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THE
TOWNSCAPE
CONSULTANCY



Project

City of London Tall Buildings Policy

Client

City of London

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Disclaimer*Assumptions and Limitations*

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

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22 January 2024

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Executive summary

1. This Strategic Visual Impact Assessment (SVIA) report has been prepared by The Townscape Consultancy (TTC) for the City of London Corporation (CoLC) to assess the visual effects of the Proposed Clusters in the City of London (CoL). The Proposed Clusters comprise the 'City Cluster' and the 'Holborn and Fleet Valley Cluster'.
2. CoLC have undertaken scoping and testing exercises to prepare the indicative massing of the Proposed Clusters, in which TTC were not involved. This report presents an independent assessment of the indicative massing resulting from CoLC's testing.
3. This document assesses the effects of the Proposed Clusters on the visual amenity of people as experienced in 50 townscape views (including kinetic sequences) selected by CoLC officers. The viewpoints relate to strategic heritage assets within the City. This report assesses the potential visual effects related to changes to the settings of each strategic heritage asset.
4. Separate Heritage Impact Assessments (HIAs) accompany this document to assess the effects on the three strategic heritage assets within the City, as follows:
 - Tower of London World Heritage Site;
 - The Grade I listed St Paul's Cathedral; and
 - The Grade I listed Monument.
5. The Proposed Clusters respond to a series of hard and soft constraints to achieve overall forms that are both sensitive to their context and establish a collective identity.
6. The consideration and consolidation of the Proposed Clusters as whole forms can enhance the relationship between them and their context through defining crests, foothills and edges to create identity and legibility at a city-wide scale.
7. Individual schemes that come forward within these areas will need to further consider architectural and urban design detail to respond to these aspects of the clusters.



1. Introduction

- 1.1 This Strategic Visual Impact Assessment (SVIA) report has been prepared for the City of London Corporation (CoLC), as part of the evidence base for the emerging 'City Plan 2040'.
- 1.2 The areas outlined in red in Figure 1.1 illustrate the locations of the two Proposed Cluster areas.
- 1.3 This document presents the findings of an independent assessment of the effects of the Proposed Clusters, referred to as the 'City Cluster' and 'Holborn and Fleet Valley Cluster' within the jurisdiction of the CoLC, on visual amenity. The Strategic Visual Impact Assessment (SVIA) was undertaken by The Townscape Consultancy (TTC), a practice that provides independent expert advice on architecture, urban design, townscape and heritage.
- 1.4 The assessment is informed by baseline research into the proposed tall building areas and surrounding built context undertaken by CoLC in the form of the 'Character Areas Study', as well as the consultant's own desk-based research and site visits.
- 1.5 The scoping work by CoLC was undertaken with visualisation specialists Millerhale, who tested a large set of views. The most strategic and representative of which are in this document. The full set of views tested, and the scoping outcome is included in Appendix 2.

- 1.6 The views contained within chapter 6 of this SVIA have been prepared by CoLC using Vu.City software. The methodology for production of these views has been included at Appendix 1 of this report.
- 1.7 Specialist visualisers, Cityscape Digital, have provided the existing photography included in this report. Camera details are included in Appendix 1.

Authorship

- 1.8 This SVIA has been prepared by The Townscape Consultancy (TTC), a consultancy with expertise in the areas of built heritage and townscape. The consultants are employed by CoLC to provide independent and unbiased professional advice and to consider any beneficial, neutral, or adverse aspects of the Proposed Clusters based on best practice guidance in a balanced and transparent manner. Any qualitative aspects of the assessments that can be considered to a certain extent to be subjective are based on informed professional judgment based on the authors' experience. All consultants are highly qualified and trained professionals in the areas of planning, architecture, urban design, and the historic environment. The assessments have been drafted with the full input and agreement of CoLC.

Conflicts of interest

- 1.9 TTC is a limited company which advises local authorities, private developers, and their design teams on new development in London, including for many sites within the City of London, which would fall within or nearby the Proposed Clusters. Therefore, in order to carry out this assessment without creating any conflicts of interest on other existing or future projects, TTC and CoLC have agreed on the appropriate boundaries of the consultants' involvement and remit in conducting the work presented in this SVIA and the associated HIA's, as described below.
- 1.10 The Proposed Clusters assessed in this document have been developed uniquely and independently by CoLC, with no involvement, nor any advice, from TTC. The consultants' role is to carry out an independent, third-party assessment of the visual effects of the Proposed Clusters as provided by CoLC. In conducting this exercise, TTC has not, and will not, influence the design of the Proposed Clusters, including any aspects such as their location, extent, height, and overall form.

