedence over Smithfield, which was until the 19th century a livestock market. 'Foreginers' – as traders from outside the City were then termed – began to operate their stalls at the Leaden Hall as business overflowed from the recognised poultry market at Cheapside (wound up by the 16th century). In 1377 'foreginers' received additional rights to sell cheese and butter. In 1411 the City Corporation acquired the Lordship of the Manor from Lord Mayor Richard Whittington (as a gift) and developed the property as a 'garner' or grain store with a courtyard to contain the Market. By 1455 these works were completed and indicated the importance of the Market to the Corporation; it was by then a general market for poultry, victuals, grain, eggs, butter, cheese and other comestibles.
- 19.14. Other mansions in the area included Crosby Hall, built in 1466 just off Bishopsgate, which included a gatehouse, tenements, parlours, chapel and garden, and those of St Thomas Gresham and Sir Paul Pindar. During the Wars of the Roses, in 1477, Lord Mayor Ralph Jocelyn had the City wall repaired and refortified with brickwork crenelations.

Early Modern – C16 and C17

- 19.15. Over these two centuries great change convulsed the Character Area, disrupting the settled medieval character of the area established over four hundred years. In 1532, three years before the general Dissolution, Holy Trinity Priory became the first monastic house in England to be dissolved. This enacted massive change to the character of the area, with the great ornamental stone buildings quarried for their materials and subdivided into houses and tenements; apart from a fragment preserved within Nos. 71-77 Leadenhall Street, no trace of them remains today but the layout of the complex is preserved in the street pattern: Mitre Square corresponds to the Priory cloister; Mitre Street, the nave of the Priory church. A priory chapel became the church of St Katherine Cree, rebuilt in its present form in 1631.
- 19.16. The Priory of St Helen was dissolved in 1537 and befell a similar fate. Much of the property was sold to the Leathersellers' Company in 1543, who have maintained a presence there ever since. The Character Area mostly escaped destruction in the Great Fire, which only consumed the south-west corner of the area comprising a pocket of land south of Leadenhall and west of Billiter Street/Mark Lane. This limited damage nevertheless gave the Corporation the opportunity to reorganise the market around three large courtyards. The market remained a powerful economic force in the area and was one of the show places in London; in the C17 the Spanish ambassador remarked that more meat was sold at Leadenhall than in all of Spain.
- 19.17. In the early C17 the Jewish community began to return to Britain, semi-formally during the Commonwealth. By 1657 a house on Creechurch Lane was converted into a Synagogue for semi-public worship. Between 1698-1701 Bevis Marks Synagogue was constructed in a small courtyard just off Bevis Marks. It was the first purpose-built Synagogue in Britain since the medieval period, and has endured to the present day as the oldest Synagogue still in use for worship in Britain. It was built for the Sephardi Spanish-Portuguese community; the Great Synagogue was built in the 17th century in Duke's Place and became the main Synagogue for the Ashkenazi German-Eastern European community.

- 19.18. In more secular realms, the area around Bishopsgate and outside the walls remained a fashionable residential district until the mid-late C17, when the West End began to be developed and drew citizens to settle away from the ancient city. Increasing overseas ventures also saw the Character Area begin to gain the maritime associations which have persisted down to the present day. Founded in 1600, the East India Company occupied rooms in the mansion of its first Governor, Thomas Smythe, in Philpot Lane; it then moved to Crosby Hall from 1621 to 1638; it moved around several other mansions in the area before settling in buildings on Leadenhall Street (on the site of the present-day Lloyd's Building). The Royal Africa Company, notorious as one of the leading exponents of the transatlantic slave trade, were headquartered a little way to the east, before the house they occupied was pulled down for the expansion of the East India Company's premises.

Georgian

- 19.19. This period saw the continuing densification of the Character Area, the expansion and enlargement of many of the premises of companies such as the East India; and, perhaps most importantly, the breaches and subsequent demolitions of the City wall and gates, removing the visual and physical distinction between the ancient sites within the walls and the more recent, fashionable suburbs located without.
- 19.20. To the east, the area continued to retain its strong connections with the Jewish community, with several Synagogues constructed in the environs: the Great Synagogue at Dukes' Place (from 1690, rebuilt 1722, 1766 and 1790), the Hambro Synagogue (1725, S of Fenchurch Street), the Great Synagogue at Great St Helens (congregation founded 1761).
- 19.21. By the late C18 a considerable complex of bonded warehouses had been built for the East India Company on land south of Fenchurch Street, between St Katherine's Row and Northumberland Alley. These stored valuable commodities imported from across the globe, including tea and drugs, and were arranged behind a neo-Classical Fenchurch Street façade with a substantial service road on approximately the same alignment as present-day Lloyd's Avenue.

Victorian

- 19.22. In 1841 Fenchurch Street Station was built in the south-east corner of the Character Area. Railways would, over the course of just a few decades, lead to the depopulation of the City as occupiers and workers sought greener, less noisome places to live; the result was to free up large areas of the City, and many small plots, for redevelopment into larger, more monocultural buildings.
- 19.23. The GOAD map of 1887 provides a snapshot of the uses in the Character Area, which at this time were considerably mixed, with a large number of warehouses (of all kinds, from large, bonded warehouses of the EIC to smaller drugs, provisions and 'Fancy' warehouses) jostling for space amongst offices, schools, churches, printers' premises, synagogues, stationers', wine merchants, Livery Halls, public houses and many others. The map also shows the intricacy and survival of the street pattern which, despite some site amalgamations, remained ancient and medieval in character. In 1898 the premises

of the Baltic Exchange were constructed over the former Jeffreys Square, west of Bury Street.

Twentieth and Twenty-First Centuries

- 19.24. The first decades of the C20 saw the rebuilding of two parts of the Character Area to form Edwardian set-pieces in the Neo-Georgian style: Lloyd's Avenue (1900s) and St Helen's Place (1920s). At the former, Lloyd's Register of Shipping consolidated themselves in a splendid new building by Colcut; Lloyd's of London, the counterpart insurance group, moved to their current site on Leadenhall Street – formerly that of East India House – from the Royal Exchange in the 1920s, into a new building by Sir Edwin Cooper, expanded again in the 1930s. In a striking architectural departure from these examples, Holland House was built in 1916 to highly idiosyncratic designs by Dutch architect H.P. Berlage as the headquarters of a Dutch shipping firm.
- 19.25. More and more sites began to be amalgamated into larger buildings. Plantation House was built in 1936 for tea trading and extended in 1951 when it was then the largest office building in the City. Others included Cunard House, Leadenhall House and Bankside House (Leadenhall Street), St Helens Court (Great St Helens') with the result that the fine grain of the Character Area gradually became coarser. Office uses were starting to become dominant in the City, although the overall great variety of uses remained. The area retained its strong maritime associations in the form of the Lloyds, the Baltic Exchange and the presence of many shipping company headquarters.
- 19.26. Looking at the Character Area today, one might imagine it was one of the most severely bomb-damaged parts of the City (in freeing up space for tall buildings) but it actually suffered less damage than other parts of the City. Destruction was confined to relatively small pockets of land: the areas East of Fenchurch Street Station, between Billiter Street and Lime Street, South of Leadenhall Street, the environs of Duke's Place and the area North East of St Mary Axe being the only parts of the Character Area seriously affected; much of it survived, especially compared to the devastation wrought in other parts of the City.
- 19.27. Nevertheless, substantive parts of the Character Area were rebuilt in the second half of the C20, incurring further losses of historic buildings. A transformative example of this was the Commercial Union Plaza laid out in the 1960s to create two towers for the Commercial Union Assurance and the Peninsular & Oriental Line, severely designed to Miesian aesthetics, and set on a spacious, open, part-paved and part-sunken piazza. This swept away the early Victorian P&O complex and other historic buildings in a modernistic gesture then highly unusual for the City, but which would set the tone for the Character Area's subsequent development into the Cluster over later decades. There were other important precedents. On the opposite side of Leadenhall Street, the Edwardian Lloyds' complex was, between 1979 and 1986, supplanted by the Richard Rogers Partnership's hi-tech Lloyd's Building; Tower 42 was, in a significant departure from height restrictions, completed for Natwest in 1981.
- 19.28. Thus precedents were established for significant height and modernism, both spatial and architectural. A further spur for redevelopment came in the early 1990s, when IRA bombs at the Baltic Exchange (1992) and Bisphosphate (1993) caused enormous amounts of damage that required significant rebuilding/redevelopment in the northern half of the Character Area. The Baltic Exchange was too badly shattered to be repaired and was eventually demolished; on its site, after much debate, the seminal 30 St Mary Axe, or the 'Gherkin', was completed in 2004. This was another important milestone in the eventual development of a cluster of architecturally iconic tall buildings.

- 19.29. With the subsequent formulation of view protection policies including the London View Management Framework, the Character Area became in the C21 established as the place in which tall buildings could be accommodated in the City.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 19.30. These are of exceptional variety within the Character Area, ranging from the diminutive (and grade I listed) medieval church of St Ethelburga to the towering form of 22 Bishopsgate, the tallest building in the City at 294.95m AOD. Between these two opposites, a great range of building heights prevails across the Character Area. In the Cluster itself, the apex is found at 22 Bishopsgate and the buildings clustered immediately around it, including 122 Leadenhall Street (238.40m) and the consented form of 1 Undershaft, which if built would then be the apex and tallest at 304.9m AOD.
- 19.31. Immediately to the north are slightly lower but still comparable tall buildings: Heron Tower (217.80m), 100 Bishopsgate (184m AOD) and Tower 42 (199.60m). To the east and south the towers are lower in scale again, such as 40 Leadenhall Street (170m) and 20 Fenchurch Street (173.3m AOD).
- 19.32. As well as these very obviously tall buildings, there many lower buildings disposed throughout the Cluster which are defined as tall buildings by exceeding 75m AOD – including 70 St Mary Axe (90.5m AOD), 120 Fenchurch Street (87.88 AOD), and the grade I listed Lloyd's Building (95m AOD).
- 19.33. Throughout the Cluster are buildings of more traditional scale and height, often historic set pieces such as the Edwardian enclave of St Helen's Place (five storeys), Leadenhall Market (two storeys), Creechurch warehouses (~five storeys).
- 19.34. Finally, there are a number of ancient churches studding the Character Area, the spires of which once defined the City's skyline; these are now seen against the backdrop of taller buildings, often to arresting affect, such as the now-famous view of St Andrew Undershaft juxtaposed against the Gherkin.
- 19.35. Many of these historic buildings are defined as City Landmarks and Skyline features, discussed more fully in section 3. Tall buildings, by virtue of their scale, height and domination of the surroundings often have a landmark quality; this also partly depends on their architecture and form and the extent to which they are perceived as having a particularly iconic or characterful presence. Many of the Cluster's tall buildings have received nicknames and, collectively, have become a defining image of the City; it is therefore not unreasonable to suggest that the Cluster itself is a landmark, particularly in pan-London strategic views.
- 19.36. Tall buildings are thus very much an established, defining feature of the Character Area, which also displays to the most acute degree the extreme variation in height often associated with the City as a whole.

Morphology, Topography and Urban Structure

- 19.37. Topographically, the western half of the Character Area occupies one of the highest points of the City, Cornhill. The Character Area falls subtly in gradient to the east, south-east and more pronouncedly to the south towards the river – visible in particular when looking south along Gracechurch Street. The gentle curve of Fenchurch Street,

transverse across the sloping gradient down to the river, is another illustration of the pre-urban topography.

- 19.38. The Character Area retains the (ancient) bones of its historic street pattern: Bishopsgate, Gracechurch Street, Leadenhall Street, Fenchurch Street, Lime Street, St Mary Axe, Bevis Marks and Houndsditch. These primary routes enclose a street pattern of great variety, with a tendency towards a coarser grain than the rest of the City because of the extensive amalgamation of sites into larger footprints, comprehensive redevelopment and construction of large-footprint towers.
- 19.39. Pockets of finer street grain survive but these tend to be the exception, and are focused in the Character Area's conservation areas such as Leadenhall Market (in which the Market buildings perpetuate the irregular, medieval street pattern), St Helen's Place and the part of Bishopsgate within the Character Area. The Creechurch area also retains a finer grain and plot size. But much has been lost to post-war schemes – notably Great St Helen's, once an extraordinary warren of dog-leg streets and tiny ancient plots, now wholly modern and more amorphous.
- 19.40. The street pattern of the Character Area, though coarsened by extensive redevelopment and road widening/realignment (c.f Undershaft for an extreme example of this), is still of the organic, evolutionary quality that characterises much of the City. Contrasting with this are instances of more formal, designed layouts. The Character Area has two notable examples of Edwardian town planning – St Helen's Place and Lloyd's Avenue. More recently redevelopment schemes have delivered new routes through and around developments, such as at the Gherkin, 120 Fenchurch Street and 122 Leadenhall.
- 19.41. The overall sense of the Character Area is of a dynamically modern place that has arisen from a more ancient predecessor. This creates a picturesque drama to the street scene ; everywhere the pedestrian encounters striking examples of modern architecture, geometries, and forms which are experienced together with a more ancient and evolutionary street pattern, and sometimes ancient material fabric, resulting in a townscape and urban form which is distinctive and idiosyncratic.

Built Form and Uses

- 19.42. In its built form as in other aspects, the Character Area is characterised by extreme variety. The sense of a constant juxtaposition between different qualities including the old and new, small and large, textured and smooth, decorative and minimalist, – which is considered so characteristic of the City as a whole, is acutest in this Character Area.
- 19.43. The Character Area possesses the ancient rubble stone walls of medieval building, found in the compelling patina of St Helen Bishopsgate and St Andrew Undershaft; it has chaste C17 brickwork in the form of Bevis Marks; it has eclectic Victoriana in the French Renaissance stylings of Leadenhall Market; it has the suave Portland stone Baroque of Edwardian office buildings (Hasilwood House, Lloyd's entrance screen); it has experiments in modernism (Commercial Union tower) and postmodernism (Minster Court) and hyper modernism (22 Bishopsgate).
- 19.44. The earliest tower in the Character Area, the Commercial Union building at 1 Undershaft, has a simple, almost minimalist rectilinear form. Over the ensuing decades, tower design would develop in a highly idiosyncratic direction. The NatWest tower takes, as its plan form, the logo of that company extruded upwards, giving it a distinctive profile. Other towers of the later twentieth century were less accomplished: the former Kleinwort

Benson tower at 20 Fenchurch Street was a boxy design with an undistinguished skyline presence.

- 19.45. Subsequent towers have idiosyncratic silhouettes while also conforming to a wider Cluster form with, loosely, its apex at Leadenhall Street/Bishopsgate and its foothills around Fenchurch Street, Bevis Marks and Gracechurch Street, and which is shaped around strategic views of St Paul's Cathedral and the Tower of London. Individual towers are influenced by these constraints, too, sometimes very obviously so: the sloping south elevation of the Cheese Grater, for instance, is entirely due to the need to lean out of and away from the seminal Processional Route views of St Paul's Cathedral.
- 19.46. Other aesthetic moves aim at breaking down the enormous form of these buildings: 22 Bishopsgate succeeds in subduing its bulk with multifaceted elevations and judiciously specified, low-iron glazing, while 6-8 Bishopsgate employs stacked, rectilinear volumes to the same effect. These new tall buildings break totally with the architectural traditions of the past to create an entirely new 'hypermodern' architectural language, their large, glazed elevations acting as backdrops or foils against which the more historic architecture of the area is perceived.
- 19.47. Only in one aspect is the Character Area somewhat lacking in variety: uses. This is the financial heart of the City and as such is dominated almost entirely by office uses that support the City's role as a global financial centre. Relatedly, the area is particularly associated with the insurance industry to a lesser extent than high finance.
- 19.48. Supporting this are a plethora of retail uses and units, largely at the ground floor levels of historic and modern buildings; Leadenhall Market is a retail centre and a Principal Shopping Centre. There are small amounts of residential units around the fringes of the Character Area, including at Creechurch, Bull's Head Passage and fronting Wormwood Street. Places of worship are also to be found in the area, including several Anglican churches and, perhaps most strikingly, the Synagogue at Bevis Marks, the oldest Synagogue in the UK still in use for worship.

Local Views

- 19.49. The Supplementary Planning Documents (SPDs) for Leadenhall Market and Lloyd's Avenue Conservation Areas identify numerous representative local views. In the Leadenhall Market CA, these views are chiefly along the main ancient thoroughfares and in and out of the Market buildings, from which a sense of the ancient, warrenlike character, overlain with eclectic later architecture, may be obtained. In many of these views the tall buildings of the Cluster are an established element of setting and form a dynamic backdrop, particularly in the views north along Lime Street Passage of the Market complex with 1 Leadenhall, 6-8 Bishopsgate, 22 Bishopsgate and 122 Leadenhall forming a dramatically different setting.
- 19.50. In the Lloyd's Avenue CA, the views are chiefly along the eponymous street and of the Edwardian set-piece there; the SPD notes the Gherkin to be a prominent and established element of setting to the north; and views eastwards and westwards along Fenchurch Street of the northern head of the conservation area. Views north out of the conservation area now feature 40 Leadenhall as well as the Gherkin. As further consolidation within the Cluster occurs the presence of tall buildings in this direction will be underscored, becoming more readily appreciable. The published Character Summary for St Helen's Place CA does not note specific views, but the views into and within St Helen's Place are clearly of importance; here, again, the backdrop of the tall buildings of the Cluster makes for a dramatic juxtaposition with the Edwardian CA buildings in the foreground. Views up and down Bishopsgate and looking east at St Helen's Church share this quality; nowhere

in the conservation area are the presence of tall buildings not felt to some degree. In the Fenchurch Street Conservation Area views of the main station frontage and in and around the streets to the south are noted as of importance; these do not have quite the same juxtapositions with tall buildings/the Cluster.

- 19.51. Beyond the Conservation Areas, there are numerous local views which distil the character of the area. In the Creechurch locality, views along Mitre Street looking West at the Cluster offer a spectacular vista of the Gherkin framed by the low-rise C19 and early C20 warehouse buildings. Views of Bevis Marks Synagogue are of great character and importance, too. The Synagogue retains its original courtyard setting and views of it from the street entrance continue to evoke a discreet, non-Anglican (i.e., State) place of worship set within, yet apart from, a densely developed global financial centre, accessed via a narrow alley, quintessential to the city. Views up and down Heneage Lane take in the Synagogue's east elevation, Rabbi's House and Vestry captured in an unfolding series of glimpses.
- 19.52. More widely the Character Area is a place where proliferate now-'iconic' views of historic buildings juxtaposed with new tall buildings. Examples of these include the view of St Andrew Undershaft against the Gherkin, and views of Leadenhall Market against the backdrop of 22 Bishopsgate, 6-8 Bishopsgate and the 122 Leadenhall Street.

Conclusion

- 19.53. The established character and appearance of the area is defined by tall buildings, whether that be the exciting intensity of their tight clustering or their unique and often remarkable contrast with a unique historic environment.
- 19.54. Whilst the area's remaining historic fabric and character is sensitive to change, it is recognised that tall buildings presently make a contribution to how this fabric within the character area is experienced and appreciated from the surroundings. Therefore, tall building proposals which take opportunities to restore, enhance and consolidate the fragmented nature of the historic environment, respond to the juxtaposition of different scales and adopts the highest quality design including, careful consideration regarding how structures meet the ground, have the potential to align with the existing character and appearance of the area whilst minimising harmful impact upon the character area and the assets within it.

Strategic Views, Townscape and Skyline

London View Management Framework

- 19.55. The City Cluster is the only Character Area with no coverage by designated viewing corridors. Protected Vistas pass to the near south of the City Cluster (Riverside Character Area) from Greenwich/Blackheath (5A.1/6A.1), whilst at further distance to the north and west come those Linear Views from Westminster Pier (8A) and Richmond Park (9A). Further tall building development within the Character Area would not directly affect any of the Protected Vistas, but there are wider, indirect, qualitative considerations which affect the Character Area.
- 19.56. The City Cluster – or the constituent parts of it – is identified as a contributing feature in all LVMF views in which it is visible. The LVMF SPG management guidance seeks to strengthen the composition of the Cluster and reinforce the positive aspects of the Cluster's long-established role on the skyline of the capital (paras 57, 87, 129, 130, 144, 146, 187 of the SPG). At para 57 the guidance seeks tall buildings which 'ideally contribute to the development and/or consolidation of clusters of tall buildings that

contribute positively to the cityscape'. As well as this, it is considered that the Cluster aids the observer's appreciation of the wider landscape and cultural topography of London as a recognisable and important landmark element.

- 19.57. The extant City Cluster of tall buildings is identified in the view-specific visual management guidance as a focal point in all six London panoramas. It is recognised that any further consolidation of the Cluster will need to be assessed according to the tests outlined in the NPPF. While strengthening the composition of the Cluster is highlighted within the SPG as a key aim, as outlined above, this does not preclude an assessment of impact upon the historic environment when individual proposals come forward.
- 19.58. LVMF 1A. 1-2 (Alexandra Palace)- From the Viewing Terrace is an iconic, broad and deep panorama from the northern suburbs of London across the Thames basin towards Central London and beyond to the North Downs. The SPG (para 85) identifies the Cluster as a distant focal point allowing for orientation. The visual management guidance (para 87) of the SPG specifically states, "New tall buildings in the panorama should consolidate and improve the composition of the existing clusters of towers and preserve the distinction between the lower density residential character of the middle ground and the higher density character of central London in the background".
- 19.59. LVMF 2A. 1-2 and 2B (Parliament Hill)- This is another famous, strategic panorama of London from one of its best-known eminences. As at Alexandra Palace, given the wide span and depth of the view, the Cluster assists the viewer's orientation, understanding and ultimately appreciation of the view. It is a good point from which to appreciate the Cluster's consolidating conical form, both in picking out individual silhouettes of buildings and their collective presence as a group. The SPG (para 96, 106) recognises the contribution of the Cluster in demarcating in the view the financial district of London; the Cluster (para 97), like the Shard, assists the observer in recognising and isolating St Paul's, whilst the consolidation of tall buildings there allows for an appreciation of the wider Surrey/Kent hills behind the Thames basin, which the guidance identifies as framing the silhouette of the City (para 96).
- 19.60. LVMF 3A.1 (Kenwood, Viewing Gazebo)- In this view from arcadian parkland, an appreciation of the great depth of an otherwise framed view of central London is dependent on built form breaking the silhouette of the distant North Downs. In this respect, the Cluster continues to be a strong orientation point and complimentary feature in an appreciation of the composition and characteristics of the view. St Paul's is perceived at a distance to the City Cluster, which is located to the west and seen here as a grouping of tall buildings distinct to the development around London Bridge which appears in closer proximity to the Cathedral. The consolidation of tall buildings within the City Cluster retains this existing sense of separation and maintains the dominance and focus of St Paul's within this view, as well as preserving views of the wider backdrop of Surrey/Kent hills, in accordance with the visual management guidance of the SPG (paras 119-121)
- 19.61. LVMF 4A. 1-2 (Primrose Hill)- From this relatively low point in the ascent of North London's hills a spectacular panorama of central London can be seen in relatively close detail. The City Cluster is identified as a complimentary feature of the view, though somewhat screened by towers at Euston (para 129), contrasting with the lack of order or coherence of the mix of larger commercial and residential buildings in the middle ground of the view (para 128). Consolidation of the Cluster would assist in reinforcing its clear, conical form, drawing out a sense of composition within the view whilst maintaining the dominance of the Cathedral.

- 19.62. LVMF 5A.1-2 (Greenwich Park)- From the General Wolfe Statue a seminal London panorama can be obtained, of great historical significance. It allows for a full appreciation of London as a great, historic port city focused on the River Thames, with the exceptional, classical group of the Royal Naval College seen in dramatic juxtaposition with the consolidating Docklands Cluster. The SPD recognises the view offers layering and depth (para 144). In the view, the course of the Thames can be traced back to central London, announced by the City Cluster, which is an important orientation point for the observer.
- 19.63. LVMF 6A.1 (Blackheath)- Looking north-west over a dramatic escarpment are fine views of central London with St Paul's Cathedral seen off-centre between the Shard and the City Cluster. The Cluster is noted as a feature of the view (para 153), with 20 Fenchurch Street proud of the main group. At present the Cluster provides a counterfoil to the Cathedral, forming a distinct feature along the horizon line appreciated within this view, contrasting also with the wooded hills of north London seen behind. Further tall buildings which consolidation of the Cluster reinforcing its clear, conical form would preserve the existing character of this view, where they ensure the dominance of the Cathedral remains distinct.
- 19.64. LVMF 10A.1 (Tower Bridge, North Bastion)- The SPG recognises this as a fine, broad river prospect, its character derived from its significant depth and width. It is the only designated River Prospect in which there are two Strategically Important Landmarks (SiL) – the Tower of London and the Cathedral. It allows them both to be read together, and the Tower to be read as a significant part of the rich tapestry of London. In this the Cluster is a prominent feature and focal point of the view between the two SiLs. The SPG (para 182) notes that this centre of the view is occupied by 'prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. 30 St Mary Axe is prominent in its relationship with the ToL'.
- 19.65. The SPG guidance is clear that the relationship between the WHS and the City Cluster are of the utmost importance and should be very carefully managed. Development should not dominate the White Tower (183) or breach the silhouette of the White Tower and visual separation should be maintained between the White Tower and the Cluster (para 186); more widely, the guidance anticipates future consolidation of the Cluster, adding considerably to the 'character and stature' of the view, and that further tall buildings must take account of existing skyline features (para 187) and the requirements of the NPPF, as highlighted above. Further tall buildings in the east or south fringes of the Character Area could unbalance this delicate dynamic and must be very carefully considered.
- 19.66. LVMF 11B.1-2 (London Bridge, Downstream)- This view downstream from London Bridge is from the uppermost extent of the Pool of London, the reach of the river that could accommodate heavy shipping and therefore of incalculable importance to London; the view is an excellent illustration of London's maritime history, visible in the group of maritime buildings and structures on the north bank, and the august grouping of the WHS and Tower Bridge. The tall buildings of Canary Wharf are visible in the distance. While the City Cluster itself is not visible in this view (occluded by Adelaide House and St Magnus House), the south and east stretches of the Character Area lie behind the Riverside Character Area in the foreground. Further tall buildings in these zones of the Character Area could have implications for the setting of the Riverside Character Area, the seminal group of maritime buildings at the Pool and the generally open quality of this part of the City's riverside leading down to the WHS.
- 19.67. LVMF 13A.1 & 13B.1 (Millennium Bridge)- This has, in a short time, become an iconic London view. It is a traditional vista composition - a broad panorama of coherent low-lying townscape anchored on a central axis terminating on the south transept of the

Cathedral, which reigns pre-eminent as the sole SIL. It is one of the best places to view Wren's masterpiece in its wider setting amongst his complementary 'spire-scape' of spires and steeples which punctuate and relieve the (on the whole) low contiguous horizon line, all of which are identified as the principal features of the view. The impact of the St Paul's Heights policy is here appreciable, with a limitation to height readily discernible. The connection to St Paul's Heights generates its own degree of historic interest. This has been diminished by ad-hoc tall buildings of less distinguished architectural form around London Wall/Broadgate, and the omnipresence of Faraday House, but is still legible.

- 19.68. The current Cluster is (just) within the scope of the view, on the far eastern periphery, at a significant distance from the SIL. Consolidation of the Cluster would leave the core facets of the characteristics and composition of the view, unaffected, that is, the principal vista and the long, low horizon skyline punctuated by the Wren steeples. The approach to consolidating growth in the Cluster relieves the pressure on that cornerstone of this strategic approach, the St Paul's Height limitations, in line with para 227/228 of the LVMF SPG. Set at a substantial distance away, the further consolidation of the Cluster would not impinge on the substantial distance between it and the SIL, this would not 'crowd' it, preserving its pre-eminence in line with para 229.
- 19.69. LVMF 15B.1-2 (Waterloo Bridge, Downstream)- These are truly iconic views of the Cathedral, with the western towers and dome forming a powerful composition foregrounded by the extensive trees of the Embankment and seen and appreciated against clear sky. The City Cluster is a highly visible and distinctive feature within the view (and is noted as such in the guidance at para 260). The bridge is perhaps one of the best places from which to appreciate the juxtaposition of the City Cluster and the Cathedral side-by-side – and, indeed, the *frisson* between them which lies at the heart of the City's character and significance. This is also perhaps one of the best views of the Cluster itself, seen from the SW at an oblique angle, with 22 Bishopsgate forming the apex and its sculpted upper reaches reminiscent of a ship's prow, and 6-8 Bishopsgate and the Cheesegrater carefully stacked around it. The relationship between this central point and the falling away in height to the north and south can already be understood and suggests the future form of a consolidated Cluster, a coherent and sophisticated urban architectural skyline. In respect of this view, the SPG explicitly advocates for an approach to new tall building which ensures the sense of a curated composition to the Cluster with 'buildings of a height appropriate to their site and of high architectural design quality' (para 263). Equally it is important to note the SPG also requires new tall buildings to preserve and enhance the composition of the view, and in particular the Cathedral's relationship with its clear sky background and not to dominate the dome or western towers or cause a canyon effect.
- 19.70. LVMF 16B.1-2 (Gabriel's Wharf, Downstream)- This comparatively modern viewing location is an excellent place from which to appreciate the three-dimensional form of the Cathedral (para 279) against clear sky. The Cluster is noted as forming the skyline to the east (para 277), acting as a dynamic counterpoint to the elegant, verdant historic environs of the Temples and Victoria Embankment to the west. From here, also, can be appreciated the relationship between the Cathedral and the Cluster, and there is a wider sense of intricacy and fine grain in the western half of the view contrasting with the density, height and modern geometries of the eastern half of the view in which the Cluster stands. Further tall buildings in the Character Area have the potential to reinforce this quality and create further refinement to the modern skyline provided by the Cluster in this view. In accordance with the guidance within the SPD, proposals for new tall buildings should contribute positively to the existing Cluster (para 281) and that new tall buildings

should not reduce the prominence of the Cathedral when moving between the Assessment Points (283).

- 19.71. LVMF 17B.1-2 (Hungerford Bridge, Downstream)- Of a similar dynamic to the Waterloo Bridge views, the Cluster here is seen to the east of the Cathedral and noted as a feature of the view (para 300). The SPG requires the preservation or enhancement of the Cathedral in respect of any new tall building proposals; new development should strengthen the composition of existing clusters of tall buildings (paras 301-302, 305).
- 19.72. LVMF 19A.1 (Lambeth Bridge, Downstream)
These deep views encompass the Palace of Westminster and, seen distantly but prominently to the far north-east, the City Cluster (para 333). The SPG anticipates the incremental consolidation of the Cluster (para 338). The presence of the Cluster in these views, so far from the City, is exciting and somewhat unexpected; it assists with the observer's orientation and implies the river's course; it makes a bold architectural statement above the verdancy of Archbishop's Park; it acts as a beacon of London's financial centre (the City) seen with its civic centre (Westminster) and an important ecclesiastical complex (Lambeth Palace). Further consolidation of the Cluster could intensify and preserve this quality. Retaining the existing hierarchy within the view, including the hierarchical relationships between Westminster the City and Lambeth Place however remains sensitive to further tall buildings within the Cluster.
- 19.73. LVMF 25A.1-3 (Queen's Walk)- Comprising one Viewing Location and a series of Assessment Points forming a kinetic sequence, these views of the WHS are iconic and some of the best places from which to appreciate several aspects of its Outstanding Universal Value. It is identified in the WHS Management Plan (7.3.22) as the most iconic view of the Tower. A Protected Vista is included from Assessment Point 25A.1 and a Protected Silhouette applied to the White Tower between the Assessment Points 25A.2-3. Along with Tower Bridge, the Cluster is noted as a prominent feature within these views and, with the juxtaposition of the Cluster and the WHS, illustrative of 900 years of London's developmental history (para 410). The SPG notes that this juxtaposition of the WHS seen together with the modern city is an appreciable characteristic of the view, and notes several of the Cluster towers as landmark elements (para 411, including the Gherkin, Tower 42 and the Heron Tower). New tall buildings in the Character Area should consolidate the Cluster to the benefit of these qualities, aiding a sense of intention and composition within the cluster. Notwithstanding these potential beneficial impacts, it is noted this does not negate the sensitivity of the World Heritage Site with regards to its Outstanding Universal Value and the ability to recognise and appreciate this within this viewpoint, and these potential impacts remain the key consideration of any new tall building proposals.
- 19.74. LVMF 26A (St James's Park)- This is another iconic London view and one of the best examples of the English Picturesque, with a distinctive London mix of landscape and townscape. At present, the City Cluster is present in the viewing experience, with 22 Bishopsgate and One Leadenhall present to the right of the Horse Guards/Whitehall Court, the latter forming a picturesque composition holding the middle ground with a clear sky silhouette. The consolidation of the City Cluster south of the apex at 22 Bishopsgate would, on the whole, always be behind the central 'Duck Island' pivot of the view and screened by foliage. The extension of the Cluster in the northwest corner of the Character Area would have more significant implications. In the kinetic experience, Tower 42 and the Heron Tower are both visible, to an incidental degree, amidst the pre-eminent Horse Guards/Whitehall Court composition. New tall buildings affecting these elements of the view would need to be very carefully considered in order to avoid a harmful impact.

LVMF – Conclusion

- 19.75. It is considered the further consolidation of the City Cluster of tall buildings, subject to further sensitivity testing, is compatible in-principle with the preservation and enhancement of all LVMF pan-London strategic views, which deem it a contributing feature. As noted above, this conclusion is without prejudice to assessment for impacts upon setting of heritage assets as required by the NPPF, national and international policy as it relates to the World Heritage Site.

St Paul's Heights

- 19.76. No part of the Character Area lies within the St Paul's Heights Policy Area or features in the backdrop to the silhouette of the Cathedral, thus preserving the clear sky silhouette of the Cathedral in accordance with the guidance at para 2.18-20 of the Protected Views SPD. For the most part the Character Area, defined by its tall buildings on the skyline, is sited and modelled not to 'crowd close' to the Cathedral either, in accordance with guidance at para 2.18. The relationship between the Cluster and the Cathedral is of particular relevance between Hungerford and Blackfriars Bridges, where the Protected Views SPD recognises the importance of a clear skyline gap which should be retained, with taller buildings stepping up from this point. Further consolidation should follow this approach. The relationship between Cathedral and Cluster is most acute on Waterloo Bridge and Hungerford Bridge (north end).
- 19.77. The Viewing Point from Fleet Street, the Processional Route to the Cathedral from Westminster, is of significant influence through the heart of the Character Area; it aligns loosely with Leadenhall Street, and the need to clear sky space around the dome and western towers is clearly seen in the form of 122 Leadenhall Street – in this particular case spawning high-tech structural innovation and iconic modern design in order to achieve this end. Otherwise, the Cluster's skyline presence exerts no influence over the remaining Viewing Points from the north and east. The Cluster is at some distance from the Cathedral in the Stone and Golden Gallery views and further consolidation would not directly affect them.

City Landmarks and Skyline Features

- 19.78. The Character Area contains only one – the Lloyd's Building, a modern tall building at the heart of the area, the skyline presence of which is limited to closer range views at the heart of the dense clustering of tall buildings. However, the size and scale of the Cluster has general implications for views of most of the City Churches with a Skyline Presence in other Character Areas, though the distance between the Cluster and the 'family' of Wren spires/steeple close to the Cathedral has preserved much of that skyline relationship. To the east, City Landmarks such as the former PLA building and Tower Bridge have settings characterised by managed juxtaposition with the tall building clusters in the Character Area and at London Bridge. Consolidation of the Cluster form is of course sensitive relative to City Landmarks and Skyline features but is not in principle incompatible with them.

The Monument

- 19.79. The Character Area falls outside the designated Immediate Setting of the Monument, over which, despite proximity, it exerts little visual influence. It is also outside of the scope of the Monument Views Policy, Views 1-5 in the Protected Views SPD. It is visible in views to the north from the viewing gallery, referred to at para 4.14 of the SPD, and it is not considered that further tall building consolidation in the Cluster would draw conflict with the loose visual management guidance which seeks to protect this spectacular panorama of diverse City buildings, including the principal axes provided by King William

Street, Gracechurch Street and Bishopsgate. In terms of wider views of the Monument (Protected Views SPD, para 4.18-4.26), the Character Area does not exert significant visual influence over the Princes Street & King William Street or Monument Street approaches (4.19-21 & 4.23). Existing, consented and potential new tall buildings would/could be sensitive in those views from Tower Bridge (4.22), Gracechurch Street (4.24-25) and from the South Bank Queen's Walk (para 4.26). Given the current and emerging relationship here between the Cluster and the Monument, which has influenced the Cluster form over time, a consolidated Cluster form could be consistent with the conservation of these views, where compliant with the SPD.

Tower of London World Heritage Site

- 19.80. The Tower of London World Heritage Site (ToL WHS), and a balancing of strategic growth with the conservation of Outstanding Universal Value (OUV), has been at the heart of a consolidating Cluster for a generation.
- 19.81. No part of the Character Area is in the defined Local Setting in the ToL WHS Management Plan. The Character Area does and would exert an influence over the undefined wider setting. The Management Plan anticipates the City Cluster (and others) to consolidate, which it has done between the erection of Tower 42 in 1971 and the recent completion of 22 Bishopsgate in 2022, whilst others are in the pipeline.
- 19.82. Notwithstanding this, the proximity of the Cluster to the World Heritage Site results in a delicate relationship between the two, with the protection of a sense of composition and focus upon the WHS in views where the two are seen together requires careful consideration. As such the eastern boundary of the Cluster, and the sense of an appreciable sky gap between the Cluster and Tower of London are particularly important aspects which make a contribution to the setting and significance of the WHS and are therefore sensitive to change.
- 19.83. By virtue of the Cluster, the Character Area retains prominence in views of and is experienced as a modern counterpoint to the WHS, especially from Tower Bridge and Queen's Walk as identified in the LVMF. Given the current and emerging relationship here between the Cluster and the WHS, which has influenced the Cluster form over time, a consolidated Cluster form could be consistent with the conservation of these views, provided future development pays particular regard to the impact to the OUV of the WHS, as stipulated within and in accordance with the management guidance and the NPPF.

