



PURCELL

TOWER OF LONDON
SCHOOLS & COMMUNITIES – EDUCATION FACILITIES PROJECT:
PROPOSED RAMP, STAIR & SENTRY
HERITAGE IMPACT ASSESSMENT: PLANNING & SCHEDULED MONUMENT CLEARANCE
FOR HISTORIC ROYAL PALACES
JUNE 2025



HISTORIC
ROYAL PALACES

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1.0 INTRODUCTION

1.1 INTRODUCTION AND PROJECT BACKGROUND

Historic Royal Palaces

Historic Royal Palaces (HRP) is a registered charity, responsible for the care, conservation and presentation, on behalf of the Crown, of HM Tower of London (TOL), Hampton Court Palace, Kensington Palace State Apartments, the Banqueting House at Whitehall, Kew Palace and Hillsborough Castle and Gardens, the official residence of HM The King in Northern Ireland and residence of the Secretary of State for Northern Ireland.

HRP is an independent conservation charity, receiving no government funding and derives its income principally from visitor admissions, retail, licensing, commercial events, sponsorship and support from donors and members.

HRP protect, conserve and manage the collections across their six palaces, revealing and preserving the stories and layers of history hidden in these unique heritage places and their collections. World class research informs HRP's work, learning from past practices to encourage innovation, exploring creative and sustainable solutions to the challenges we face in preserving the nation's heritage.

Tower of London

HM Tower of London is an iconic place. It is a UNESCO World Heritage Site as well as a Scheduled Monument. It is also within a Conservation Area. Many of the buildings and structures within its curtilage are also listed.

The Tower of London is a secure fortress, a royal palace and an infamous prison. The building of the castle was begun shortly after the Conquest by William the Conqueror, whose great keep, the White Tower, sits at its heart. The fortress was first constructed within the south-eastern corner of the ancient Roman city walls along the riverbank of the Thames. Extended beyond the boundaries of the Roman city walls by Henry III, and developed as a concentric castle by Edward I in the 13th century, the Tower – the monarch's stronghold in the often hostile city – became the home of major State institutions, as well as the setting for the nationally significant historic events. The Tower is the home of the Coronation Regalia and Crown Jewels, and the birthplace of the Royal Armouries Museum, which still displays part of its world-class collection within the White Tower.

The fortress is most strongly associated in the popular imagination with the Tudors, and the turbulent events of the 16th century, including many prisoners kept within its walls. The 19th century Romantic perception of the Tower saw the beginning of the castle's emerging identity as a tourist attraction.

Today, the Tower of London is one of the most important historic sites in the world. It is the UK's most visited paid-for attraction welcoming nearly 3m visitors a year and generating over 70% of HRP's total income.

Tower 2030 Programme

Tower 2030 is an ambitious programme of sustainable development to put into action HRP's overall vision and strategy at the Tower of London, the busiest site.

The vision for the Tower of London towards 2030 is to ensure the Tower serves as a living resource for everyone, to be a space to stir and be stirred, whether onsite, offsite or online. This will be achieved through putting HRP's strategy into practice at the Tower, to: Reach further, Mean more, Act for the future.

An ambitious project to bring about a once-in-a-generation transformation of the Tower of London will encompass the entire site, focusing on conserving and reusing historic buildings and redeveloping the moat landscape. Alongside its preservation, HRP's aim for the Tower of London is to be source of pleasure, inspiration, surprise and debate for everyone. HRP must cater for the needs of its visitors from all around the world who pay to see and appreciated the castle and its history. The aim is always to provide facilities for inclusive use, visitor enjoyment, and education with no or minimal impact on the historic fabric and buried archaeology of the site.

Ensuring all development is respectful of the architecture, archaeology and heritage of this internationally significant historic monument and the keeper of the nation's history is paramount within this vision.



In 2022 the moat at the Tower of London hosted Superbloom, a spectacular landscape design with a stunning floral display from over 20 million sown seeds. This was a national event which commemorated Her Late Majesty Queen Elizabeth II's Platinum Jubilee. Superbloom was the first year of a permanent transformation of the Moat, now known as the Moat Legacy Project. The Schools and Communities Education Facilities Project is running parallel with this as a part of Tower 2030 vision, enhancing the education offer at the Tower of London alongside the improvements Moat Legacy will make to visitor experience.