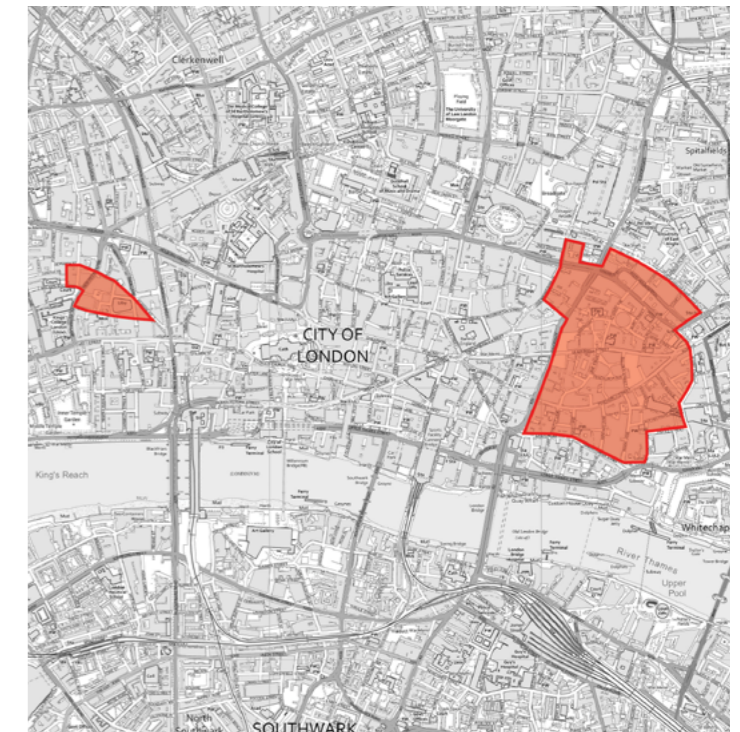


Figure 1.1: Map of Proposed Clusters.

2. Methodology of Assessment

Introduction

- 2.1 This Strategic Visual Impact Assessment (SVIA) considers the potential impact of the two proposed tall buildings areas for the City Cluster and Holborn and Fleet Valley Cluster, represented through indicative massing of the Proposed Clusters, on the visual amenity of people experiencing townscape views.
- 2.2 The viewpoints relate to the three strategic heritage assets within the City; The Tower of London World Heritage Site; The Grade I listed St Paul's Cathedral; and The Grade I listed Monument. This report assesses the potential visual effects related to changes to the settings of each strategic heritage asset. This is set out in more detail the Heritage Impact Assessments (HIAs) of the three strategic heritage assets, which are set out in separate documents. The HIAs assess the effects on the significance of the strategic heritage assets in line with NPPF guidance.
- 2.3 This SVIA assesses the effects of the Proposed Clusters on views from strategic locations as illustrated in 50 townscape views, including five kinetic sequences, identified by CoLC. The scoping work by CoLC was undertaken with visualisation specialists Millerhare, who tested a large set of views. The full set of views tested, and the scoping outcome, is included in Appendix 2.

- 2.4 The assessment methodology set out in this chapter has been informed by policy and guidance at a national, regional, and local level with regards to urban design, the townscape and visual impact. The relevant policies and guidance are set out in chapter 4.

Method of Assessment – Townscape and Visual

- 2.5 The Guidance for Landscape and Visual Impact Assessment (GLVIA, Third Edition, 2013), at paragraph 2.7, defines townscape as: "...areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes, but townscape means the landscape within the built up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces."
- 2.6 Paragraph 2.20 of the GLVIA goes on to define visual amenity as "When the interrelationship between people ('human beings' or 'population' in the language of the Directive and Regulations) and the landscape is considered, this introduces related but very different considerations, notably the views that people have and their visual amenity – meaning the overall pleasantness of the views they enjoy of their surroundings."