Neighbouring Borough Views

Southwark

- 19.84. The City Cluster of tall buildings is a recognised feature in multiple neighbouring borough strategic views. The LB of Southwark have five designated Borough Views. The CoL is the defining landmark of all with the exception of View 5 (Millennium Bridge to the Tate Modern). These comprise a London Panorama from One Tree Hill (View 1), two Linear Views from Nunhead Cemetery and Camberwell Road (Views 2 and 3) and a River Prospect from Kings Stairs Gardens (View 4).
- 19.85. Views 1, 2 3 are inclusive of Protected Vistas of St Paul's Cathedral which would not over sail the Character Area whose consolidating Cluster of tall buildings would not conflict with Policy 22 of the Southwark Plan (2022) or the associated visual management guidance at Annex 4. The City Cluster is a prominent feature in View 1 (One Tree Hill) and View 4 (Kings Stairs Gardens). From View 1, the Character Area and City Cluster are located a sufficient distance to the right of the central axis view to St Paul's to

preserve the ability to recognise and appreciate the Strategically Important Landmark. The presence of the City Cluster is recognised as a complementary landmark in the view. New tall buildings are anticipated to consolidate and improve the composition of existing and emerging clusters, such as the City Cluster. Similarly, in View 4 from Kings Stairs Gardens, 20 Fenchurch Street and the City Cluster are identified as landmarks in a rich and characterful view containing some of London's most famous landmarks, including Tower Bridge, St Paul's and the River Thames. Notwithstanding this, new development should not obscure the City Cluster and should ensure an appreciation of its set back from the River, retaining visibility of those core riparian landmarks identified above. Overall, the consolidation of tall buildings in the Cluster could be considered to make a positive contribution to the preserving and enhancing the Borough views, their composition and views of significant landmarks and townscape in accordance with Policy P22 and the associated visual management guidance, notwithstanding the tests outlined within the NPPF.

Lambeth

- 19.86. The LB Lambeth consulted of a draft Local Views SPD between November 2020 and January 2021. The Lambeth Local Plan 2020-35 (adopted 2021), Policy Q25(B) (Views), identifies views of local interest and protect their composition and character, which are split into Panoramas (10), Landmark Silhouettes (16) and Roofscape Views. Of those 27, the vast majority would not be affected. Those affected are described as follows:
- i.) St Paul's Cathedral as well as the City Cluster is identified as a landmark within these views, the latter specifically identified from to viewpoints. The visual management guidance relating to this view states that tall buildings in the central of London from here are likely to enhance the view by adding 'richness to the cityscape'. This guidance notes that further intensification of tall buildings including within the Cluster, should not block those identified landmarks, inclusive of both St Paul's Cathedral and the cluster itself.
 - ii.) The distant Cluster is identified as the visual foundation of the view with a neutral foreground and the visual management guidance states that new distant tall buildings will reinforce the landmark status of the distinct City.
 - iii.) The focus of this view is described as the distinct towers of the City of London and St Paul's – the visual management guidance seeks to preserve the relationship between the landmark foreground Christ Church and its relationship with the distant tall building cluster which it states will reinforce the landmark status of the distant City.
 - iv.) A fortuitous axial alignment, which is a well enclosed vista, is identified as focusing on St Luke's Church's landmark tower which is identified as have a complementary traditional form to the modern City Cluster, identified as being the focus of the view. The significance of St Luke's is identified as stemming from its singular form on the skyline, underscored and enhanced by the visible separation from and distance to the City Cluster. The striking visual relationship between the two is described as of importance, and it is noted that development in the foreground/middle ground should not upset this juxtaposition. Notwithstanding this, the SPD anticipates that further distant tall buildings would reinforce the landmark status of the horizon Cluster as outlined within the visual management guidance for this view).

- 19.87. Panorama viii somewhat different in character, it being an urban centre raised river prospect from the terraces of the National Theatre on the South Bank:
- viii.) The view is ascribed as having a rich riparian foreground of an array of landmarks including, but not limited to, those in the CoL comprising the Inner Temple, Unilever House and St Paul's. Consolidation of the City Cluster that would not dominate or compete with any of the landmark buildings, would in principle avoid a diminishment of the ability to appreciate and recognise those landmarks identified above acceptable, subject to further detail and tests outlined within the NPPF, as well as adherence to management guidance.
- 19.88. Development in the City Cluster is relevant to Landmark Silhouette View xviii, from the South Bank Queen's Walk to St Paul's, between Waterloo Bridge and Oxo Tower Wharf, the kinetic experience:
- xviii.) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and Borough Boundary: The visual management guidance identifies the primacy of St Paul's in the kinetic viewing experience and that the City Cluster is sufficiently separated so as not to cause visual intrusion, but that taller buildings around London Wall do intrude to the detriment of the silhouette. The Cluster at present does not obscure the Cathedral and, given the separation between the two, it is considered consolidation of the Cluster form would not, in principle, be intrusive, unsightly or visually dominate or compete with the Cathedral, subject to further sensitivity testing.
- 19.89. In all instances it is considered that, without prejudice as relates to further sensitivity testing the consolidation of the City Cluster has the potential to enhance the stature of these local views. In the identified views assessed above, it has been demonstrated that there is an established juxtaposition between old and new. As relates to these views, it is not considered that the consolidation of the Cluster would block or detract from an identified landmark element and further tall building development could serve to reinforce the composition and character of these views, in accordance with Policy Q25 and associated emerging guidance in the Local Views SPD.

City of Westminster

- 19.90. The City of Westminster refer in the City Plan (2019-40) (adopted 2021) to local 'Metropolitan Views', referenced at Policy 40(F) (Townscape and Architecture) and para 40.17-19. This document commits to publishing a list of such views and preparing guidance on their management.
- 19.91. There is a 2007 draft Metropolitan Views SPD containing 45 local views such have been used for the purpose of this exercise. Of the 45, it is only considered the Cluster has the potential to affect six, which are V13, V21, V22, V25, V34 and V43, ranging from a very limited (if at all) degree (V13) to a modest degree (V25, 34) to a more significant degree in riparian views (V21, V22, V42 & V43).
- 19.92. From View 13 (Palace of Westminster from Hyde Park), the summit of the existing Cluster is in theory visible from the kinetic Viewing Area, albeit to a limited degree around the tree canopy line in the apparent far distance. This distance is such that, no material influence on the foreground, middle ground or background landmarks of the Westminster World Heritage Site is appreciable. Subject to further sensitivity testing, given the distance and only slight visibility of the Cluster as existing, further tall building within the City Cluster,

which retained the existing hierarchies and focus within these views would be considered appropriate.

- 19.93. In View 25, Lambeth Palace from Lambeth Bridge, the consolidating Cluster can be seen in the far distance, however the distance is such that perceptibility is weather dependent. The palace silhouette is seen alongside distant tall buildings, as identified in the visual management guidance. This guidance notes the view is potentially sensitive to high buildings around Blackfriars Road/London Bridge. With regards to the City Cluster, this is experienced as a recessive feature in the view, with a sense of composition appreciable in its tapered summits, creating a positive juxtaposition with the pre-eminent principles and cupolas of the Palace.
- 19.94. Similarly, in V34, the distant City Cluster is visible (weather dependant) as part of a dynamic experience from the bridge at Green Park. Here on the whole, it is seen behind the Duck Island, much less visible when the trees are in leaf. While the visual management guidance considers the view vulnerable to closer high buildings at Waterloo/Blackfriars Road, the distance of the City Cluster is such that the picturesque quality of contrast between the cluster and elaborate historic roof line in the foreground contributes positively to the view.
- 19.95. V21 and V22, both towards St Paul's from the environs of Sommerset House (Victoria Embankment and the terrace). This view is dynamic, reflecting the kinetic experience of evolving foreground as the terrace or embankment is traversed. Dependant on seasonal foliage, the background of the dome interfaces at points with the Herron Tower and 100 Bishopsgate as the viewer crosses. These moments are however fleeting, with the Dome of the Cathedral remaining appreciable as an intact silhouette against the sky. The potential impact of new tall buildings within this view would therefore need to be assessed in detail but could be acceptable should they avoid further collision with the Cathedral across the full extent of the terrace or embankment view.
- 19.96. V42/43, from Waterloo and Hungerford Bridges, go beyond the LVMF and comprise the whole dynamic extent of the bridges. Tall buildings are a recognised part of these views, as identified within the visual management guidance. The relationship between tall buildings and the Cathedral remains sensitive, however there is a potential for further tall buildings to contribute positively with regards to a sense of composition along the skyline. Notwithstanding the requirement for individual proposals to comply with Policy 40(F) of the Westminster City Plan, further tall buildings within the cluster could therefore remain in accordance with the visual management guidance outlined within the SPD.
- 19.97. Overall, it is considered, subject to further sensitivity analysis, further tall buildings within the cluster would not create an in-principle conflict with Westminster's Metropolitan Views, acknowledging that there is potential for tall buildings to contribute positively to the creation of a nuanced composition to the skyline whilst conserving heritage significance, in accordance with Policy 40(F).

LB Islington Local Views

- 19.98. The LB of Islington have eight designated Local Views which are identified in Policy DM2.4 of the Development Management Policies (2013), with associated guidance at Appendix 1 of the same. LV1-8 contain protected vistas towards St Paul's Cathedral in the CoL, which the Policy seeks to protect and enhance. No viewing corridor to the Cathedral, as demonstrated in the Islington Policies Map, would be affected by the consolidation of tall building in the City Cluster Character Area. Neither would the City Cluster Character Area, at present or through consolidation, be visible from an identified

Viewing Area (LV1, Appendix 1). The City Cluster would only be visible in those more distant views from LV4, LV 5 and LV 7, from Archway Road/Bridge and Dartmouth Park Hill. From here, any consolidation of tall buildings in the Character Area would be seen well to the east of St Paul's, preserving a recognition and appreciation of it, whilst potentially consolidating the emerging landmark singular form of the City Cluster and enhancing the legibility and composition of the views. It is considered that the potential expansion and consolidation of the City Cluster, in principle, could protect and enhance Islington's Local Views in accordance with Policy DM 2.4.

Conclusion

- 19.99. The Character Area, whilst defined by existing and consented tall buildings on a macro townscape level, is still sensitive to new tall building development, in particular in those more localised central London LVMF views, and in particular the River Prospects. However, in principle, the policy framework outlined above seeks further consolidation of the Cluster, which subject to detail could enhance the characteristics and composition of these views. In those wider, more distant London Views, in particular from higher vantage points, the consolidation of the Cluster, in principle, could protect and enhance the characteristic juxtapositions, compositions and legibility of these views.
- 19.100. Whilst remaining sensitive, in principle, it is considered that in terms of strategic townscape heritage and skyline, further tall building development is of lesser sensitivity in this Character Area than elsewhere within the City of London.

Heritage Significance

Overview of Heritage Assets

Listed Buildings

- 19.101. **Grade I** – 7, including St Helen Bishopsgate, St Ethelburga, St Andrew Undershaft, St Katherine Cree, Lloyd's Building, Bevis Marks Synagogue, All Hallows Staining.
- 19.102. **Grade II*** - 5, including Leadenhall Market, Holland House and Lloyd's Register.
- 19.103. **Grade II** – 29, including 19-21 Billiter Street and Hasilwood House
- 19.104. As existing Tall Buildings make an established contribution to the settings of most, of the listed buildings within the character area. The nature of this contribution varies from asset to asset, as set out in Historic England's setting guidance note GPA 3.
- 19.105. Those with skyline features i.e., pinnacles, spires, steeples etc designed to be seen against clear sky are most sensitive; those with unadorned or unexpressed roofs less so. Where the setting, immediate or otherwise, of a listed building contributes to its significance, then tall building proposals would be sensitive. An example would be Bevis Marks Synagogue, where the low-midrise buildings enclosing the synagogue and its courtyard are an element of setting which contribute positively to its significance. This sense of enclosure is therefore sensitive to tall building development.
- 19.106. Normally such highly graded assets would be exceptionally sensitive to tall building development, were their skyline features seen against clear blue sky. But it is inescapable that they are now in a vastly changed context, in the heart of the long-established Cluster of tall buildings. In this Character Area, acute juxtaposition is now an established dynamic

and, while not always positive or successful, is also not inherently a negative quality. The cumulative effect of further tall buildings remains an important parameter against which any future development must be assessed.

Scheduled Ancient Monuments

- 19.107. 5, including the remains of the Forum-Basilica under Leadenhall Market and the remains of various sections of the Roman and medieval City wall and the Bishopsgate.
- 19.108. Given their largely below-ground invisibility, there is no in-principle sensitivity to the development of tall buildings; indeed, tall building development on their sites, if in-principle acceptable and appropriately designed, could provide new interpretation and access to these monuments.

Conservation Areas

- 19.109. These conservation areas are small and tightly defined, thus reducing the potential for them to become truncated, with them drawing more limited contribution from elements of setting. The setting is one defined by the presence of the long-established Cluster to the extent that is its understood and recognised, even sometimes valued context. Subject to an appropriate policy and guidance context, there is no in-principle conflict between the Character Area's conservation areas and the continued consolidation of the tall building cluster.
- 19.110. Leadenhall Market The SPD for this conservation area (2017) articulates key elements of its character, appearance and significance as:
- (i) The grade II* listed Victorian market buildings – an outstanding example of a Victorian market and a remarkably cohesive and immersive experience;
 - (ii) Vibrant mix of uses and activity, complementing the financial/insurance uses in the area;
 - (iii) Highly significant archaeological remains relating to the C1 Forum-Basilica and medieval Leaden Hall;
 - (iv) Great contrast between the scale of buildings, streets and spaces within and without the CA, resulting in dramatic townscape views;
 - (v) Preservation of the medieval street plan within the C19 market, offering an intricately layered plan form and retained historic thoroughfares;
 - (vi) An area increasingly experienced from higher level viewpoints where the appearance of its roofscape is of special importance.
- 19.111. Most of significance is drawn from the physical form and remaining integrity of the Conservation Areas tightly drawn boundaries, inherent in its surviving street pattern, grain and built form. Being self-contained, it draws only modest contribution from elements of setting, namely, that associated relationship with the activities of the City's commercial core, the relationship with complementary historic contexts (Bank and Eastcheap Conservation Areas) and that remarkable, unique, relationships of contrast and scale which exist with those tall buildings on its periphery.
- 19.112. Located just south of the 'apex' of the Cluster at the junction of Leadenhall Street and Bishopsgate, this Conservation Area has an established and well-defined setting of tall buildings immediately to the north, and an emerging context of consented, unbuilt tall

building schemes to the west and south along Gracechurch Street. As set out in the SPD, the contrast between the scale of the conservation area and the established, dramatically different setting of tall buildings immediately surrounding is considered to form a key part of its character, appearance and significance.

- 19.113. This conservation area is therefore less sensitive to tall building development within its setting, provided that any new tall building proposals clearly elide with the established backdrop of modern towers and form a positive juxtaposition with the buildings and spaces within the conservation area. In principle, there is no intrinsic conflict between the consolidation of the tall building City Cluster, and the conservation, even enhancement, of the asset, subject to an appropriate design which preserves and enhances the integrity of the conservation area's essential physical form and accentuates the remarkable contrast with the enclosing Cluster.
- 19.114. St Helen's Place Being rather discursive in structure, the published Character Summary (2000) for this conservation area does not explicitly state the key elements of character, appearance and significance; however, the following might reasonably be extrapolated both from the document and analysis of the area today:
- (i) Rare survivals of medieval churches, St Helen Bishopsgate and St Ethelburga;
 - (ii) Archaeological potential for the extensive precincts of the Priory of St Helen;
 - (iii) Deep associations with the Leathersellers Company, the patronage of which massively shaped the area from the Reformation onwards;
 - (iv) An Edwardian, formally planned townscape set piece unusual in the City; a group of three modest historic buildings on Bishopsgate that illustrate the street's appearance through most of history, but lost to recent times and
 - (v) Great contrast between the scale of buildings, streets and spaces within and without the CA, resulting in dramatic townscape views.
- 19.115. Located to the north of the Cluster 'apex', this Conservation Area lies in the north-west zone of the Character Area and is surrounded by tall buildings: Tower 42 to the west, 100 Bishopsgate to the north, the Gherkin to the east and 22 Bishopsgate and 1 Undershaft to the south. This dramatic setting of the Conservation Area will be intensified with the implementation of consented, unbuilt schemes at 1 Undershaft and 100 Leadenhall Street.
- 19.116. Given this proximity, the contribution of setting to significance is particularly limited in this case specifically within the CoL context. This contribution is considered minor relative to the significance drawn from its physical form. Where setting is considered to make a beneficial contribution to significance, this is principally through localised historical and architectural relationships, such as with the Bishopsgate Conservation to the north and Bank immediately to the west. The current setting of the whole Conservation Area is one defined by the emerging tall building Cluster on all sides providing a backdrop and dramatic counterfoil as a result of the contrast in scale.
- 19.117. In principle, there is no inherent inconsistency between the continued consolidation of the tall building cluster and the conservation (and potential enhancement) of the asset, subject to an appropriate policy and guidance framework and judicious assessment on a case-by-case basis.

- 19.118. Creechurch (part) This conservation area has only recently (11 January 2024) been designated and is the City's newest. As such, the SPD for this conservation area is in preparation and not published. However, the conservation area proposal considered by Planning and Transportation Committee on 12 December 2023 provides an initial assessment of the main elements of character, appearance and significance as follows:
- (i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern
 - (ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City
 - (iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church)
 - (iv) A proliferation of historic open spaces of diverse scales, functionality and appearance
 - (v) Strong and continuing associations with the Jewish community following resettlement in the C17, exemplified by the presence of Bevis Marks and the sites of the First and Great Synagogues
 - (vi) A place of contrasting architectural scales, juxtaposed dramatically with the backdrop of tall buildings in the City Cluster.
- 19.119. The conservation area's boundaries are tightly defined to capture the special architectural and historic interest, and distinctive character, of the Creechurch locality. The conservation area draws only a limited contribution to significance from setting.
- 19.120. Located in the eastern part of the Character Area, this conservation area lies at the existing Cluster's eastern edge and as such has an existing setting of tall buildings to the west (the Gherkin), south (40 Leadenhall) south-west (the Scalpel) and north-west (70 St Mary Axe). The conservation area contains an existing tall building – One Creechurch Place – and the site of another implemented permission for a consented tall building (Bevis Marks House).
- 19.121. There is not an in-principle conflict between the conservation of the physical form of the Conservation Area and further tall building within the character area. Further tall building development potentially could reinforce an appreciation of the conservation area's location near the heart of the City's commercial core.
- 19.122. Lloyd's Avenue The SPD for this conservation area (2012) sets out the main elements of character, appearance and significance as follows:
- (vii) Rich history spanning a number of periods, including the medieval church of St Katherine Coleman, the East India Company and Lloyd's Register;
 - (viii) A townscape which varies according to different periods of development and responds to the natural and historical topography of the area;
 - (ix) A group of listed and unlisted buildings of consistently high architectural quality and high conformity in scale, design and street plan; and;
 - (x) An area focused on a collection of buildings along Lloyd's Avenue which have solid masonry facades, regular punched openings, abundant classical modelling and surface detail. It possesses a tall building in the form of the Lloyd's Registry tower at Nos. 68-71 Fenchurch Street.

- 19.123. As with other Conservation Areas here, its boundaries are tightly defined, forming a coherent distinct ensemble. As above, the conservation area draws only a limited contribution to its significance from setting. That more limited contribution draws principally from its location appreciably amidst and part of the City's commercial core, underscoring the historic function and intended use of many of the buildings within the conservation area interior. This commercial core includes some buildings of complementary form near its edges.
- 19.124. Located to the east of the Character Area, this Conservation Area lies more towards the 'foothills' of the Cluster, where the heights of tall buildings, both built and consented, step down in response to the setting of the World Heritage Site. To the north, the tall buildings at 40 Leadenhall Street and the Gherkin form prominent elements of setting.
- 19.125. There is not an in-principle conflict between the conservation of the physical form of the Conservation Area and further tall building within the character area. Further tall building development potentially could reinforce an appreciation of the conservation area's location near the heart of the City's commercial core and the proximity of the insurance industry.
- 19.126. Bishopsgate (part) Only a tiny part of this conservation area is included in the Character Area: that part comprising the Heron Plaza scheme and the low-rise row of buildings fronting Devonshire Row. The Heron Plaza scheme is a tall building, hence the inclusion in the Cluster; this corner of the conservation area is defined by its dramatic contrast in scale with the buildings of the Cluster immediately to the south. As such, it is not considered overly sensitive to further consolidation.
- 19.127. Eastcheap (part) The Conservation Area is very much at the edge of the Character Area and is a transitional zone. A short 'arm' of the Conservation Area extends up Philpot Lane, in amongst the transition to the City Cluster proper. It has the familiar tight borders which seek to tie together a cogent historic environment from what war-damage and post-war redevelopment left as a more truncated setting.
- 19.128. The primary significance of the Conservation Area is drawn from the earlier street pattern focused on the principal historic throughfare of Eastcheap, with good survivals of the Victorian commercial City associated with the River Thames and including two exceptional Wren Churches. It draws a significant contribution from setting, in particular in its relationship with the River, Custom House and Old Billingsgate to the south, but also as a bridge to a wider historical setting – the Tower of London to the east, St Paul's to the west and the wider setting of the Monument to the southwest.
- 19.129. There is no in-principle conflict between the conservation of the physical form of the asset, from which it draws its substantive significance, and the consolidation and development of the City Cluster. There is no real potential for consolidation to diminish further those important elements of setting, which are the relationships with the River Thames and historic environments to the west, east and south, in principle.
- 19.130. Fenchurch Street Station (part)- The Character Area encompasses most of this small conservation area (excluding only that part south of Crutched Friars), the character, appearance and significance of which is drawn from the Station façade, surviving Victorian railway infrastructure and the planning thereof, and a characterful group of significant C18, C19 and C20 buildings along Crutched Friars. While the layout and street grain of the conservation area make views into the Character Area difficult, existing modern buildings in the southernmost areas of the Character Area form a backdrop, as do those to the south in the Riverside Character Area, and these provide a neutral contribution to the conservation area's setting, signposting its location within the centre of

the metropolis. Further tall building development in the Character Area may consolidate this backdrop quality. Notwithstanding the need to retain a sense of enclosure within the views identified above in order to avoid a harmful impact, further tall building within the character is not considered to be in principle harmful to the conservation areas setting and significance.

Core City Typologies

- 19.131. High Finance – the Character area contains the Lloyd’s Building, an outstanding expression of a prestige High Finance building in a highly modern idiom; otherwise, it has fewer examples of this typology.
- 19.132. Offices – the Character Area exhibits examples of historic office buildings from the mid-Victorian period onwards; 19-21 Billiter Street, St Helen’s Place, Hasilwood House, 32 St Mary Axe (Spillers, now Baltic Exchange), Holland House, and others.
- 19.133. Civic/Institutional – the Character Area has one livery hall: Leathersellers’ Hall, in an undemonstrative Edwardian classical style.
- 19.134. Ecclesiastical and City Churchyards – the Character Area is rich in examples of these: Bevis Marks Synagogue, St Andrew Undershaft, St Ethelburga, St Katherine Cree, St Helen Bishopsgate. Unusually, none of them are Wren churches; all are either surviving medieval churches, much restored, or a rare example of an early C17 Laudian church. . All distributed in the northern half of the Character Area. Their comparatively diminutive qualities mean they have less landmark quality than other of the City churches; their skyline features are for the most part simple cupolas, turrets or pinnacles.
- 19.135. Markets – The Character Area is the location of Leadenhall Market, one of three surviving Victorian market buildings by Horace Jones, City Surveyor.
- 19.136. Retail and Hospitality – The Character Area has some examples of these: the Leadenhall Market complex and public houses therein (New Moon, Lamb and Swan), the East India Arms.
- 19.137. Tall Buildings – Unsurprisingly the Character Area is exceptionally rich in this typology, though interestingly is significant only for recent height, lacking the taller spires of the Wren churches or other examples of historic heights such as the early C10 steel-framed office blocks. From the post-war period onwards, the Character Area became increasingly associated with this typology, a trend that accelerated with the formation and clarification of view protection policies which gave it a new status as the only part of the City outside the main viewing corridors.
- 19.138. Warehouses – The Character Area contains a number of these, clustered in the Creechurch locality; though converted to other uses, they form a fine and well-preserved group of late C19 warehouses of a kind that has survived only sporadically in the City. There is another fine example at Nos. 43-44 Crutched Friars.

Core City Significance Traits

- 19.139. **AGE** – The west and south-west zones of the Character Area were some of the earliest parts of the City to be settled, and swiftly became an administrative and commercial locus for Londinium. It has been inhabited ever since (although the early Saxon phases of occupation are less well understood); moreover, monuments from the Roman era to the present day have survived. It is an extreme example of the City’s ‘palimpsest’ quality.

- 19.140. **COMMERCE** – The Character Area was the location of the Roman administrative and commercial core at the Forum-Basilica located on Gracechurch Street/Leadenhall Street; barring the early Saxon interregnum, it has retained the status of a commercial locus since that time. In the early C17, it was the location of a number of overseas trading companies, now notorious: the East India Company and the Africa Company, and later became the centre of Insurance. Today, the Cluster is often used as visual shorthand for the City/London's status as a global financial centre.
- 19.141. **PEOPLE** – The Character Area has associations with specific notables including Archbishop Laud, John Stow, Samuel Pepys,
- 19.142. **COSMOPOLITANISM** – the eastern zones of the Character Area became, in the C17, a notable settlement for the Jewish community and retain these associations today in the form of Bevis Marks Synagogue; the area possesses strong associations with maritime trade and particularly the Baltic states through the presence of the Baltic Exchange.
- 19.143. **STREET PATTERN** – The Character Area incorporates streets originally laid out in the Roman, Saxon and medieval periods; although much-changed, the bones of this layout remain.
- 19.144. **VARIETY & DIVERSITY** – the City Cluster perhaps expresses most acutely this trait of the City, appearing as though an extreme palimpsest where buildings from all phases of the City's history jostle together with the intense modernity of the tall buildings of the Cluster.
- 19.145. **ARCHITECTURAL CALIBRE** – The Character Area strongly exemplifies this trait, in both its historic and modern buildings, from the understated elegance of the Synagogue through to the idiosyncratic faience of Holland House, the superlative and now-iconic form of the Gherkin and others.
- 19.146. **HEIGHT & SKYLINE** – the epicentre of the City's tall buildings. In a neat paradox, the City churches here are the most diminutive in the square mile, meaning that for historic height the Character Area is not as superlative; it is the modern, secular tall buildings in the Character Area which best express this trait of the City's significance, and which in recent years have become an immutable part of the City's identity.

Conclusion

- 19.147. Overall, the coverage of designated heritage assets within the Character Area is about average in a City context; and many of these have established, modern and often strikingly dynamic settings. Similarly, the Character Area is not specifically rich in particular typologies. Given the City Cluster represents the apex of height within the CoL context, the sense of picturesque contrast with more ancient fabric associated with the origins of the city is here most tangibly experienced. This in turn enhances a sense of historic continuity, noted as at the core of the CoL's wider significance. Therefore, these traits are not considered in principle, to be fundamentally incompatible with tall buildings. Accordingly, the Character Area is considered to be only sensitive in respect of heritage significance.

Overall conclusion: Sensitivity to Tall Buildings

- 19.148. Through a long pedigree of high-rise development, the Character Area has become a striking symbol of the modern City. This means it has gained the character and

appearance that is comparatively less sensitive in principle to further tall building development; and is in a similar condition in respect of heritage significance. The Character Area is fortuitously placed in relation to St Paul's Cathedral, the Tower of London, the Monument and the river, and these landmarks are seen together and in proximity to the character area in many of the views which are considered to define London's identity. Further tall buildings within the character area is therefore not, in principle, considered incompatible with the existing positive ways in which the character area contributes to the character and significance of the City of London, or those landmarks and heritage assets within it. It is however acknowledged that these landmarks include those of the highest heritage sensitivity and any further development will need utmost consideration, to ensure a beneficial or neutral impact upon these asset's significance. For all these reasons, with its established and consolidating Cluster of tall buildings, the Character Area is considered **sensitive** to tall building development.

Character Area: Liverpool Street & Broadgate

Introduction

- 20.1. The Character Area is, like the rest of the City, well connected by all forms of transport. It has a TfL Public Transport Accessibility Level of 6b, the highest level of public transport accessibility in the Capital. Liverpool Street Station is a major interchange between National Rail, the Elizabeth Line, TfL Rail and the London Underground Hammersmith and City, Circle, Metropolitan and Central Lines, as well as many bus routes converging on Bishopsgate, the Character Area's main artery. A London Streetspace Plan route runs along Bishopsgate.
- 20.2. The Character Area is predominantly contemporary redevelopment around the major transport interchange of the 19th century station. The uses are largely commercial, and the buildings are large scale in terms of height and footprint. There are small pockets of historic frontages however the prevailing period is postwar and the architectural language and scale of most of the area is modern. The Broadgate complex occupies the majority of the Character Area directly west, north and east of Liverpool Street Station. Earlier phases of building include Liverpool Street Station and the Great Eastern Hotel (nineteenth century)), and small pockets of historic frontages to the west and south-east of the area; the boundary of the Bishopsgate Conservation Area overlaps with the latter.
- 20.3. The scale of development within the Character Area is generally lower to the south and west, of 4-8 storeys, and rising to a more mid-rise scale flanking the train shed. A taller building, the Broadgate Tower, stands in the northernmost part of the Character Area. Liverpool Street & Broadgate's defining character is of a major inner-city transport interchange which has acted as a catalyst for large-scale commercial development on its edges.

Historic Development

- 20.4. Liverpool Street and Broadgate was located outside of the Roman city limits and for much of the capital's early history, chiefly used as a burial ground. The land was drained during the medieval period, and unconstrained by the city walls, a more spacious suburban street grain prevailed. The area has early associations with French immigrants and traders from Europe and these new poorer populations contrasted with established residents of the more expansive established estates. In 1247 Bethlem Hospital was founded on the site of the current Liverpool Street Station, before moving in 1676. The hospital was replaced with a network of alleys and courts, densifying throughout the seventeenth century as they became subdivided.
- 20.5. While much of the area survived the Great Fire, during the nineteenth century extensive large-scale intervention dramatically altered the character of the surroundings and interior of the character area as the railways reached the capital. Liverpool Street itself was established in 1829, and many of the surrounding historic commercial buildings re-fronted.
- 20.6. The Great Eastern Railway company, formed in 1862, was particularly influential in the redevelopment of the area. Prior to the clearance of the site, the character area was considered to be one of the most 'poverty stricken, dirty and unhealthy' in London, a reputation which made clearances more palatable. Notable losses during this period included the London Workhouse and Paul Pindar's House.
- 20.7. Liverpool Street Station was constructed in two phases, the first beginning in 1872 to 1875, with an extension east completed in 1894-5. The station is celebrated for its

engineering, its platforms located approximately 5m below existing ground level. They were framed by imposing L-shaped, Neo Gothic buildings. A ramp down, led from the area of the present Hope Square onto the concourse. The low-level tracks and platforms enabled the integration of the lines with the Metropolitan Railway, which itself was being extended eastwards from Moorgate. The Great Eastern Hotel was constructed at the junction of Liverpool Street and Bishopsgate, providing a grand frontispiece for the station, and included a number of opulent, interior reception rooms. The grandeur of these spaces is reflected in the decorative turreted roofline to the hotel, which in turn possesses a landmark presence within the local streetscape.

- 20.8. While the station itself largely survived the Second World War, contemporary Bomb Damage Maps show the area to the northwest above Sun Street sustained considerable damage, and the majority of buildings along Earl Street and Finsbury Market marked for clearance. The map shows the railway lines to the north of the station at this time still open to the sky, with Pindar, Primrose and Worship Street all oversailing large areas of track below. These areas were to be completely transformed throughout the late twentieth century as part of post war rebuilding works.
- 20.9. Liverpool Street Station was extensively altered and extended between 1985 and 1992, occurring alongside the closure of Broad Street Station in 1986. British Rail architect Nick Derbyshire proposed an historicist extension of the 1870s trainshed, extending the two wrought-iron naves in steel, which connected to a second southern transept running behind the Great Eastern Hotel and over a new concourse beneath. All of the existing 1890s second phase fabric of the station was lost at this time. The Sun Street Passage screen wall was extended, and a longer Bishopsgate elevation established, with new entrances to Hope Square and Bishopsgate created with flanking towers. 50 Liverpool Street was rebuilt to replicate the southern pavilion of an original office range, and this structure is thought to incorporate salvaged fabric.
- 20.10. The closure of Broad Street Station engendered a period of extensive redevelopment to the west and north of the station, known as the Broadgate development. The station itself was replaced by Broadgate Circus, a shopping and office complex. This was built in phases to designs by Arup Associates amongst others. 1, 2 and 3 Finsbury Avenue were first to be completed in 1986, followed the next year by 1 and 2 Broadgate and the Broadgate Circle. 100 Liverpool Street and 8-12 Broadgate were completed by 1988, before being conjoined as a single building in 1998, creating a single ground scraper north of the station. Central to the redevelopment at Broadgate is development Exchange House, a 10-storey office building which rises to 78 metres, completed in 1990. The building spans over 18 railway lines now enclosed beneath. This key constraint informed the distinctive structure of the building, which is expressed on its façade, creating a strong architectural character consistent with the 'high-tech' aesthetic of late twentieth century architecture. The huge column-free public space beneath the building created new pedestrian links from Liverpool Street Station north up to Shoreditch. From Exchange House it is possible to look into the station, across Exchange Square, where the pleasing contrast between Victorian trusses and the contemporary architecture can be appreciated.
- 20.11. Much of the Broadgate development has now been refurbished, with extensive improvements to the public realm surrounding Exchange Square. In 2008, SOM completed the Broadgate Tower, which became the fourth tallest building in the City of London. Nos. 3, 4 and 6 have been demolished and replaced with 5 Broadgate (Make Architects, 2015) Broadgate Circle was refurbished in May 2015. 1 Finsbury Avenue was listed Grade II in January 2015 and planning permission and listed building consent were

subsequently granted in November 2015 for the refurbishment and extension of the building.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 20.12. The height of the Character Area is largely modern, generally ranging between 6-20 storeys, with marked increases in height towards the north of the area. To the west, the height of the Character Area is broadly consistent with that in the neighbouring Bank Character Area, rising as it progresses west to a more monumental scale encircling the trainshed, fronting Bishopsgate, and in the north of the Character Area where the Broadgate Tower is located. If the consented scheme at 2-3 Finsbury Avenue is implemented the new building at 2-3 Finsbury Avenue will be a tower that is similar in height to Broadgate tower, creating a change from the broader townscape character described above.
- 20.13. The historic station buildings and trainshed are lower scale height and encompass chunks of the south and the centre of the Character Area a large amount of area. There are pockets of more traditional scale in the W corner (corner Eldon St/Wilson St) and the section of Bishopsgate CA overlapping in the SE corner of the Character Area – otherwise, buildings are of a more mid-rise scale.
- 20.14. Landmarks in the Character Area include Liverpool Street Station and the Great Eastern Hotel. Broadgate Tower takes the form of a podium block to Bishopsgate, which conforms to the general scale of the rest of the CA, with the tower element above (171.5m), aligned roughly SW-NE to fit into the gap between LVMF WSCAs. The height of the tower makes this building a landmark.

Morphology, Topography and Urban Structure

- 20.15. The Character Area's present form has been almost entirely shaped by the late nineteenth and twentieth centuries: the arrival of the railway station, then redevelopment of the railway lands around the trainshed. The result is a stretch of the City that is quite unrepresentative – there is no fine historic grain or street plots similar to those that can be found elsewhere aside from the little group of narrow frontages including the RC church to the west. The street plan otherwise consists of large, mostly rectilinear shapes arranged on axis with the orientation of the railway tracks and platforms in the trainshed.
- 20.16. Much of the street pattern is modern, reflecting intervention and development around Broadgate which deliberately strive to create interesting or dynamic moments, such as the Broadgate Circle. The prevailing street pattern is orthogonal and reflective of a sense of intentional urban planning, in contrast to the more organic, evolutionary and fortuitous streetscapes found elsewhere within the CoL. Bishopsgate is the main and most ancient artery in the Character Area contrasting with the areas of modern intervention described above – a broad irregular curve dominating the E of the character area.
- 20.17. The Character Area is relatively rich in open spaces, the majority of which have been shaped by post-war redevelopment: Exchange Square, the generous spaces between buildings in Broadgate focused on the Rotunda. Hope Square is an important

commemoration of the *Kindertransport* of Jewish refugee children shortly before the outbreak of the Second World War.

Built Form and Uses

- 20.18. The Character Area consists mainly of large, orthogonal blocks, generally with large footprints, clad in stone, metals and generally with large window openings. Broadgate was a pioneering site for modular, quick-build office construction. The guiding priority was rapidity of assembly and efficiency of plan/layout. No. 1 Finsbury Avenue by Foggo was the pioneering scheme in this regard. It established the principles of office buildings as kits of parts, with heavily glazed, light, rectilinear forms, and much that could be easily swapped, adapted or changed. Today this central part of the Character Area retains a modular, twentieth century character, although many of the original buildings at Broadgate have been re-clad and/or extended.
- 20.19. The modern buildings across the Character Area employ various façade systems, usually stone or metal panels with differing rations of solid to void. Broadgate was originally a series of stone-faced buildings with gridded facades, with some of the later ones using simple classical references but on a monumental scale, notably 135 Bishopsgate.
- 20.20. Architecturally, the Broadgate Tower comprises expressed metal bracing and glazing, with dynamic angular bracing between tower and podium cutting across ‘public realm’ between them. The larger scale to the urban grain within the Broadgate development, , combined with an emphasis on glass and metal to the exterior results in an assertively corporate built environment. These commercial buildings employ rich external materials but the functional requirement for large open footplates is reflected in the facades which lack active frontages or decoration at a human scale. More recent redevelopment has proactively sought to mitigate these issues—and include the greening of Exchange Square and improvements to legibility of access into buildings. This has begun to soften what is otherwise often perceived as, an exclusionary and exclusive built environment.
- 20.21. In the more historic pockets of the Character Area, the Great Eastern Hotel shares scale/monumentality of these more modern blocks, but is far more finely detailed and designed. Similarly, Liverpool Street Station is monumental in scale, yet architecturally is a collision of fabrics of different periods; the inner trainshed canopy and flanking east and west walls are original Victorian work, subsumed in a series of 1980s additions and extensions broadly in the same style, but erring towards pastiche.
- 20.22. In respect of building uses, the Character Area is prevailingly commercial and transport-led, with prominent seams of retail throughout the station and the ground floors of most of the office buildings. This retail activity tails off and there is an increase in inactive frontages to the north and northwest sides of the Character Area.

Local Views

- 20.23. Part of the character area falls within Bishopsgate Conservation Area. Local views identified within the Character Summary and Management Strategy SPD include:
- North from the junction of Old Broad Street and Liverpool Street;
 - East along Liverpool Street from the same junction;
 - Northwest from the junction Liverpool Street and Bishopsgate.

- 20.24. Views of important townscape value beyond those identified above include views south across Exchange Square towards the station (as described above), as well as more intimate views across this green space. East along Eldon Street retains a well-defined nineteenth century character to the streetscape.