1.0 INTRODUCTION

Schools & Communities Education Project

A significant aspect of the 2030 vision is a series of projects to transform the schools and community programme at the Tower. The Tower of London is Historic Royal Palaces' busiest site and the top paid-for attraction in the UK. It is HRP's busiest site for schools, welcoming around 125,000 children per year. Despite a world class offer of activities and visits, the facilities are inadequate. For example, with only three lunchrooms approx. 50% - 70% of groups are left without a covered lunch space during visits. There are no dedicated toilet or handwashing facilities for groups. Accessibility is also a major problem. Currently only one lunchroom is accessible, and classroom and lecture theatre spaces can only accommodate one wheelchair user at a time due to evacuation issues.

The transformation towards Tower 2030 will not only enhance visitor experience but also ensure the Tower of London remains a vital educational and cultural resource for future generations. The Tower lacks community spaces and facilities, restricting HRP's ability to grow this part of our programme. HRP have carried out a review of space across the Tower to ensure that plans to increase the schools and community spaces footprint will complement future development options and provide practical, inclusive and safe journeys for all visitors. To address the shortcomings of the current provision and enhance the education programme at the Tower of London, Historic Royal Palaces' plans within the Schools & Communities Education Project include:

- A Welcome Centre on the Wharf. Vastly improving the arrival experience for schools and creating additional capacity for an expanded activity programme.
- The first-ever dedicated community spaces at the Tower. Fostering a sense of belonging and increasing participation among local communities.
- Curricular-linked activities. Offering a vibrant programme for schools, adult learners, communities, and families using diverse engagement techniques
- An Outdoor Classroom within the Moat. Providing science, nature, and wellbeing activities.
- Extended costume and live interpretation space. Accommodating more performers to lead an increased number of school sessions.
- A regular programme of national projects to extend reach across the country.
- Accessible lunchrooms. Ensuring comfortable lunchbreaks for schools, families and community groups.
- Quiet spaces to retreat from the busy Tower environment, enhancing the experience for visitors with sensory processing needs.
- Volunteer spaces, supporting the expansion of HRP volunteering and apprenticeship schemes.

Proposed New Ramp & Stair and Sentry Box Entry

Jamie Fobert Architects were appointed by Historic Royal Palaces in Spring 2024 to lead designs to realise the architectural ambitions of the Schools & Communities projects listed above.

This includes the creation of a new visitor entrance into the Moat from the Wharf with new staircase and inclusive access ramp – in the location of the previous temporary access ramp that was installed and used during Superbloom.

The stair and ramp and the sentry box at the entrance comprise the project scope covered within the application for planning permission, and Scheduled Monument Clearance to which this Heritage Impact Assessment relates.

Purcell Conservation Architects & Heritage Consultants are working alongside Jamie Fobert Architects to help define and evolve designs which preserve and protect heritage significance, historic fabric, and archaeology of the buildings and spaces within the scope of the project wherever possible.



The Tower of London is HRP's busiest site for schools, welcoming around 125,000 children per year. Despite a world class offer of activities and visits, the current facilities are inadequate with limited lunchrooms and classrooms, and challenges to inclusive access.

1.0 INTRODUCTION

1.2 PURPOSE OF THE DOCUMENT

This Heritage Statement & Impact Assessment has been developed through RIBA Stages 1-3 on the Tower of London Schools & Communities Education Facilities Project to date, and is intended to:

- Provide detail on the historic development and heritage significance of the Tower of London site, in particular the areas that will potentially be affected as part of the project proposals.
- Build upon previous Statements of Significance and Conservation Plans for the Tower of London, including the Tower of London World Heritage Site Management Plan, to define conservation principles and priorities to support considered management, maintenance and development appropriate to the unique heritage significance of this place, its context and setting.
- Act as a design tool to support the informed development of high-quality project proposals which are sensitive and appropriately designed within the heritage context of the Tower of London Scheduled Monument, listed buildings (especially the Grade II* listed South Revetment Wall), the Tower of London Conservation Area, and the wider Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site.
- Assist the project in exploring ways in which heritage can be better presented and interpreted to visitors through the proposals.
- Provide a key component part of pre-application discussions with Historic Royal Palaces, Historic England, and London Borough of Tower Hamlets, as key stakeholders. The Heritage Statement was shared during the early pre-application discussions with stakeholders to collectively agree a baseline understanding of heritage significance. The Impact Assessments concluding this document have also been developed throughout the pre-application discussions.
- Assist in shaping the key heritage considerations within the project towards statutory Planning, Listed Building Consent, and Scheduled Monument Clearance applications during RIBA Stage 3 design.
- Provide an assessment of impact on the Outstanding Universal Values and Attributes of the UNESCO World Heritage Site, in line with UNESCO 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context.