Baseline conditions

- 2.7 The current condition of the proposed tall building areas and their surroundings were ascertained by the Character Areas Study produced by CoLC, which established a baseline assessment of the condition of the whole City of London, including the proposed tall building areas.
- 2.8 Buildings, open spaces and townscape that have the potential to be affected by the Proposed Clusters through views, particularly those that have been previously identified as significant by designation or in other ways, are identified through this process. In this case the assessment focuses on views of strategic heritage assets against relevant guidance as set out below.
- 2.9 The impacts of the Proposed Clusters on the views, in the form in which these clusters are to be included in the emerging 'City Plan 2040', are assessed in this report. This assessment is informed by computer generated images showing 'as existing', 'as future baseline' and 'as proposed' views from selected strategic viewpoints.

Future baseline

- 2.10 A number of proposals for new development near the Proposed Clusters have been granted planning permission or are under construction. These are considered 'committed' schemes, because they are reasonably likely to be built out.

- 2.11 The committed schemes identified contribute to what is called the 'future baseline'; that is, a future scenario in which they have been constructed and therefore change the environment within which they are located, including the setting of heritage assets.
- 2.12 If any adverse effects were derived from each committed scheme, it is considered that the local authority would have considered any mitigation as part of the planning process. The effect of the future baseline is not further assessed in this SVIA.
- 2.13 In this SVIA, the assessment focusses on the 'additional' effects of the Proposed Clusters on each view over and above the future baseline scenario.

Identification of viewpoint locations

- 2.14 A detailed scoping exercise was undertaken by CoLC, supported by map analysis and the use of computer models, to establish the identification of viewpoint positions from which the Proposed Clusters would potentially be visible, as presented in chapter 6. Although digital means informed the process, the selection of views was also informed by site visits. The list of identified views for this study is not exhaustive but includes a range of key assessment points from various strategic locations contributing towards a comprehensive evaluation of the potential impact of the Proposed Clusters.



2.15 Considerations for selected views include, amongst other factors: the likely maximum visibility of the Proposed Clusters; the likely people that may experience the views from a certain location; winter and summer-time tree cover (where relevant); hierarchy of viewpoint (e.g. public or semi-public access, where relevant); the heritage significance of the viewing location or viewed place; the position of traffic signs or other visual obstructions; and the ability for surveyors to safely place equipment without causing obstructions. Views are generally restricted to street level (i.e. 1.6 metres above ground), as this is from where townscapes are most commonly appreciated. Exceptions to this may include views from elevated places, such as publicly accessible viewing platforms.

2.16 The set of viewpoints represent a spread of close, medium and long range views. The set of viewpoints cover areas which have the highest sensitivity to tall buildings and maximum visibility of the Proposed Clusters in strategic LVMF views and important local views identified by other planning authorities.

2.17 The selected views are from publicly accessible locations and illustrate the urban relationships likely to arise between the Proposed Clusters and the setting of heritage assets and other important elements of the townscape. Each viewpoint, and view from it, aims to represent the 'maximum exposure' of the Proposed Clusters as well as its 'maximum conjunction' with sensitive elements in the built environment.

2.18 Within this study area, two types of viewing location, all publicly accessible, were identified:

- Views that have been identified as significant in the London Plan through the London View Management Framework (LVMF, 2012) in regard to St Paul's Cathedral and the Tower of London World Heritage Site (ToL WHS); and

- Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Clusters may significantly affect the settings of heritage assets including St Paul's Cathedral, the Monument and other highly-graded assets within and outside the City. These views were identified by CoLC and correspond to relevant views from others, including Historic Royal Palaces, Westminster City Council, and the London Borough of Lambeth. The relevant policy and guidance documents are referred to as part of the visual assessment.

2.19 Views that are considered strategically important are assessed in this document. There will be other areas where the Proposed Clusters would be visible, such as local townscape locations, which are not necessarily strategically important. This includes areas of open space that are important in a local context, e.g. for leisure purposes. These local views will need to be considered on a case-by-case basis for development sites within the Proposed Clusters.

2.20 The set of viewpoints was chosen to cover:

- A representative range of strategically important viewpoints from different directions from which the Proposed Clusters will be visible;
- A range of distances from the Proposed Clusters;
- Different types of townscape area; and
- Strategically important settings which include City landmarks and heritage assets.

2.21 Possible locations in these categories within the study area were identified by CoLC as part of their scoping exercise with Millerhale. Details of this are found in Appendix 2.

Assessment

2.22 The visual assessments are carried out by comparing an 'existing' photograph and a computer model image of the 'future baseline' condition with a 'proposed' image of the Proposed Clusters in addition to the future baseline, which includes schemes in the vicinity that are consented or under construction; these are considered committed schemes.