Conclusion

- 20.25. Largely modern, and of mid-high rise character, however the area is considered to be sensitive to tall buildings, particularly with regards to the distinctive roof profile of buildings associated with the station, including the towers of the twentieth century extension, its Victorian trusses and the landmark quality of the Great Eastern Hotel.

Strategic Views, Townscape and Skyline

- 20.26. The key sensitivity is St Paul's Cathedral. By virtue of the existing Broadgate Tower, the Character Area already has a presence in many westerly River Prospects looking towards the Cathedral; in these views the Broadgate Tower lies quite close to the sky silhouette and under the Cathedral's westerly sky setting. Should 2-3 Finsbury Avenue be implemented, it will also have a similar impact upon views.
- 20.27. The Character Area is distant from the Tower of London, reducing the sensitivity of the WHS to change and further tall building development within the character area. However, the kinetic experience over Tower Bridge could potentially be impacted, alongside views from the inner curtain wall looking north. Therefore, the WHS is not considered to be sensitive in regard to this Character Area.

London View Management Framework

Linear Views

- 20.28. The site is covered by two LVMF Protected Vista Wider Setting Consultation Areas (background): Linear Views 8A.1 (Westminster Pier) and 9A.1 (King Henry VIII's Mound, Richmond Park). These thresholds, orientated SW-NE across the Area. There are a number of existing and cumulative breaches which have been subject to case-by-case qualitative assessment against the generic and view-specific visual management guidance.

Linear View 8A.1 (Westminster Pier) – Wider Setting Consultation Area

- 20.29. The WSCA clips the western edges of the Character Area – specifically the street block fronting Wilson Street and No. 5 Appold Street. Development within a section of the Character Area which breaches the threshold of the linear of the WSCA is subject to a qualitative assessment.
- 20.30. Para 170 of the SPG states here that development here should 'preserve or enhance the viewer's ability to recognise or appreciate the dome, peristyle and south-west tower of St Paul's Cathedral. These elements should generally remain with a clear sky backdrop'. Tall building within the character in this location therefore has the potential to harmfully impact these qualities and is sensitive on this basis.

Linear View 9A.1 (King Henry VIII's Mound, Richmond Park) – Wider Setting Consultation Area

- 20.31. The WSCA cuts broadly through the middle of the Character Area, across the centre of the Broadgate complex, the northern part of the trainshed and Exchange Square and the lower podium block of the Broadgate tower. A number of existing buildings in the Character Area breach this threshold plane, including 5 Broadgate, Exchange House and the podium block of Broadgate tower. These developments and any future developments are subject to a qualitative impact assessment.
- 20.32. Para 176 of the SPD says that such developments should 'preserve or enhance the viewer's ability to recognise and appreciate the dome of the Cathedral. In determining applications, it is essential that development in the background of the view is subordinate to the Cathedral and that the clear sky background profile of the upper part of the dome remains.' As above, further tall building in the character area is therefore sensitive on this basis.

River Prospects

- 20.33. The Character Area has an existing presence, to varying degrees, in these River Prospects: the Broadgate Tower can be perceived in many of them. Depending on the location of the River Prospect, the tower is seen in the west or east sky setting of St Paul's Cathedral. The location of the Character Area means that further tall building development here could visually 'bleed' with the existing towers in the Barbican and Golden Lane Character Area, risking the appearance a mass of towers appearing to 'march' on St Paul's from the West.

15B.1 & 15B.2 – Waterloo Bridge, Downstream Pavement

- 20.34. The Character Area is visible in this view quite close to the Cathedral, at some distance in the first assessment point, but then moving closer to the Cathedral as one moves south along the bridge. At the bottom of the Bridge the Broadgate Tower collides with the dome and peristyle. Further tall building development in this Character Area, especially in the central and southern sections, is likely to further erode the openness around and collide with the skyline elements of the Cathedral in this view. Relevant SPG paras: 264, 266, 267.

16A & 16B – South Bank, Gabriel's Wharf

- 20.35. The Character Area lies directly behind the Cathedral. Broadgate Tower is occluded by the dome and peristyle. However, further tall building development in this Character Area is likely to lead to tall buildings appearing directly behind and either side of the Cathedral in this view, overwhelming its sky setting and/or conflicting directly with the sky silhouette. Relevant SPG paras: 280-281, 283

17B.1 & 17B.2 – Golden Jubilee/Hungerford Footbridge

- 20.36. The Character Area is prominent in this view directly to the left of the Cathedral, as evinced by the existing presence of the Broadgate Tower, located in the north of the Character Area. Further tall building development is likely to bring tall buildings closer to the Cathedral in this view. The issues for this view are much the same as those for the

Waterloo Bridge views – please see above commentary. Relevant SPG paras: 301-302, 304-305.

St Paul's Heights

- 20.37. The site is not in the St Paul's Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in those strategic riparian views identified in the Protected Views SPD and are the subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD. The site is in the visual scope of the backdrop setting of the Cathedral in those same views, from Hungerford, Waterloo and Blackfriars Bridges, in addition to the kinetic sequence along the South Bank Queen's Walk between Waterloo and Millennium Bridges. Further tall building development in the Character Area could have implications for these views, as outlined in the LVMF section above.

City Landmarks and Skyline features

- 20.38. There are no City Landmarks or Skyline features within the Character Area as identified by the City's Protected Views SPD (2012). However, the churches of St Botolph Bishopsgate and All Hallows London Wall lie directly to the south and south-west, and further tall building development within the Character Area could affect the skyline presence of these two Skyline Features.

The Monument

- 20.39. The Character Area lies due north of the Monument and lies in the background of views north *from* the Monument up Bishopsgate. Although partially screened by the intervening mass of the City Cluster, further tall building development within the Character Area could appear in these views. Similarly, the Character Area is in the deep background of the views *of* the Monument from London Bridge; further tall building development could appear on the skyline in the background.

Tower of London World Heritage Site

- 20.40. The Character Area is located some distance from the Tower of London, to the north of the City Cluster. In key views of the WHS from Tower Bridge and Queen's Walk, the Character Area would largely be occluded by the Cluster. In the kinetic experience over Tower Bridge, the Character Area would gradually become more visible in views of the WHS, signalled by the Broadgate Tower which starts to become prominent particularly in views from the northern abutment of the Bridge. Additionally, the Character Area could be discerned in the Representative View from the Inner Curtain Wall (North).
- 20.41. Further tall building development within the Character Area would have to be of significant height to be prominent in the setting and these views of the WHS, screened as the area currently is by the City Cluster Character Area.

Neighbouring Borough Views

- 20.42. There are no neighbouring borough views in which the Character Area is sited.

Conclusion

- 20.43. Tall buildings in the Character Area have the potential to significantly affect views of St Paul's Cathedral from the west. The existing Broadgate Tower is already very close to the Cathedral in key River Prospects and other westerly views. Further tall building development is likely to lead to direct conflict with the skyline features of the Cathedral, contrary to the SPG guidance, as well as further infilling the skyline to the west of the Cathedral with towers.

Heritage Significance

Overview of Heritage Assets

- 20.44. The Character Area is light in designated heritage assets within its boundary.

Listed Buildings

- 20.45. There are three Grade II listed buildings: Liverpool Street Station, No.1 Finsbury Avenue and the Roman Catholic Church of St Mary Moorfields. The Great Eastern Hotel, is Grade II*.

Scheduled Monuments

- 20.46. There are no scheduled monuments within the character area.

Tree Preservation Orders

- 20.47. There are no TPOs within the character area.

- 20.48. The group value of the listed building's associated with Liverpool Street Station makes an important contribution to their respective significances, with each appreciably remaining part of a functioning historic townscape with important nineteenth century origins. Works which disrupted this appreciation through limiting intervisibility or significant loss of fabric would incur a high level of harm. Equally these buildings, as well as the listed churches, were each designed to possess a landmark quality, expressing their important spiritual or civic functions. The loss of sky silhouette to their roofscapes, or prominence within the streetscape would be detrimental. It is acknowledged that the wider setting of these buildings take in the city cluster to the north, however the cumulative impact of further intensification of height may result in the creation of harm to the setting of these assets and its contribution to significance.

Conservation areas

- 20.49. The Character Area incorporates a small section of the Bishopsgate conservation area, comprising the Great Eastern Hotel and, immediately to the west, the neighbouring Victorian station building and Hope Square. The main body of the conservation area lies to the east, across Bishopsgate, and comprises an 'area consisting of predominantly Victorian and Edwardian buildings with small-scale commercial uses, alongside notable examples of the City's Georgian townscape', with 'a dense urban grain formed by the historic network of streets, lanes and alleys either side of Bishopsgate, overlaid with key

examples of Georgian town planning and Victorian railway infrastructure. (from the CA SPD adopted 2012).

- 20.50. The adopted SPD further notes that the area is 'distinct in the east of the City in terms of building scale and diversity of uses, contrasting with the large-scale office buildings to the north, south and west' – an apt summary of the Character Area.
- 20.51. The conservation area lies directly to the north of the City Cluster of tall buildings and these form an established part of its setting; one tower, 150 Bishopsgate, actually lies within the conservation area boundary. Because the conservation area is already seen and experienced in relation to a backdrop either of towers or 'large-scale office blocks', it is considered that further tall building development within the Character Area could amplify this existing element of setting to a negative degree.

Core City Typologies

- 20.52. The Character Area is considered to support the following traits of the City's overarching Heritage Significance identified in section 2. The susceptibility of these traits in relation to the intensification of tall buildings within the character area are outlined below.
- 20.53. *Offices* – The character area has several examples of contemporary and late twentieth century office development. 1 Finsbury Square, listed Grade II, is an exceptional example of the rapid growth of speculative office development in the City in the 1980s, designed by highly regarded, Arup Associates. Recent development surrounding the Broadgate estate also is representative of the retrofit and adaptation of existing office buildings, an area of growing importance as the built environment responds to climate change and post pandemic changes in working environments.
- 20.54. *Civic and Institutional* – The Liverpool Street Station complex is the key transport hub within the city and vital for its national and international connectivity. The nineteenth century origins of the station underline the transformation of the City during the Victorian period, and is emblematic of its role as the seat of commerce and finance in the national context.
- 20.55. *Ecclesiastical and City Churchyards* – the Roman Catholic Church of St Mary Moorfields, Grade II is the only city church within the character area.
- 20.56. *Tall Buildings* – Development at Broadgate, and specifically the New Street Square and New Fetter Lane possess a strong contemporary character, presently defined by a number of tall buildings. These buildings establish a renewed emphasis to the street scape through their dramatic angular massing. While this typology is not considered sensitive to tall buildings, any new addition to this group should continue to retain a sense of a coordination and hierarchy to avoid a detracting impact in townscape terms.

City Significance Traits

- 20.57. **AGE** With regards to 'Age', the character area largely reflects post war, late twentieth and contemporary redevelopment, with the exception of buildings associated with Liverpool Street Station. The intensification of tall buildings within the character area should be

limited to avoid the diminishment of the landmark presence of buildings associated with the Station, diminishing their important historic, civic function.

- 20.58. **COMMERCE** The redevelopment of Broadgate created a number of important examples of 'shell and core' development, which typified the late twentieth century development, some of which are now listed, or widely recognised as successful examples of the type.
- 20.59. **HEIGHT & SKYLINE** North and west of the station the height intensifies as the built environment transitions into the City Cluster Proper. The Broadgate tower is the tallest of these, however intensification of further height is limited by the LVMF and potential impacts to St Pauls.

Conclusion

- 20.60. The area's proximity to the City Cluster means that the few heritage assets within its boundaries are already seen against a backdrop of tall buildings; however, there remains sensitivity to further encroachment of their skyline silhouettes.

Conclusion: Sensitivity to Tall Buildings

- 20.61. Overall, the Character Area is considered to be **very sensitive** to tall buildings. The scale of building is mid-high rise; the area is largely modern in scale and appearance; the street pattern and urban structure is robustly modern. Further tall building development within the Character Area could overwhelm the westerly sky setting of St Paul's Cathedral in the aforementioned River Prospects, merge detrimentally with the existing tall buildings in the Barbican and Golden Lane Character area and even directly clash with the Cathedral's sky silhouette.

Character Area: Bank

Introduction

- 21.1. Bank is at the heart of the City; Bank Junction is an instantly recognisable interchange, home to famous heritage assets of national importance (e.g., the grade I listed Bank of England and Royal Exchange), with a hinterland of characterful lanes and alleyways. The Character Area is a richly distinctive and well-preserved place that continues to function as a financial heart.
- 21.2. The Character Area is, like the rest of the City, well connected by all forms of transport. It has a TfL Public Transport Accessibility Level of 6b, the highest level of public transport accessibility in the Capital. The area incorporates Bank junction, one of the most historic and recognisable focal points of the City and London.
- 21.3. The area is relevant to most LVMF Protected Vistas and River Prospects, St Paul's Heights and is very relevant to the wider setting of the Cathedral, particularly in viewpoints from the River Thames and the Processional Route. The area has further relevance to Monument Views from the gallery (4 and 5) and wider riparian views, and to views from within the Tower of London WHS.
- 21.4. Most of this Character Area is covered by various heritage designations and include 19 scheduled monuments, one Registered Park and Garden, nine conservation areas (only one partially within the Character Area), and numerous listed buildings, including a high proportion of Grade I and Grade II* listed. Unlisted buildings of some architectural and historic interest are also ubiquitous.
- 21.5. Despite extensive modern development and redevelopment that has been carried out in its surroundings, especially to the east, the Character Area has retained most of its historic character and modest scale of buildings. Its defining character is that of a deeply rooted and defined centre of the City of London; with its extraordinary concentration of historic High Finance buildings and City churches set upon a fine, medieval street pattern, it is perhaps best defined as the essence of the historic commercial City of London.

Historic development

- 21.6. From the first organised settlement of London by the Romans (c. AD 40-50), to the medieval times and the redevelopment that followed after the Great Fire, the symmetry of Georgians and the grandeur of Victorians, through the Brutalist post-war era and the contemporary high-tech skyscrapers that followed, all these major eras have left their mark and are evident in the built fabric of the Bank Character Area.
- 21.7. During the Roman period, the City Wall and gates were established and formed the basis of the later development of the Character Area. However, most of the area's street pattern originates from the reoccupation of the City in the Saxon period and its subsequent medieval development. The result was a dense and intricate network of streets, lanes and alleys that largely survives today and is a significant component of the Character Area's characteristic urban grain.
- 21.8. By 14th century, the Mayor and Commonality and Citizens of London, later to be also known as the Corporation of London, became established as an independent governing

body whose primary function was to ensure the smooth and fair operation of trade and business. The centre of this body was the Guildhall which continues today to be the administrative centre of the City. The dominance of Guildhall and the Corporation of London made the area attractive to the Livery Companies, the primary function of which was the economic regulation of each trade but also attendance to the social and religious needs of their members.

- 21.9. By the 16th century, a distinctive district, focused on the area of the Royal Exchange, had been established in which finance, overseas commodities, and commercial and maritime information were exchanged. This reflected the long tradition and importance of London as a major centre for trade and finance that started from as early as the 1st century.
- 21.10. The development and prosperity of the City were interrupted by the Great Plague of 1665 and the subsequent Great Fire in 1666 which were to mark a fundamental change in the character and use of the City and the Bank Character Area. The subsequent reconstruction largely followed the earlier street layout, including the building of new roads such as King Street and Queen Street. Architectural fashion and the various Building Acts of the 18th century combined to create a distinctive and relatively cohesive urban fabric. The hierarchy of streets became more pronounced following improvements, and new regulations relating to materials are reflected in today's contrasting use of stone on principal buildings and streets, and brick on secondary routes.
- 21.11. An influx of wealth, in the end of the 18th century saw an age of improvement across the City, as a whole, with one of the most significant changes being the removal of the City Wall and most of its Gates, to accommodate buildings beyond the walls and improve traffic circulation.
- 21.12. The establishment of the Bank of England in the late 18th century and the explosion in the rate and nature of commercial development during the 19th century had the most significant impact on the area. The impact of the growth in commercial banking during 19th century is still evident today, particularly on King Street, Gresham Street and Ironmonger Lane.
- 21.13. The Victorian period saw the arrival of the railways and their respective bridges, viaducts and hotels in the City. They were responsible for major physical change and the displacement of much residential and commercial activity. Between 1829 and 1835 Moorgate and King William Street were formed to link the centre and the north of the City with the new London Bridge, situated to the west of the original. Cannon Street, which had previously consisted of a narrow medieval lane between Bishopsgate and Walbrook, was widened and extended to St Paul's Cathedral in the 1840s. Along with the construction of Queen Victoria Street in the 1870s, this had a major impact on the area, bisecting the rectilinear pattern of lanes and introducing an element of Victorian grandeur.
- 21.14. The interwar period saw a continuation and consolidation of Victorian and particularly Edwardian trends in development. Prompted by a greater degree of site amalgamation, the relaxation of the Building Acts relating to the permissible height of buildings and the constructional flexibility associated with the use of the steel frame.
- 21.15. Between the First World War and the depression of the 1930s, businesses experienced a significant boom period, with several new national company headquarters built to the designs of leading architects. At the heart of this expansion was the Bank of England, which achieved the additional space with a new tall central block and comprehensive

rebuilding by Sir Herbert Baker between 1921 and 1937, set within the Soane screen wall.

- 21.16. Bombing raids during the Second World War caused significant damage to the City, and many of its buildings were completely or partially destroyed. The Bank Character Area in general escaped the level of bomb damage experienced in other parts of the City. In 1986 the deregulation of the financial markets allowed stocks to be traded electronically in a free market. This resulted in an influx of international banking to the City with a new demand for large open plan offices and trading floors, no longer requiring a location in close proximity to the Stock Exchange. This, and other post-war reconstruction and redevelopment, has had a limited impact on Bank Conservation Area, with new development generally maintaining the street plan and plot sizes, respecting its character and appearance.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 21.17. The buildings in the Character Area are of largely traditional scale, ranging mainly between 2 and 10 storeys, but with a prevailing scale of 6-8 storeys and generally not more than 10, with a couple of isolated and unrepresentative taller buildings which have undermined that general cohesion. These buildings tend to enclose the principal thoroughfare, whilst the rich mix of secondary lanes, alleys and courts tend to be defined by smaller, more human scale of 4-6 storeys. The number of storeys to which each building or street rises is significantly related to its age, or location within the established hierarchy of roads, lanes, alleys and courts.
- 21.18. Apart from the few ad-hoc tall post-war buildings mentioned below, which provide little to no legibility as landmarks, there is a high concentration of historic landmark historic buildings in this Character Area, which tend to express themselves to an extent through additional height, but principally through their scale (relative to a block), corner presence at a confluence of routes and/or their architectural articulation. This includes the extensive block of the Bank of England; the Mansion House; and the corresponding wedge-shaped blocks of the Royal Exchange and No. 1 Poultry. And then there are the extraordinarily high concentration within the Character Area of Wren towers, spires and steeples which arrestingly break the historic scale of the area and have a wider skyline presence.
- 21.19. There are taller, modern buildings in the Character Area, located mainly at the fringes, chiefly to the north-east and north-west of the Character Area, reflecting the proximity of these places to areas of taller development in the Barbican and Golden Lane/City Cluster Character Areas. Examples include Tower 42, 20 Gracechurch Street, 88 Wood Street and Alban Gate. Some of these tall buildings do intrude towards the heart of the Character Area, such as New Court and Angel Court, where they are distinctly at odds with the character and grain of the Character Area and have had a significant adverse effect; tall buildings generally, apart from the complimentary City church spires and other landmarks, are uncharacteristic of the Character Area, which would be sensitive to their presence other than that of a background context.
- 21.20. Overall, the area is considered very sensitive to the potential of tall buildings in this area. This is because of the often consistent heights and clearer spatial hierarchy of this

Character Area, and an undermining of the coherent of that would make its landmarks very susceptible to further tall buildings in this area.

Morphology, Topography and Urban Structure

- 21.21. The Character Area has a distinctive network of streets, lanes, courts and alleys, and associated urban spaces. This pattern has been identified as principally Saxon and medieval, with earlier Roman origins and influences, albeit with 19th century and post-war accretions. It represents the influence of the original natural topography of the City and the pattern of linkages in social, economic and defence activity since the foundation of the settlement.
- 21.22. Despite the pattern of principal east – west routes served by the series of north - south lanes linking these with the waterfront, the street pattern is essentially ‘organic’ and informal in character. Historically, main thoroughfares were connected by a web of alleyways and passages faced with densely packed narrow buildings, linking the river with the markets. Substantial parts of this street pattern still survive today, and the resulting hierarchy and layout of streets, plots and spaces makes a significant contribution to the area’s character. The plan form is varied greatly, and the degree of uniformity to each street and alley is a reflection of its age. For example, King William Street, Moorgate and Queen Street which were laid out in the Victorian period are noticeably straighter and more regular in layout than streets with medieval origin like Cornhill which retains its slightly irregular form despite centuries of redevelopment. The tertiary ‘capillaries’ of alleyways off Cornhill are unique, characterful survivals of an even finer urban grain, threading public houses and churchyards.
- 21.23. The plan form of Livery Halls in Dowgate Hill are a significant illustration of the historic tendency for properties to be focused on courtyards behind the principal street frontage. On Dowgate Hill a series of historic narrow frontages include discreet access through to the 17th century courtyards of the Skinners’ and Tallow Chandlers’ Halls, some of the City’s most significant survivals of the type. Plots between Cannon Street and Cloak Lane illustrate the relative uniformity which was introduced to the area in the early /mid-19th century, whilst those to the western side of Queen Street are examples of the larger sites developed in the late 20th century.
- 21.24. Topographically, the ground is higher around Cornhill, which is one of the two highest points in the City (the other being Ludgate Hill, outside of the Character Area) and declines gently towards the river, to the south. The difference in ground levels is more evident when approaching towards the river, creating interesting and varied views. Examples include areas between the main east-west thoroughfares of Cannon Street, to the north, and Upper Thames Street, to the south, where the land falls steeply towards the Thames.
- 21.25. The key node in the Character Area, and one of the most historic and recognisable focal points in London, is the convergence of roads at Bank junction. Principal routes radiate from this point to all parts of the City, including principal roads such as Queen Victoria Street and King William Street. Other primary routes through the Character Area include Cheapside, Princes Street that leads to Moorgate and Cornhill. London Wall, also a principal road artery, runs to the north of the Character Area.
- 21.26. Open spaces are generally sparse, the result of the fine, historic urban grain of the Character Area. They include Finsbury Circus, a planned early 19th century development

of a distinctive oval shape, incorporating large scale trees and planting. Guildhall Yard is another important open space (albeit one of more recent proportions), also of high historic significance, and despite its hardstanding nature is of considerable townscape and amenity value. Courts and churchyards provide a series of compact open spaces which vary greatly in character. Courts include Castle Court and Cowpers Court, while churchyards include St Mary Aldermanbury Garden, Churchyard of St John Zachary and St Laurence Pountney Churchyard.

- 21.27. In general, the area comprises a very dense and fine-grained urban structure, intersected by larger, often later and more regular arterial routes and major local distributor roads. This could be very sensitive to the amalgamation of sites if tall buildings and whose larger footprints could diminish a finer grain network and sense of hierarchy and scale. Tall Buildings here could upset an appreciation of St Paul's on high ground to the west of the Character Area, whilst accentuating any undue prominence in the east of the Area.

Built form and Uses

- 21.28. The Bank Character Area has experienced centuries of development and renewal corresponding to periods of growth and prosperity as well as emerging architectural styles and influences. The multiple phases of development in the Character Area have resulted in a rich collection of buildings representing different historical periods and architectural styles, mainly from the 17th to the 21st centuries.
- 21.29. Changes in architectural taste and materials as well as advances in construction technologies over the past centuries have each left their mark. The churches of Christopher Wren and Nicholas Hawksmoor were built in an architectural language that was innovative and unprecedented in London in the 17th and 18th centuries and now are some of the area's most significant and prominent buildings. Surviving buildings from the late 17th century and Georgian buildings retains some sense of both the domestic scale and mixed-use domestic character of the pre-Victorian City and are characterised by restraint, simplicity and symmetry. Examples include no. 48 Cornhill and no. 80 Coleman Street.
- 21.30. Over the course of the 18th and 19th centuries, Soane's Bank of England, Dance the Elder's Mansion House and Tite's Royal Exchange each made a monumental contribution to the form of the area, which in turn influenced the physical appearance of subsequent development. There is a strong Classical influence in the majority of the historic buildings in the Character Area reflected in the massing, rhythm, material and architectural detailing that makes a significant contribution to the area's character and appearance. Throughout much of the City's history, Classical architecture has been regarded as the most appropriate expression of the strength, solidity, commercial power and importance – the identity – of City business, particularly banking, finance and its administration and insurance; the Italian Renaissance and Baroque have provided most inspiration. Classical proportions, features and detailing unify the majority of buildings in the area, including churches, livery halls, and warehouse buildings of the 17th, 18th and 19th centuries.
- 21.31. Until World War II, architectural taste in the area had remained restrained, traditional, and largely classical, particularly in the central business area. Post-war modern development, in contrast to other areas within the City, has been relatively constraint with modern and

contemporary buildings respecting the overall scale of the historic buildings. Significant examples include No1 Poultry, Drapers Gardens, Angel Court and the Stock Exchange.

- 21.32. The Character Area displays a rich variety of high-quality building materials which reflect the evolution of the area; a succession of architectural periods and developing tastes, as well as a hierarchy of building types. Portland stone is prevalent in the area, and is mostly used on monumental public buildings, and a significant proportion of street elevations on principal routes. Red brick, with stone or render dressings is found on private and domestic Georgian buildings. Victorian buildings in the Character Area display a far more eclectic mixture of building materials, characteristic of wider architectural trends. There are good examples of the use of terracotta, sandstone, pink granite and grey granite, often combined with Portland stone or brick. Post war building materials include steel, concrete and glass used in a structural capacity, giving however a distinct appearance to the buildings which are expressed through their form and lack of ornamentation.
- 21.33. The predominant land use in the Character Area is office use, with strong historical associations with the banking, insurance and financial industries, most of which continue to be in use as such today. Other office uses very closely associated with the City and the Character Area as the Livery Halls associated with craft and guild activities. Churches/ places of worship and educational uses are also present.
- 21.34. An increasing number of buildings have a retail frontage to the street, including examples on Cannon Street, Lombard Street, Throgmorton Street, Cornhill and Gracechurch Street. Other examples include Bow Lane and Watling Street which are lined with retail premises that include small independent shops and high street chains, as well as pubs, bars and restaurants.
- 21.35. Uses in the Character Area are prevailing of high finance activities with associated retail and hospitality businesses. This creates a vibrant pedestrian environment during working hours, Monday to Friday, with large numbers of workers present in all parts of the Character Area. The vitality of the area is particularly evident during the morning and evening rush hours and at lunchtimes. Buildings which incorporate restaurants and bars contribute to great diversity of activity on the street, with people making use of these facilities at lunchtimes or outside work hours late into the evening. At weekends, the vibrant mixture of uses which the area supports are markedly quieter in character, due to closed offices and the absence of the working population. There are small numbers of residential units distributed throughout the Character Area with higher numbers found generally towards the south of the area; there are a number of hotels again located largely to the south.

Local Views

- 21.36. The relevant Conservation Area Appraisals identify and list numerous representative local views in the area.
- 21.37. Bank

1. South down Moorgate to northwest corner of Bank of England.
2. North from Copthall Avenue to Salisbury House
3. From Moorgate east into Moorgate Place
4. North to 3 Moorgate Place from Great Swan Alley
5. South to rear elevation of 12 Tokenhouse Yard from Whalebone Court
6. East to 1 Whalebone Court from Telegraph Street
7. West to Telegraph Street from Copthall Buildings
8. North up Copthall Avenue from Copthall Buildings
9. North to 1 Whalebone Court from Tokenhouse Yard
10. East to 6-8 Tokenhouse Yard
11. North up Tokenhouse Yard from Kings Arms Yard
12. South from Tokenhouse Yard to north elevation of BoE
13. East to St Margaret's Lothbury from 2 Lothbury
14. South to Bank Junction from 2 Lothbury
15. East down Lothbury
16. South to Royal Exchange from 41 Lothbury
17. North down Bartholomew Lane to 41 Lothbury from Royal Exchange
18. East along Throgmorton Street from 29 Throgmorton Street
19. North through Austin Friars from Old Broad Street
20. South-west down Old Broad Street from road junction of Throgmorton Street and Old Broad Street
21. North west from Adams Court to Old Broad Street and Austin Friars Bank Conservation Area - Character Summary and Management Strategy SPD 20
22. North from Threadneedle Street to 4 Threadneedle Street entrance to Adams Court
23. West down Threadneedle Street from 39 Threadneedle Street
24. West down Threadneedle Street from 28-29 Threadneedle Street
25. South from 62-63 Threadneedle Street to Cornhill through Royal Exchange Buildings
26. South from Finch Lane to 36-38 Cornhill
27. From Cornhill to Sun Court
28. From Cornhill to White Lion Court
29. East from 54-60 Cornhill
30. East from Ball Court down Cornhill to St Paul's Cathedral
31. From Cornhill to St Michael's Alley
32. From Cornhill to Ball Court
33. North from Birchin Lane to Cornhill
34. East from Birchin Lane to Bengal Court
35. North to Cornhill from junction St Michael's Alley to Castle Court
36. East to Castle Court from 3 Castle Court
37. North in Change Alley to rear elevation of 28-30 Cornhill
38. North-west from Lombard Street to Bank Junction
39. South-west from entrance of Popes Head Alley from Lombard Street to St Mary Woolnoth
40. From 1 Princes Street to Threadneedle Street
41. From 1 Princes Street to Cornhill
42. From 1 Princes Street to Lombard Street
43. From 1 Princes Street to King William Street and the Monument
44. From 1 Princes Street to Queen Victoria Street
45. South from Mansion House Street to St Stephen Walbrook
46. East from 27-35 Poultry to 1 Cornhill
47. East from 37-39 Poultry to Bank Junction
48. North-east from 26-38 Queen Victoria Street to Bank Junction
49. South-east from Queen Victoria Street to Walbrook
50. South-west corner of Bucklersbury to Walbrook
51. North from Mansion House Place to BoE
52. From Mansion House to Lombard Street

53. Glimpse view from corner of Mansion House Place and St Swithin's Lane to St Mary Woolnoth
54. From King William Street to St Mary Woolnoth
55. North from King William Street at Junction of Sherborne Lane to 1 Cornhill
56. North from 1 King William Street to Bank of England and 1 Princes Street
57. From King William Street to Clement's Lane
58. From Clement's Lane to St Edmund the King and Martyr
59. From London Bridge Approach to 68 King William Street
60. North from 33-35 Cornhill to Stock Exchange through Royal Exchange Buildings
61. East from 2-10 Queen Victoria to Royal Exchange
62. South from London Wall down Throgmorton Avenue
63. West from Royal Exchange to 2- 10 Queen Victoria Street, Mansion House and Bank Junction
64. South-west down Old Broad Street
65. Through Archway of Jamaica Buildings, St Michael's Alley to Churchyard of St Michael Cornhill
66. North from St Stephen Walbrook to 1 Prince's Street
67. From St Clement's Lane through to Lombard Street Bank Conservation Area - Character Summary and Management Strategy SPD 21
68. Glimpse view from Popes Head Alley, Cornhill, to portico of Royal Exchange
69. From corner of 36-38 Cornhill with Birchin Lane to South-east corner and clock tower of Royal Exchange
70. East from 2-10 Queen Victoria Street to Royal Exchange
71. North-west from Bucklersbury to 7-9 Bucklersbury
72. North-west from junction of Lombard Street with King William Street to 1 Prince's Street and 27-35 Poultry, 5 Prince's Street
73. From Mansion House to BoE
74. From south end of Prince's Street to 3-4 Lothbury
75. North in Austin Friars to 13, 14 and 18 Austin Friars
76. St Swithin's N/S 77. Abchurch Lane /Yard N/S
78. Lombard Street 79. Gracechurch Street N
80. Sherborne Lane N
81. South down King William Street to the Monument finial (behind 52-55 London Bridge Approach).
82. Cannon street, west to St Paul's Cathedral

21.38. Guildhall

1. The view north up King Street towards Guildhall
2. Views through the narrow streets, such as Ironmonger Lane.
3. The view across Frederick's Place to the buildings in Ironmonger Lane.
4. Views towards Bank Conservation Area from its eastern boundary towards Tivoli corner and along Old Jewry.
5. Views towards Bow Lane Conservation Area.

21.39. Bow Lane

1. From Bank Junction facing west, towers of both St Mary Aldermary and St Mary le Bow can be seen in a single view
2. North along Queen Street to the Guildhall.
3. West along Cannon Street to St Paul's Cathedral.
4. West along Watling Street to St Paul's Cathedral.
5. West along Cheapside to St Paul's Cathedral.
6. North along Bow Lane to spire and south-east corner of St Mary le Bow.
7. East along Queen Victoria Street to Bank junction (the Royal Exchange).

21.40. Foster Lane

1. Views from Gresham Street looking west towards St Anne and St Agnes Church
2. View from Gresham Street of St John Zachary Churchyard.
3. View from Staining Lane across the lower portion of the St John Zachary Churchyard towards Wax Chandlers' Hall and Goldsmiths' Hall.
4. Views along Foster Lane, which is narrow, and curves away there are important views of the fine group of buildings 'bookended' by Goldsmiths' Hall and St Vedast Church at the north and south end of the street.
5. Views from outside the conservation area of the tower of St Vedast. In particular, from the north east corner of St Paul's Churchyard and the west end of Cheapside.
6. Elevated view of the tower of St Vedast Church and along Foster lane from the roof terrace of One New Change. Foster Lane CA Draft Character Summary and Management Strategy SPD – July 2015 13
7. View looking north along Noble Street, along the line of the Roman and Medieval City and fort walls. This provides a long view across London Wall to the continuation of the historic wall on the north side.
8. View of important 19th century townscape group on the corner of Gresham Street and Aldersgate Street.
9. Long view along Gresham Street of the conservation area, important buildings, trees and green spaces.

21.41. Queen Street

1. From the junction of Queen Street and Cannon Street, North along Queen Street and King Street to the Guildhall and its porch.
2. From Cannon Street, south along Garlick Hill to the spire of St James Garlickhithe.
3. From Garlick Hill north to the spires of St Mary Aldermay and St Mary le Bow.
4. From Dowgate Hill north to the spire of St Stephen Walbrook.
5. From Dowgate Hill west into the courtyard of Tallow Chandlers' Hall.
6. From Dowgate Hill west into the courtyard of Skinners' Hall.
7. From the junction of Walbrook and Cannon Street south to the group of Livery Halls on Dowgate Hill.
8. From College Street / Whittington Gardens north to the rear elevations and roof features of Skinners' Hall.
9. From Dowgate south to Cannon Street Station towers.

21.42. Laurence Pountney Hill –.

1. Along Suffolk Lane
2. Along Laurence Pountney Lane
3. Views towards the north side of Upper Thames Street.

21.43. Finsbury Circus

1. The significant views are from within the Circus itself.

21.44. New Broad Street

1. Views along New Broad Street.

21.45. Bishopsgate (part)

1. View north from Liverpool Street along Sun Street Passage and the west elevation of Liverpool Street Station train shed
2. View east from the junction of Liverpool Street and Old Broad Street to the southern elevation of the former Great Eastern Hotel
3. View north from Bishopsgate Churchyard to St Botolph's Church Hall and the south/west elevations of St Botolph's Church
4. View north from the junction of Bishopsgate and Wormwood Street/Houndsditch to St Botolph's Church and former White Hart Inn
5. View north from Bishopsgate to the southeast corner of the former Great Eastern Hotel
6. View southeast from the eastern entrance of Liverpool Street Station to the west elevation of the former fire station, 164 Bishopsgate
7. View south from Bishopsgate towards the eastern cluster of office buildings and the south of the City
8. View east along Brushfield Street to the Church of Christ Church Spitalfields
9. View east along Widegate Street to Artillery Passage
10. View west from New Street to the east entrance of Liverpool Street Station
11. View east from New Street into the courtyard of the former East India Company warehouses
12. View north from New Street to the gateway of 21 (with ram statue)
13. View west from Devonshire Row to the east elevation of the former Great Eastern Hotel
14. View north from southern end of Bishopsgate
15. View within Swedeland Court, off Bishopsgate

Conclusion

- 21.46. The Character Area has a prevailing low-mid-rise scale, refined and traditional materiality and architecture and fine historic grain structure which is largely coherent and intact. It is a Character and Appearance would be at odds with further potential tall building developments. Their large, modern footprints, height and mass would be incompatible with the fineness of the street plan, consistency of building heights and scales and architectural richness described above. At present there is a strong background presence of tall buildings from parts of the Character Area, but a strong (perhaps even positive) sense of 'here and there', whereby the strong overarching coherent character and integrity of the Character Area means the impact on the Area is mitigated and often preserved. Accordingly, the Character Area is considered to be **very sensitive** to tall buildings in terms of Character and Appearance.

Strategic Townscape, Heritage and Skyline

London View Management Framework

- 21.47. The western part of the Character Area is directly affected by LVMF view designations. However, due to the close proximity of the Character Area to St Paul's Cathedral and the lack of tall buildings (only a few examples) in the area, any new tall buildings would be instantly noticeable and prominent in the skyline with a potential to not only affect the prominence of St Paul's Cathedral but also to negatively affect the exceptionally high significance of heritage assets within the Character Area.