The Moat at the Tower of London has a rich history and has played host to several major national events. This image shows a soldier encampment in the East Moat for Queen Victoria's Diamond Jubilee celebrations of 1897. Copyright Historic Royal Palaces / Yeoman Warder Archive

1.0 INTRODUCTION

1.3 CONSIDERING WORLD HERITAGE SITE POLICIES & OBJECTIVES

As the scheme proposals have developed, the impact of the proposals on heritage significance and the Outstanding Universal Values of the World Heritage Site have been carefully appraised in accordance with UNESCO 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context, to avoid harm on these values or their key components.

Additionally, other key pieces of relevant UNESCO policy have been considered and guided scheme development.

In particular:

- Policy Document on climate action for World Heritage
- Policy for the Integration of a Sustainable Development Perspective into the processes of the World Heritage Convention

The 2030 Agenda adopted by the UN General Assembly integrates, for the first time, the role of culture, through cultural heritage and creativity, as an enabler of sustainable development across the Sustainable Development Goals. World Heritage may provide a platform to develop and test new approaches that demonstrate the relevance of heritage for sustainable development.

This is highly relevant at the Tower of London where, as one of the UK's foremost cultural visitor attractions, maintaining a world class visitor welcome is key to ensuring the Tower of London can generate a sustainable income which supports its long-term conservation.

Throughout design scheme proposals have been considered in terms of the contribution made to relevant Sustainable Development Goals (SDGs) defined in UNESCO guidance <https://sdgs.un.org/goals>, relevant targets and indicators.

Of relevance to the Ramp & Stair and Sentry Box scheme proposals are:

- Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

The Ramp, Stair and Sentry Box scheme seeks to provide greatly improved accessibility to The Moat, a highly significant part of the Tower of London site. The new visitor route will contribute to the overall visitor learning experience, heritage interpretation and understanding of this significant historic place.

- Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation

On a very local scale, the Ramp, Stair and Sentry Box scheme seeks to provide high quality, resilient infrastructure to enable an inclusive and accessible visitor route into the Moat. This will be of considerable benefit to the Tower of London for the long-term, supporting Historic Royal Palace's innovative programme of events, exhibitions and visitor heritage interpretation.