2.23 Following guidance, unlike assessments that form part of an Environmental Statement (ES), where these follow a complex procedure based on significance tables, the assessments in this SVIA are written in a simple and proportionate narrative manner.

2.24 The 'existing' photographs used are provided by Cityscape Digital. Camera details are included in Appendix 1. For the 'future baseline' and 'proposed' views, 3D model views are produced by importing a three-dimensional computer model of the Proposed Clusters into the Vu.City software. The 'proposed' 3D model views illustrate the degree to which the form of the Proposed Clusters will be visible in addition to the future baseline.

2.25 The 3D model views were created by CoLC, who have an in-house team of experts on the use of Vu.City. The methodology for the production of 3D model images is included at Appendix 1. While the 3D model views are not Accurate Visual Representations (AVRs, also known as verified views), they have been produced to match as best as possible the image of the existing view. This is a proposed envelope for consultation and fully verified views will be developed in due course.

2.26 Each of the views identified for assessment are illustrated in chapter 6 of this SVIA with three images. The narrative assessments are structured under the following elements:

- 1) A photograph of the view as 'existing' accompanied by a description of the view, with reference to any visual management guidance available;

- 2) A non-verified 3D model view of the 'future baseline', which includes all consented schemes. The accompanying text evaluates its townscape qualities and the visual amenity; and

- 3) A non-verified 3D model view of the 'Proposed Clusters' overlaid on the future baseline. It is accompanied by a description of the Proposed Clusters as seen in the view and how this will change the visual amenity of people, in addition to the future baseline, to result in a '**beneficial**', '**neutral**', or '**adverse**' visual effect. Where the Proposed Clusters are not seen there would be '**no effect**'.

2.27 The assessment commentary that accompanies the 'proposed' views is intended to provide a clearly expressed and non-technical narrative argument that sets out 'what matters and why', together with the effects of the Proposed Clusters. The reader is therefore encouraged to appreciate the assessments in the context of the narrative text about each view. The effects found should not be translated into scoring systems or statistics.

Visual assessment guidance

2.28 The SVIA is based on the existing guidance for designated views, including the LVMF and local views guidance. Reference to relevant visual assessment guidance will be provided in each view assessment. A full list of relevant visual guidance is included in chapter 4.

Limitations

2.29 The assessment of individual views considers the effects of the Proposed Clusters on the townscape and on the visual amenity of people experiencing the views, as they will be experienced in reality. Photographic images of townscape are no more than an approximation to this, for a number of reasons:

- Viewers have peripheral vision; their view is not restricted by borders as a photograph is. They can move their eyes and heads to take in a wide field of view when standing in one place;
- Viewpoints themselves are not generally fixed. Townscape is experienced for the most part as a continuous progression of views or vistas by people who are moving through streets or spaces in a kinetic way, rather than standing still;
- Photographs do not reflect the perception of depth of field as experienced by the human eye due to parallax and the mechanics of capture devices;
- 'Before and after' views illustrate the view in conditions that are particular in respect of time of day and year, daylight and sunlight, and weather. The view will appear differently to varying degrees when any or all these conditions vary; and
- Townscape is experienced not by the eye alone, but by the interpretation by the mind of what the eye sees, considered in the light of experience, knowledge and memory.