- 21.48. London Panoramas These are long-range, panoramic views from elevated points to the north of London. They comprise geometrically defined Protected Vistas extending from the viewing point to the Strategically Important Landmark and beyond. These Protected Vistas in turn consist of a Landmark Viewing Corridor (LVC), under which there is a presumption for refusal of a proposal which would breach the height, and a Wider Setting Consultation Area (WSCA), in which a qualitative assessment of a proposal would be triggered. The LVMG SPG sets out the approach in general to London Panoramas in paras 56-63.
- 21.49. 1A. 1-2 - Alexandra Palace, Wider Setting Consultation Area- The western edges of the Character Area are clipped by the Wider Setting Consultation Area (WSCA) of these views. Tall building development within them or in the western fringes of the Character Area more generally could have implications for the primacy and easterly skyline setting of the Cathedral. Development in the WSCA should preserve or enhance the viewer's ability to recognise and appreciate the peristyle, drum, dome and western towers of the Cathedral (para 90). Relevant SPG paras: 87-90.
- 21.50. 2A.1 – Parliament Hill, Wider Consultation Area- Further tall building development would be seen to the east of the Cathedral, with potential encroachment on the sense of dominance of the Cathedral in this view, albeit its silhouette is already compromised by the Shard, within the southern portion of the character area falling with in
- 21.51. 3A. 1 – Kenwood, Wider Consultation Area- The south-west corner (i.e., sites including One New Change, 25 and 30 Cannon Street, Ormond House, and buildings at Great St Thomas Apostle/Cloak Lane/Garlick Hill) of the Character Area falls within the Background WSCA of these views, which have a near-identical geometric definition. Tall building development in these areas would have implications for the primacy and skyline silhouette of the Cathedral, while tall building development near the Background WSCAs could have implications for the skyline setting of the Cathedral more generally in these views.
- 21.52. Development behind the Cathedral which breaches the WSCA should contribute to a composition that enhances the setting of, and the ability to recognise and appreciate, the Strategically Important Landmark. Special regard should be paid to the height, orientation, design and materials used in the development. Careful use of form and materials could enable development proposals to improve the clarity with which the Cathedral is seen its surroundings (para 121). Relevant SPG paras 102 and 121.
- 21.53. 4A. 1 - Primrose Hill, Wider Setting Consultation Area- The south-west corner and south fringe of the Character Area (approximately to a line drawn between northern end of Cheapside and the southern end of King William Street) lies within the Background WSCA. Tall building development in these areas would have significant implications for the primacy, skyline silhouette and/or skyline setting of the Cathedral in this view. The Cathedral silhouette is seen against clear sky and is not currently dominated by development in its backdrop, a situation that should not be compromised. Relevant SPG para 134
- 21.54. 5A.2 – Greenwich Park, Landmark View Corridor and Wider Setting Consultation Area- The south-west corner and south parts of the Character Area (approximately to a line

drawn between northern end of Cheapside and the southern end of King William Street) lies in the Middle Ground Landmark Viewing Corridor (LVC) and WSCA of this view. Proposals for tall buildings under the LVC are subject to a policy presumption to refuse permission as they would directly conflict with and occlude the Cathedral' silhouette. Tall building development in the flanking WSCA could have implications for the primacy and skyline silhouette of the Cathedral in this view. The relationship between Tower Bridge, the Monument and St Paul's are critical to the integrity of this view and the ability to recognise and appreciate the Cathedral. Relevant SPG para 145.

- 21.55. 6A.1 - Blackheath Point, Landmark View Corridor and Wider Setting Consultation Area- The south-western corner and south fringe of the Character Area fall within the Middle Ground LVC and WSCA of this view. Proposals for tall buildings under the LVC are subject to a policy presumption to refuse permission as they would directly conflict with and occlude the Cathedral' silhouette. Tall building development in the flanking WSCA could have implications for the primacy and skyline silhouette of the Cathedral in this view. Relevant SPG paras 154 and 155

Linear Views

- 21.56. These are narrow and extremely focused views of St Paul's Cathedral, the Strategically Important Landmark. They comprise geometrically defined Protected Vistas extending from the viewing point to the Strategically Important Landmark and beyond. These Protected Vistas in turn consist of a Landmark Viewing Corridor (LVC), under which there is a presumption for refusal of a proposal which would breach the height, and a Wider Setting Consultation Area (WSCA), in which a qualitative assessment of a proposal would be triggered. The LVMG SPG sets out the general approach to Linear Views in paras 56-58 and 64-67.
- 21.57. 8A.1- Westminster Pier, Wider Setting Consultation Area- A narrow tranche of the Character Area extending north-east from St Paul's Cathedral lies in the background of this view. Because of the focused, linear nature of this view, tall building development on these sites in the Character Area would conflict with the Cathedral's skyline silhouette and pre-eminence, while tall building development just outside the WSCA boundary could risk encroaching upon the setting of the Cathedral silhouette. Development should preserve or enhance the viewer's ability to recognise or appreciate the dome, peristyle and south-west tower of the Cathedral and preserve their clear sky backdrop. Relevant SPG para 170
- 21.58. 9A.1- King Henry VIII's Mound, Wider Setting Consultation Area- A broader tranche of the Character Area extending north-east from St Paul's Cathedral lies in the background of this view. Because of the focused, linear nature of this view, tall building development on these sites in the Character Area would conflict with the Cathedral's skyline silhouette and pre-eminence, while tall building development just outside the WSCA boundary could risk encroaching upon the setting of the Cathedral silhouette. Development should generally preserve and, where possible, enhance the legibility of the Cathedral silhouette. Relevant SPG para 176

River Prospects

- 21.59. These are riparian views from various points along the Thames banks and bridges. They are not geometrically defined as with the preceding views. Proposals affecting the River Prospects are subject, in the main, to qualitative assessments of impact, with presumption to refuse if overly intrusive, unsightly or prominent in the fore or middle grounds of the views. The LVMF SPG sets out the general approach to River Prospects in paras 68-73.
- 21.60. 10A, Tower Bridge, Upstream- The Character Area lies in the Background, behind the City Cluster and Riverside Character Areas, but tall building development, particularly if very tall, would have the potential to be visible in the middle of this view, challenging the prominence of the lantern and upper dome of St Paul's Cathedral, Cannon Street towers and other landmarks noted in the view. The setting of the Monument is particularly vulnerable to height in the Character Area. Tall building development could also merge with and exacerbate the City Cluster and could appear overwhelming, detracting from the surrounding heritage assets.
- 21.61. River Prospect 11A – London Bridge, Upstream- The Character Area lies in the Background and is screened from view by the Riverside Character Area, though some of its skyline features can be glimpsed, such as the pinnacles of St Mary Aldermary. Tall building development could give it a greater presence in the right-hand half of this view, potentially affecting the setting of the prominent Cannon Street towers and St Paul's Cathedral, of which most of the silhouette is visible. Tall building development in the Character Area could affect the prominence of St Paul's, Cannon Street Station and a number of other skyline features.
- 21.62. River Prospect 12A.1 – Southwark Bridge, Upstream- The Character Area is screened from view by the Riverside Character Area, and lies to the right of this view, east of the Cathedral. Tall building development in the very western edges of the Character Area could affect the setting of the Cathedral, but otherwise the risk to this view of intensification would be limited.
- 21.63. 13A. 1 & 13B.1 – Millennium Bridge/Thames side at Tate Modern- Though screened by the Riverside Character Area, the Character Area has a presence in the eastward side of the view, with the spires of some of its landmark elements visible, notably St Vedast, St Mary-Le-Bow, St Mary Somerset and St Mary Aldermary. Tall building development within the Character Area would have implications for the easterly immediate setting of the Cathedral and the presence of these spires and skyline features. These places are some of the best from which to appreciate the Cathedral in the context of the wider 'family' of Wren spires and steeple; undermining this wider setting would also undermine appreciation of the Cathedral as Strategically Important Landmark.
- 21.64. 5B.1 & 15B.2 – Waterloo Bridge, Downstream- In both views development in the northern half of the character area would backdrop the Cathedral dome, adversely effecting its pristine sky silhouette and dominance in the view. This view is very sensitive to further tall buildings development therefore.
- 21.65. 17B.1 & 17B.2 Golden Jubilee/Hungerford Footbridges- The Character Area lies between the Cathedral and the City Cluster in the Background of this view. Tall building development would have serious implications for the clear sky space between the two, as well as risking eroding the sky space to the west of the Cathedral and even conflicting

with its skyline silhouette. Tall building development in the Character Area would significantly risk the viewer's ability to recognise and appreciate the skyline silhouette of the Strategically Important Landmark.

- 21.66. 16B.1 & 16B.2 – The South Bank: Gabriel's Wharf- The Character Area lies directly behind and to the east of the Cathedral in this view, advertised by the spire of St Mary-Le-Bow. Intensification in the Character Area could risk bringing the mass of taller modern development of the City Cluster closer into the setting of the Cathedral and undermining the existing silhouette of St Mary-Le-Bow.

St Paul's Heights

- 21.67. The south-western corner of the Character Area is clipped by the St Paul's Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in those strategic riparian views identified in the Protected Views SPD (subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD). Even though the rest of the Character Area lies outside of the policy area, tall building development particularly in its central and southern zones would have implications for these famous riparian views from the bridges and in the kinetic experience along the South Bank between Waterloo and London Bridges.
- 21.68. Though outside the policy area, the Character Area lies directly to the east of St Paul's Cathedral and behind it in the famous, highly significant views from the Processional Route along Fleet Street. Tall building development within the Character Area, particularly in its central zone, could have serious implications for this most important of views.
- 21.69. The fine views of the south transept, the apostles and the western towers originate on Cannon Street, within the Character Area, which the policy area also seeks to protect. Tall building development particularly along Cannon Street and its environs would have implications for the foreground setting of these views and the primacy of the Cathedral and its skyline presence.
- 21.70. Overall, tall building development in this Character Area could have serious implications for the strategic skyline balance between St Paul's and the City Cluster, infilling fundamental sky space and potentially altering the silhouette of the Cathedral on the skyline and its complementary historic context, in particular the important relationship with wider Wren spires.

City Landmarks and Skyline Features

- 21.71. The Character Area is the richest of them all in City Landmarks and Skyline Features as identified by the City's Protected Views SPD. N.B. dates given are for the completion of the church or its tower, which sometimes came later; by Wren can mean by Wren and his office of highly skilled colleagues, although his was the overarching guiding hand.
- 21.72. St Mary-Le-Bow – grade I listed, 1683 by Sir Christopher Wren. His earliest, largest and finest spire, a seminal piece of architecture and a conspicuous skyline feature in both the Character Area and in wider views, including from the bridges and the South Bank.
- 21.73. St Mary Aldermary – grade I listed, late C17 by Sir Christopher Wren. Unusual in that Wren here departed from Classicism to work in the Gothic; his delightful four pinnacles anticipate those of St Michael Cornhill executed a few decades later by his colleague,

Nicholas Hawksmoor. St Mary's are widely visible in long views through the locality and in wider City views from the bridges and the South Bank.

- 21.74. St Vedast Foster Lane – grade I listed, 1697 by Sir Christopher Wren. The steeple is strikingly baroque with its elliptical shapes and is a conspicuous presence in views across the locality and in wider City views from the bridges and South Bank.
- 21.75. St James Garlickhythe – grade I listed, 1687 by Sir Christopher Wren. The tower belongs to the family of smaller, but no less delightful, towers with intricate architectural forms that can also be seen at St Michael Paternoster Royal and St Stephen Walbrook. Because of its smaller size less prominent on the wider City skyline but seen from certain perspectives and an important feature of the local skyline.
- 21.76. St Michael Paternoster Royal – grade I listed, 1713 by Sir Christopher Wren. A particularly fine, smaller-scale spire, one of the last to be completed (and after St Paul's Cathedral). A particular presence in long views through the locality and glimpsed in certain wider City views.
- 21.77. St Stephen Walbrook – grade I listed, 1687 by Sir Christopher Wren. Seminal as a trial-run at the internal spatial experimentation and refinement that he would employ in the Cathedral; the spire is another impressive and enjoyable variant on the family of smaller steeples described above. Prominent in long views through the locality and in wider City views.
- 21.78. St Margaret Lothbury – grade I listed, 1695 by Sir Christopher Wren. A humbler and simpler church spire taking the form of a simple, lead-clad obelisk but no less characterful. Prominent in long views up and down Lothbury; less so in wider City views.
- 21.79. St Lawrence Jewry – grade I listed, 1686 by Sir Christopher Wren. A fine lead-clad steeple that is memorably askew to the body of the tower below, belying the medieval foundations re-used by Wren. A prominent skyline fixture of the locality and best appreciated looking east down Gresham Street; less prominent in wider City skyline views._
- 21.80. St Michael Cornhill – grade I listed, body 1677 by Sir Christopher Wren, tower 1721 by Hawksmoor. An unusual City church for the amalgam of work and long gestation; its four pinnacles surmounted with golden finials are prominent on the City skyline.
- 21.81. St Peter Cornhill – grade I listed, 1687 by Sir Christopher Wren. A unique tower with an octagonal copper-clad needle springing from a bulbous hemispherical base. Prominent in certain views from the churchyard and Cornhill/Leadenhall Street but lower than the others and otherwise largely screened from view. N.B. not identified in the City's SPD, but considered a skyline feature I this paper.
- 21.82. All Hallows London Wall – grade I listed, 1767 by George Dance the Younger. A fine, severe classical building with a pierced octagonal lantern; prominent in local views but not, on account of its relatively short height, in wider City views.
- 21.83. St Botolph Bishopsgate – grade II* listed, 1729. Simple circular stone tower with ornamental stone finial. Prominent in local views but not, on account of its relatively short height, in wider City skyline views._
- 21.84. St Alban Wood Street (tower) – grade II* listed, 1687 by Sir Christopher Wren. Another rare example of Wren working in the Gothic style; the tower has a simple openwork stone

trefoil balustrade and crocketed pinnacles. Prominent in local views but not wider City views.

- 21.85. St Mary Somerset (tower) – grade I listed, 1694 by Sir Christopher Wren. Tower incorporates a mysterious arrangement of entablature, parapet and eight tall pedestals supporting urns at the corners with obelisks between. Prominent in local views and in views from the South Bank and the bridges.
- 21.86. Guildhall – grade I listed, C15 with much later rebuilding. Prominent Gothic fleche atop the roof which is seen in long views up and down King/Queen Streets.
- 21.87. Royal Exchange – grade I listed, 1844 by Sir William Tite. Highly prominent and monumental late Classical building at Bank Junction; incorporates an east tower in an extravagant classical design and surmounted with a golden grasshopper; visible in certain views.
- 21.88. This plethora of highly graded and significant skyline features alone would make the Character Area highly sensitive to tall buildings. Tall building development near or along sightlines of these would have implications for their skyline prominence and architectural significance.

The Monument

- 21.89. The Character Area has a presence in both views *of* the Monument and views *from* the viewing platform as identified by the City's Protected Views SPD (2012) (subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD).
- 21.90. View Five: Northwest to St. Paul's Cathedral- The Character Area lies within the scope of Monument View 5 identified *from* the viewing platform, which crosses the south-west corner of the Character Area. In this view the upper skyline parts of the Cathedral are already partly compromised by buildings in the New Street Square Character Area; nevertheless, intensification on these sites within the Character Area would have further implications for the legibility and setting of St Paul's in this view and could even occlude it.

Northern Views

- 21.91. Though not specifically identified on the proposals map, views north along King William Street and Gracechurch Street are identified by the SPD as being of significance. The view north-west along King William Street is a view into the heart of the Character Area, while the view north along Gracechurch Street is of its eastern fringe. Accordingly, tall building development in the Character Area would have implications for the 'spectacular panorama of diverse City buildings' (4.14) mentioned in the SPD.

Views of the Monument

- 21.92. The Character Area is prominent in the long views of the Monument down Princes Street/King William Street, and tall building development in these zones could have adverse implications for the setting of the Monument and its primacy. The eastern fringe and south-eastern corner of the Character Area is a key part of the setting of the Monument in views south down Gracechurch Street and north over London Bridge. Tall building development in this zone of the Character Area could have adverse implications for the legibility and setting of the Monument in these views. The Character Area would also have a presence in the background of the Monument in views north-west-west along

Monument Street, and tall building development could have implications for its legibility and sky setting.

Tower of London World Heritage Site

- 21.93. The Character Area lies in the centre of the City, screened from the Tower of London by the City Cluster and Riverside Character Areas. Nevertheless, tall building development within could have a presence in views west and northwest of the Tower from Tower Bridge and in representative views from within the WHS. However, because of the remove of the Character Area from the WHS, intensification is considered unlikely to affect its setting or pre-eminence on the Thames to any significant degree.

Neighbouring Borough Views

- 21.94. Such is the proximity of the Character Area to St Paul's Cathedral, and its centrality to the City of London in general, tall building development within could also have implications for the following Local Views identified and/or designated by neighbouring boroughs. These typically focus on St Paul's Cathedral, but some like the views of the City from Brockwell Park in Lambeth, comprise a more general City panorama. Islington Views LV1-6 of St Paul's Cathedral, Lambeth Views 4.3, 4.6, 4.8 and 4.22, Southwark Views 1, 2, 3 and 4 Westminster Views from the Strand and Westminster Bridge.

Conclusion

- 21.95. The Character Area is **very sensitive** in respect of Strategic Views, Townscape and Skyline, for the many individual and highly significant skyline features within the boundary, and for its presence in many City- and London-wide views of St Paul's Cathedral, and its proximity to the same.

Heritage Significance

Overview of Heritage Assets

- 21.96. The Character Area has the highest concentration of designated heritage assets of them all, as well as numerous non-designated heritage assets and places of high architectural and townscape quality from different periods. The street pattern, layout and built form of the Character Area illustrates development throughout all periods of the City's history. As such, it is perhaps the most richly historic Character Area in the City. Cumulatively, the heritage assets reflect the rich layering of history and architecture to be found within the Character Area, exhibiting all the periods of the City's development (barring the Saxon) and capturing that sense of commercial prosperity and piety which so defines the historic City.

Listed Buildings

- 21.97. Dispersed evenly throughout the Character Area are numerous grade I, grade II* and grade II listed buildings, the majority of which fall within conservation area boundaries.

Collectively they reflect the City's architectural development from the medieval period onwards.

- 21.98. **Grade I** – over 15, including renowned financial institutions such as the Bank of England and the Royal Exchange, City Churches such as St Mary Le Bow, St Stephen Walbrook and St Mary Aldermary and foci of governance including the Guildhall, Mansion House and Goldsmiths' and Skinners' Halls.
- 21.99. **Grade II*** - over 20, including palatial headquarters such as Lutyens House and the National Westminster Bank, Livery Halls such as Drapers', Merchant Taylors' and Tallow Chandlers' Halls and modern office blocks such as Bracken House and No. 1 Poultry.
- 21.100. **Grade II** – over 30, chiefly commercial and administrative buildings including the National Westminster Bank, 30 Cannon Street and Salisbury House.

Scheduled Ancient Monuments

- 21.101. Within the Character Area are 19 Scheduled Ancient Monuments. Many of them are Livery Halls, doubly designated as listed buildings also. Others lie completely below ground, such as the Roman Governor's Palace. Seven sections of the Roman and medieval City wall are to be found within the Character Area which survive as visible standing remains. The Roman Amphitheatre at Guildhall and Baths at Huggin Hill survive as viewable upstanding remains below ground. Overall, the Character Area has the richest collection of SAMs which reflect the City's earliest development in the Roman period.

Conservation Areas

- 21.102. The Character Area has the highest coverage of conservation area designation, with eight included within the boundary. This reflects the well-preserved historic townscape to be found throughout and which characterises the Character Area. Many of them neighbour each other and overlap in character and appearance, and many harbour the same characteristics including, but not limited to, medieval street patterns and plots, fine historic architecture of varying materials and styles but largely consistent scales; tranches of this 'classic' townscape flow between highly significant historic landmarks including those around Bank Junction and the Guildhall, expressing the above characteristics in subtly different and frequently delightful ways.
- 21.103. The conservation areas are treated briefly in turn as follows:
- 21.104. Bank – the largest and most pivotal to the heritage significance of the area. It encompasses the seminal nodal Bank Junction of High Finance buildings including the Bank of England and Royal Exchange, with a hinterland of a finely grained and well-preserved medieval street pattern studded with Wren churches, Livery Halls and leavened with dignified commercial architecture, chiefly of the C19 and C20, of multiple styles. The overall character and appearance is of the rarefied, palatial City of high finance and ancient fraternities.
- 21.105. Guildhall – focused on another seminal nodal point, the Guildhall complex, the ancient administrative City centre which nestles alongside and dissolves into that around Bank Junction. The ancient Guildhall is set within a hinterland of City churches and small-scale commercial buildings, on a fine medieval street pattern. The overall character and

appearance is of the ancient administrative City interleaved with more lively commercial uses.

- 21.106. Bow Lane – a lively, dense assortment of historic commercial buildings, churches and public houses, intersected by intimate alleyways and routes on a medieval street pattern, lying between the commercial node of Bank Junction and the ecclesiastical node of St Paul’s Cathedral. The overall character and appearance is of the classic tranche of mixed-use, historic City to be found in and around the major commercial, administrative and ecclesiastical landmarks.
- 21.107. Foster Lane – a small but quintessential mix of City churches, Livery Halls and small-scale commercial buildings on a medieval street plan. It has particular associations with the Goldsmiths. Like Bow Lane, the overall character and appearance is of a classic tranche of mixed-use, historic City.
- 21.108. Queen Street – a multitude of Livery Halls, City churches, small commercial buildings and former Fur Trade buildings set on the medieval street pattern, with particular associations with the commodities of the Fur Trade and linkages to the river, which lies just to the south. Like Bow Lane, the overall character and appearance is of a classic tranche of mixed-use, historic City, but in this instance distinctly leavened with a clustering of Livery Halls and a distinct sense of the City’s former trading activities.
- 21.109. Laurence Pountney Hill – a small combination of fine, early C18 City merchant’s houses, pubs and churchyards. It is a rare survival of a type once proliferating throughout the City. Unusually, the overall character and appearance is of a quiet, leafy, historic residential City backstreet – in the heart of the historic commercial City.
- 21.110. Finsbury Circus – encompassing an unusual and rare example of formal planning in the otherwise organic City; stemming from development of the marshy suburbs beyond the City wall in the modern period, conspicuously green and typified by palatial commercial buildings. The overall character and appearance is of the commercial City of later ages, uncharacteristically post-medieval in form but of similar grandeur in architecture.
- 21.111. New Broad Street – with its fine standing remains of the Roman and medieval City wall at All Hallows, the area nicely displays the limits of the ancient City and the later growth beyond. Its overall character and appearance is of an area of later commercial development around ancient landmarks.
- 21.112. Bishopsgate (part) – the Character Area incorporates the south-westerly part of this conservation area, the character and appearance of which is like that of New Broad Street described above.

Core City Heritage Typologies

- 21.113. The Character Area exhibits many of, and is particularly rich in, the core heritage typologies identified in section 2. Of all the Character Areas it best expresses the following four typologies:
- 21.114. High Finance – Bank of England, Royal Exchange, numerous palatial commercial buildings.

- 21.115. Offices – Atlas Assurance, numerous examples on Cornhill.
- 21.116. Civic and Institutional – Guildhall, Mansion House, numerous Livery Halls.
- 21.117. Ecclesiastical and City Churchyards – City churches such as St Mary Le Bow, St Vedast Foster Lane, St Michael Cornhill.
- 21.118. Additionally, the Character Area contains examples from the following typologies:
Retail and Hospitality – public houses such as Simpson’s Tavern, the George and Vulture, the Cock and Woolpack, Williamson’s Tavern
- 21.119. Residential – historic C18 houses in Laurence Pountney Hill.

Core City Significance Traits

- 21.120. Through its extensive designated heritage assets across a range of Core City Heritage Typologies, the Character Area is considered to support the following traits of the City’s overarching Heritage Significance identified in section 2.
- 21.121. **AGE** the Character Area contains designated heritage assets ranging from Roman remains to modern buildings, examples from all periods of the City’s history barring the Saxon. The Character Area thus provided an excellent insight into this trait of significance.
- 21.122. **COMMERCE** the Character Area is one of the two hearts of the historic financial and commercial City (the other being the City Cluster) but has by far the most intact historic townscape; and therefore, offers an unparalleled insight into the City’s commercial history.
- 21.123. **PEOPLE** the Character Area has associations, too many to list in full, with a wide spectrum of nationally and locally significant figures including businessmen (e.g. Sir Thomas Gresham, the Rothschild family), architects (Sir Christopher Wren, Sir John Soane, Sir Giles Gilbert Scott) clergy (Chad Varah) and many more.
- 21.124. **COSMOPOLITANISM** The medieval Jewish community were clustered around Old Jewry near the Guildhall; Lombardic bankers took up residence in and gave their name to Lombard Street; the Character Area has a distinctly cosmopolitan flavour which expresses this trait of significance.
- 21.125. **STREET PATTERN** The Character Area has an exceptionally well-preserved and extensive medieval street pattern, offering valuable insight into this trait of significance.
- 21.126. **TYOLOGIES** As above. The Character Area has outstanding examples of the four Core City Typologies around High Finance, Offices, Civic and Institutional and Ecclesiastical and City Churchyards. It therefore offers fine insight into the typologies that typify the City’s uniqueness.
- 21.127. **VARIETY** The City’s architectural variety is well felt in the Character Area, with a rich and nuanced mix of buildings from the medieval period onwards and exhibiting great variety in styles, materials and detailing.
- 21.128. **CALIBRE** Similarly, the Character Area is exceptionally rich in a high quality of architecture chiefly historic and also modern, with many buildings designed by acclaimed architects of national import.

21.129. **HEIGHT & SKYLINE** The Character Area is conspicuously rich in the historic heights of the Wren towers, steeples and spires which delightfully break the prevailing historic scale of the area; it therefore offers valuable insight into the historic aspect of this trait of significance.

Conclusion

21.130. The Character Area is **very sensitive** to tall building development in respect of Heritage Significance. As set out above, the high quantity and quality of designated heritage assets within the Area, and their overlapping and often interdependent settings, lend it high architectural and historic significance; they also exemplify many of the Core City Typologies and offer insight, often exceptional, into nearly all of the identified traits of the City's Heritage Significance. By directly or indirectly (through setting) affecting some of these designated heritage assets, tall buildings proposed in the Character Area could have negative knock-on effects for the traits of overarching significance of the City as a whole.

Overall conclusion: Sensitivity to Tall Buildings

21.131. The Character Area is considered to be very sensitive to tall buildings, through a combination of (i) low-rise, historic and finely-grained character and appearance, (ii) proximity to St Paul's Cathedral in and general centrality to many London-wide strategic views and (iii) having a very high number of designated heritage assets within its boundary, and their overlapping, sensitive settings, expressing and supporting many of the key traits of the City's overarching heritage significance.

Character Area: Eastern City Fringe

Introduction

- 22.1. The Character Area is, like the rest of the City, well connected by all forms of transport. It has a TfL Public Transport Accessibility Level of 6b, the highest level of public transport accessibility in the Capital. It incorporates a major London terminus, Fenchurch Street Station, and Tower Hill and Aldgate Underground Stations; its northern section lies close to the major interchange of Liverpool Street Station.
- 22.2. The Character Area has a mixed architectural and spatial character. At its northern and southern ends are characterful pockets of historic streetscape in the Bishopsgate and Crescent Conservation Areas; the former seen amidst the dramatic shift in scale of the City Cluster, the latter seen as part of the Local Setting of the Tower of London World Heritage Site, the presence of which defines the southern environs of the Character Area.
- 22.3. Between these two historic ends is a middle section of more modern, larger buildings running along the eastern City boundary. The street pattern is recognisably historic (echoing the form of the Roman and medieval City wall), but the streets have been realigned and rationalised. The scale of development and fineness of the street grain across the Character Area is accordingly quite mixed. Uses are mixed too, encompassing residential, transport, office, retail and leisure.
- 22.4. The Eastern City Fringe's defining character is of a liminal area of the City with a less well-defined and more elusive character, typical of fringe locations.

Historical Development

- 22.5. The majority of the Character Area fell outside of the Roman city walls, and consequently retained an open verdant character for much of the City's early history. Thought to have been principally used as a cemetery during the Roman period, development outside the walls was largely limited to a ribbon of buildings along the eastern and north-eastern access roads into the city, known as 'Algatestrete' and Ermine Road, later Bishopsgate. The abbey of St Clare was a notable exception, creating a large complex of monastic buildings to the centre of the Character Area in the early medieval period. Additionally, the priory of the Blessed Virgin Mary Without Bishopsgate, later St. Mary Spital, was founded on the east side of Bishopsgate in the late 12th century. Shortly before the dissolution, land associated with the priory of St Mary Spital was leased to an artillery company from 1537-80, referenced in the present-day street names of Artillery Lane and Artillery Passage.
- 22.6. Following the dissolution of the monasteries, the sale of monastic lands to wealthy families assisted the area in becoming a more fashionable suburb. The Elizabethan mansion, Fisher's Folly, stood just to the west of what later became Devonshire Square dates from this period. This character persisted into the early seventeenth century, with Bishopsgate in particular described as an "...an airy and fashionable area...a little too much in the country". The land along Bishopsgate itself retained the character of a garden suburb, with mansions of wealthier citizens developed nearer the gate. To the east and north, the urban grain became denser in response to the thriving trade route into the city centre. Communities of artisans, traders, Huguenot refugees and immigrants are known to have occupied this area creating a vibrant cosmopolitan urban environment.

- 22.7. In 1675 Fisher's Folly was abandoned and sold to Nicholas Barbon for development, with Devonshire Square and a new Quaker meeting house built on the former garden between 1678 and 1708. The remains of a wall of Fisher's Folly survives, forming the lower part of the rear wall of 4-18 Devonshire Row.
- 22.8. Further south, prior to the Great Fire, tighter grained development had spread infilling the land from Bishopsgate to Algatestreet, as well as along 'Minories', a long road running the length of the city wall named after the "Minoresses" of the St Clare's Abbey. During this period in the south of the Character Area began to take on a light industrial character with a number of yards identified on historic mapping, supplying the trade and industry to the north.
- 22.9. The 18th century saw a significant expansion of both residential and commercial developments, with the expansion of St Katharine's Docks causing a rise in the demand for houses for the wealthy merchant class. The development of America Square, Crescent and Circus, to designs by George Dance the Younger, were established during this period. These developments to the south of the Character Area are indicative of Georgian town planning ideals, sweeping away narrow lanes to provide clearer geometry to the streetscape. New Street also dates to this period, formed when the L-shaped Hand Alley was realigned and renamed in 1782.
- 22.10. During the 19th century there was a general decline of the area as a fashionable residential district with increased commercial activity. Existing buildings were modified, with a number of 19th century shopfronts along Bishopsgate inserted into much earlier buildings and the creation of larger purpose-built workshops and warehouses. Bishopsgate became characterised by the contrast between flourishing main thoroughfares, and slum-like conditions in the numerous overcrowded side streets. Within the south of the Character Area, the industrial character persisted with a 'tobacco and snuff' manufacturer and a large number of goods yards seen on late nineteenth century mapping.
- 22.11. The arrival of the London Blackwall Railway and Fenchurch Street Station by 1850 created a number of railway lines that bisected the Character Area on a north-south and east-west axis. The viaduct which formed Fenchurch Street Station's approach was later widened to the north in 1881, cutting across Vine Street through the area between America Square and Crescent. Additionally, by 1884 the eastward extension of the Metropolitan District Railway, now the Mansion House to Aldgate sections of the District and Circle line, ran beneath the Crescent. These interventions created large experiential barriers which in turned influenced the scale of development and use types. To the north of the Character Area, the main thoroughfares consisted mainly of late 19th century buildings which largely respected the pre-existing pattern of courts and alleys. The Bishopsgate Institute was built at this time, providing a public hall and library, now designated Grade II*. Early twentieth century development continued the trend of consolidating smaller plots into larger warehouses and offices. A notable pre second world war survival is Ibex House (Grade II) by Fuller, Hall and Foulsham, with a characteristic sleek design (currently undergoing renovation).
- 22.12. The Second World War brought widespread damage to the southern portion of the Character Area south of Stoney Lane, including the loss of eighteenth-century Holy Trinity Church built on the site of the former St Clare's Abbey. The demolition and clearance of the damaged built fabric throughout precipitated large-scale redevelopment from the 1950s onwards. Much of this significantly altered the building grain and eroded a domestic scale, with new building works creating on the whole larger commercial buildings. Post-war renewal subsequently created a more piecemeal and fragmented streetscape, with individual sites developed gradually over time, lacking a consistency of

height and building line. Typical of this period is the 1960s Middlesex Street Estate, a large residential development comprised of five large 'groundscrapers' surrounding an open courtyard with an additional 23 storey tower to the centre. The massing of the estate can be understood to adhere to its own internal architectural hierarchy with little to relate it to its surroundings, creating an almost defensive street presence.

- 22.13. Additionally, the arrival of Aldgate Gyratory and Bus-station south of Aldgate High Street further eroded permeability throughout the Character Area, as well as a human scale to the street front. A second large residential development arrived in the 1980s, in the Mansell Street Estate, formed of eight storey tessellated brick blocks and surrounding perimeter wall.
- 22.14. At this time the Crescent was rebuilt, removing some of the nineteenth century embellishments. Additional rebuilding occurred to the south and east sides of Vine Street facing Minorities and Tower Hill, with a series of modernist buildings in brick and concrete were completed by the Greater London Council for London Guildhall University. Later twentieth century rebuilding has now supplanted many of the immediate post war developments, creating a number of modern and contemporary buildings of varying heights and styles to the south of the Character Area. These are predominantly multi-storey, with several examples exceeding ten floors. Post modern developments to America Square, as well as the recently completed Motel One are of a scale which define the surrounding streets. To the north, the surviving historic warehouses and houses surrounding Devonshire Square have undergone alteration and refurbishment, with Shield House, 5 – 7 and 16 New Street which was altered for residential and retail uses.
- 22.15. While much of the Character Area is defined by modern development, the location of remaining historic fabric is recognised in the tightly drawn boundaries of the conservation areas designated across the Character Area, including Lloyd's Lane, The Crescent and Bishopsgate.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 22.16. The heights of the Character Area vary from lower-rise areas in the northern (Bishopsgate CA) and southern area (Crescent CA/ToL Local Setting) with higher buildings in the middle.
- 22.17. Within the Bishopsgate conservation area, the prevailing heights are between four and six storeys, many of them on smaller plots giving a sense of fine historic grain. Moving south, the former PLA warehouses and associated modern development around Devonshire Square increase the scale by another couple of storeys, imparting a sense of historic/industrial scale. These buildings are juxtaposed with the dramatic difference in heights in the City Cluster Character Area immediately adjacent.
- 22.18. Beyond these, the buildings become more modern, the building plots more amalgamated and the scale generally greater. Examples include the Middlesex Street Estate and the Beaufort House development.
- 22.19. A mixture of heights characterises the southern environs of Aldgate/Aldgate High Street, where undesignated historic buildings of 4-6 storeys intermingle with larger modern developments, including the midrise nucleus of buildings at Aldgate High Street/Minorities,

reaching heights of 13 storeys, the Vine Street student housing development at 10 storeys, and the 80 Fenchurch Street development at 15 storeys.

- 22.20. Further south, towards the ToL Local Setting Area, the buildings remain prevailing modern. Along Minorities the scale is fairly consistent at 6-9 storeys. The America Square/Cooper's Row hotel developments depart from this scale and are noticeably higher. The environs north of the ToL are largely modern, but for the concealed and subsumed Crescent Conservation Area, and are between 6 and 9 storeys.
- 22.21. Landmarks within the Character Area include the Church of St Botolph Aldgate (grade I listed), the tower of the Middlesex Street Estate, the former PLA warehouses, and the America Square development.

Morphology, Topography and Urban Structure

- 22.22. There remains a dense urban grain formed by the historic network of streets, lanes and alleys east of Bishopsgate to the north of the Character Area, around and leading to the enclave of Georgian warehouses at Devonshire Square, where the throughfares and spaces are more spacious and industrial in character.
- 22.23. Moving south, the streets assume a more primary character, heavy with vehicular traffic, and run south-east down towards the river, aligned approximately with the course of the Roman and Medieval City wall they lay beyond, connected by shorter streets running approximately south-west. All these streets are historic but have been widened and/or realigned to some extent.
- 22.24. Aldgate Square is a generous open space, recently implemented after the closure of the Aldgate Gyratory, framed by two main roads but largely pedestrian in character, with good open views of the Aldgate School and the Church of St Botolph Aldgate. To the south is another fragmentary stretch of historic townscape, framed by primary roads running down to the gyratory about the Tower of London, and intersected with shorter streets; as before, all these streets are historic but widened and/or realigned. Aldgate Bus Station is another major transport node around which large scale developments are coming forward, with new routes and a shared public realm design between them.
- 22.25. Vestiges of the Georgian planned development of Crescent and America Square survive to the very south of the Character Area but blurred and simplified by later redevelopments. The tracks into Fenchurch Street cut across the southernmost part of the area. Apart from Crescent, and Bishopsgate to the north, the urban structure is modern in character and characterised by large blocks formed by past site amalgamations, situated between primary roads and secondary crossing streets.

Built Form and Uses

- 22.26. Again, the architectural character of the area is decidedly mixed. Apart from the redbrick Victorian commercialism of the Bishopsgate conservation area, and the Georgian tones of the Crescent conservation area, there are no consistent stretches of townscape in the Character Area which, instead, is more characterised by various, often bulky, modern buildings of varying quality. These are eclectic in style and range from the brutalism of the Middlesex Street Estate (incorporating a tower element) to the postmodernism of America Square. Facades are similarly mixed in materials and employ a broad palette of glazing, curtain walling, metal and stone cladding, and differing solid: void ratios.
- 22.27. Uses within the Character Area cover a broad spectrum, with a markedly varied mix compared with other parts of the City. As well as the two residential estates, there are

high numbers of residential units throughout the Character Area, situated in a mixture of purpose-built residential blocks and the upper floors of historic buildings. The character of this residential is varied, too, with a mixture of social, private and student housing (the latter at Vine Street). There also seven hotels within the Character Area. Retail use is prevalent throughout the area, within the Bishopsgate conservation area and along Minories in particular, while other uses include transport (e.g., Aldgate Station), religious (e.g., St Botolph's) and institutional (e.g., the Bishopsgate Institute). All these differing uses act as a substantive counterweight to the commercial uses in the Character Area, which usually are the dominant use in other parts of the City, but here are equalled if not surpassed by the others.

Local Views

- 22.28. Outside of conservation areas, views across Aldgate Square from Fenchurch Street take in the open green space of the square, seen together with the spire of St Botolph Aldgate and its church yard. Contemporary development to the northern side of the square frames these views and contrasts with the lower scale and more mixed development including some nineteenth century buildings to the southern side. The open quality of the view combined with the public and ecclesiastical use of the church creates a more civic quality to the streetscape in this location, creating a focal point in the streetscape.
- 22.29. The following views are identified as of interest within the conservation areas located across the Character Area. Where available, the accompanying maps identifying these views have been included.
- 22.30. Within the Crescent Conservation Area Character Summary and Management Strategy, identified views primarily reflect where the form of the crescent is visible from the surrounding streetscape.

1. Glimpsed view of the Crescent from Minories along Hammett Street which runs through an opening in the university building.
3. A view north to Crescent underneath the university buildings from the open space on the former site of the Circus in Tower Hill Garden but is temporarily blocked by timber hoardings.
4. A narrow pedestrian route behind Crescent, accessed from Vine Street allows for close views of the rear of the buildings.
5. A view of the City Wall and the rear of Crescent is captured through the pedestrian alley reached from Vine Street.
6. An important view south from the Conservation Area captures views of the Tower of London World Heritage Site and beyond to Tower Bridge.
7. The southern part of the of the conservation area can be viewed from within the Tower of London.