Aerial view of the Tower of London from the south west

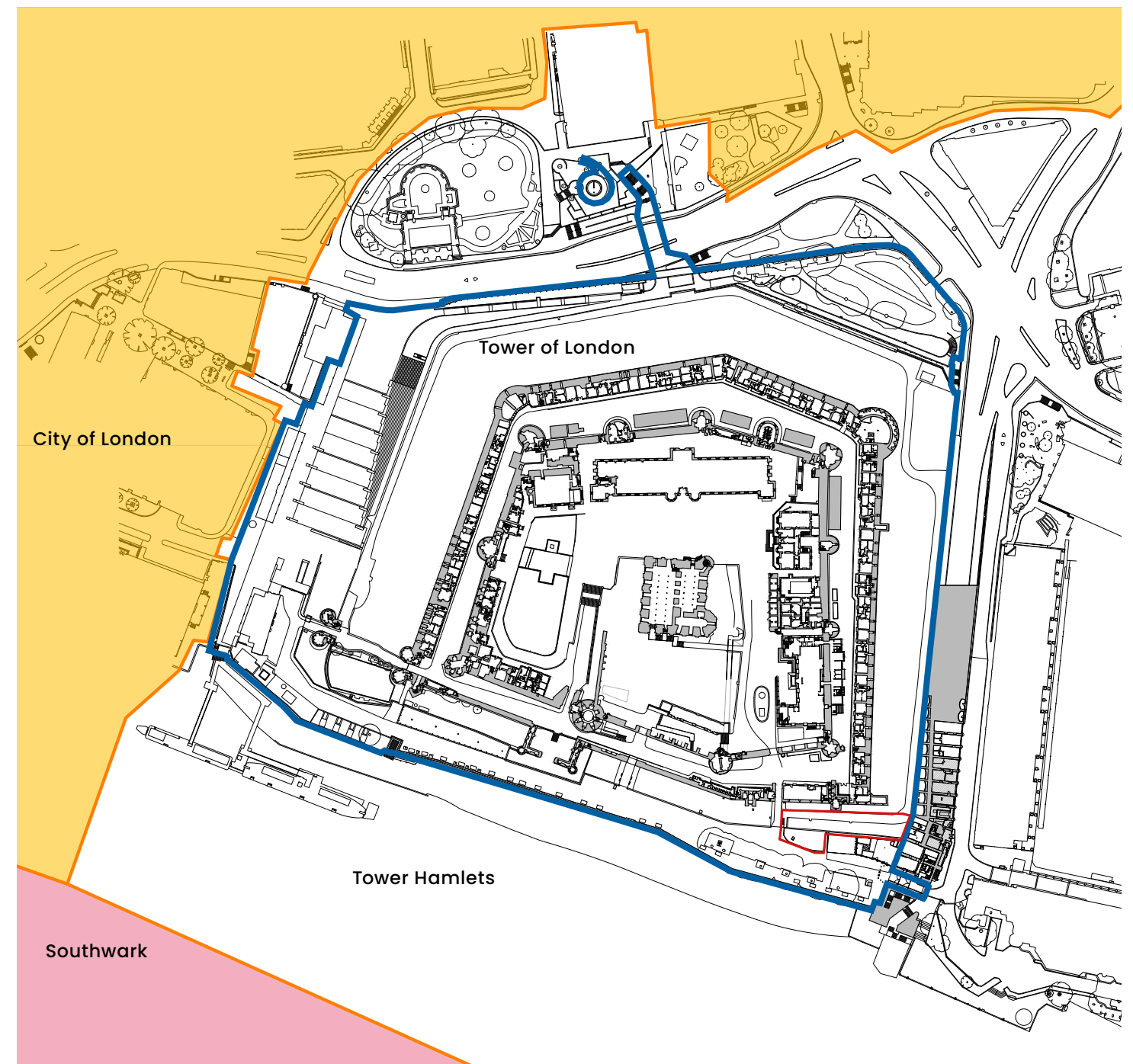
2.0 HERITAGE STATEMENT



2.0 HERITAGE STATEMENT

2.1 SITE DESCRIPTION AND DESIGNATIONS

SITE PLAN SHOWING SITE APPLICATION AREA



KEY

- City of London
- Southwark
- Historic Royal Palaces site boundary
- Proposed scope area of the Ramp, Stair & Sentry scheme, for which Planning & Scheduled Monument Clearance is sought.

2.0 HERITAGE STATEMENT

2.1 SITE DESCRIPTION AND DESIGNATIONS

SITE APPLICATION AREA WITHIN THE CONTEXT OF THE TOWER OF LONDON & TOWER BRIDGE HERITAGE ASSETS

- 1. Revetment wall to west and north side of moat (Grade II listed)
- 2. Tower of London Liberty boundary markers (Grade II listed)
- 3. Tower of London Liberty boundary markers (Grade II listed)
- 4. Revetment wall to north side of moat (from Tower Fill postern to Tower Bridge Approach) (Grade II listed)
- 5. Outer curtain wall with casements and mural towers
- 6. Chapel of St Peter ad Vincula
- 7. Waterloo Block
- 8. Tower of London Inner curtain wall with mural towers, the New Armouries, the King's House and Tower Green
- 9. The White Tower
- 10. Museum of the Royal Fusiliers and attached terrace to front
- 11. The Middle Tower, with causeway to Byward Tower and remains of causeway to Lion Tower to west
- 12. K6 Telephone kiosk outside gateway of Byward Tower
- 13. Revetment wall to south side of moat
- 14. The Old Hospital block and raised terrace and railings
- 15. Tower Bridge Approach
- 16. Tower Bridge