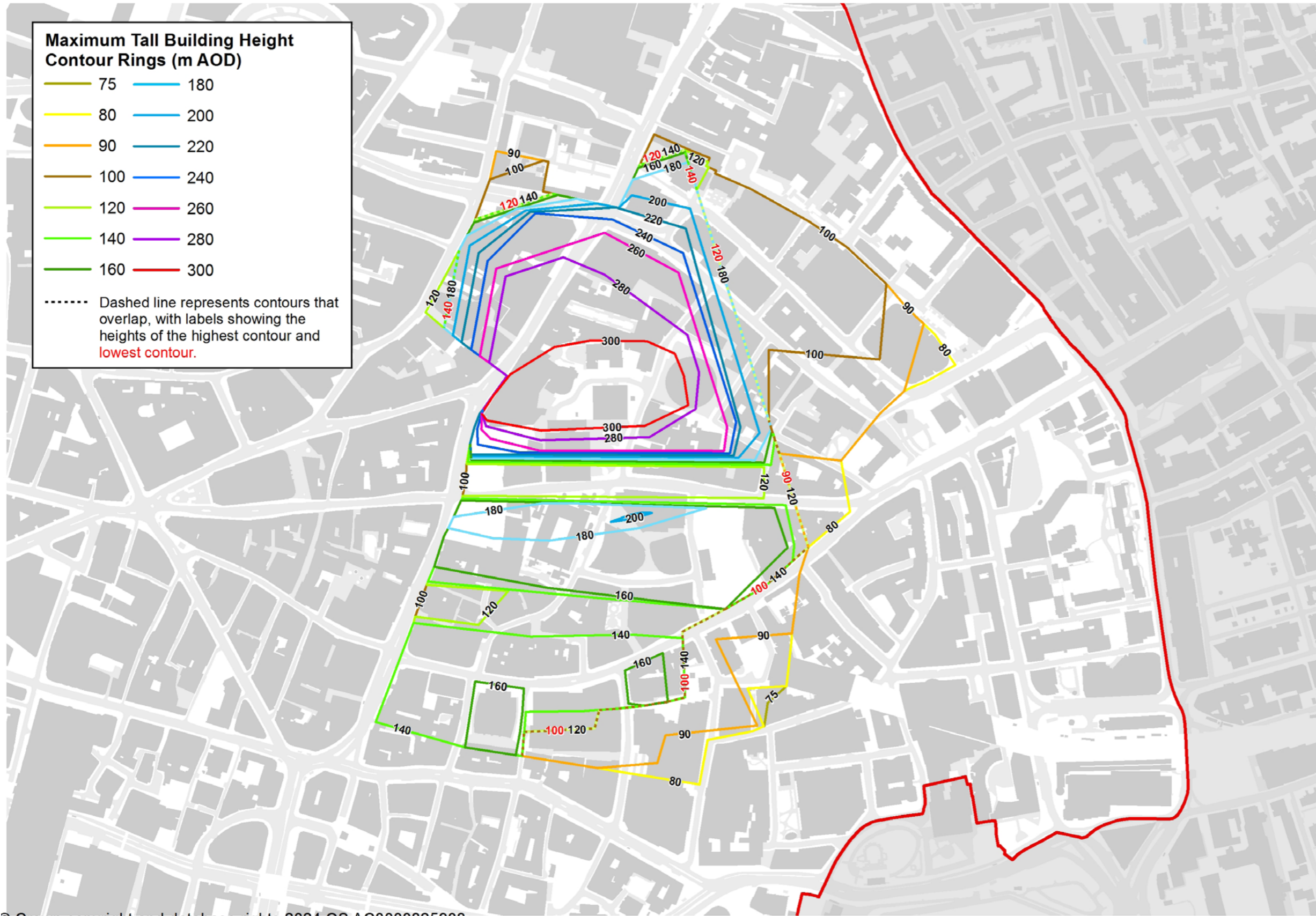
2.30 The non-verified 3D model views are provided as a guide to the effect on views as they would be experienced on site; to act as an aide-memoire; and to assist site visits. The assessment provided in this SVIA represents a professional judgement of the likely effect of the Proposed Clusters on the view or the townscape in addition to the future baseline, rather than an assessment of the images.