The following views are identified within the Bishopsgate Conservation Area SPD:

5. View north from Bishopsgate to the southeast corner of the former Great Eastern Hotel
6. View southeast from the eastern entrance of Liverpool Street Station to the west elevation of the former fire station, 164 Bishopsgate

7. View south from Bishopsgate towards the eastern cluster of office buildings and the south of the City
8. View east along Brushfield Street to the Church of Christ Church Spitalfields
9. View east along Widegate Street to Artillery Passage
10. View west from New Street to the east entrance of Liverpool Street Station
11. View east from New Street into the courtyard of the former East India Company warehouses
12. View north from New Street to the gateway of 21 (with ram statue)
13. View west from Devonshire Row to the east elevation of the former Great Eastern Hotel
14. View north from southern end of Bishopsgate
15. View within Swedeland Court, off Bishopsgate

22.31. The following views are identified within the Lloyd's Avenue Conservation Area SPD:

1. Viewed from the west along Fenchurch Street, the buildings which face Fenchurch Street on the south side can be appreciated as a group in oblique views, with the East India Arms in the foreground, culminating in the grandest buildings at the top of Lloyd's Avenue.
2. The double curve of Lloyd's Avenue creates a series of subtly different views north along Lloyd's Avenue, with each building viewed obliquely and collectively in groups. At the top of the street, Furness House, Nos. 105-106 Fenchurch Street, has a dominant presence and terminates the view with its imposing central pedimented bay being gradually revealed upon approach.
3. The ground level rises between Crutched Friars and Fenchurch Street as it moves north away from the river. This emphasises the height and appearance of buildings when looking northwards, especially Furness House which forms an end stop looking north.
4. The 30 St Mary Axe building is a prominent feature in views north along both Lloyd's Avenue and Northumberland Alley.
5. Views south along Lloyd's Avenue are terminated by a group of modern buildings, including the north elevation of No. 17 Crosswall, the corner turret of Jardine House, and the upper storeys of No. 1 America Square beyond.

Conclusion – Character and Appearance

22.32. The character and appearance of the Character Area is extremely mixed, with no one use pattern or building typology prevailing, as befitting a more 'fringe' location. Where contemporary and twentieth century development has occurred, the lack of a consistent building line and grain combined with an array of experiential barriers, including railways and arterial road network, have prevented a sense of a co-ordinated intensification of height. Therefore, the Character Area remains sensitive to tall building development, in that it may incur further annexation of the remaining pockets of historic fabric and

increased difficulties for pedestrian wayfinding. Accordingly, the area is judged to be sensitive to tall buildings in character and appearance terms.

Strategic Views, Townscape and Heritage

- 22.33. The key sensitivity for this Character Area is the Tower of London World Heritage Site.

London View Management Framework

- 22.34. The Character Area is affected by a number of LVMF views, principally River Prospect 10A.1 (Tower Bridge, North Bastion) and Townscape Views 25A1-3, the views of the Tower of London World Heritage Site from Queen's Walk on the South Bank.
- 22.35. 10A.1 – Tower Bridge (North Bastion) and the kinetic experience over the bridge- The Character Area is located towards the northernmost edge of the triptych in this view, over the shoulder of and behind the White Tower. It already has an unwelcome presence in this view through the way the upper parts of America Square emerge between the turrets of the White Tower.
- 22.36. Although the management priority for this view is the relationship between the City Cluster and the Tower of London, further tall building development within the Character Area could have implications for the setting of the ToL to the north, potentially appearing behind the WHS or overwhelming it to the north in this view.
- 22.37. In the kinetic experience moving north over Tower Bridge, the Character Area remains behind the WHS, and further tall building development could have implications for the skyline presence and wider setting within the experience. Relevant SPG paras: 183-187
- 22.38. 11B.1 & 2 – London Bridge (Downstream)- The Character Area is located within the central sections of these triptychs. Further tall building development within the southern half of the area in particular would have implications (i) for the setting of the Tower of London to the north, forming an unwelcome contrast to its currently relatively low-rise setting and (ii) challenge or distract from the other landmarks noted in these views, including Custom House, Old Billingsgate, the tower of the PLA building and the spire of All Hallows by the Tower. The Character Area is also partly located within the left-hand section of the triptychs, but intensification would be likely screen by the existing bulk of the Northern and Shell building and St Magnus House. Relevant SPG paras: 202-205.
- 22.39. 15B.1 & 2 – Waterloo Bridge (Downstream)- The Character Area is located in the central section of these triptychs. Further tall building development in the area would likely begin to appear to the south of the City Cluster, so would not undermine the presence of the Cathedral; it could, however, challenge the primacy of the Monument on the skyline when viewed from these locations. Relevant SPG paras: 262- 267.
- 22.40. 16B.1 & 2 – Gabriel's Wharf- The focus of these views is the Cathedral. Further intensification in the Character Area would likely appear to the south of the City Cluster and therefore unlikely to impact the contribution or appreciation of the Cathedral in this view. Further intensification of tall buildings would be consistent with the existing character of this view but should respond to the hierarchy and form of the City Cluster. Relevant SPG paras: 280-283.

Townscape Views

- 22.41. 25A.1-3 – The Queen’s Walk- The White Tower is a Protected Silhouette in these views and a Protected Vista applies from Assessment Point 25A.1. The Character Area is located directly behind the WHS in each of these Assessment Points, and in the kinetic experience between them. It has a visible presence in these views through the America House and the Cooper’s Row Hotel, the upper levels of which are clearly visible behind the WHS.
- 22.42. The Protected Silhouette is currently largely seen against clear sky (but for the slight infringement caused by St Clare House) and the WHS as a whole is extremely legible, standing proud and distinct of modern development in the background to the west and east. The views provide an excellent perspective on the Tower as an internationally famous monument and its landmark siting apart from the City controlling a key strategic riverside location. Further tall building development within the Character Area could have implications for both of these key attributes of OUV and could erode the primacy of the WHS on the skyline and clash with the Protected Silhouette. Relevant SPG paras: 414 – 422

St Paul’s Heights

- 22.43. The site is not in the St Paul’s Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in those strategic riparian views identified in the Protected Views SPD and are the subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD.
- 22.44. The site is partially within the visual scope of the backdrop setting of the Cathedral in those same views, from Hungerford, Waterloo and Blackfriars Bridges, in addition to the kinetic sequence along the South Bank Queen’s Walk between Waterloo and Blackfriars Bridges. Further tall building development within the Character Area could have implications for the general setting of the Cathedral as governed by the St Paul’s Height’s policy, although it could largely be screened by the existing City Cluster in these views.
- 22.45. The middle of the Character Area is under the sight path of the iconic views of the Cathedral from Fleet Street along the Processional Route. Further tall building development within the Character Area could therefore risk impacting the primacy of the Cathedral and its silhouette in this view.

City Landmarks and Skyline Features

- 22.46. The City’s adopted Protected Views SPD identifies one City church with a skyline presence within the boundary of the Character Area, St Botolph Aldgate. Further tall building development within the Character Area could have implications for its skyline presence, principally in views north up Minories and south down Bevis Marks.
- 22.47. Additionally, the following are located near the Character Area and therefore further tall building development of height could have implications for their local settings:
- St Botolph Bishopsgate (grade I)
 - Tower of former PLA building (grade II*)

The Monument

- 22.48. The Character Area is not affected by views from or of the Monument as identified in the City's adopted Protected Views SPD (2012). However, there are fine long views of the Monument's summit and copper orb from the western bridges, chiefly Waterloo Bridge. In these, the orb is seen against clear sky as the prime skyline element rising above the City's roofscape. Lying behind in these views, further tall building development in the Character Area could undermine the primacy of the Monument in these views.

Tower of London World Heritage Site

- 22.49. The Character Area lies just to the north of Tower of London and therefore has a pivotal role in the setting of the WHS. Its southern extent lies within the Local Setting Area of the WHS. The three LVMF views which govern development in relation to the Tower have been discussed above. In addition to these, the Local Setting Study (2010) sets out a number of Representative Viewpoints from within the WHS against which development must be assessed:

Scaffold Site

- 22.50. Views from the scaffold site take in the buildings of the inner ward, including the White Tower, the Bloody Tower and Queen's House and Fusiliers' Museum, set around the open space of Tower Green and enclosed by the inner curtain walls. The proximity of these buildings to each other, the green and the curtain walls is illustrative of their specific historic use and function, making an important contribution to the World Heritage Site. The upper reaches of the City Cluster are distantly visible to the northwest, creating a number of tall buildings which appear as a co-ordinated group on the skyline. While visible, the distance of these buildings is such that the sense of a preserved historic environment to the immediate surroundings of the scaffold site remains intact.
- 22.51. The Character Area is located north of this viewpoint, commencing approximately 200 metres outside the curtain walls. Its relative proximity means that tall building developments are likely to appear overly intrusive and dominant in the skyline and undermine the sense enclosure within the curtain walls.

Inner Curtain Wall (N)

- 22.52. This viewpoint from the Inner Curtain Wall takes in 360-degree views over both the centre of the Tower of London enclosure, the Outer Curtain Wall, as well as views north towards the City Cluster, framed on either side by the Martin and Brick Towers. The landmark siting of the Tower, close to the contemporary heart of the city, as well as its concentric design and defensive character are all readily appreciable.
- 22.53. Buildings within the southern half of the Character Area are presently visible from this viewpoint, comprising modern development of a markedly lower scale before the dramatic crescendo of height within the City Cluster interior commences to the west. As above, Tall building development in the Character Area therefore has the potential to disrupt an appreciation of an intentional composition to the cluster, diminish the prominence of the Tower itself and more specifically, collide with silhouettes of the Brick, Flint and Bowyer towers as the inner curtain wall is traversed.

Inner Curtain Wall (S)

- 22.54. This viewpoint similarly enables 360-degree views over both the riverside, Tower of London interior and City Cluster beyond. The concentric castle design, the prominence of

the White Tower, and the Tower's relationship to the Thames to the south can be appreciated within this view and forms the core of its contribution to the World Heritage Site. The White Tower is seen centrally within views north from this viewpoint, with the Character Area located directly behind, beyond Tower Hill. Tall building development in the Character Area therefore has the potential to compete with or conjoin within the silhouetted built forms within the Inner Yard, and the White Tower in particular, diminishing its skyline presence.

Main entrance and Moat

- 22.55. This viewpoint is located on the bridge between the Byward and Middle Towers, looking across the moat and defences of the tower. This viewpoint reflects the main entrance into the Tower complex since the 13th century, with the military and defensive character of the Tower readily appreciated.
- 22.56. Buildings within the Character Area including One America Square are clearly visible, taking in the southeast end of the Character Area. Tall buildings within the Character Area, within the south in particular, have the potential to appear overly dominant in views of towards the curtain wall, and diminish the sense of prominence of the Tower of London in its wider setting.

Tower Hill

- 22.57. Tower Hill provides a sequence of views looking towards the Tower from the West, located at the top of a small incline. These views are dominated by the Tower's outer defences, illustrating its military importance and strategic location. The local setting study defines the significance of this view as making 'explicit the relationship of the Tower to the river from the landward side'. While the Character Area is located away from the river to the north, tall building development nevertheless has the potential to be overly dominating in this view, undermining the prominence of the Tower and its defences.

Tower Bridge

- 22.58. This viewpoint is recognised as LVMF viewing location 10A, assessed above.

Queens Walk

- 22.59. This viewpoint is recognised as viewing location 11B.2, assessed above.

Neighbouring Borough Views

- 22.60. Southwark. - King's Stairs- The Character Area is to the north in this very fine view looking upstream of Tower Bridge, St Paul's, the Monument and the Tower of London. Further tall building development in the Character Area would appear to the north of these landmarks, on the right-hand side of this view.

Conclusion

- 22.61. Due to its proximity commencing almost immediately beyond Tower Hill to the north, the Character Area is found to be very sensitive to tall buildings in respect of Strategic Views, Townscape and Skyline, primarily due to its proximity to the Tower of London World Heritage Site.

Heritage Significance

Overview of Heritage Assets

- 22.62. There are not many listed buildings or designated heritage assets within the Character Area in comparison to other parts of the city. These largely fall within designated Conservation Areas, and principally within the narrow lanes to the east of Bishopsgate.

Listed buildings

- 22.63. **Grade I** – 1, the Church of St Botolph
- 22.64. **Grade II*** – 4 Bishopsgate Institute, 10 & 14 Brushfield Street, Hoop and Grapes Public House, 46 Aldgate High Street.
- 22.65. **Grade II** – 19 including a grouping of eighteenth to nineteenth century former PLA warehouses around New Street and Devonshire Square, a group of 17th to 18th century survivors to Aldgate High Street as well as Ibe House to the south.
- 22.66. With the exception of the PLA warehouses, these designated assets on the whole relate to the historic character of the area as a residential suburb, with uses ranging from housing to amenities such as shops, pubs and a place of worship. The north retains more complete groupings of such structures, and here Tall buildings would erode the finer grain to the streetscape which supports the sense of a preserved historic setting. Equally, while assets are more scattered in the south, intensification of height and mass would increase the sense of annexation and isolation of these assets from each other. The church of St Botolph specifically has a landmark quality which is at risk of diminishment with further tall building development in close proximity.

Conservation areas

- 22.67. The Character Area contains most of Bishopsgate conservation area at its northern end, and also includes the diminutive Crescent and part of Lloyd's Avenue conservation area at its southern end.
- 22.68. Bishopsgate- That part within the Character Area is characterised by a surviving historic street pattern and C19-C20 buildings of a generally consistent historic townscape scale, characterful use of red brick with stone dressings, and a historic commercial character with many shopfronts and other such details.
- 22.69. Crescent- One of the City's smallest conservation areas, Crescent is a post-war rebuilding of a Georgian crescent shattered by bombing. Its character is outwardly Georgian and domestic in character and consists of fine brickwork frontages with sash windows and doorcases, all located in a highly secluded Crescent off Minories.
- 22.70. Lloyd's Avenue (Part)- Within the Character Area the conservation area comprises a group of listed and unlisted office buildings of consistently high architectural quality, mainly Edwardian in origin, with a high level of conformity in terms of scale, design and street plan. These buildings have solid masonry facades with regular punched openings, enriched by abundant classical modelling and surface detail.
- 22.71. Under current Local Plan policy there is presumption to refuse any tall building within the conservation areas (CS14 and S12, in which conservation areas are deemed areas

inappropriate for tall buildings). While the wider setting of Bishopsgate Conservation Area includes the City Cluster almost immediately to the south, the continuation of lower building heights to the southeast within the Character Area enables a sense of permeability towards the river as well as demarcates the extent of the London Wall. Tall Buildings within the Character Area would likely obscure these qualities, eroding the contribution of setting to the conservation area's significance. Crescent and Lloyd's Avenue Conservation Areas are presently experienced as isolated pockets of historic fabric, within a largely altered wider streetscape. While further tall buildings would not be inconsistent with their present setting, they could further erode the sense of enclosure and intactness to the conservation area interiors through a more dominant skyline presence.

Core City Typologies

- 22.72. The Character Area best exemplifies the following typologies:
- 22.73. Offices - Offices comprise a large majority of the buildings within the Character Area, and these are typically either late twentieth century or contemporary redevelopment. These buildings are disparate in character and large in scale, creating a streetscape with a sequential and fragmented rather than consistent appearance. Beaufort House is representative of late twentieth century redevelopment works of this nature which, similarly to the America Square development, uses a mix of glazing and stone façades in a post-modern style. Listed office buildings in the area include Ibex House, a rare inter-war survival and purpose-built design. Marlow House within the Lloyd's Avenue Conservation Area is also interwar in date and retains a finely decorative metal surround to shallow projecting Crittal style bay windows at 1st-3rd third floors.
- 22.74. The later twentieth century and contemporary office developments are less sensitive to tall building development, tall buildings may exacerbate the sense of a disjointed townscape, where offices were built as part of a consistent streetscape or form a distinct group.
- 22.75. Warehouses- Within the Bishopsgate Conservation Area many of the former warehouses have been converted into office use, generally retaining the characteristic proportions to the fenestration, so that their historic function remains appreciable. Former warehouses have also now been converted, containing some retail uses such as the grade II listed former Port of London Authority's Warehouses.
- 22.76. Residential- The Middlesex Street and Guinness Street Estate provides a concentration of residential dwellings within the centre of the Character Area. More generally residential housing is scattered throughout. To the north, Bishopsgate Conservation Area retains a small number of surviving eighteenth century townhouses including 5-7 New Street and 12 and 13 Devonshire Square. The rebuilt Crescent reflects a small piece of Georgian townscape which remains recognisable for its residential origins. Tall buildings pose some risk where groupings of historic residential dwellings create pockets of preserved historic streetscape, which could be overwhelmed by new intensification of height.
- 22.77. Retail and Hospitality- To the north the Character Area contains a number of eighteenth-century shops which illustrate the importance of the area as a commercial centre for much of its history. Additionally, some nineteenth century shops have been retained along Minories, but the shopfronts themselves are modern. Historic pubs in the area include Dirty Dick's Public House at 202-204 Bishopsgate (established 1745) and the Grade II* list Hoop and Grapes, a late seventeenth century survival. Additionally, number

of contemporary hotel developments are also within the Character Area including, Motel 1 and The Canopy. As with the impact to residential buildings, tall buildings risk the loss of a historic grain to the streetscape, where this remains appreciable, and particularly within the Bishopsgate conservation area.

- 22.78. **Tall Buildings-** While the Character Area contains a lot of contemporary development, very few buildings are over 75mAOD, including America Square and Middlesex Street Tower. A number of late twentieth century and contemporary developments are between 60-70m in height, including the ACME buildings, St Clare House and Motel 1. The overall pattern of height within the Character Area feels capricious and sporadic. As such future intensification of Tall Building development, could risk furthering the sense of fragmentation to the streetscape, and should seek to create a coordinated response to the nearby City Cluster and existing tall buildings.

Core City Significance Traits

- 22.79. The Character Area is considered to particularly support the following traits of the City's overarching Heritage Significance identified in section 2. The susceptibility of these traits in relation to the intensification of tall buildings within the Character Area are outlined below.
- 22.80. **COMMERCE** Strong transport links including proximity to the river and later the railway enabled goods and services to flow into the area. The location outside the city walls also enabled the relatively early development of larger scale warehousing which, in turn fed the flourishing commercial interests along principal streets. This sense of a bustling historic commercial centre is best represented along Bishopsgate, with retail frontages seen together with the warehouses behind. Tall buildings risk the obscuring of this historic pattern of development, and the inter-relationship between warehousing and retail. The later twentieth century commercial development which characterises much of the south of the Character Area is generally less sensitive to tall building development.
- 22.81. **STREET PATTERN** The alignment of the London Wall is clearly expressed in the axial arrangement of Minories. While post war rebuilding has created a less coherent grain to the streetscape, the location of the Character Area largely beyond to the city walls is appreciable. Tall building development risks the loss of a sense of distinction between the city wall interior and exterior, the former recognisable through views towards the city cluster.
- 22.82. **VARIETY & DIVERSITY** Variety of massing, use, materiality and grain defines much of the Character Area, largely as a result of extensive waves of post war rebuilding. Consequently, perhaps more than any other Character Area there is little consistency to the streetscape aside from where larger developments create a continuous frontage to a single city block. This in general reduces the sensitivity of the Character Area to new development of all forms, including that of Tall Buildings. However, a lack of hierarchy and focal points within the architectural environment means that tall buildings may exacerbate the incidental quality to the existing streetscape, with little to dictate where intensification of height may be advantageous from a place making perspective.

Conclusion

- 22.83. The Character Area is found to be **sensitive** to tall building development with regards to heritage significance, principally stemming from close proximity to the Tower of London World Heritage Site. The better-preserved townscape to the north of the Character Area, would also be adversely affected by the loss of a finer grain to the streetscape or intrusion into enclosed views within surviving historic lanes and alleys.
- 22.84. Due to widespread late twentieth and contemporary redevelopment across the south of the Character Area, setting in general has been found to make a reduced contribution to the significance of heritage assets in comparison to elsewhere in the city. Heritage assets are largely isolated and scattered across the Character Area and cumulatively create only a fragmentary historic environment. However, with regards to the identified Core City Significance Traits, and 'street pattern' in particular, it is important to note the influence of the London Wall remains appreciable, creating a sense of distinction between the city interior and exterior. A loss of this sense of contrast would therefore have a detrimental impact on how the Character Area contributes to the City's significance.

Overall conclusion: Sensitivity to Tall Buildings

- 22.85. The Character Area is considered to be **very sensitive** to tall buildings, through (i) proximity to and partial location within the local setting of the Tower of London World Heritage Site (ii) Potential harmful impact to LVMF viewpoints 10A.1 and 11B.1 &2, with implications for the setting of the ToL to the north and Tower Bridge as appreciated from the river. (iii) The lower rise and finer grained character and appearance of the Bishopsgate, Lloyd's Avenue, and Crescent Conservation Areas.

Character Area: Holborn and Fleet Valley

Introduction

- 23.1. Holborn and Fleet Valley is, like the rest of the City, well connected by all forms of transport. It has a TfL Public Transport Accessibility Level of 6b, the highest level of public transport accessibility in the Capital. The area incorporates the major interchange of Holborn Circus and includes bus routes along Holborn, Newgate Street and Farringdon Street, Chancery Lane underground station, City Thameslink station and proximity to Farringdon Crossrail, Underground and Thameslink stations in the nearby Smithfield Character Area. The Cycle Superhighway runs up Farringdon Street north-south.
- 23.2. The central and eastern sides of the Character Area are constrained by the high number strategic views which dissect the area from the northwest to south east. These include the Protected Vistas and Panoramas from Blackheath, Greenwich Park and Primrose Hill. Additionally sensitive riparian viewpoints between Hungerford and London Bridges, as well as designated viewing points towards St Paul's in the wider setting. This has necessarily limited the heights of recent developments surrounding New Street Square, with new developments largely to 17-22 storeys.
- 23.3. The historic environment is fragmentary in character and takes the form of a scattering of individual heritage assets, often highly graded, dispersed between modern blocks, generally of larger plots but of a broadly consistent 6-9 storey scale overall. The street grain alternates between narrower historic routes and broader routes widened and/or realigned in the modern period. The Chancery Lane Conservation Area occupies approximately a quarter of the area at the western edge, and provides a little more consistency in age, grain, architecture and character; otherwise, the prevailing architectural and spatial character of the area is quite variable. To the east is a sliver of the Newgate Street comprising two listed buildings and open spaces on the western edge of Old Bailey. At New Street Square itself, there are a nucleus of tall buildings grouped between Fetter Lane to the west, Shoe Lane to the east and East and West Harding Streets to the south.
- 23.4. Remnants of medieval courts and alleys such as at Staples and Barnard's Inn, (Grade I, and Scheduled Monument respectively) survive sporadically throughout the character area, best preserved within the Chancery Lane Conservation Area to the west. These embody a core element of the character area's significance. Beyond the inherent rarity value of a surviving pre-Georgian streetscape, several of these structures are associated with the architectural foundations of the legal profession in the city. A sense of enclosure to these yards and alleys are an important aspect of their setting, as are glimpsed views west towards Lincoln's Inn from Chancery Lane. A number of foundational buildings associated with Education are also represented, including Kings College (Maughan Library, Grade II*). The public function of these buildings is reflected in their landmark quality, their relative scale and decorative facades. Other landmark structures such as St Andrews Holborn also retain their more spacious historic plots, preserving areas of surrounding open space which allude to their public use. Views along Holborn towards the church spire of St Andrews is therefore of importance.
- 23.5. Glimpsed views towards larger areas of Victorian intervention, such as the Prudential Building (north of the character area, Grade II*), Holborn Viaduct, as well as Breems Buildings are also of interest, contributing a contrasting sense of scale to the medieval street pattern.

- 23.6. Notwithstanding these elements of significance, New Street Square's defining character is of a typical stretch of 'midtown', of a transitional urban area between destinations which have a more defined character and identity, including Fleet Street, Holborn, Smithfield and the Inns of Court.

Historic Development

- 23.7. The Character Area lies largely outside the walls of the Roman and medieval City; it retained an open character until the early Modern period when expansion beyond the City walls began to transform it first into a suburb and then, eventually, into a densely built-up part of Central London.
- 23.8. Located towards the western edge of the medieval City, during the Tudor period the area was characterised by large swathes of green space set behind the key north-south routes, comprising 'Chaunceler' 'Feweter' and 'Showe' lanes. By 1682 William Morgan's 'Map of the City of London, Westminster and Southwark' shows this urban grain has been largely infilled, with a network of narrow yards and lanes aligned east-west, creating a dense urban streetscape. New Street Square is identifiable at this time, principally accessed from West Harding Street from the south and Dean Street from the west. Holborn is already established as a major thoroughfare, with a number Inns of court and St Andrews Church fronting north directly onto the road.
- 23.9. This streetscape persisted towards the end of the nineteenth century, with the western end avoiding much rationalisation. Much of this surviving streetscape now falls within the Chancery Lane Conservation Area (See Chancery Lane Conservation Area Character Summary and Management Strategy). In the east, the arrival of the 'London Chatham & Dover' railway viaduct swept away a large area of historic street grain, establishing larger, regular plots and the creation of St Andrews Street terminating in Holborn Circus to the west of the church. The blitz had a major impact, with virtually all of the structures around New Street Square from the viaduct in the east to Fetter Lane in the west 'damaged beyond repair' (Bomb Damage Map 1945). The majority of the effected plots were subsequently consolidated in the twentieth century, and this is reflected in the lack of designations to the east of the character area. New Fetter Lane was created at this time, connecting the western side New Street Square to Holborn in the north. 2006-2015 saw the redevelopment of the land surrounding New Street Square, resulting in an intensification of heights, with five new office buildings now reaching up to 21 storeys and re-defining the square as an area of formalised modern public realm.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 23.10. Heights are variable in this Character Area and include taller buildings. They range between circa 4 (e.g., Took's Court) and 21 storeys (6 New Street Square). Landmarks include the Church of St Andrew Holborn, the former Public Records Office, now the Maughan Library,
- 23.11. In the Chancery Lane Conservation Area, building heights generally average between five and eight storeys. Lower heights are intermingled with the larger buildings, generally focused in areas of greater survival like Took's Court and Barnard's Inn. These offer a domestic scale to contrast with larger, later buildings such as the London Silver Vaults and Lonsdale Chambers.
- 23.12. The scale of buildings on the west of Fetter Lane but outside the area generally conform to the scale of the conservation area, with marginal increases in height, apart from the

recent scheme at 100 Fetter Lane (being implemented) which aligns more with the heights of New Street Square.

- 23.13. Building heights increase eastwards of the area towards New Street Square, where a series of taller buildings (14-21 storeys) form a prominent grouping of increased height, gradually rising in scale from 40-60m to reach a 'summit' of the following tall buildings:
- 6 New Street Square – 94m
 - 12 New Fetter Lane – 77m
 - 1 New Street Square – 84m
- 23.14. New Street Square provides a notable and relatively large new civic space, demarcated by an increase in building heights surrounding the square. Another important nodal landmark space is at a confluence 'round point' comprising Shoe Lane, St Bride's Street Little New Street and Stonecutter Street. This location has an emerging landmark status with the distinct corner elements of 1 New Street Square (84.2m AOD), Goldman Sachs (25 Shoe Lane) (66.2m AOD) and consented schemes at Stonecutter Court (68.8m AOD) and 120 Fleet Street (93.1m AOD) offering a new 'gateway' to the wider New Street Square estate.
- 23.15. Past New Street Square, moving eastwards, are a mixture of more traditionally scaled buildings interspersed with taller modern blocks averaging between 50-70m in height. Due to the falling topography in this area these are generally less prominent/obvious than NSS.

Morphology, Topography and Urban Structure

- 23.16. The area has a variable urban grain, with sections of surviving historic street pattern of a finer grain (typically concentrated in the Chancery Lane CA, though with some residual survivals in the east of the area) connecting with larger, broader thoroughfares – ancient routes such as Fetter Lane, which was realigned and widened in modern times.
- 23.17. Topographically, a subtle fall w-e towards the Fleet valley and n-s towards the Thames results, broadly, in a gentle decline eastwards, southwards and south-eastwards from the higher ground in the Character Area to the north.
- 23.18. Nodes or junctions include Holborn Circus to the north of the area and the convergence of Shoe Lane, St Bride Street and other smaller streets in the 'star junction, east of New Street Square. The orientation of the new development explicitly addresses this junction, establishing a sense of a focal point within the immediate surroundings and views south from Holborn.
- 23.19. Primary routes include Farringdon Street, formed over the Fleet river in the C19, Holborn and Holborn Viaduct, Chancery Lane and New Fetter Lane. These form a distinctive shape, reminiscent of a pistol holster, which can be recognised on the Agas map of 1561. Within this shape the main routes have retained their 17th century configuration; Southampton Buildings, Furnival Street, Cursitor Street, Took's Court and others are all as they appear (sometimes renamed, or slightly widened) on Ogilby and Morgan's map of 1676.
- 23.20. Partly covered by the Chancery Lane Conservation Area, this western side of the Character Area has greater intricacy, with small, surviving historic courts such as Quality Court and Took's Court and narrow streets like Rolls Passage juxtaposed with broader routes like Holborn. Historic open spaces associated with Staple and Barnard's Inns offer further variation, although the configuration of the latter has changed over time. The

tightness of the street pattern can be seen in the relationship between building lines and pavement. Many buildings meet the back edge of the pavement and others clearly define the boundary with railings. This strong definition, particularly at street corners, has resulted in a regular built form of defined blocks.

- 23.21. The jaggedness of the eastern conservation area boundary indicates the bomb damage suffered by the area during World War Two and the post war rebuilding that followed. Moving eastwards from Fetter Lane, the rest of the Character Area possesses a moderately regular grain. New routes have been introduced through development sites which complement the survivals of historic street pattern, such as at New Street Square. There are a series of historic courts/routes branching off Farringdon Street to the east.
- 23.22. There is a trend towards large, modern office buildings fronting or incorporating open spaces/pocket parks/former City churchyards. Such spaces soften the urban character of this area and introduce welcome notes of greening, planting and trees.

Built Form and Uses:

- 23.23. The Character Area encompasses a very broad spectrum of building, from the C15 timber-framing of Staple Inn fronting Holborn to the hypermodern architectural styling of 1 New Street Square. No one architectural character, typology or age prevails, however New Fetter Lane can be seen boundary between the better-preserved historic streetscape to the west, and taller to mid-rise commercial curtain wall developments which arrived following WWII damage.
- 23.24. Buildings in the Chancery Lane Conservation Area tend towards traditional materials and architectural styles, reflecting their age. Within that designated area there is great diversity of architectural character, from the aforementioned Staple Inn to the neo-Gothic of the Maughan Library (Pennethorne), the domestic brick frontages of Took's Court and the Art Deco frontage of the former Brewery at the top of Fetter Lane. Outside the conservation area are pockets of historic architecture and spaces, such as St Andrew's Church and its associated Vicarage, or the standalone listed buildings on Farringdon Street.
- 23.25. Contrasting with all of these are the larger modern buildings interspersed throughout the character area and forming a particularly defined group, in terms of unified age, materials and scale, around New Street Square and executed in an array of heights, materials and details, with glass, steel and metal cladding panels predominating. The modern buildings tend to occupy large plots, the result of site amalgamations in the twentieth century and particularly after the bomb damage incurred in World War Two; prior to this the fine grain seen in the Chancery Lane conservation area would have predominated.
- 23.26. The architectural diversity of this character area is such that its streets can possess wholly different characters – for instance, Shoe Lane is entirely lined with modern facades of varying forms and quality, while Chancery Lane is lined with a far richer historic townscape.
- 23.27. As with elsewhere in the City, the prevailing land use is office in a variety of building typologies – from historic buildings converted to office use to purpose-built C20 office blocks; some of these, but not many, incorporate retail frontages at ground floor level, while others bring inactive frontage down to street level. This character area does have a high proportion of residential units, concentrated mainly between Fetter Lane and Chancery Lane; there are also numerous residential units in the courts and alleys south between the character area and Fleet Street. Historic land uses have been associated with the printing industry allied to Fleet Street's newspaper production and the bookselling

trades clustered to the east around St Paul's. Retail units tend to exist only on the main streets.

Local Views

23.28. The Chancery Lane Conservation Area SPD identifies numerous representative local views in the west side of the character area, and these are outlined below.

23.29. Views identified in the Chancery Lane Conservation Area SPD

1. View of the opening of Chancery Lane from High Holborn
2. View south along Chancery Lane from outside No. 53-64
3. View of Staple Inn gardens from Chancery Lane
4. View into Quality Court from Chancery Lane
5. View along northern side of Cursitor Street from Chancery Lane
6. View along Rolls Passage from Chancery Lane
7. View of Breams Buildings from Chancery Lane
8. View of the west frontage of the former Public Records Office from Chancery Lane
9. View of former Patent Office from Southampton Buildings
10. View into Took's Court from Cursitor Street
11. View into Took's Court from Furnival Street
12. View out of Took's Court towards Cursitor Street
13. View north along Furnival Street from Cursitor Street
14. View of Staple Inn north range from Holborn
15. View into Staple Inn quadrangle from Holborn
16. View of Staple Inn Hall from entrance to garden
17. View of Staple Inn Hall from Holborn entrance
18. View into Dyers Buildings from Holborn
19. View of Barnard's Inn Hall from tiled Holborn entrance
20. View of Barnard's Inn Hall from south-west corner of courtyard
21. View of Nos. 78-86 Fetter Lane from Holborn
22. View of Dunstan's Court and the former Public Records office from outside No. 5-11 Fetter Lane.

23.30. Characteristic local views outside of the conservation area include the panorama south and east from Holborn Circus. This view possesses a layered character, taking in the towers of the Church of St Andrew and City Temple seen together with the sweeping

glazed curve of 33 Holborn and Goldman Sachs. These buildings however retain their landmark quality, and this view is therefore sensitive to any competition along the skyline.

- 23.31. A cohesive contemporary character taking in the redevelopment surrounding New Street Square is appreciable in views along St Brides Street as well as north and south from New Fetter Lane. Here the curve in the road creates unfolding views flanked by new buildings, which in turn frame the Maughan Library, seen centrally in views south-west from the road bend. As above, this view is sensitive to any encroachment of the open sky surrounding this local landmark structure.

Conclusion

- 23.32. New Street Square has no unifying or especially sensitive architectural, physical or spatial character. It has a diverse mixture of buildings styles, scales and materials and the fineness of the street pattern is equally variable. Overall, it is considered only sensitive to tall buildings in respect of character and appearance.

Strategic Townscape, Heritage and Skyline

- 23.33. On a strategic level, tall building development within the Character Area has the potential to affect St Paul's Cathedral and other Skyline Features, including St Bride's, St Dunstan in the west and St Andrew Holborn, in addition to LVMF River Prospects, views from the Monument Viewing Gallery and local borough views in the City of Westminster.

London View Management Framework

- 23.34. The majority of the Character Area (all but the south-west sector around Bream's Buildings) is affected by LVMF view designations.
- 23.35. London Panorama 4A.1 – Primrose Hill (LVC)- The Character Area lies in the Middle Ground of the view. The Landmark Viewing Corridor imposes a height ceiling in a NW-SE channel over:
- N end of Fetter Lane & NE tip of Chancery Lane CA
 - Holborn Circus
 - Goldman Sachs
 - City Thameslink
 - Limeburner Lane/Old Bailey

- 23.36. As such, there would be a presumption to refuse tall buildings in these areas, which would directly conflict with the skyline silhouette of the Cathedral. Paragraph 128 of the SPG notes while there is little prevailing order to the existing tall buildings within this view, reduced visibility towards the Cathedral remains an important risk. The copper spire of 24-30 Holborn at the northern termination of Fetter Lane is just visible in front of the southern clock tower of St Pauls and demonstrates the sensitivity of this area to development.

The Wider Setting Consultation Area of the view covers the following areas:

- E side of CA
- Part of No. 33 Holborn Circus
- No. 8-10 Fetter Lane and Bartlett's Passage (part)
- Buildings immediately S of Goldman Sachs
- Buildings lining Holborn Viaduct/Newgate Street

- 23.37. Development in these would trigger a qualitative assessment instead of an automatic refusal. New Street Square mostly lies outside the viewing corridor but appears as a group of tall buildings immediately to the W and partially within the WSCA. There is development in other boroughs closer to the viewing location which partially screens them. Tall buildings in the WSCA would need to be carefully sited and scaled so as to respect the setting of the Cathedral and ensure the peristyle, drum, dome and western towers remain pre-eminent, so the ability to recognise and appreciate the Cathedral is protected. Relevant SPG paras: 128, 132, 134
- 23.38. London Panorama 5A.2 – Greenwich Park, Wider Setting Consultation Area- The Character Area lies in the Background of the view. The WSCA covers much of the Character Area, leaving only a triangular pocket in the south-west within the area boundary uncovered (though partly within the Chancery Lane CA). Development that exceeds the WSCA threshold triggers a qualitative assessment of impact on the Strategically Important Landmark (St Paul's). Much of New Street Square is in the WSCA, to the west. No.5 New Street Square and the Rolls Building (Law Courts) lie outside the CA and the WSCA. Tall buildings proposed behind the Cathedral in the WSCA would directly conflict with its skyline silhouette and pre-eminence. Tall buildings in the WSCA either side of the Cathedral would need to be carefully sited and scaled so as to respect the setting of the Cathedral and ensure the peristyle, drum, dome and western towers remain pre-eminent. Relevant SPG paras: 142, 145
- 23.39. London Panorama 6A.1 – Blackheath, Wider Setting Consultation Area- The Character Area is located in the Background of the view. The coverage of the WSCA of the Character Area is very similar to the Greenwich view, but aligned slightly more north-westerly, meaning that most of New Street Square lies outside or is clipped by the view. As with the Greenwich view, tall buildings proposed behind the Cathedral in the WSCA would directly conflict with its skyline silhouette and pre-eminence, potentially impacting on the ability to recognise and appreciate St Paul's. Tall buildings in the WSCA either side of the Cathedral would therefore need to be carefully sited and scaled so as to respect the setting of the Cathedral and ensure the peristyle, drum, dome and western towers remain pre-eminent. Relevant SPG paras: 151, 153, 156

River Prospects

- 23.40. The Character Area has the potential to affect five River Prospects: Southwark Bridge, Waterloo Bridge, Gabriel's Wharf Hungerford Bridge and Westminster Bridge. The Character Area lies in the background of these views and is not immediately visible, but tall buildings within the area could appear on the skyline above the Temples and Whitefriars conservation areas to the west of St Paul's. Tall building development in the Character Area would have a presence in these riparian views and would need to be very carefully scaled and designed. A particular challenge would be to avoid creating a sense of randomly distributed towers on the skyline west of St Paul's. Relevant SPG paras: 151, 153, 156
- 23.41. River Prospect 12A.1 – Southwark Bridge, Upstream- The Character Area is already a prominent feature of this view, by virtue of the existing tall buildings at New Street Square. Intensification would increase its prominence accordingly. It lies some distance to the west from the Cathedral, between Faraday House and the spire of St Bride's; the latter is a distinctive landmark in this view and its setting sensitive to intensification within the Character Area. Relevant SPG paras: 214

- 23.42. River Prospect 15B.1 & 15B.2 – Waterloo Bridge, Downstream Pavement- The Character Area could affect the skyline above the treed river frontage in this view to the west of St Bride's spire. New Street Square is largely concealed behind No. 4 Temple Place in the City of Westminster, but tall buildings in the eastern half of the Character Area could become prominent in this view (although this half of the area is affected by other view constraints including landmark viewing corridors). Relevant SPG paras: 266 & 267.
- 23.43. River Prospect 16A.1 South Bank, National Theatre- The Character Area lies to the extreme east of this view of Somerset House and is largely concealed by trees. Further tall building development in this view would manifest to the extreme east, at some distance from Somerset House. Relevant SPG paras: 274.
- 23.44. River Prospect 16B.1 & 16B.2 – South Bank, Gabriel's Wharf- The Character Area lies to the extreme west of these views and is largely concealed by the trees. Further tall building development here would manifest to the extreme west of these views at some distance from the Cathedral. Relevant SPG paras: 280 & 281
- 23.45. River Prospect 17B.1 & 17B.2 – Golden Jubilee/Hungerford Footbridge- The Character Area could affect the western extremity of the view, west of the Barbican towers. No. 1 New Street Square can be seen rising above No. 4 Temple Place, and further intensification of the nucleus here would appear prominently to the west of the Barbican towers, some distance from the Cathedral. Relevant SPG paras: 301, 304 & 305.
- 23.46. River Prospect 18B.1 – Westminster Bridge (at the Westminster Bank)- Further intensification in the Character Area could affect the centre of this view and become a prominent new element in the background. There is an ensemble of civic buildings on the shores of Westminster, Lambeth and the City that is characteristic of this view. Relevant SPG paras: 324

St Paul's Heights

- 23.47. The Character Area is not in the St Paul's Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in those strategic riparian views identified in the Protected Views SPD (subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD).
- 23.48. However, the Character Area is within the visual scope of the backdrop setting of the Cathedral in those same views, from Hungerford, Waterloo and Blackfriars Bridges, in addition to the kinetic sequence along the South Bank Queen's Walk between Waterloo and Southwark Bridges. As such, further intensification within the Character Area could affect these views in the manner set out in the section on LVMF River Prospects above.