3. Assumptions and Limitations

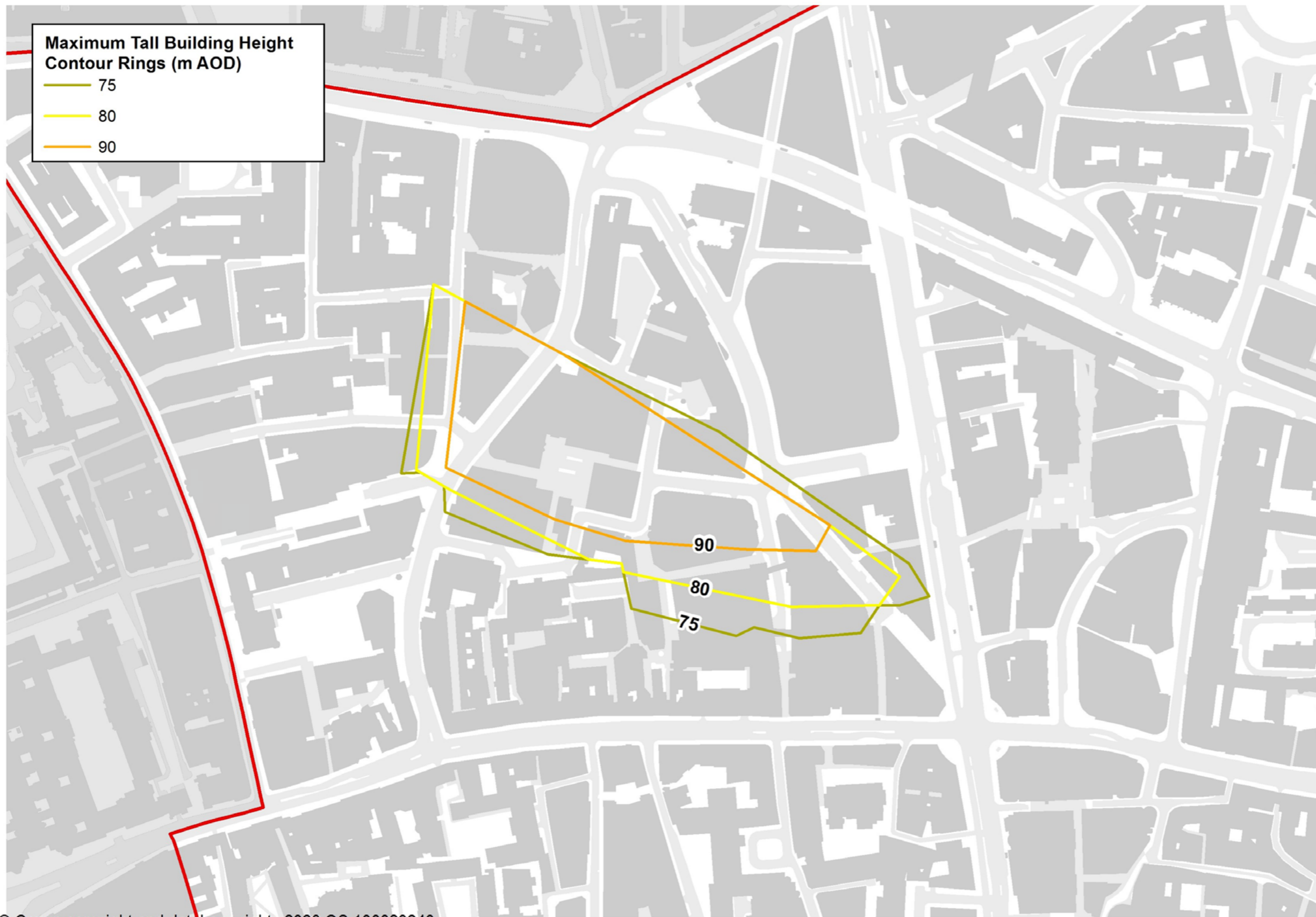
3.1 This report includes some assumptions and limitations:

- This report is compiled using primary and secondary information derived from a variety of sources, only some of which has been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate. This includes the assumption that the baseline material set out in CoLC's Character Areas Study is reasonably accurate;
- The views included in chapter 6 of the SVIA do not cover every possible view of the Proposed Clusters, but were selected by CoLC using professional judgement of where there are particular instances of townscape of visual sensitivity, represented by views identified as significant by regional and local planning policy and guidance;
- Assumptions have been made in this SVIA about the susceptibility of people to visual changes in the townscape, as well as on the types of people likely to experience particular views. These assumptions are based on professional judgment but are limited as the responses of individuals are varied and cannot all be covered in the assessment.
- The assessments undertaken in chapter 6 are based on the indicative massing of the Proposed Clusters. Specific design quality of individual buildings is not assessed in this document. For all emerging proposals, a tailored HTVIA will need to be carried out.
- This SVIA provides a quantitative assessment of the form of the Proposed Clusters and a qualitative assessment of the overall shape within their context. This document does not provide a qualitative assessment for individual forms on a site specific basis.
- Proposals for sites within the Proposed Clusters will be required to respond to the relevant heights specified on the 2D contour maps produced by CoLC so that they sit within these 3D envelopes. These are shown at Figs.3.1 and 3.2. It is not expected that individual sites would be fitted exactly to the three dimensional forms, but to work within them.
- The visually represented forms are not actual proposals, instead, they represent indicative massing of the two Proposed Clusters. This massing has been developed through detailed testing of the building heights within each area, taking into account hard constraints and other relevant criteria.



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Figure 3.1: Contour map for the Proposed City Cluster.



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Figure 3.2: Contour map for the Proposed Holborn and Fleet Valley Cluster.