Cannon Street views of St Paul's

- 23.49. Furthermore, the Character Area is situated approximately WNW of the Cathedral and lies upon the axis of views W along Cannon Street of the south-west tower, south elevation and dome of St Paul's Cathedral. These views are acknowledged, and their foreground protected through St Paul's Heights. Further tall building development in the Character Area could have implications for the clear sky silhouette between the south-west tower and the Apostles seen along Cannon Street. These impacts could be averted

through further 3D modelling to understand the height limits imposed by staying out of these views.

N.B. the policy area does very marginally overlap with a tiny sliver of pavement in the north-east corner of the Character Area, but for the purposes of this exercise the Character Area is considered not to lie within the policy area.

City Landmarks and Skyline Features

- 23.50. The Character Area does not contain any City Landmarks or City Churches with a Skyline presence as identified in the City's adopted Protected Views SPD (2012). However, further tall building development within the Character Area has the potential to affect the settings of the following Landmarks/Skyline Features situated nearby:
- 23.51. St Dunstan-in-the-West- The elegant open latticework of this grade II* listed octagonal tower can be appreciated against a clear sky backdrop in a series of close and long views when looking east along the Strand/Fleet Street and west from Ludgate Hill and along Fleet Street. Tall buildings in the Character Area, particularly towards the south of the area, could affect the setting of the church's tower in these important views.
- 23.52. St Bride, Fleet Street-The famous steeple of grade I listed St Bride's can be clearly discerned in various views from the South Bank and the bridges looking north and north west, often against open sky. By virtue of the existing nucleus of tall buildings at New Street Square, the Character Area already has a presence in these views and further tall building development could bring development closer to and potentially in conflict with the steeple of St Bride's in these views. For instance, the spire is appreciated against clear sky from the Millennium Bridge but with the tall buildings at New Street Square close to it. Please see also the discussion of the River Prospects in the LVMF section.
- 23.53. St Andrew Holborn & City Temple- To a limited extent, tall buildings in the Character Area could appear behind/be seen in conjunction with these buildings (former, grade I; latter, grade II) when viewed from the north.

The Monument

- 23.54. Certain views from and to the Monument are protected by policy CS13(2) and emerging Policy S13(2) and are set out in detail in the City's adopted Protected Views SPD (2012). The Character Area is situated some distance from the Monument and, as such, further tall building development is unlikely to significantly affect views of the Monument.
- 23.55. However, the Character Area already has a prominent presence in View 5 from the Monument, looking north-west to St Paul's Cathedral. In this view, the existing nucleus of tall buildings at New Street Square form a prominent backdrop to the Cathedral, appearing directly behind the dome, peristyle and western towers and coming into direct contact with the Cathedral's skyline silhouette. As such, further tall building development within the Character Area could further challenge the Cathedral's skyline silhouette and setting in this view.

Tower of London World Heritage Site

- 23.56. Lying to the north-west of the City, the Character Area is at some distance from the World Heritage Site. The existing nucleus of tall buildings around New Street Square is not visible from any of the key LVMF or Local Setting Study views of the ToL.
- 23.57. In LVMF 10A.1 the Character Area is within the River Prospect but is screened from view by intervening development; it is unlikely that tall building development within the Character Area would become visible in this view to any meaningful degree, or to the detriment of the setting of the World Heritage Site.

Neighbouring Borough Views

Westminster

- 23.58. V18: Churches of St Clement Danes and St Mary-Le-Strand - Identified by Westminster City Council as part of their protected Metropolitan Views. These two churches are grade I listed, by seminal architects Sir Christopher Wren and James Gibbs respectively, and are therefore of the highest architectural and historic significance. Moreover, they are situated on the Westminster section of the ancient Processional Route between Westminster and St Paul's, itself a highly significance approach and series of vistas.
- 23.59. The view of the churches, with St Mary in the foreground and St Clement's behind is 'linear and is framed by the buildings fronting onto the Strand. The expanse of sky which provides the backdrop to the steeples is of great importance.' Further tall buildings in the Character Area could encroach upon this clear sky backdrop and affect the settings of these highly significant heritage assets.
- 23.60. V19 Royal Courts of Justice Law Courts from the Strand- As above this view has been identified by Westminster City Council as part of their protected Metropolitan Views. The view reflects the picturesque revelation of the Royal Courts of Justice as the curve in the strand unveils the full of façade. The roof line is elaborate, with turrets and gables contributing greatly to the romantic Gothic Revival style. Further tall buildings in the Character Area could encroach upon this clear sky backdrop and affect the setting of the listed building.

Conclusion

- 23.61. The Landmark Viewing Corridor of LVMF 4A.1 precludes tall buildings in the north and east parts of the Character Area. In the south and west parts of the Character Area, tall building proposals would be subject to qualitative assessments of impact on the following views:
- WSCAs of LVMF 4A.1, 5A.2 and 6A.1
 - View of St Paul's along Cannon Street
 - Monument View 5
 - Views of various heritage assets east along the Strand and Fleet Street and west along Fleet Street/Ludgate Hill
- 23.62. As such, consolidation/expansion of the existing nucleus of tall buildings around New Street Square is not strategically precluded, being subject only to qualitative assessments

of their impact on the London Panoramas and River Prospects, not presumptions to refuse.

23.63. Overall, the Character Area is considered to be sensitive to tall buildings in strategic view terms.

Heritage Significance

23.64. The Character Area has a relatively low number of designated heritage assets within the boundary. Listed buildings are largely concentrated in the Chancery Lane Conservation Area to the west, with a small amount of additional listed buildings distributed randomly throughout the north and east parts of the area.

23.65. A summary of the designations is given below:

Listed Buildings

23.66. **Grade I** – 3, including: Nos. 1-4 Holborn Bars, Nos. 4-6 Staple Inn, Church of St Andrew

23.67. **Grade II*** - 5, including: Former Public Record Office, Nos. 337-338 High Holborn, Barnard's Inn, Former Patent Office, No. 15 Took's Court.

23.68. **Grade II** – 21, Including: City Temple, C18 buildings on Took's Court, Vicarage of St Andrew's Church.

Scheduled Ancient Monuments

23.69. 1, including: Barnards's Inn Hall

Tree Preservation Orders

23.70. 3, in Staple Inn

23.71. 4, in Breams Buildings churchyard

23.72. The group value of the barristers' chambers at Staple Inn and Holborn Bars greatly add to their individual significance. Seen together with a verdant backdrop to the south also makes a positive contribution. Any erosion of this open sky setting, or seclusion within the interior courtyards could be detrimental to the sense of a preserved historic townscape.

23.73. Similarly, the Church of St Andrew was designed by Sir Christopher Wren, who retained and refaced the existing C15 tower of the existing building. It has a Victorian vicarage complex designed by Teulon with which it forms a group. The landmark quality of this structure, and its prominence within views along Holborn is sensitive to any encroachment into its prominence seen against the skyline. Similarly, the former Public Records Office has a commanding neo-Gothic presence to Chancery Lane and Fetter Lane, also holding an elaborate skyline presence.

Conservation areas

23.74. Chancery Lane Conservation Area- The Character Area includes the Chancery Lane Conservation Area, the character and appearance of which is summarised in the adopted SPD (2016) as:

- An exceptional span of building ages and styles, resulting in a townscape of arresting contrasts;
- Significant historic associations with the legal profession, with origins as a centre for medieval legal administration;
- The collegiate surroundings of Staple Inn and Barnard's Inn, which incorporate rare secular medieval survivals;

- A historic association with educational establishments that has persisted to the present time (e.g., the Inns of Court, Birkbeck College, King's College London);
- The site of the Knights Templars' first precinct and church in London (at Southampton Buildings);
- A well-preserved and easily legible historic street network;
- Monumental 19th century Victorian public buildings in a range of styles;
- One important early act of conservation (Staple Inn north range) and several buildings of varying periods associated with a single company's patronage (Prudential Assurance Co.);
- Well-considered 21st century insertions into a historic context.

- 23.75. There is a consistent scale and height across the conservation area, with a fine urban grain and buildings principally of brick and terracotta of varying ages, styles and typologies. Under current Local Plan policy there is presumption to refuse any tall building within the Chancery Lane CA (CS14 and S12, in which conservation areas are deemed areas inappropriate for tall buildings). As well as the Local Plan presumption to refuse, tall buildings proposed within the conservation area would impact on those neighbouring in other boroughs.
- 23.76. The setting of the conservation area to the north, west and south (framed by CAs in the LB Camden and the Fleet Street CA) makes a moderate contribution to the significance of this conservation area by stitching it in to a wider historic streetscape which survives to a high quality.
- 23.77. To the east, the setting of the conservation area is more neutral, framed by the nucleus of tall buildings around New Street Square, the closest of which is the recently consented scheme at 100 Fetter Lane (75.1m AOD). These buildings are prominent in views looking east out of the conservation area and form an established part of its setting within the Character Area.
- 23.78. Newgate Street Conservation Area- The Character Area incorporates a sliver of the Newgate Street conservation area, comprising Nos. 15-17 Old Bailey (both grade II listed) and their surrounding open spaces. As with Chancery Lane, the conservation area retains a consistent sense of scale, historic street pattern and fine masonry buildings fronting the principal thoroughfares. Most of the conservation area is located in the neighbouring Smithfield Character Area, as part of a group of neighbouring conservation areas including Smithfield, Postman's Park and St Paul's Cathedral. Collectively these have a consistent historic scale, grain, and architectural character. As well as the Local Plan presumption to refuse within their areas, they are sensitive to tall building proposals within their settings. N.B this part of the Character Area lies under the Landmark Viewing Corridors of LVMF 3A.1 and 4A.1 and as such tall buildings would be strategically precluded.

Core City Typologies

- 23.79. The Character Area exhibits very strong examples of the core heritage typologies identified in section 2.
- 23.80. Offices – The character area has several examples of Legal Inns and chambers including, 1-4 Holborn Bars, Nos 4-6 Staples Inn, 337-338 High Holborn, Barnards Inn. The idiosyncratic collegiate plan form of these buildings creates a strong group value with intimate and enclosed views experienced within their interior yards. This typology is

therefore sensitive to tall buildings in their immediate surroundings, which risk overshadowing the cohesive sense of scale experienced within their associated courtyards. More generally the loss of a finer grain to the surrounding streetscape would have a detrimental impact, further eroding the sense of a preserved historic townscape.

- 23.81. Civic and Institutional – The civic function of these buildings such as the Former Patent Office and Former Public Record's Office are often expressed through a more open setting, allowing longer vistas through the surrounding streetscape. Contemporary development has generally preserved these views however the landmark character of these structures remains sensitive to tall buildings. The potential to disrupt the clarity of these structures' skyline silhouettes remain a key consideration.
- 23.82. Ecclesiastical and City Churchyards – City Temple and the Church of St Andrew retain their prominence on High Holborn. Whilst these buildings are appreciated against a backdrop of new development surrounding New Street Square, kinetic views towards these churches towers allowing their principle facades to be appreciated in silhouettes against the sky. Their landmark quality and group value is therefore sensitive to tall buildings, which risk intrusion into the open sky quality of their setting.
- 23.83. Residential – Pockets of retained seventeenth- and eighteenth-century residential terraces at Furnival Street and Took's Court create a domestic scale to the streetscape which is sensitive to tall buildings. Views within these streets are relatively enclosed and despite proximity to the contemporary development of New Street Square, these remain unappreciable. The introduction of tall buildings could therefore risk the loss of a cohesive sense of scale and domestic character.
- 23.84. Tall Buildings – New Street Square and New Fetter Lane possess a strong contemporary character, presently defined by a number of tall buildings. These buildings establish a renewed emphasis to the street scape through their dramatic angular massing. While this typology is not considered sensitive to tall buildings, any new addition to this group should continue to retain a sense of a coordination and hierarchy to avoid a detracting impact in townscape terms.

Core City Significance Traits

- 23.85. The Character Area is considered to support the following traits of the City's overarching Heritage Significance identified in section 2. The susceptibility of these traits in relation to the intensification of tall buildings within the character area are outlined below.
- 23.86. **AGE** With regards to 'Age', while New Street Square has undergone waves of redevelopment, a series of historic tableaux remain appreciable across the Character Area, comprising preserved fragments of Medieval, Georgian and Victorian townscape. Several of these reflect key city 'typologies' as outlined above, including legal chambers and residential buildings. Recent development has retained the sense of an intimate scale where these historic groupings survive, as well as key vistas of civic buildings. The intensification of tall buildings within the character area should be limited to avoid intrusion into these views, or the loss of the remaining historic '*street pattern*' or erosion of an intimate character to the streetscape.
- 23.87. **COMMERCE** Whilst secondary to Bank and the City Cluster, New Street Square in recent years has gained a smaller cluster of tall modern commercial buildings, and this is experienced within the Character Area alongside the more scattered historic examples of commercial buildings seen to the west. As such the Character Area contributes to the '*Commercial*' trait of the cities significance.

- 23.88. **HEIGHT & SKYLINE** Similarly the News Street Square cluster establishes a crescendo in height within the east. This expresses the ongoing evolution of the Character Area as a thriving commercial centre, in many ways experienced as the legacy of the remaining historic commercial institutions within the Character Area to the west. This new cluster of tall buildings surrounding New Street Square therefore adds to the key city significance trait of '*height*'. Further intensification of tall buildings should however preserve hierarchies where historic buildings which are emblematic of '*height*' at the time of their construction remain appreciable. This includes the landmark quality associated with St Andrews Church as well as the former Public Records Office.
- 23.89. **VARIETY** The character area represents one of the strongest examples of architectural 'variety' within the city, with the granular redevelopment of the western side of the character area over time resulting in a pleasing mix of high calibre buildings, experienced sequentially along the street front. Whilst tall buildings presently form part of this mix, these have generally replaced poorer quality post-war rebuilding. Any diminishment or replacement of a diverse range of building types and styles within the character area could eroded this core interest.

Conclusion

- 23.90. Overall, the Character Area is considered to be sensitive to tall buildings in respect of heritage significance. Views from the riverfront are moderately sensitive to tall buildings, The Chancery Lane Conservation Area has been found to be highly sensitive to tall buildings both intrinsically and because of its complementary setting of low-rise historic architecture of neighbouring CAs in the London Borough of Camden. The setting of the conservation area to the east within the Character Area, is more variable and the existing nucleus of tall buildings at New Street Square provides an established element of higher, modern settings.

Conclusion: Overall Sensitivity to Tall Buildings

- 23.91. **Sensitive** to tall buildings. As set out above, tall buildings are effectively precluded in much of the western side of the Character Area (in Local Plan conservation area terms) and in the eastern side (lying under Landmark Viewing Corridors). Between New Fetter Lane and Shoe Lane there is an established nucleus of tall buildings, New Street Square. Strategic and Local designations do not preclude further tall building development in these environs, instead subjecting them to qualitative assessments of impact on the range of heritage assets and designations assessed above.
- 23.92. Taking all issues into consideration, it is considered that an opportunity exists to beneficially augment and expand this existing nucleus, preserving the presence of the Strategically Important Landmark (St Paul's Cathedral) while enhancing local views with a dynamic new skyline. The Character Area is therefore taken forward to further assessment in Section 4.

Character Area: Smithfield

Introduction

- 24.1. Smithfield is one of the most richly historic and iconic places in the City of London. It has a presence in the public consciousness through the millennia-old presence of the Meat Markets and, as an important part of the City's northern fringe, has developed a reputation for a lively night-time economy. Like all other places in the City, the Character Area is exceptionally well-connected (PTAL 6), with stations on the Elizabeth Line, Thameslink (Farringdon) and London Underground (Farringdon and Barbican). Bus routes and Cycle Superhighway along Farringdon St; bus routes along Aldersgate; major interchanges road interchanges nearby at Rotunda.
- 24.2. Reflecting its deep famous history, the Character Area's historic environment is exceptionally rich and consistent, being largely covered by conservation area designation and home to a diverse array of highly significant heritage assets, including sections of the Roman and medieval City wall, the Georgian blocks of St Bartholomew's Hospital, St Bartholomew the Great (incorporating Norman fabric) and the Meat Market buildings, the churches of St Botolph Aldersgate and Christchurch Greyfriars, and rare survivals like 41-42 Cloth Fair (a pre-Great Fire house). Reflecting these ancient roots, the street pattern is multi-layered, with medieval streets and ways overlain with later public infrastructure improvements, but all hanging together in a consistent and immersive experience. Buildings in the Character Area conform largely to a traditional, historic sense of scale. Smithfield's defining character is as one of the City's, and more widely London's, most famous and exceptional historic destinations.

Historical Development

- 24.3. Roman records indicate Smithfield was primarily used as a cemetery occupying an area of high ground northwest of the city walls. Smithfield became associated during the medieval period with horse trading, and subsequently a series of droeways accessing the market persist in the existing street pattern. Beyond the market boundary to the southeast, St Bartholomew's Priory and Hospital was founded in the early 12th century, creating a large complex of buildings with radiating gardens and cloisters to the west of 'Aldredegate'. The church of St Botolph Without was established by 1291 located just north of the city walls, with the church yard later becoming Postman's Park. To the south and within the city walls, the Franciscan friary of 'Greyfriars', later converted to Christ's Hospital and School, created a second large monastic complex during the medieval period, occupying the land up until 'Newgatestrete', which ran east-west leading towards St Pauls Cathedral.
- 24.4. A charter granting a weekly market at Smithfield was issued in the 14th century, with the open ground later paved and drained in 1614-15. The Great Fire of 1666 destroyed much of the lands surrounding Postman's Park, however portions of the city wall including Aldersgate and Newgate survived. The Horwood map of 1799 shows the rebuilding of 'Christchurch Greyfriars' as well as Christ's Hospital by Sir Christopher Wren. The largest post fire intervention is the dramatic extension of Bartholomew's Hospital by James Gibbs, creating a series of courtyards accessed from Smithfield to the north.
- 24.5. The 19th century saw the arrival of the railway, with Smithfield expanding to include a series of covered markets to the north of the square, creating the 'poultry', 'general' and 'central meat' markets. The interconnection of the market with railway sidings beneath,

created a large functional Nineteenth century townscape to the west of the Character Area. By 1902 the school vacated the site of Christ's Hospital, with the area to the north of Christchurch Greyfriars redeveloped to create the 'General Post Office'. This large structure, together with the 'General Telegraph Office' established a communications quarter to the north of Newgate Street.

- 24.6. The area sustained widespread damage during the World Wars, impacting the General Post Office buildings, the as well as the majority of Aldersgate Street from Little Britain to Long Lane. This has informed the areas of late twentieth century and more recent redevelopment, including the creation of the Bank of America Merrill Lynch headquarters on the site of the former friary, the rebuilding of Aldersgate Street and the redevelopment around Bartholomew Close. St Bartholomew Hospital received new out-patients, casualty and pathology blocks in the first half of the twentieth century, with a these later consolidated into a large triangular structure to the south of the James Gibbs Courtyard.

Character and Appearance

Heights, Landmarks and Tall Buildings

- 24.7. Buildings within the Character Area are generally between 2 and 9 storeys throughout, apart from an uncharacteristic modern exception (200 Aldersgate). Generally, low, historic scales of building prevail across the Character Area, with some examples of higher but still respectful C20 development, stepping up gradually to a higher set of buildings fronting St Martin-Le-Grand and Aldersgate.
- 24.8. Streets between Long Lane and Newbury Street are predominantly formed by buildings of 4 or 5 storeys, or less, with consistent cornice and parapet lines. Buildings in this area are to a compact, domestic scale. Some have been extended at roof level. The hospital complex is formed by buildings of four or five storeys, with those Victorian and Edwardian to Giltspur Street of a more monumental scale than the earlier buildings around the Courtyard. Taller buildings on the west side of West Smithfield descend in height towards Hosier Lane and Newgate Street and are still comparatively low-rise.
- 24.9. The buildings of the market complex have a consistent building height of predominantly two or three storeys, gaining their grandeur through their massive horizontality instead, with taller elements such as their corner turrets and pavilions forming prominent landmark features. Their roofscapes of pitched, hipped, mansard and domed forms are a characterful feature of the Character Area.
- 24.10. The tallest buildings in the Character Area are those fronting Aldersgate Street to the east, where larger post-war and C21 office blocks of 7-9 storeys begin to equate to the scale of the Barbican directly opposite. 200 Aldersgate, a prominent modern scheme in the east of the Character Area, is the tallest building in the area. It was refused by the City Corporation but won on appeal; its topmost element has a detrimental impact on views of St Paul's Cathedral from the South Bank and bridges. The scheme serves as an illustration of how tall buildings within this Character Area are (i) uncharacteristic of the scale within the Character Area and (ii) could have negative implications for wider City Landmarks and Skyline Features outside the Character Area.
- 24.11. Landmarks within the Character Area include the Market buildings, the Hospital buildings, St Bartholomew the Great, the former Post Office buildings fronting St Martin-Le-Grand, and churches such as St Sepulchre and Christchurch Greyfriars.

Morphology, Topography and Urban Structure

- 24.12. The Character Area lies largely outside the old Roman and medieval City walls, between the Fleet valley to the west and the approach to Aldersgate to the east. There is a marked fall in the land west towards Farringdon Street, marking the course of the river Fleet (now culverted), and south. There is a contrast in scale between these areas and Holborn Viaduct to the south of the Character Area, built in the C19 as a viaduct to connect Newgate Street and Holborn over the Fleet valley.
- 24.13. The area developed around the market, held originally, since time immemorial, on the 'Smooth field', the Priory of St Bartholomew the Great and the associated Hospital. After the Reformation the Hospital continued in use and the new landowner, Richard Rich, laid out the small plots to the east. This fine historic grain survives well in the Character Area, overlain the planned townscapes of later epochs: the Georgian Hospital buildings and the C19 Market buildings and the associated Rotunda and Holborn Viaduct scheme to the south. In the south-east are the great complex of former GPO buildings and their sites. These larger, later schemes tend to have created an urban structure of larger, impermeable blocks bounded by short streets.
- 24.14. The Character Area is rich in open spaces, ranging from the Smithfield Rotunda to the churchyards of Christchurch Greyfriars and Postman's Park. These allow for longer views of the buildings of the Character Area and provide valuable amenity and green spaces within the area's otherwise dense urban grain.
- 24.15. Thus, the Character Area is of greatly varied topography, morphology and urban structure; a finely layered place of ancient forms and townscape intermingled with more modern forms of development, but all of it broadly consistent in proportions with no particularly jarring departures in scale or urban form.

Built Form and Uses

- 24.16. A great diversity of historic building types is to be found throughout the Character Area, from the Norman chancel of St Bartholomew's to more modern buildings fronting Aldersgate. The prevailing character is of masonry buildings executed in a broad palette of materials (chiefly stone and brick) and incorporating a multitude of architectural styles, from the vernacular qualities of 41-42 Cloth Fair (late C17) to the purer Georgian classicism of the hospital buildings and the Franco-Renaissance stylings of the General Market. In this respect the Character Area is a place of great variety in detailing and ornament but is united by the warmth of these traditional materials everywhere used and the human scale of the architecture, which is present even in the proportions of the massive market buildings of the C19. C20 monumentality can be found in the large former GPO buildings to the South East, with their clifflike facades of Portland stone.
- 24.17. Modern development within the Character Area has generally been sensitive, contextual and largely adhered to this local context. The exception is to the southern (e.g., Atlantic House) and eastern fringes – particularly the buildings addressing the Museum of London Rotunda and Aldersgate.
- 24.18. Perhaps the most prominent of the uses in the Character Area is the continued long-term presence of the Meat Market, facilitated by the refurbishment of the East and West Market buildings in the 1990s. The changing nature of the operations of the meat trade - particularly following the marked increase in the scale of supermarket activity in recent years - has meant that a number of smaller ancillary businesses which traditionally have been located nearby in the area have either changed, relocated or ceased operation.
- 24.19. As a consequence, the patterns of activity located within Smithfield have reflected these changes, but the area as a whole is coherent and remains one of mixed uses. The result

is that small-scale businesses, residential development, livery companies and mixed uses including restaurants, cafes, bars and public houses continue to provide vitality and interest which enriches the special character of the area. Many of these businesses have located in the area because of its special character, with similar uses to be found to the north on Charterhouse Street, St John Street and Cowcross Street.

- 24.20. The area's vibrant daytime atmosphere changes in the evening when users of the numerous pubs, bars and restaurants contribute to a busy environment. Activity continues through the night, with night clubs located close to the Smithfield. Subsequent early morning activity connected with the meat trade ensures that the area supports a 24-hour economy during the week, whilst at weekends most businesses are closed and Smithfield becomes much more tranquil.
- 24.21. In addition to the market use and surrounding mixed uses, a significant portion of the Smithfield is given over to the specialist functions of St Bartholomew's Hospital. The continued presence of the hospital over a period of several centuries has been facilitated by the construction of new buildings and the careful adaptation of existing ones in order to meet modern day requirements. The consolidation of the hospital onto a single site west of Little Britain is currently underway, marking a significant change in the area.
- 24.22. Smithfield is subject to a specific local policy concerning mixed uses to ensure that development maintains or enhances the varied and special character of the area. The area is identified in the City of London Core Strategy (2011) as an area suitable for residential in appropriate locations. Specific policies are identified in the Management Strategy.
- 24.23. Smithfield falls within the Central Activities zone, Policy SD4 (The Central Activities Zone) of the London Plan (2021) identifies a 'Specialist Cluster' of Arts, Culture and Creative Uses around Barbican, Smithfield and Farringdon.

Local Views

- 24.24. As identified in the Smithfield and Postman's Park Conservation Area appraisals. The majority of these views are across or from Smithfield Rotunda Garden to the south or northeast along looking along Cloth Fair and towards Bartholomew's Hospital. Building heights surrounding the rotunda are relatively consistent, with the south façade of the market buildings and Bartholomew Hospital retaining a focus of interest through their decorative and architectural treatment rather than height. The impact of tall buildings within these views would potentially create an overly intrusive addition that would overwhelm the scale of the rotunda, distract from the historic facades of the market and hospital, as well as appear within the more intimate views within the remaining pre-Victorian streetscape to the north-east.
- 24.25. Within the Smithfield Street Conservation Area, the following views have been identified:
1. View of the Red House from the top of Smithfield Street.
 2. View of the General Market and wider conservation area from Holborn viaduct as it crosses Farringdon Street.
 3. View of the parabolic roof of the Poultry Market from the junction of Smithfield Street and Snow Hill.

4. View of the tower of St Sepulchre Without Newgate, and the dome of St Paul's Cathedral, from the junction of Snow Hill and Cock Lane.
5. View up to the Victorian buildings at Nos. 8-21 West Smithfield from the bottom of the Rotunda ramp.
6. View of the Central Criminal Court dome, behind the drinking fountain statue, from the entrance to the Rotunda Gardens.
7. View of the three Barbican towers combined with the north-east cupola of the East Market, from the junction of Charterhouse Street and Lindsey Street.
8. View of the north transept of St Bartholomew-the-Great from Long Lane through Rising Sun Court.
9. Glimpsed views of the apse and north elevation of St Bartholomew-the-Less and mature trees from West Smithfield through the screen wall grille.
10. View to the courtyard of St Bartholomew's Hospital from West Smithfield through the gatehouse.
11. View to the St Bartholomew the-Great gatehouse and neighbouring buildings, with the tower of St Bartholomew-the Great behind, from the junction of West Smithfield and Giltspur Street.
12. View to the Central Criminal Court dome from the junction of West Smithfield and Giltspur Street.
13. View to Lauderdale Tower, Barbican Estate, from Middlesex Passage.
14. View to St Paul's Cathedral from the junction of Bartholomew Close and Little Britain.
15. View to William Harvey House from Little Britain.
16. View to houses on Cloth Fair from St Bartholomew-the-Great Churchyard.
17. View to the rear of St Bartholomew-the-Great Gatehouse and the rear of 57b West Smithfield.
18. View to houses on Cloth Fair and north transept of St Bartholomew-the-Great from Middle Street/Cloth Fair.
19. View to the east elevation of St Bartholomew-the-Great from Bartholomew Close.
20. View through St Bartholomew the-Great Gatehouse to the church porch.
21. View along the south elevation of the Main Market Building from the junction of Cloth Street and Long Lane.
22. View to the Main Market entrance and Grand Avenue from St John Street /Cowcross Street.
23. View to the Main Market entrance and Grand Avenue from West Smithfield.
24. View to Henry VIII Gatehouse with overhanging London Plane Tree from West Smithfield.

- 25. View to Lauderdale Tower between the north and east wings of St Bartholomew's Hospital.
 - 26. View of St Bartholomew's Hospital North Wing from within the hospital courtyard.
 - 27. View of the General, Poultry, West and East Market buildings east along Charterhouse Street.
 - 28. View along Cock Lane to the curved western end of the street.
- 24.26. Within Postman's Park Conservation Area identified views focus on the garden within the ruins of the St Christchurch Greyfriars looking west towards the church tower as well as more intimate views within Postman's Park Garden. Tall buildings pose a risk of intrusion within interior views within Christchurch Greyfriars Garden, distracting from the prominence of the church tower. Similarly views within Postman's Park take in a building of a range of styles but of broadly consistent height, creating an enclosed character to the park, as well as along Little Britain. Tall buildings which appear over the established roofline will encroach upon the sheltered character of these views.
- 24.27. Within Postman's Park the following views have been identified:
- 1. Views into Postman's Park from
 - a. Aldersgate Street
 - b. Little Britain
 - c. King Edward Street
 - 2. Views along Little Britain from
 - a. North of St Botolph Aldersgate
 - b. From junction with King Edward Street
 - 3. From within Postman's Park
 - a. View of Nos. 1-6 Little Britain
 - b. View of St Botolph Aldersgate
 - c. View of Nomura House
 - 4. View of King Edward Buildings from west entrance of Postman's Park
 - 5. View of Nomura House from King Edward Street
 - 6. View along Christchurch Passage from King Edward Street
 - 7. Views into Christchurch Greyfriars garden from
 - a. North-east corner
 - b. East wall
 - c. South-east corner
 - d. South, Newgate Street

- e. West doorway
- 8. Views into Christchurch Greyfriars churchyard from
 - a. Christchurch Greyfriars garden/Greyfriars Passage
 - b. Newgate Street
- 9. View across Christchurch Greyfriars churchyard towards Nomura House
- 10. View along Minerva Walk from Giltspur Street Exterior
- 11. View of Nomura House from Gresham Street
- 12. View of Christchurch Greyfriars garden from outside BT centre
- 13. View of north side of Newgate Street
- 14. Views into surrounding conservation areas
 - a. Newgate Street
 - b. Smithfield

Conclusion

- 24.28. The Character Area is **very sensitive** to tall buildings in respect of its Character and Appearance. This is down to its prevailing historic character and consistently traditional, multi-layered historic townscapes and vibrant mix of uses.

Strategic Views, Townscape and Skyline

London View Management Framework

- 24.29. 1A.2 – Alexandra Palace (The Viewing Terrace)- The Character Area lies in the foreground of this view, directly in front of the Strategic Landmark. Parts of the Character Area lie directly under the Landmark Viewing Corridor, which means there is a presumption to refuse any tall building proposals under the LVC (broadly affecting the grade II* Meat Market, Bart’s Hospital and the Bank of America site). Tall building development within the Character Area would have implications for the primacy of the Cathedral’s skyline silhouette and may even conflict directly with it. Relevant SPG paras: 82 – 90.
- 24.30. 2A.1 & 2 – Parliament Hill – The Summit- The Character Area lies in the foreground of this view, directly in front of the Strategic Landmark. Parts of the Character Area lie under the Landmark Viewing Corridor, meaning a presumption to refuse any tall building proposals on these sites (broadly, the General/ /Annexe Markets and buildings fronting Snow Hill). Tall building development in the Character Area would, in general, have implications for the immediate setting of the Strategic Landmark in this view and could even conflict directly with the Cathedral’s silhouette. Relevant SPG paras: 98-103.
- 24.31. 3A.1 – Kenwood Park – The Gazebo- The Character Area lies in the foreground of this view, directly in front of the Strategic Landmark. Parts of the Character Area lie under the Landmark Viewing Corridor, meaning a presumption to refuse any tall building proposals on these sites (broadly, the General/Poultry/Annexe Markets and sites directly SE fronting Snow Hill). Tall building development in the Character Area would, in general, have implications for the immediate setting of the Strategic Landmark in this view and

could even conflict directly with the Cathedral's silhouette. Relevant SPG paras:119 - 122.

- 24.32. 4A.1 – Primrose Hill – The Summit- The Character Area lies in the foreground of this view, just to the side of the Strategic Landmark; the Wider Setting Consultation Area just clips the buildings on the southern boundary of the Character Area. Tall building development within the Character Area could have implications for the immediate setting of the Strategic Landmark. Relevant SPG paras:129 -130.
- 24.33. 5A.1 – Greenwich Park – General Wolfe- The Character Area lies in the background of this view, to the north-west of the Strategic Landmark. The Wider Setting Consultation Area just clips the buildings on the southern boundary of the Character Area. Tall building development within the Character Area could have implications for the immediate setting of the Strategic Landmark, in much the same way as in the view from Primrose Hill described above. Relevant SPG paras:145 – 147.
- 24.34. 6A.1 – Blackheath Park – The Point- The Character Area lies in the background of this view, in a similar fashion to the Greenwich Park view described above, except that more of the southern part of the Character Area is covered by the Wider Setting Consultation Area. The implications of Tall building development would be as described above. Relevant SPG paras:154 – 155.

River Prospects

- 24.35. Tall building development within the Character Area could affect the below river prospects and the kinetic experience between them, as also governed/safeguarded by St Paul's Heights.
- 24.36. 11A.1 – London Bridge Upstream- The Character Area lies directly behind the Cathedral in this view. Tall building development in the Character Area could have implications for the skyline silhouette of the Cathedral, potentially crowding and colliding with the drum/peristyle/western towers, and the prominent skyline features of the Old Bailey and Cannon Street Station. Relevant SPG paras:193-198.
- 24.37. 12A.1 – Southwark Bridge, Upstream- The Character Area lies directly behind the Cathedral in this view. Tall building development in the Character Area could affect St Paul's (as above) and the skyline presence of St Nicholas Cole Abbey. Relevant SPG paras :211 – 214.
- 24.38. 13A.1 & B.1 – Millennium Bridge- The Character Area lies directly behind and to the west of the Cathedral in these views. Tall building development within the Character Area could have implications for the openness and pre-eminence of St Paul's in this view and on the wider 'family' of Wren spires evident in this view, including St Mary-le-Bow, St Vedast, St Benet Paul's Wharf, St Augustine, St Nicholas Cole Abbey, St Vedast and St Martin's (all grade I listed and skyline features). Relevant SPG paras: 227-230.
- 24.39. 15B.1 & 2– Waterloo Bridge (Downstream)- The Character Area lies to the west of the Cathedral in these views. Tall building development would have implications for the setting of the Whitefriars and Temples Conservation Areas and, if combined with tall building development in other Character Areas including Barbican and Golden Lane and Liverpool Street and Broadgate, could create the impression of a 'wall' of development bearing down on St Paul's Cathedral. Relevant SPG paras: 262- 267.
- 24.40. 16B.1 – Gabriel's Wharf- The Character Area is located west of the Cathedral in this view, behind the Whitefriars Conservation Area. Tall building development would have

implications for this and for the skyline 'breathing space' west of the Cathedral silhouette. Relevant SPG paras: 280-283.

- 24.41. 17B.1 & 2 – Hungerford Bridge, Downstream- The Character Area is positioned in relation to the Cathedral much the same as in the Waterloo Bridge views, and Tall building development would have similar consequences for the view. Relevant SPG paras: 302-305.

St Paul's Heights

- 24.42. The Character Area lies within the St Paul's Heights Policy Area which seeks to preserve the foreground setting of the Cathedral in strategic townscape and riparian views identified in the Protected Views SPD (subject of CS13(2) and emerging Policy S13(2) and associated guidance in the SPD). Approximately the central tranche of the Character Area lies under the policy area, which imposes height limitations of approximately 34m-56m across sites including the Market buildings, the Hospital buildings and the Bank of America centre. The views thereby protected are from Farringdon Street, Amwell Street and St John Street. Tall building development within the Character Area could have serious implications for the primacy of the Cathedral in these views, as well as the multitude of views from the western bridges, from the South Bank and the kinetic sequence between them all, from Waterloo Bridge to London Bridge. Further, the policy area seeks to protect important views from King Edward Street and St Martin-Le-Grand.

City Landmarks and Skyline Features

- 24.43. Within the Character Area is one City Landmark/Skyline Feature as identified by the City's Protected Views SPD: St Sepulchre Holborn. Although not identified by the SPD, Christchurch Greyfriars has a similarly impressive skyline presence. Their skyline silhouettes could be challenged by Intensification within the Character Area boundary. Tall building development could also have implications for a number of Landmarks and Skyline Features outside the boundary, from proximity (e.g., St Andrew Holborn, the Old Bailey) to more strategic impacts including upon the family of Wren spires and towers seen from various viewpoints along the South Bank.

The Monument

- 24.44. The Character Area has limited presence in those views *from* the Monument identified by the City's Protected Views SPD (2012); Tall building development could become apparent in the extreme northern edge of Monument View 5, but not particularly affect the setting of the Cathedral in this view.

Tower of London World Heritage Site

- 24.45. The Character Area is located some distance to the north-west of the Tower of London World Heritage Site. Further, it is screened in the key views of the Tower by the intervening presence of the City Cluster Character Area. Therefore, Tall building development within the Character Area is not considered to pose a risk to the setting or significance of the Tower of London World Heritage Site.

Neighbouring Borough Views

Islington

- 24.46. The Character Area has a presence in the following locally protected views from the north identified by the London Borough of Islington:
- LV1: View from Farringdon Lane / Farringdon Road / Clerkenwell Road to St. Paul's Cathedral
 - LV2: View from St. John Street to St. Paul's Cathedral
 - LV3: View from the Angel to St. Paul's Cathedral
 - LV4: View from Archway Road to St. Paul's Cathedral
 - LV5: View from Archway Bridge to St. Paul's Cathedral
 - LV6: View from Amwell Street to St. Paul's Cathedral
 - LV7: View from Dartmouth Park Hill to St. Paul's Cathedral
- 24.47. The coverage of these protected viewing corridors over the City almost exactly corresponds with that of the St Paul's Heights policy area over the Character Area. Accordingly, Tall building development within the Character Area would have the same implications as set out above.

Conclusion

- 24.48. The Character Area is **very sensitive** in respect of Strategic Views, Townscape and Skyline. Much of it is crossed by Landmark Viewing Corridors in which tall building proposals would be explicitly contrary to policy; Tall building development would be highly likely to lead to conflict with the silhouette and skyline presence of St Paul's Cathedral, particularly in views from the bridges and the South Bank.

Heritage Significance

Overview of Heritage Assets

- 24.49. The Character Area is rich in designated heritage assets, many of them at a high grade, reflecting the area's ancient history and good level of survival.

Listed buildings

- 24.50. **Grade I** – these include St Bartholomew the Great, North, West and East Wings and Gatehouse of St Bartholomew's Hospital, and the churches of St Sepulchre Holborn, Christchurch Greyfriars and St Botolph Aldersgate
- 24.51. **Grade II*** - these include St Bartholomew the Less, Smithfield Meat Market, former GPO building on King Edward Street, St Bartholomew Gatehouse, Nos. 41-42 Cloth Fair
- 24.52. **Grade II** – these are more numerous and include the Poultry Market, the Rotunda, the Hand and Shears and Viaduct Tavern public houses, and Founders' Hall.

Scheduled Ancient Monuments

- 24.53. Newgate, Aldersgate, London Wall, Christchurch Greyfriars. These largely take the form of buried remains, although one section of the wall and bastion are visible below the Bank of America site.

Tree Preservation Orders

24.54. 15, in Postman's Park.

Sensitivity to tall buildings

24.55. The landmark quality of the hospital buildings and churches identified above are sensitive to tall building development, which risks undermining their prominence in the local skyline. Additionally tall buildings in this area, through the loss of a more granular streetscape, would erode and obscure the historic influence of the market and its role in shaping the development of the surrounding streetscape.

Conservation areas

24.56. The majority of the Character Area is covered by conservation area designation, reflecting the deep age and surviving historic character of the area. Only the fringes lie outside conservation areas, including the modern buildings to the north of Long Lane and to Aldersgate Street, the former BT headquarters at the south-east corner and the buildings on the north side of Holborn Viaduct either side of Farringdon Road.

24.57. Under current Local Plan policy there is presumption to refuse any tall building within the Chancery Lane CA (CS14 and S12, in which conservation areas are deemed areas inappropriate for tall buildings) meaning that there would be a presumption to refuse any tall building proposals in much of the Character Area.

24.58. Smithfield and Postman's Park – the character and appearance of these conservation areas is largely articulated above and in the adopted SPD for the conservation area (Smithfield 2013, Postman's Park, 2018 respectively).

24.59. Charterhouse Square – a tightly-drawn boundary around a small group of warehouse buildings and Barbican railway station, on the south side of Charterhouse Square (otherwise mostly in the LB Islington). The characteristics which contribute to the special interest of Charterhouse Square include the distinctive Victorian industrial character of the buildings, including the railway cutting and associated structure with the former Aldersgate Street Station as well as the direct visual inter-relationship with Charterhouse Square to the north.

24.60. Newgate Street – the junction of Newgate Street, Giltspur Street and Old Bailey, fronted by highly graded designated heritage assets. See Character Appraisal (1999). The consistent sense of scale, historic street pattern and fine masonry buildings fronting the principal thoroughfares make important contributions to the character of the area.

24.61. All of the conservation areas are sensitive to tall buildings, with a clear architectural hierarchy to their interiors, focusing on either an open park or junction. The creation of a tall building within their boundaries would overly dominate this existing hierarchy and erase largely retained historic street grains.

Core City Typologies

24.62. The Character Area exhibits strong examples of the following core heritage typologies identified in section 2.

24.63. Warehouses- Charterhouse Square – A small group of warehouse buildings on the south side of Charterhouse Square.

- 24.64. Markets – The influence of Smithfield market on this Character Area is high, informing much of the surrounding street pattern. Through its scale, and rectilinear planform and decorative character, the market is clearly appreciated as a landmark in the surrounding streetscape. The loss or consolidation of the surrounding street pattern through the development of tall buildings would obscure the influential quality of the market and diminish an appreciation of its historic importance in the City context. Similarly, a tall building within close proximity of the market would overly dominate the mass and height of the market, undercutting its landmark quality.
- 24.65. Civic and Institutional- Bartholomew’s Hospital (Grade I, II) as well as the Old Bailey (Grade II*), and King Edward Building’s Post Office (Grade II*) are landmark institutional structures with complex social histories and associations. Their public function is reflected in their prominence and scale within the surrounding streetscape. These buildings form part of a wider interrelated townscape which has evolved as a direct result of their important social functions. The landmark quality of these structures is therefore at risk from Tall Buildings through the potential disruption of the existing hierarchy in the streetscape, particularly within views east along Newgate Street or across the Smithfield Rotunda.
- 24.66. Ecclesiastical and City Churchyards – Postman’s Park, Christchurch Greyfriars Garden, Greyfriars Monastery (Scheduled Monuments), as well as the Churches of St Sepulchre, Christchurch Greyfriars (Grade I), St Botolph (Grade I) and Church of St Bartholomew (Grade I) all reflect important spaces associated with worship in the City. These spaces retain a surrounding open and verdant character appropriate to an ecclesiastical building, with the church towers themselves local landmarks within the surrounding streetscape. Tall buildings may encroach upon the secluded setting of the churchyards as well as diminish an appreciation of a church’s spire by occluding or conjoining with the spire’s silhouette.
- 24.67. Residential – Residential buildings along Cloth Fair and Middle Street retain the character of a historic domestic group. This character is enhanced through the narrow proportions of the streetscape as well as proximity to Grade II listed Hand and Shears and St Bartholomew, creating the sense of a complete residential townscape. These buildings retain pre-Great Fire fabric or are historic in character ranging from eighteenth to nineteenth centuries. Tall buildings in the Character Area have the potential to intrude upon the sense of domesticity and enclosure within this narrow streetscape.

Core City Significance Traits

- 24.68. The Character Area is considered to support the following traits of the City’s overarching Heritage Significance identified in section 2. The susceptibility of these traits in relation to the intensification of tall buildings within the Character Area are outlined below.
- 24.69. **AGE** With regards to ‘Age’, the Character Area contains built fabric from most of the key phases of historic development within the city. The early establishment of the open area surrounding Smithfield Market has resulted several of the surrounding streets retaining important historic fabric, such as the 13th century door to the St Bartholomew Gatehouse (Grade II*) and pre-Great Fire house at 41-42 Cloth Fair (Grade II*). The impact of the Victorian market development and accompanying largescale intervention in the street layout has resulted in an over-riding nineteenth century character to the surroundings of the Smithfield Rotunda. Contemporary development is generally limited in the Character Area, predominately comprising the newer St Bartholomew’s Hospital buildings, recent development at Bartholomew Close, the eastern end of Holborn Viaduct and to the west

of Christchurch Greyfriars churchyard. The intensification of tall buildings within the Character Area, through the need for a larger ground plan and heightened visibility risks an overly dominant intrusion into the remaining historic streetscape creating competition with existing landmark buildings which have been built to respond to key views.

- 24.70. **VARIETY** The Character Area represents a rich variety of use and architectural style. This variety is experienced as specific clusters of buildings of similar style, age or use, creating a series of distinct local townscapes. These clusters are frequently experienced separately from one another, with unfolding rather than distant views across the entirety of the Character Area, due to the historic enclosure of areas associated with the Abbey, Hospital and market. There are no tall buildings presently within the Character Area, and their development would most likely disrupt this sense of enclosure, becoming distantly visible across the entire Character Area's extent.
- 24.71. **ARCHITECTURAL CALIBRE** The high quality of architecture is reflected in the number of Grade I and Grade II* listed buildings within the surroundings including but also includes the sensitive contemporary rebuilding of Christ's Hospital. City's historic and modern architecture is generally of the highest quality, with a consistent level of quality of facades, materials and design rivalled only by a few other British cities, e.g. Oxford and Cambridge, but none of these ancient rivals can match the quality of modern developments the City also possesses, from the completeness and success of the post-war Barbican to the sophisticated glass façade systems of 22 Bishopsgate. As with the insistent variety, the sheer calibre of the City's built form testifies to its historic and ongoing commercial success, itself a source of significance.
- 24.72. **PAGENTRY & EVENTS** While less associated with formal pageantry the Character Area has strong associations with historic events, including the memorials commemorating the extinguishing of the Great Fire of London, in the Grade II listed 'The Golden Boy of Pye Corner' and as well as the Grade II listed William Wallis memorial, signposting the location of his, and other protestant martyrs, execution. Tall buildings in this area run the risk of disruption how these monuments are presently appreciated in the location's they commemorate.
- 24.73. **STREET PATTERN** As noted above specific street patterns have been identified within the Character Area, including the Victorian infrastructure surrounding the market and viaduct, eighteenth century residential streets to Cloth Fair. The creation of a number of large institutional buildings such as the Post and Sorting Office (now redeveloped) resulted in a more regular street pattern to the southeastern end. A sense of a more intimate scale and enclosure to the church yards has however been maintained. Tall buildings, through the need for a large ground plan, risk the loss of characteristic street pattern and grain.

Conclusion

- 24.74. **Very sensitive** in respect of Heritage Significance, principally due to (i) the many conservation areas which make tall buildings in the Character Area explicitly contrary to Local Plan policy and (ii) the many highly graded listed buildings and their sensitive historic settings.

Conclusion - Overall Sensitivity to Tall Buildings

- 24.75. The Character Area is found to be **very sensitive** to tall buildings, in respect of its character and appearance, Strategic Views, Townscape and Skyline as well as its

heritage significance. Much of the area is crossed by Landmark Viewing Corridors in which tall building proposals would be explicitly contrary to policy; Intensification here would be highly likely to lead to conflict with the silhouette and skyline presence of St Paul's Cathedral, particularly in views from the bridges and the South Bank. Tall buildings in this area would also create unwanted landmarks, detracting from the focal point of the area surrounding Smithfield Market, as well as negative competition with the perception of the Barbican towers on the skyline.

Section 3: Conclusion

- 25.1. This section has assessed the City of London for sensitivity to further tall building development. The whole of the City of London had been found to be sensitive to tall buildings, with this sensitivity varying in magnitude depending on location and context.
- 25.2. Nine character areas within the CoL were defined and assessed individually in terms of sensitivity. This assessment considered the character and appearance of each area, including landmarks and local views of interest, as well as how each character area contributes to strategic views and the wider London skyline. This assessment has also considered each character area's contribution to the wider significance of the City of London as a whole, using the criteria identified in section 2.
- 25.3. A summary of the key heritage assets within each character area was also provided. A summary of their significance, and identification of how key aspects of setting may make a contribution to this significance was also stated (in general terms). A high-level assessment of how this contribution may be impacted by further tall buildings inside the character area was also given. Drawing together all of these factors, a determination on overall sensitivity of a character area was then made. This determination gave particular weight to where a potential harmful impact to a heritage asset was identified.
- 25.4. It should be noted that a judgement on how any future tall buildings within these character areas may impact the setting and ability to appreciate the significance of any heritage asset within, or external to, a character area's boundary falls outside the scope of this report. For that reason, this assessment does not preclude the testing of individual tall building proposals against the requirements of the NPPF as part of standard planning process. This includes the requirement to give great weight to the conservation any heritage asset's significance, including how this is appreciated through the asset's setting.
- 25.5. Of the nine assessed, seven are considered very sensitive to further tall buildings within each character areas boundary. These are: Fleet Street and the Temples, Smithfield, Barbican and Golden Lane, Liverpool Street and Broadgate, Eastern City Fringe, Riverside and Bank. These character areas have therefore been excluded from further consideration within this sieving exercise.
- 25.6. Two character areas, the City Cluster and Holborn and Fleet Valley, have been found to be sensitive to further tall buildings when using the criteria defined above. Through the character area analysis it was additionally found that one building in the Riverside character area was found to qualify as a tall building (Minster Court), with reference to its comparative height and context. In order to control how this building appears within the proposed clusters, this site has been brought forward to the scoping exercise.
- 25.7. These two character areas are therefore brought forward for further sensitivity analysis¹ which refines the extent of their perimeter boundaries and determines acceptable building heights within these areas.
- 25.8. While these two areas a brought forward, the sensitivities to tall buildings as outlined in their respective sections above remain, and future tall building proposals within these

¹ Note, this is inclusive of the northern half of Minster Court.

areas would need to demonstrate no adverse impacts upon these criteria as part of the planning process and subject to the requirements in the City Plan and London Plan policies.

SECTION 4 – ASSESSMENT OF IMPACT

Introduction

- 26.1. To conform with policy D9 of the London Plan, this section identifies two locations within the City of London which may be appropriate for further tall building development. These fall within the City Cluster and Holborn and Fleet Valley character areas, established within the sieving exercise within Section 3 to be 'sensitive' to further tall buildings.
- 26.2. Using 3D modelling, and working on the basis of the City's definition of tall buildings as 75m AOD or above, a more detailed analysis of potentially acceptable heights and locations within each character area is then tested, seeking to create indicative envelopes of the potential additional capacity of each area: the proposed City Cluster and proposed Holborn and Fleet Valley Cluster. A rationale for the benefits of this approach is outlined below.
- 26.3. This section sets out the modelling process, describing how the 3D models were devised in response to the sensitivity criteria established in section 3, and iteratively adjusted to avoid or minimise potentially harmful effects, principally on the three Strategic Landmarks: the Tower of London, St Paul's Cathedral and the Monument. Throughout, strategic views identified in policy were used to test the model's evolving design and inform the selection of views to be included in the final assessment of visual impact. Further technical information on the production of the models is provided in Miller Hare's methodology.
- 26.4. Initial volumetric testing was undertaken by Miller Hare, producing a series of contour rings for each Cluster, specifying bands of heights and locations where tall buildings could potentially be acceptable. These contour rings were then taken forward by City Corporation officers for further refinement. This data was used to create 3D models of each proposed tall building area, illustrating how the policy could potentially be implemented. This established an indicative visual envelope for each cluster, enabling an assessment of potential visual impact.
- 26.5. A Heritage Impact Assessment (HIA) was then undertaken for each of the strategic landmarks within the City noted in Section 2, comprising the Tower of London World Heritage Site, St Paul's Cathedral and The Monument. The visual impact of the indicative visual envelope of each cluster was assessed in relation to views of each asset identified in policy, informing the final assessment within each HIA. Additionally, a bespoke Strategic Visual Impact Assessment (SVIA) was undertaken to determine the impact of the clusters upon the identified views in the LVMF, illustrated with baseline photography and computer-generated imagery to support this analysis. The HIAs make reference to the SVIA as appropriate to evidence their assessments. The findings of these reports are summarised in these sections below.
- 26.6. Using this information, this section also then provides a final high-level assessment of the impact of the clusters upon the elements of significance for the City of London, as defined in section 2.
- 26.7. It should be noted that the 3D models illustrated within the SVIA are only indicative visual envelopes for each cluster. These models are illustrative of a single consolidated form,

and cannot demonstrate how individual sites maybe realised over time. This therefore does not allow for how spaces between tall buildings within each cluster interior may appear. The cluster shape also encompasses streets, public realm and some buildings (such as listed buildings) where the development of tall buildings would be highly unlikely to come forward. Therefore, the impacts discussed in the section are described as potential impacts only. Accordingly, while a judgement is made on where tall buildings may potentially be acceptable, this assessment does not preclude the need for individual tall building schemes to be fully assessed in accordance with national and local policy.

Tall Buildings - A definition

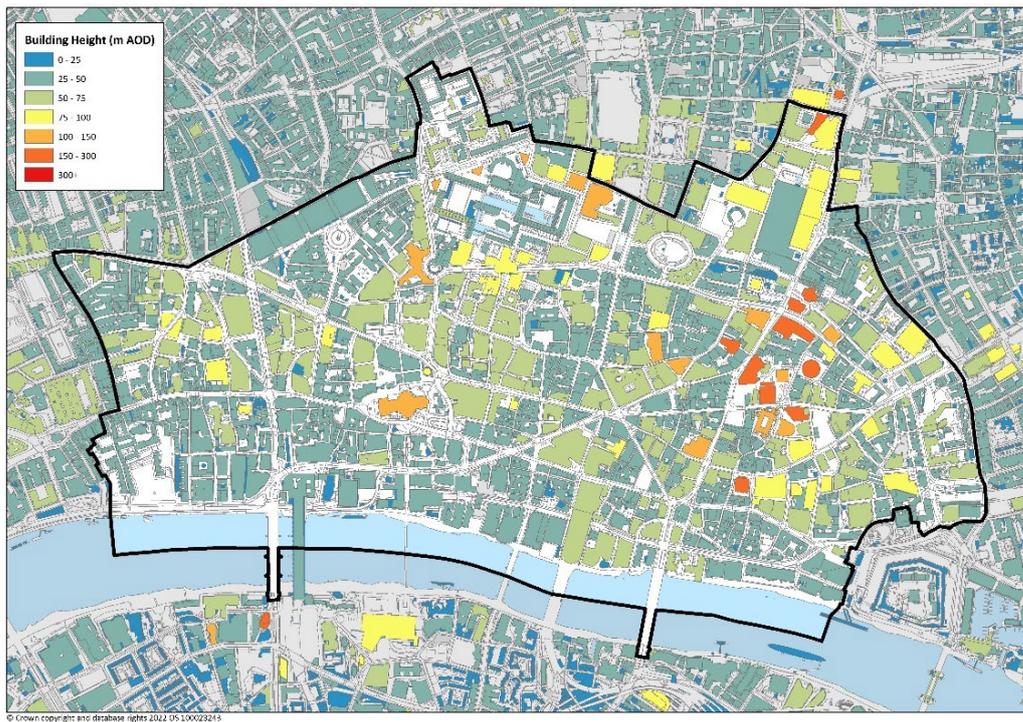


Figure 36. Existing Building Heights (2022)

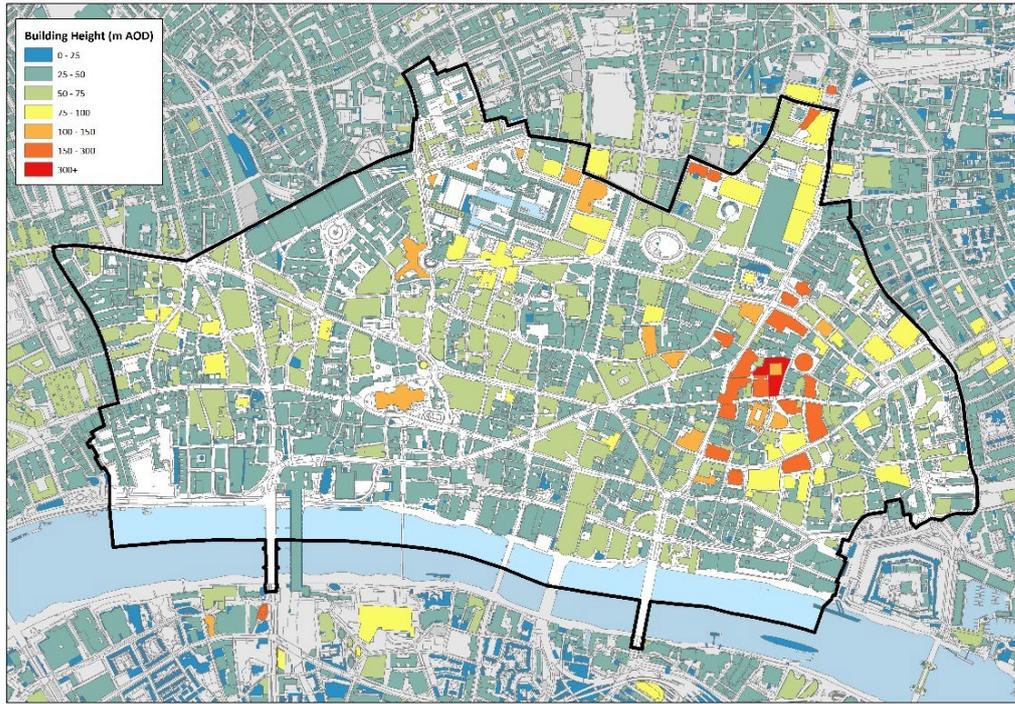


Figure 37. Emerging Building Heights.

- 27.1. The two above maps demonstrate that only small pockets of the City are consistently at or around 6 storeys or 18m high, notably Smithfield, Fleet Street and the Temples, or along the lanes and alleys surrounding Bank.
- 27.2. As is apparent from the heights mapping, much of the City is between 50-75m AOD, or between 15-21 storeys, including a significant number of listed buildings and buildings in

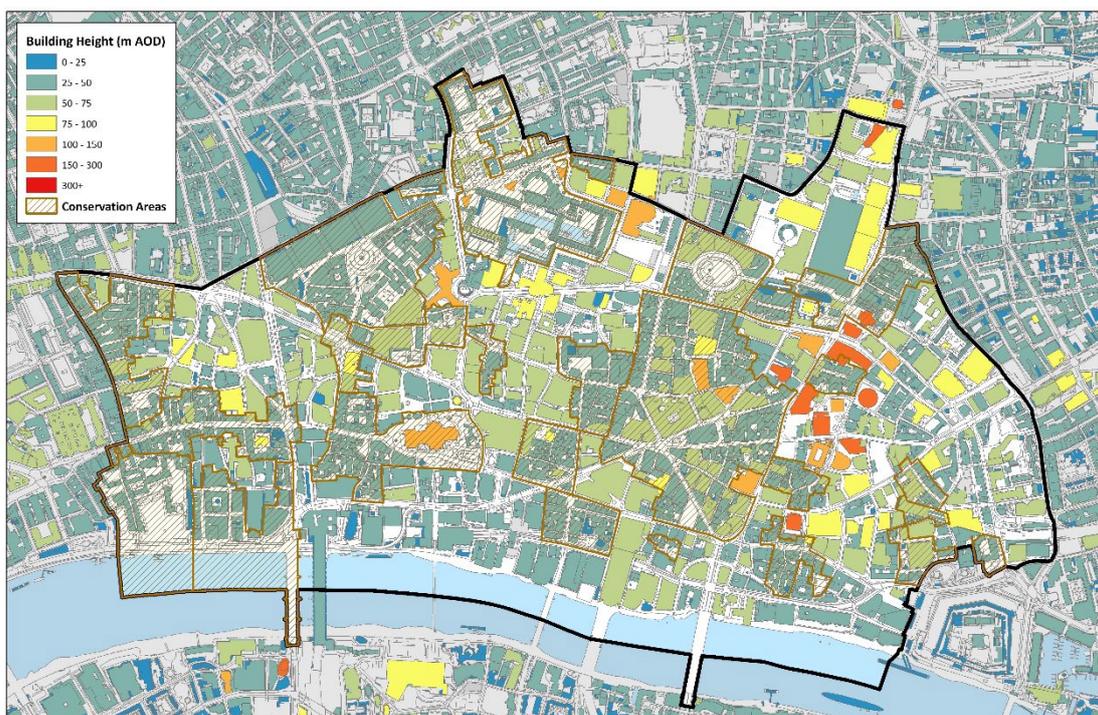


Figure 38. Building Heights and Conservation Areas

the conservation areas. It has also been established that the City has a varied character where a common trait is dense spatial contrast, often between small and large.

- 27.3. Given the diverse and small geographical area, it was not considered appropriate to prescribe a granular approach to a definition of tall buildings on an area-by-area basis.
- 27.4. The City Corporation publishes annual monitoring reports on tall buildings in the City of London. These reports define tall buildings as being 75m>AOD. For the purposes of addressing London Plan policy requirements, it is considered that a 75m AOD definition is appropriate. It ensures consistency with longer-term monitoring and is a level which would likely have significant visual implications at a local and wider level. It is considered such buildings could trigger the definition of the London Plan, potentially being substantially taller than their surroundings and resulting in a significant change to the skyline.
- 27.5. A map showing spatial distribution of buildings of 75m>AOD is provided at Figure 33. These buildings have a significant prominence in the local context and a macro-level townscape and skyline presence, either individually or as part of a wider clustering of taller buildings rising above the prevalent lower datum heights.

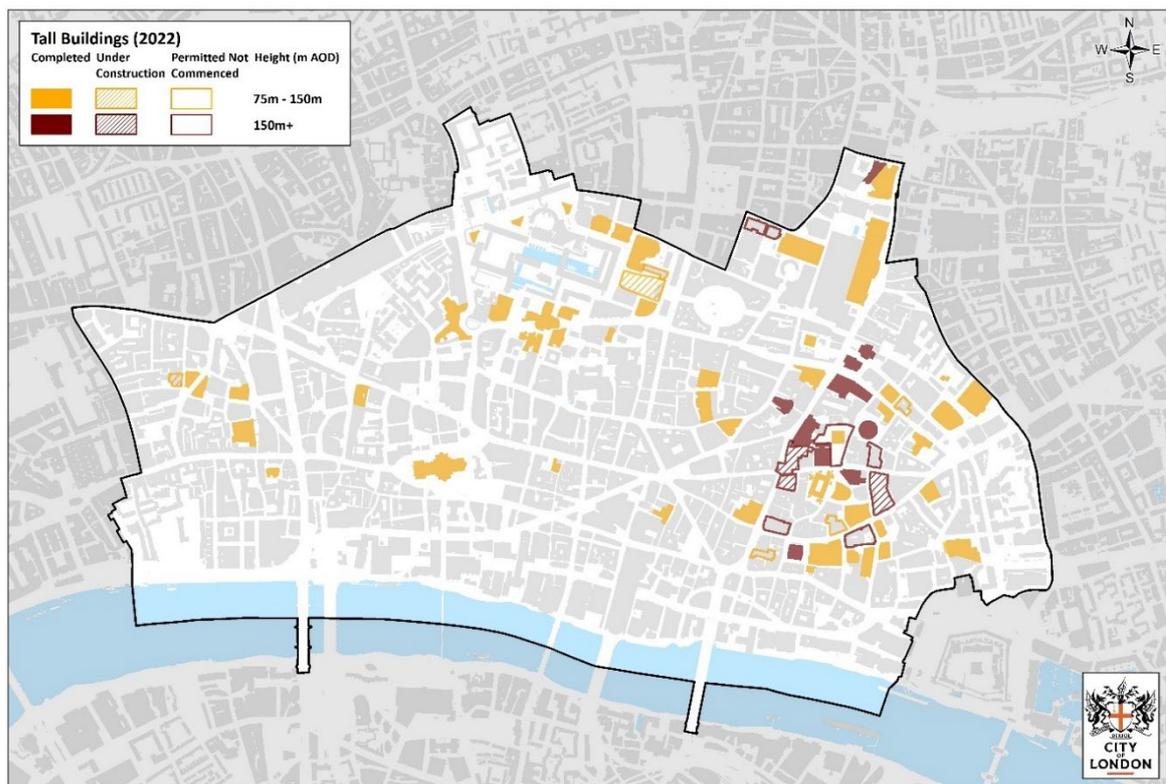


Figure 39. Tall Buildings within the City of London (75m>AOD)

Concept of Clustering

- 27.6. In proposing areas potentially appropriate for future tall buildings, the approach taken has been to establish these locations within consolidated clusters, rather than as isolated or scattered plots. This is consistent with the long-term evolution of the City Cluster, which has sought to influence development so that a considered, coherent overall shape and composition to the skyline presence of tall buildings could be achieved. This enables

a sense of curation to more distant views of the City skyline, beneficial with regard to maintaining a wider pleasing townscape character. This approach also enables the coordination of investment into the public realm ensuring and/or restoring the retention of a generous civic character to the street scene and optimising the provision of services. This also enables relief from pressure for development upon those areas of the City found to be very sensitive to development of this kind.

Tall building Sensitivity Testing

A Strategic balance

- 28.1. The whole of the City of London has been found to be sensitive to tall building development. Given the strategic importance the CoL has as a world leading business and financial centre, and to Greater London as a 'World City', reconciling growth and change with the conservation of the historic environment has always been at the heart of the Plan-led process.
- 28.2. This has required a balance between accommodating the strategic growth needs outlined in section one with avoiding, and where appropriate, mitigating impacts on the historic environment and strategic views. Further, reference is made to paragraph 190 of the NPPF, which requires local authorities to implement a positive strategy which protects the conservation of the historic environment.
- 28.3. The fundamental aim of this exercise is to avoid and mitigate strategic-level harms. It is however beyond the scope of this exercise to predict the full impact of any individual development scheme that may arise. This report does not therefore preclude the need for all future tall building proposals to undergo individual assessment and analysis.

Establishing the Constraints

- 28.4. The initial shaping of each tall building area was informed by a 'Select Criteria', drawn from established, adopted macro-level strategic view and heritage constraints.
- These were:
- The Tower of London World Heritage Site, and associated policy and guidance;
 - St Paul's Cathedral, and associated policy and guidance;
 - The London View Management Framework (LVMF), and associated policy and guidance;
 - City Landmarks and Skyline Features, and associated policy and guidance and;
 - The Monument to the Great Fire, and associated policy and guidance.
 - Relevant neighbouring borough's strategic local views.
- 28.5. These Select Criteria produced a series of hard constraints, chiefly all relevant LVMF views, views of the ToL and other views specified in the aforementioned policy and guidance. The location of existing and consented tall buildings also informed the

production of the model, seeking where possible to consolidate tall buildings into cluster forms.

- 28.6. Height options were then modelled on sites within the clusters and assessed against views identified within the Selected Criteria above, settling on an outcome judged to strike the right balance between conservation and delivering growth.
- 28.7. This process is outlined below.

Cluster Modelling Process

- 29.1. Using the hard constraints identified above, an initial visual envelope was produced for each cluster, subsequently shaped in the iterative process outlined below and in detail within Miller Hare's methodology. At each stage, adjustments were made with reference to the potential impact to the views associated with the select criteria. This process then generated forms from which contour lines defining bands of appropriate height in 20 meter increments could be illustrated on 2D maps and provide the basis for the policy. From these contour lines, a stepped mould was established with the edges of each band simply joined together to demonstrate potential overall form of each cluster which adhered with the policy.
- 29.2. This process enabled two options for each of the clusters to be tested further. These tested different spatial boundaries and heights, with Option A providing greater capacity and uplift potential than Option B. Both options were assessed for visual intrusion within the identified views associated with the select criteria and adjusted accordingly. This process found that Option B struck the appropriate balance overall, when the resultant potential townscape and heritage impacts were taken into consideration alongside capacity needs and this option is therefore taken forward to the final assessment stage.
- 29.3. Throughout the overall shape of option B was sculpted to avoid an overly jagged mass, however its form assumes the maximum height within each band, creating edges to each contour band which respond to the hard constraints identified above. The closest points on the contour rings were joined together to produce an enclosed shape. The form of the clusters were also enclosed, to ensure each cluster appears as a finished dimensional form for the purposes of undertaking the SVIA and HIAs. Further testing and refinements were made in response to strategic views. The indicative visual envelopes taken forward

to the final assessment should be understood as a representation, generated to understand potential visibility of each cluster in a specific scenario.

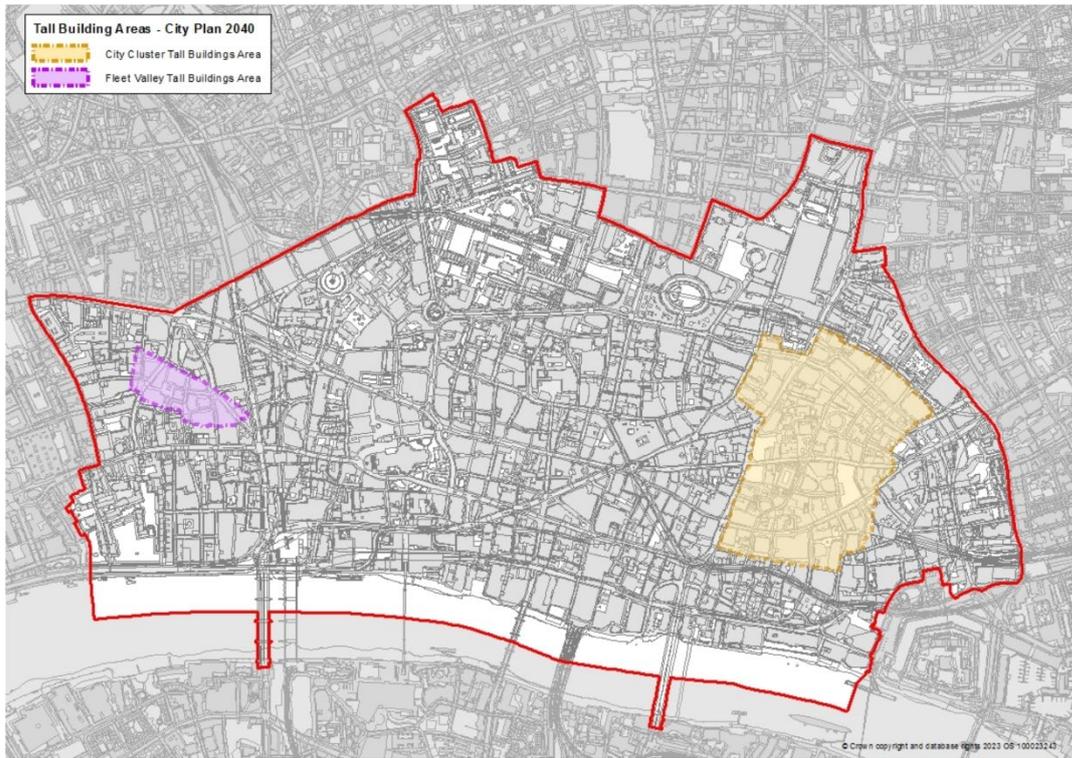


Figure 40. Proposed tall building areas.

Assessment of Impact

30.1. This section assesses the potential impact of the proposed clusters upon macro level strategic view and heritage constraints as define above, comprising the Tower of London, St Paul's Cathedral and The Monument. This analysis is drawn from and supported by Heritage Impact Assessments as well as a bespoke Strategic Visual Impact Assessment, which should be read alongside the below. A summary analysis of these impacts is outlined below, before a final assessment against the significance criteria established in Section 2.

Tower of London

- 30.2. A full Heritage Impact Assessment has been undertaken, analysing the potential impact of the proposed new clusters upon the Outstanding Universal Value of the Tower of London World Heritage Site (WHS). The full methodology for these reports is included within the HIA and has been undertaken in reference to the UNESCO toolkit for assessing impact. The findings of this report are summarised below.
- 30.3. This potential impact has been assessed against the seven attributes, and their components of Outstanding Universal Value (OUV), as identified within the adopted Statement of OUV. It is considered that all attributes of OUV draw to an extent on the contribution of setting for significance and an appreciation of it, with the following attributes drawing particularly from setting² :
- I.) An Internationally famous monument
 - II.) Landmark siting
 - III.) Symbol of Norman power and
 - IV.) Physical dominance (of the White Tower);
- 30.4. As the proposed clusters are outside the WHS, there would be no direct, physical impact on the fabric of the WHS. The potential impact of the proposed new clusters would therefore be indirect, comprising change within its setting. The proposed new clusters are not in the designated local setting (as identified in Fig. 4 of the WHS Management Plan) but the proposed City Cluster is located in the spatially undefined wider setting, and its impact upon the OUV of the ToL was therefore taken forward for assessment.
- 30.5. It is important to note that the WHS Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It recognises that the Cluster has had an emerging distinct identity and the relationship between the ToL and the Cluster is long-established, having existed for over half a century, forming a backdrop in views, including over buildings in the Inner Ward.
- 30.6. In recognising the place of the Cluster in the wider setting the Management Plan also acknowledges that it will intensify as a distinct and separate element to the ToL. This is consistent with the UNESCO Mission reports which has accepted that the clustering of

² As per Inspector's decision APP/K5030/W/20/3244984

tall buildings offers some potential mitigation with regard to any adverse impacts arising from additional visual intrusion.

- 30.7. Additionally at para 7.3.27, the Management Plan states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider (i) their effect on the established Cluster, (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.
- 30.8. The Local Setting Study identifies in section 7 those most representative views and/or viewing areas to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change (identified as 'HRP' views below). An assessment of these views points has formed the basis for analysis of impact to the OUV, alongside relevant or equivalent views within the LVMF, with specific reference to the Management Guidance contained within the LVMF and WHS Management Plan.
- 30.9. A summary of the potential impact of the indicative Cluster envelopes upon these views and the Outstanding Universal Value of the World Heritage Site is provided below. Please note a full assessment is provided in the relevant HIA and the below should be read alongside this report.

Eastern River Views

- 30.10. In these views across the river the proposed City Cluster is seen to the west of the White Tower, include LVMF views 10A.1, 25.A3, 25.A2, 25.A1 and HRP representative views 9, 10 and Approach Route 14: Tower Bridge (SVIA View 20). These views are generally of fine, broad river prospects. These views are considered within the management guidance of the local setting study to enable an appreciation of many of aspects of the OUV of the Tower. In summary, the landmark siting of the Tower is considered to be represented by its position in relation to the river and city beyond, additionally representing Norman power through the dominant, landmark appearance of the White Tower. As relates to Approach Route 14 the concentric castle design is also considered apparent, as is St. Thomas's Tower, Wakefield Tower, Traitor's Gate and Middle Tower.
- 30.11. The guidance notes that the Tower should continue to be appreciated as a gateway to the City and not lost within it and it should continue to dominate its surroundings. The guidance further notes that new buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point and the visibility of the concentric castle design should be maintained.
- 30.12. The proposed City Cluster in these existing and baseline views forms a strong presence in the skyline, establishing a rapid increase in the visible height of development in the background, creating an apex on the skyline. The Tower of London is perceived as close to the Cluster in these views, with consented development joining within the silhouette of the White Tower in 10.A (the lower half of 80 Houndsditch, London) but retains a sense of command on the foreshore through its prominent location on the river front, the open sky above the ToL's outer walls and remaining isolated portion of sky silhouette of the White Tower. It is noted that the proposed City Cluster, as existing, in comparison to the ToL occupies a greater quantum of skyspace, however its layered form, comprised of many different individual buildings, contrasts with the singular clarity of the White Tower.

This contrast, specifically as it relates to clarity of form, is considered to preserve an appreciation of the ToL's commanding presence on the riverside.

Impact

- 30.13. From LVMF 25.A1-3 the proposed visual envelope of the proposed City Cluster is shown to potentially expand to the east in the form of a slope which mediates between the existing eastern apex of the cluster and twentieth century architecture on the skyline. While the overall sky space occupied by the cluster is potentially seen to increase, this change maintains a distinct gap between the White Tower and the apex and visible envelope of the cluster. The eastern edge of the proposed cluster has been modelled to respond to the context of the ToL WHS and to accord with the SPG, leaving a clear skyspace gap between the Cluster's eastern edge and the silhouette of the White Tower to maintain visual separation. To the west, the proposed cluster form would be tightly wrapped around the silhouette of 55 Gracechurch Street, leaving a considerable sky gap between the Cluster, the Monument and St Paul's Cathedral.
- 30.14. It is acknowledged that, in this scenario, individual schemes coming forward on sites at the Cluster's eastern edge as perceived from LVMF viewpoint 10A.1, could have the potential to conflict with the guidance, potentially appearing overly dominant the view of the White Tower (LVMF paragraph 183, p.58 of WHS Local Setting Study). There is therefore a potential harmful impact arising from this view, adversely affecting how the setting contributes to an appreciation of the Tower's significance and OUV. The further proximity to its silhouette on the skyline is considered to potentially diminish the following attributes: An Internationally famous monument and physical dominance (of the White Tower). Specifically, this potential harmful impact relates to a diminishment of the ability to appreciate the integral architectural composition of the Tower and its overall form. This degree of adverse impact could, to an extent, be mitigated by individual scheme's specific material palette, should this retain a sense of contrast to the white stone of the Tower, as well as their overall form and termination.
- 30.15. Nevertheless, it is considered that the form and modelling of the Cluster at this point would strike, overall, an appropriate balance in respect of the SPG and the consolidation of the Cluster form. A sense of deference is established through the sloping of the cluster down towards the horizon line, directing the eye towards the ToL and softening the existing 'cliff edge' quality to Cluster. This offers some mitigation to the impacts created through the narrowing of the sky gap, which is in 10A.1 retained, albeit reduced in size. As such on the whole the proposed City Cluster can be seen to remain within the existing appreciable hierarchy and composition in these views, with the tall apex of the contemporary city continuing to be seen to the backdrop to the west and ancient ToL seen distinctly lower to the east but prominently within the foreground.
- 30.16. A similar impact is shown within View 20, representative of the kinetic sequence along Approach Route 14 Tower Bridge as identified in the Local Setting Study. Notwithstanding the effect described above, it is acknowledged that this view is representative of an 'approach', and here these potential impacts are appreciated as a fleeting moment; that the experience of viewing the Tower whilst moving north along the bridge is a kinetic one; and that the City Cluster is an established, dynamic backdrop feature that frequently results in arresting contrasts. It is further acknowledged that other views of the White Tower against clear sky would remain unaffected. In all case the

focus of the views continues to be the ToL in the foreground. The impact to this view is therefore considered to be neutral.

Western River Views

- 30.17. These views comprise LVMF 11B.1-2, HRP representative viewpoint 11, taken from London Bridge looking downstream. At present the City Cluster is not appreciable in these views. The ToL is seen obliquely in the mid-distance beyond the rectilinear frontage of Customs House, but the sky silhouette of the White Tower is appreciable. The Local Setting Study notes that views from this location reinforce the landmark siting of the Tower on the Thames as a symbol of Norman power and as an example of a medieval fortress and concentric castle design. The defensive location of the Tower at the eastern end of the City is also apparent. The management guidelines requires development to not detract from the Tower's silhouette or diminish its perceived scale, maintaining visibility of the concentric castle design.

Impact

- 30.18. In these views the proposed City Cluster would potentially appear above the development on the north bank, seen partially and above the existing horizon line composed of contemporary development. Whilst this comprises a change within these views, the City Cluster will appear at a considerable distance to the west from the ToL. Given the Cluster's siting, the proposal would not affect the clear sky backdrop of the White Tower, and would not impose itself on it, preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

North Bank approach routes to the ToL and views towards the City Cluster.

- 30.19. These views take in the World Heritage Site together with the City Cluster seen in the approaches from the north bank, as well as view to the City from the ToL's outer walls (HRP Views Approach routes 12 and 4, Local setting route 5, representative viewpoints 2,5 and 8).
- 30.20. The Local Setting Study recognises that these views showcase the ToL as a riverside gateway and the historic relationship between the ToL and the river remains tangible. Its landmark siting is demonstrated by the position of the Tower in relation to the City, with its concentric castle design remaining visible. The associated management guidance seeks to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond. Within views north from the Inner Curtain Wall, the management guidance seeks to maintain views that reveal the relationship between the Tower and the City as well as an appreciation of the defences as an outstanding example of concentric castle design. The LSS recognises that future tall buildings *could* reduce the perceived prominence of the Tower in its setting, stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the ToL and the City to the north and that clear views of the concentric curtain walls should be preserved.

30.21. As existing, the Cluster creates a strong presence in the backdrop of these views, creating a marked increase in height on the skyline, with lower development seen within the middle ground of these views between the cluster and ToL. There are instances where the fabric of the ToL and that of the cluster are seen adjacent to one another, despite distance and intervening development, however in all cases the fabric of the ToL remains appreciably distinct, occupying the foreground of these views.

Impact

30.22. The indicative visual envelope shows the visible extent of the City Cluster would potentially increase in these views, with 20 Fenchurch Street largely continuing to define its outer southern limits. While this creates a potential increase in visibility, the form of the proposed cluster can be seen to be limited, extending no further laterally in the field of view beyond where consented and existing development presently occurs. As such this change can be understood as a consolidation of existing built development. Specifically, the proposed City Cluster is shown to draw the emerging crests of the cluster together to achieve a more consolidated form. It would step down substantively towards the south and east in the direction of and to give sufficient breathing space to the WHS.

30.23. While this will potentially establish a greater sense of dense, layered forms within the City Cluster's interior, this is not considered to diminish how the singular form of the ToL is appreciated. With regards to height, the cluster as existing is seen to reach above that of the ToL, and while this contrast would increase, this change is consistent with the existing hierarchy appreciable in these views. This would not create a loss of visibility towards the ToL, nor erode the sense of its verdant setting to the north or disrupt an appreciation of its commanding position in the foreground. Therefore, while the existing contrasts between the Cluster and ToL are considered to be marginally accentuated but not to the extent it creates an adverse impact.

30.24. As such it is considered that the White Tower, accentuated by its massive, fortified walls, would remain the focus of these views, with the Cluster a distant subservient entity beyond; preserving the essential relationship between the ToL and the River and an appreciation of it as a historic gateway. Equally preserving the pre-eminence of concentric defences in these views, all in accordance with the guidance. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

Inner Ward Views

30.25. These views are north west from the Inner Ward of the ToL (HRP Representative viewpoints 1 and 4, SVIA views 31-34 and 57-58).

30.26. These views are deemed by the Local Setting Study to illustrate the ToL's significance as the setting for key historical events, enabling an appreciation of the relationship between and scale of surrounding palace buildings of the Inner Ward. The management guidance seeks to maintain how these views illustrate the, 'living tradition' of the ToL, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls. Specifically tall buildings in the wider surroundings are noted as potentially

detracting from a unique sense of place apart from the modern city. The associated 'Objectives and Guidance' states that development should therefore respect that sense of place and ensure the buildings surrounding the Inner Ward remain the focus of the view.

- 30.27. In these views as existing the City Cluster is intermittently seen beyond the inner walls, rising above the parapet line, adjacent to and occasionally joining with the Spire of Peter Ad Vincula as well as the White Tower. Due to the distance between the cluster and the Tower walls, the effect of parallax creates a large variation in the extent and location of the Cluster's visibility, changing considerably as the viewer moves east and west across the yard or when approaching St Peter Ad Vincula to the north. Nevertheless, the field of view is dominated by the inner ward itself, with the important relationship between the open lawn to the yard interior, the White Tower and surrounding walls remaining readily appreciable.

Impact

- 30.28. The proposed cluster will potentially increase the extent to which the City Cluster is perceived above the walls of the tower. As outlined above, this is consistent with the existing character of these views, where partial glimpses of the upper storeys of towers within the cluster are seen intermittently above the walls of the inner ward. The shape and form of the proposed cluster where visible in these views can be seen to be centred on where existing glimpses occur. As such the nature of change in these views can be considered as a consolidation of where visibility of the Cluster is presently perceptible in the existing scenario. The kinetic nature of this experience is also noted, so that unblemished views of St Peter Ad Vincula and a pristine silhouette to the walls of the inner ward would still be possible at close quarters as the north western corner of the ward is approached. Further to the above, the transition from the lower foothills of the City Cluster to its apex will ensure that taller developments, while visible, will be perceived at a remove from the World Heritage Site.
- 30.29. It is considered, then, in accordance with the guidance in the Local Setting Study, that the proposal would respect the distinct sense of place within the Inner Ward, allowing those enclosing Inner Ward buildings to remain the focus. While it is acknowledged that a greater extent of modern development will potentially be visible, the iconic, strategic landmark siting and dominance of the White Tower would be unchanged, in terms of the overarching attributes of OUV and their components. Equally, the relationship between the ToL and the City beyond would be maintained with the City Cluster remaining as a distinct, long-established backdrop entity, set away from the ToL.

St Paul's Cathedral

- 30.30. A full Heritage Impact Assessment has been undertaken, analysing the potential impact of the proposed new clusters upon the significance of the St Paul's Cathedral, Grade I, including any impact to the contribution of setting. The findings of this report are summarised below, but this section should be read in conjunction with the full report.
- 30.31. The existing contribution of setting to an appreciation of the significance of the Cathedral has been defined in full in section 2 of this report. This has been itemised within a list, outlining the elements of setting and how they contribute to an appreciation of significance. This provides a criterion against which the impact of the proposed clusters to the significance of the Cathedral has been assessed. In summary this includes:
- i) The Local Setting, including St Paul's Churchyard and surrounding streets;
 - ii) The Processional Route to the Cathedral;
 - iii) Relationship with the River Thames;
 - iv) Clear Sky Setting;
 - v) Wider Civic Views;

Local Setting

- 30.32. Many views to and from the Cathedral are identified and protected within local and regional policy. This includes the identified views within the LVMF (London View Management Framework) and The Protected Views SPD. The potential visual impact of the proposed clusters as it relates to the Cathedral has been illustrated within the visuals of the SVIA and assessed in the HIA in accordance with associated policy and guidance. The impact to the above criteria is summarised below, with reference to visuals identified in the SVIA. Where an impact may affect one or more of the identified criteria this is also cross-referenced, noting that the nature of the impacts assessed here are largely in relation to an appreciation of the Cathedral's clear sky setting (element iv). This section should be read with reference to the full statement of the contribution of setting as defined in section 2.
- 30.33. As relates to the local setting of the Cathedral (element i), those associative qualities of the local setting, including the commemoration to the St Paul's Cross and association with myriad historic events are considered to be preserved, with fabric of particular commemorative or symbolic importance within the Cathedral's churchyard or along the Processional Route retained. With regard to the contribution of the churchyard itself, the HIA has found that both proposed clusters are located at a distance from the boundaries of the churchyard, preserving the existing spatial relationship between the yard and Cathedral, such as an appreciation of its proximity, sheltering quality and interior verdant character. As such an appreciation of the Churchyard as a place of contemplation, procession and commemoration is preserved, protecting the extent to which the churchyard contributes to the Cathedral's spiritual and symbolic mission and significance.
- 30.34. It is acknowledged that as existing, as the viewer progresses eastwards from the junction with St Paul's Churchyard and Godliman Street, tall buildings within the cluster are seen in the distant background of the Cathedral, visible beyond the eastern extent of the churchyard and seen against Bank Junction in the foreground. While the proposed City Cluster would draw together the overall form of the Cluster, resulting in new visible tall buildings to the east, this is considered to preserve how the church yard presently contributes an appreciation of the Cathedral's significance, with those aspects which

contribute to significance retained in full. It is noted the churchyard's contemplative and enclosed character as existing, is appreciated in contrast to the bustling city centre beyond, and this sense of contrast is considered to be preserved by new tall buildings seen in the background, maintaining a sense of a layered and changing city in the backdrop.

- 30.35. Equally the Cathedral will continue to be appreciated as at the heart of a local and strategic route structure. Specifically, views along the Processional Route (element ii) (assessed in detail below) have informed the early modelling of the proposed clusters, eliminating any further visual encroachment upon the silhouette of the western front in views north along Fleet Street and Ludgate Hill beyond the outlines of consented development.
- 30.36. As existing, the distance between the City Cluster and the Cathedral is such that, while the apex of the City Cluster is higher than that of the Cathedral, the Cathedral retains its primacy within the local streetscape. Clarity to this architectural hierarchy in the local surroundings has been protected by the St Pauls Heights policy, which has limited tall development to well beyond the eastern extent of the policy area. The Cathedral is therefore overwhelmingly perceived as the preeminent structure within the locality. As such, while the overall visible extent of the City Cluster will potentially increase, this is considered to preserve the hierarchies of the streetscape along the local routes towards the Cathedral.
- 30.37. Specifically with regards to the proposed Fleet Valley Cluster as existing, it is noted that views west along Cannon Street take in partial and unfolding sightlines towards the south western tower, south transept and dome (SVIA Views 103-108). At present the consented baseline, in particular 120 Fleet Street, creates a backdrop to the fabric of the Cathedral perceived within these views. Consent development is appreciable in these views colliding with the silhouette of the south western clock tower as well as above the south transept. The extent the consented baseline creates a backdrop within these views reduces as the Cathedral is approached, with consented development appearing only below the parapet of the southern clock tower when viewed beyond the junction at College Hill.
- 30.38. Due to the consented development therefore, these views as existing do not take in a pristine sky setting to the Cathedral's silhouette and moreover the oblique angle of the sight line, lends a fortuitous quality to this axis. However, glimpses of the open lantern of the western towers, seen together with the dome, pediment and golden phoenix create a picturesque townscape moment of considerable strategic importance to the character and identity of the City, making a strong positive contribution to an appreciation of the Cathedral's significance.
- 30.39. Within these views the indicative visual envelope of the proposed cluster can be seen to broadly follow the outline line of consented development, at 120 Fleet Street, but consuming a small amount of additional sky-space. As such there would be the potential for minor adverse effects over that of the consented baseline. Therefore, this point in the Cannon Street viewing experience would need to be rigorously scrutinised at individual scheme stage, to mitigate or avoid these potential adverse effects to elements' (i) and (iv) as set out above.
- 30.40. Additionally, an assessment of views from the Monument towards the Cathedral has found the Cathedral here is already somewhat compromised on the skyline and would still be appreciated in the foreground. A detailed assessment of this impact is included within the HIA and discussed in detail below. (para 31.50). This assessment has demonstrated that the proposed Holborn and Fleet Valley cluster will potentially be

visible in the backdrop of this view, seen alongside and behind the Western Towers and Cathedral Dome. The indicative visual envelope of the cluster in this location has however been shown to fall below consented development which presently infills the gap between the towers and Dome, so that the overall impact of the proposed cluster on this view is considered to be neutral. As noted, this neutral impact is contingent upon the retention of distinction in materiality between any proposed new structure and the fabric of the Cathedral. Notwithstanding this, the visibility of the Cathedral and its prominence within the view is considered to be preserved, protecting the sense of group value with the Monument.

Processional Route

- 30.41. With regards to impacts to the Processional Route (ii), as noted above, views along Fleet Street towards Ludgate Hill are protected within the Protected Views SPD. These have from the start informed the modelling of the proposed clusters. Accordingly, the proposed City Cluster is tightly drawn around existing and consented development, following the existing compositional form of the City Cluster. Consequently, the indicative visual envelope of the proposed cluster has been found to be not visible along the Processional Route east of Ludgate Circus. To the west, two of the viewpoints along the Processional Route at Crane Court and Wine Office Court indicate new buildings within the Proposed cluster will be potentially visible, resulting in a small increase in the sky space occupied by the cluster seen at these locations. This increase however reflects where the proposed cluster contours connect existing and consented development silhouettes and does not result in a sense of further encroachment upon the isolated form of the Cathedral. It is considered the indicative visual envelope responds to the prevailing scale and building line of Fleet Street, picking up on the prevalent shoulder datum heights which enclose the vista east towards St Paul's, without impeding on it. At no point would it obscure or detract from the pre-eminence of the unfolding composition or on the skyline presence of the Cathedral this kinetic viewing experience. The overall impact upon how these views contribute to an appreciation of the significance of the Cathedral is therefore considered to be neutral. This element of setting (ii) and its contribution to significance would therefore be preserved. Further, an appreciation of the Route's antiquity and relationship to London's oldest place of worship will be preserved, as will the layered townscape experience perceptible along its extent. Equally the influence of the of this western approach route upon Wren's designs remains tangibly felt, with no interruption of how the Dome and western towers are perceived together, as well as their pristine sky setting.

Relationship with the River Thames

- 30.42. The relationship between the Cathedral, the Thames, and the former's clear sky setting is bound up together (elements iii and iv). South-westerly views from the South Bank and bridges take in a clear sky setting to the Dome, spire and towers, and this clarity of form creates a sense of focus to the views which in turn enhances its symbolic presence of the Cathedral on the skyline. An assessment of riverside views has found that the proposed clusters have retained the clear sky silhouette of the Cathedral, set back approximately 372 and 880 metres respectively.
- 30.43. The overall form of the proposed City Cluster can be seen to consolidate around existing and consented development, mediating between its existing and consented apexes and outer extent. 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, where it is presently seen as a larger but multifaceted and

layered townscape feature on the horizon line. As existing, this stratified quality to the City Cluster contrasts to the singular clarity of the Cathedral's silhouette and iconic composition of the Dome and Western towers, and this quality of contrast is considered to be upheld.

- 30.44. Specifically with regard to LVMF view 15.B1 from Waterloo Bridge, the angle across the river is such that the proposed new City Cluster and the Cathedral are perceived closer together in comparison to elsewhere along the riverfront. Here it is considered that the consumption of further sky space closer to the east of the Cathedral could create the potential for conflict with the guidance in the SPG, which requires development to maintain the Cathedral's visual prominence and not dominate any element of the Cathedral's silhouette in the background of the view (paras 266 and 267) and individual schemes coming forward on sites at the Cluster's edge in this location would need to be thoroughly interrogated in this respect. Nevertheless, it is considered that the form and modelling of the Cluster at this point strikes, overall, an appropriate balance in respect of the SPG and the consolidation of the Cluster form.
- 30.45. Overall, it was found the visual effect in respect of the Cluster form alone is considered to be beneficial, through the enhancement of its form and sharper definition of its edges. However, it is acknowledged that there is some low potential for adverse effects, particularly at the north-western corner closest to the Cathedral, and these will need to be rigorously scrutinised at individual scheme stage. These adverse effects have the potential to impact the contribution of elements (iii) and (iv) of the Cathedral's setting, as identified above.
- 30.46. With regards to the Holborn and Fleet Valley Cluster, within riverine views while the proposed new cluster would potentially create a new, taller, horizon line, its apex is considered to remain demonstrably subservient to that of the Cathedral, and would not compete for focus within the view, albeit intensifying an urban character within the wider surroundings.

Wider Civic Views

- 30.47. With regard to wider civic views (element vi as identified above), it has been found that the proposed cluster's preserve the existing composition of each view. The proposed clustered would not undermine an appreciation of St Paul's strategic wider skyline setting from London's broad cityscape panoramas. As above while there is the potential for visible change within the indicative visual envelope of each proposed cluster, this change is considered to have a neutral impact upon how each view contributes to an appreciation of St Paul's significance. For example, in views from Primrose Hill (LVMF 4.A), the Fleet Valley cluster is seen to follow the line of consented development at New Street Square, stopping short of the Shard.
- 30.48. A fleeting impact has however been identified in relation to the view from Somerset House Terrace, where the proposed cluster would encroach more upon the silhouette of the Cathedral's dome in this view; the potential for adverse impacts here would need to be interrogated at individual scheme stage.
- 30.49. In all other respects the proposed clusters are found to preserve the contribution of these views to an appreciation of the Cathedral's significance, as well as the LVMF guidance.

The Monument to the Great Fire of London

- 30.50. A full Heritage Impact Assessment has been undertaken, analysing the potential impact of the proposed new clusters upon the significance of the of the Monument to the Great Fire of London, Grade I. This assessment has found these impacts to be indirect, affecting the setting of this designated heritage asset.
- 30.51. Section 2 of this evidence base as well as this report has provided a definition of how this setting presently contributes to an appreciation of the Monument's significance, drawing upon existing policy including the Protected View and Monument View Study SPDs as well as LVMF Guidance. This has established specific criteria against which the Proposed clusters could be assessed, and identified key views from which the contribution of setting to significance is illustrated. This includes vistas from the Monument, identified in the Protected View and Monument Views Study SPD's as well as views to the Monument, with additional views in which the Monument is considered a Landmark identified in the London Views Management Framework.
- 30.52. The Heritage Impact Assessment has demonstrated an iterative scoping process ensured both proposed clusters fall outside of the immediate setting of the Monument as defined in the above SPDs, as well as outside the Protected Vistas from the Monument. The assessment found that the Fleet Valley cluster while falling outside of the vistas defined by the policy, will be potentially visible in the backdrop of View 5 from the Monument, looking north west towards St Paul's.
- 30.53. Within this view, the potential visual envelope of the Fleet Valley cluster follows the line of consented development, appearing adjacent to and between the western towers of the Cathedral and the Cathedral Dome. The indicative potential height of the cluster would however preserve an appreciation of the gilt pineapple finials of the twin western towers against sky and would result in no further erosion of the dome beyond consented development. Tall buildings could therefore be potentially acceptable in this location, should they continue to retain a distinction between the fabric of the Cathedral and background development, ensuring the legibility and prominence of the Cathedral in this view is preserved and delivering no further infill of the open sky-setting of the Cathedral.
- 30.54. Additionally, it was found that the proposed clusters would not transect or obscure identified views to the Monument. However, it was established that the proposed City Cluster would be peripherally visible within the wider field of view within a number of these views. The assessment found that while the proposed clusters created a visible change within the wider surroundings, this, on the whole, preserved the ability to appreciate the Monument's significance. Specifically, the assessment found the proposed clusters would retain an appreciation of its historic and symbolic location on the line of Old London Bridge seen along the waterfront. Its group value with the steeples of the City Churches was also found to be preserved, and the symbolic contribution of the Monument to the skyline composition of the Cathedral and Tower Bridge, where seen distantly from the east was also found to be retained. While the proposed City Cluster could be understood to potentially increase in terms of its visible extent in these views, this was not considered, when the sloped modelling of the cluster to the east was taken into account, to prevent how these identified views enabled an appreciation of the Monument's significance.
- 30.55. Specifically with regards to LVMF viewpoint 16.B2 from Gabriel's Wharf, the Monument is here distantly and partially visible on the skyline, with the orb and viewing gallery seen against an open sky. In this distant view the City Cluster was perceived to potentially join with the sky silhouette of the Monument, meeting its outline below the viewing gallery, albeit in magnified views a gap would be preserved. This would potentially undermine

the extent to which the Monument is appreciated in this view as a landmark, albeit this landmark quality and the Monument itself is not specifically identified within the Visual Management guidance of the LVMF nor its it identified within the Protective Views or Monument Views Study SPDs. This harm could be potentially mitigated through the improved legibility of the Monument through the form of the proposed cluster. Specifically, the proposed slope of potential development is considered to aid the Monument's identification on the skyline in this distant view, drawing the eye towards the orb and viewing platform which would remain free from development. Future tall building proposals will therefore need to carefully demonstrate an avoidance of this potential adverse impact.

London View Management Framework.

- 30.56. A Strategic Visual Impact Assessment has been prepared assessing the impact of the proposed clusters upon the guidelines of the London View Management Framework. This assessment has found that in addition to the future baseline, the Proposed clusters would have largely neutral and in some cases beneficial effects on the qualities and composition of the views. The consolidation of the existing and emerging schemes into a legible form would be beneficial to their composition and architectural identity as Clusters. It is acknowledged however the proposed clusters would, if delivered to their fullest extent, lead to considerable change on the City skyline. Such change could have the potential to create adverse effects in some of the views, taking into account the sensitivity of the Strategic Landmarks and the complexities created by the City's small geographical area, topography and phases of development.

Potentials for adverse effects were identified in the following views:

- LVMF 10A.1 – Tower Bridge
- LVMF 15B.1 – Waterloo Bridge
- LVMF 16B.2 – Gabriel's Wharf
- LVMF 26A.1 – St James's Park

- 30.57. The impacts to 10A.1, 15B.1 and 16B,2 are discussed above. With regards to 26A.1 it was found that the uppermost parts of the proposed City Cluster would be visible in this view. Although the proposed cluster would appear lower in height overall in comparison to the other elements of the future baseline, and the modelled form of the cluster is considered to present a declining, deferential edge at its most prominent in this view, it would still form a prominent new presence interacting with the notable elements of the view. While the proposed cluster would appear as part of one of the existing groups of buildings, in line with the guidance in para 431, it is considered that the proposed cluster has the potential to appear to dominate or compete with the notable elements of the view and therefore could potentially conflict with the guidance in para 431 of the SPG, though this could be mitigated by attaining exceptional design quality in individual proposals. Overall, it is acknowledged that there is some low potential for adverse effects upon the qualities and composition of this view, and these will need to be rigorously scrutinised at individual scheme stage.

- 30.58. Therefore, in summary, the forms of the proposed clusters have been carefully sculpted in relation to these views to minimise the potential for adverse effects as far as possible. However, in the views identified above, the Cluster(s) have particularly sensitive

relationships to the Strategic Landmarks. Although it is considered that the proposed clusters strike an appropriate balance between delivering additional growth and conservation of these most important assets, in these instances it is acknowledged that some residual potential for adverse impacts remains. These will need to be rigorously scrutinised at individual application stage, when this potential can be mitigated or averted by exemplary design. With the exception of these potentials for adverse effects, the proposed clusters were largely found to have either a neutral or beneficial effect on the qualities and composition of the views. Overall, it is considered that the proposed clusters would create coherent urban forms, bringing an enhancement over the future baseline in that they would enhance the legibility and identity of the City's skyline and townscape. It is further considered that they represent the right balance between the challenge to deliver further growth within the Square Mile whilst respecting and safeguarding as far as possible the presence of the Strategic Landmarks.

Assessment against City of London Significance Criteria

- 30.59. The selection of areas within the City which may be appropriate tall building development has undergone a rigorous sieving exercise. The scale of the proposed clusters was such that it was considered appropriate that a macro study of the City's significance be undertaken, acknowledging that the City itself has a singular symbolic, historic and architectural relationship to the rest of London, contributing greatly to its national and international perception. This study produced a set of significance traits (set out in section 2 of this report) against which the potential impact of further tall buildings within each character area could be assessed, and inform the decision of whether to take a Character Area forward for further consideration and assessment in the detailed modelling stage.
- 30.60. While it is acknowledged this is a bespoke exercise that sits apart from the requirements of existing planning policy, it is considered appropriate to complete the assessment of the final proposed cluster forms against these significance traits in order to fully understand their potential impact. Given the intended lifespan of the local plan, this exercise also is undertaken in anticipation of and in order to pre-empt any future changes in legislation which may require a more holistic or broader understanding of impact upon the heritage interest of the City as a whole.
- 30.61. Defined traits of significance for the City of London were subsequently set out and the relative contribution of setting to the appreciation of each summarised. The potential vulnerabilities to tall buildings for each trait was also outlined. The following assessment therefore draws on this information, and assesses the impact of the proposed City and Holborn and Fleet Valley Clusters upon the significance of the City of London, where the trait has the potential to be impacted by the proposed cluster forms.
- 30.62. Traits considered to be unaffected by proposed cluster's due to their associative rather than physical or spatial nature of the interest have been scoped out of this assessment (for example the trait of 'people'). Where appropriate an assessment of potential impacts to specific traits will be grouped where the nature of this impact is similar.

Historic Interest

Age

- 30.63. The juxtaposition of the hyper-modern with the ancient makes a fundamental contribution to how the longevity of the City of London is presently appreciated. This appreciation stems at its heart from the retention and continued visibility of fabric from the earliest occupation of the City, seen alongside and amongst new development. Equally the continued use of historic street patterns, overlaying one another to the extent that the passerby may traverse through several architectural epochs along one street frontage makes this trait tangible.
- 30.64. With regards to the proposed City Cluster, the west and south-west zones of the Character Area were found to contain some of the earliest parts of the City to be settled, with survivals from the Roman era still present. These are experienced alongside the hypermodern Tall Buildings which presently comprise the Cluster. As such this character area was found to be the most acute example of the City's 'palimpsest' quality, with both old and new seen together, in turn enhancing an appreciation of the City's age and continuity of occupation. Therefore, while the expansion of the City Cluster will potentially result in further tall building development within its limits, this is considered to be in sympathy with how an appreciation of the City's age is presently experienced, maintaining this sense of contrast. This is however predicated on the presumption that individual tall building proposals will retain historic fabric and street patterns where they remain, for example within the Leadenhall Market, St Helen's Place, Lloyd's Avenue, Bishopsgate, Eastcheap and Fenchurch Street Station Conservation Areas. As noted throughout this report, future proposals within the City Cluster will need to be assessed in full under the tests of the NPPF, where great weight is given to the conservation of designated heritage assets. It is also noted that non-designated heritage assets may be identified through the planning application process, enabling the protection of any fabric which is as yet undesignated to be controlled as part of any tall building development.
- 30.65. With regards to the Holborn and Fleet Valley Cluster, while the area has undergone waves of redevelopment, a series of historic tableaux remain including fragments of Medieval, Georgian and Victorian townscape. The boundary of the proposed cluster has been drawn to avoid intrusion into views where these tableaux remain and retain a sense of intimate scale where these historic groupings survive, as well as key vistas of civic buildings. Further tall buildings within the proposed cluster will therefore avoid intrusion into these views and the loss of the remaining historic 'street pattern' or erosion of an intimate character to the streetscape.
- 30.66. Therefore, the proposed clusters are considered to preserve the significance of the City of London as it relates to 'age'.

Commerce

- 30.67. The relative abundance and close proximity of commercial and financial buildings within the City has been found to establish the sense of a dense financial architectural ecosystem, which draws upon setting through an appreciation of the tight knit spatial relationship between relevant building types. Both proposed clusters have been intentionally modelled to create clusters of tall buildings, themselves largely appreciated as indicative of intensive office development associated with Commerce. As such the potential consolidation of tall building clusters in both the Fleet Valley as well as the City Cluster is thought to be sympathetic to this trait of significance. Therefore, the proposed

clusters are considered to preserve the significance of the City of London as it relates to 'commerce'.

Cosmopolitanism

- 30.68. As noted within section 2, tall building clusters for many are considered indicative of a City with global reach and internationally recognised identity. This in turn evokes expectations of a diversity to those who work within and within sight of these tall buildings. This is in keeping with the history of London, which has provided homes and livelihoods for many diverse communities over the centuries, from Lombardic financiers to Hanse merchants. The continued development of tall buildings is therefore not incompatible with this significance trait.

Pageantry & Events

- 30.69. The architectural 'theatre' of interrelated streets, lanes, passages and squares where symbolic Processional Route and historic events have played out make an important contribution to the significance of the City. The boundaries of the proposed tall building clusters have been drawn to avoid the occlusion or loss of views and routes which related to these events, preserving this trait of significance. Specific attention was paid to the preservation of the Processional Route towards the Cathedral, as outlined above. Therefore, the proposed clusters are considered to preserve the significance of the City of London as it relates to 'pageantry & Events'.

Architectural/Artistic Interest

Height & Skyline and Architectural Calibre

- 30.70. Section 2 has demonstrated that the City is a highly idiosyncratic urban entity, of Roman origin but retaining its purpose as a commercial centre. The evolutions of commerce and high finance mean that the City's skyline is subject to continual development pressure. This has created a specific urban character, with the appreciable retention of a historic street pattern seen together with a curated tall building cluster. This is considered to have created a distinct hybrid quality to the city. Nevertheless, the sheer calibre of the City's built form is expressed by both its most ancient and modern fabric, the latter including planned responses to the historic settings of its early buildings.
- 30.71. This hybrid character has therefore retained the prominence and dominance of several strategically important landmarks, and these frequently remain the focus within even distant views of the City. This includes those views most frequently depicted, through paintings, engravings and photographs. The important contribution of these views as illustration of the city's architectural calibre, is often reflected through their identification within the LVMF. The riverside setting of the City has similarly been identified of profound historic importance. Beyond the creation of a pleasing waterside foreground, this setting is symbolic of the existing and historic trade routes which caused the city to thrive. Equally the river provides an experiential route via which the unfolding vistas of the city are seen in the wider urban context, and the strategic landmarks noted above are also readily appreciable.

30.72. As outlined above, potential adverse impacts within regards to these significance traits have been identified within this report. In the main these relate to where the proposed clusters potentially could diminish the clarity with which the iconic structures of the Tower of London, St Paul's Cathedral and the Monument are appreciated. While in all cases there is no loss of visibility towards these landmarks, the potential for further development within their backdrop has been found to pose a possible risk to their dominant characters or loss of focus in views where they presently make a strong compositional presence. It is therefore reiterated that further scrutiny at application stage is therefore required to ensure the architectural or artistic interest of the City is not diminished by individual tall building applications as they come forward.

Street Pattern, typologies, variety and diversity

30.73. The City's ancient origins are immediately recognisable in its street pattern and diverse array of building types. The proposed tall building clusters are located in areas where a historic street pattern and retention of historic buildings of interest has largely been eroded, however pockets remain where the grain and alignment of the roads reflect earlier eras within the City's built history and include building types of notable interest. Individual tall buildings proposals should, therefore, seek to preserve these buildings and reinstate historic routes where possible, ensuring a diversity to the streetscape is maintained in order to avoid adverse impacts to these traits.

Archaeological interest

30.74. Although there has been considerable redevelopment and excavation within the City, there remains much potential for the City's archaeology to reveal information about and deep understanding of period in its history spanning two millennia. The proposed clusters should therefore minimise the risk of loss of archaeological interest as currently set out within National and local planning policy and legislation, in order to avoid adverse impacts to this trait.

CONCLUSION

- 30.75. This exercise has been undertaken to meet the requirements of policy D9 of the London Plan. This report has identified location within the City which may be suitable for further tall building development, determined what heights within these locations may be acceptable and assessed the potential impact. An assessment of the city's significance, as defined in section two, has found the heritage significance of the City to be fundamentally predicated on the juxtaposition of ancient and modern. The layering of architecture from 2,000 years of development has produced an unique urban environment, which has thrived through a continuous life and evolution in response to national and international circumstances. Within this context, therefore, the identification of proposed tall building clusters can be understood to ensure the continuity of this architectural evolution, safeguarding this aspect of the City's urban character.
- 30.76. Two new areas potentially appropriate for tall buildings have been identified, and defined in a series of contour lines, comprising the proposed City and Holborn and Fleet Valley Clusters respectively. It should be noted this exercise has produced a detailed series of constraints which should inform future proposals but does not preclude the need for individual tall building applications to undergo rigorous assessment against the full tests of the NPPF and national and local planning policy. However, the sensitivities of each character area to tall buildings highlighted in section 3 remains a useful matrix to inform the development and design of any new tall building proposals.
- 30.77. The principal rationale behind the defined extent of the proposed clusters has been to consolidate where tall building growth has already occurred. This rationale has been demonstrated to be an accepted form of tall building growth, reflected in the language of existing policy and management guidance landscape. This approach to consolidating growth in the Cluster is also considered to relieve development pressure upon existing conservation policies, including the key strategic operation of the St Paul's Heights limitations as well as allow for the efficient implementation of any public benefits that may arise.
- 30.78. Notwithstanding this there remains a tension between the delivery of the floorspace necessary to meet future needs, as outlined in Section 1, and the conservation of the City's historic and architectural significance. The proposed clusters would, if delivered to their fullest extent, lead to considerable change on the City skyline and inevitably, such change could have the potential to create adverse effects in some of the identified views of designated strategic heritage assets and how these views contribute to an appreciation of their significance. The assessment of impact outlined in section 4 found that potential adverse effects were identified with regards to the settings of the Tower of London, St Paul's Cathedral and the Monument, with contingent adverse impacts upon LVMF views 10A.1, 15B.1, 16B.2 and 26A.1. The forms of the proposed clusters have been carefully sculpted to minimise the potential for adverse effects as far as possible. Although it is considered that the proposed clusters strike an appropriate balance between delivering additional growth and conservation of these most important assets, in these instances it is acknowledged that some residual potential for adverse impacts remains. These views will therefore need to be rigorously scrutinised at individual application stage, when this potential adverse impact could be to an extent mitigated or averted by exemplary design.
- 30.79. Overall, it is considered that the Proposed clusters would create coherent urban forms, bringing an enhancement over the future baseline in that they would enhance the

legibility and identity of the City's skyline and townscape. It is further considered that they represent the right balance between the challenge to deliver further growth within the Square Mile whilst respecting and safeguarding as far as possible the presence of the Strategic Landmarks.