KEY

The Tower Conservation Area

Historic Royal Palaces site boundary

Application scope - Ramp & Stair, Sentry Box, South Moat

Scheduled Monument - Tower of London

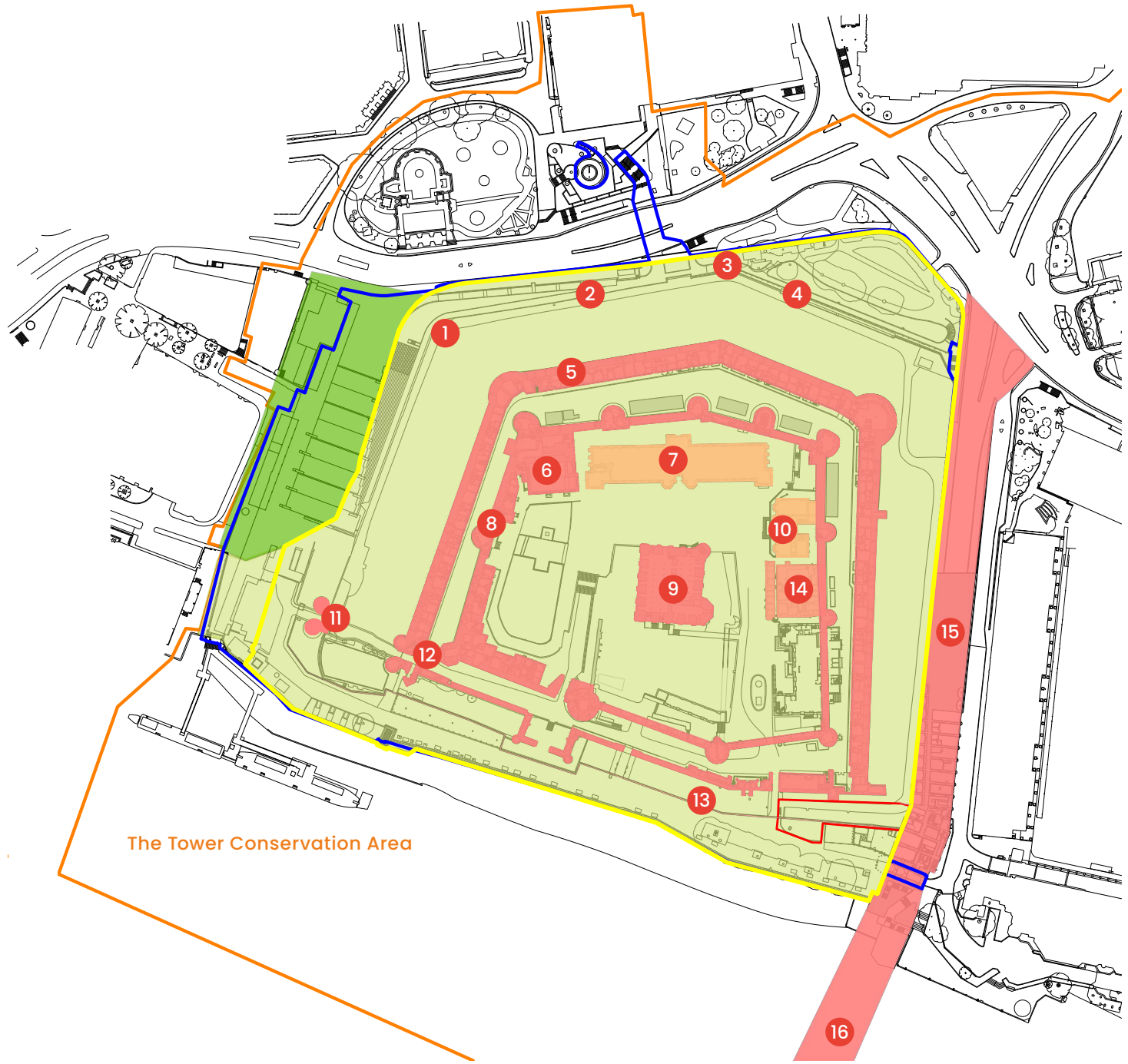
Scheduled Monument - Tower Hill West

Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site

Grade I Listed

Grade II* Listed

Grade II Listed



2.0

HERITAGE STATEMENT

2.1

SITE DESCRIPTION AND DESIGNATIONS

RELEVANT REQUIRED CONSENTS

The scheme proposals include a new ramp and stair within the South Moat, new landscaping, and a new sentry box to the Wharf.

They therefore require the following consents, as covered within this application:

- Planning Permission
- Scheduled Monument Clearance

- 1

Grade II* Listed Building 'Revetment wall to south side of Moat' (List ID 1065764)
- 2

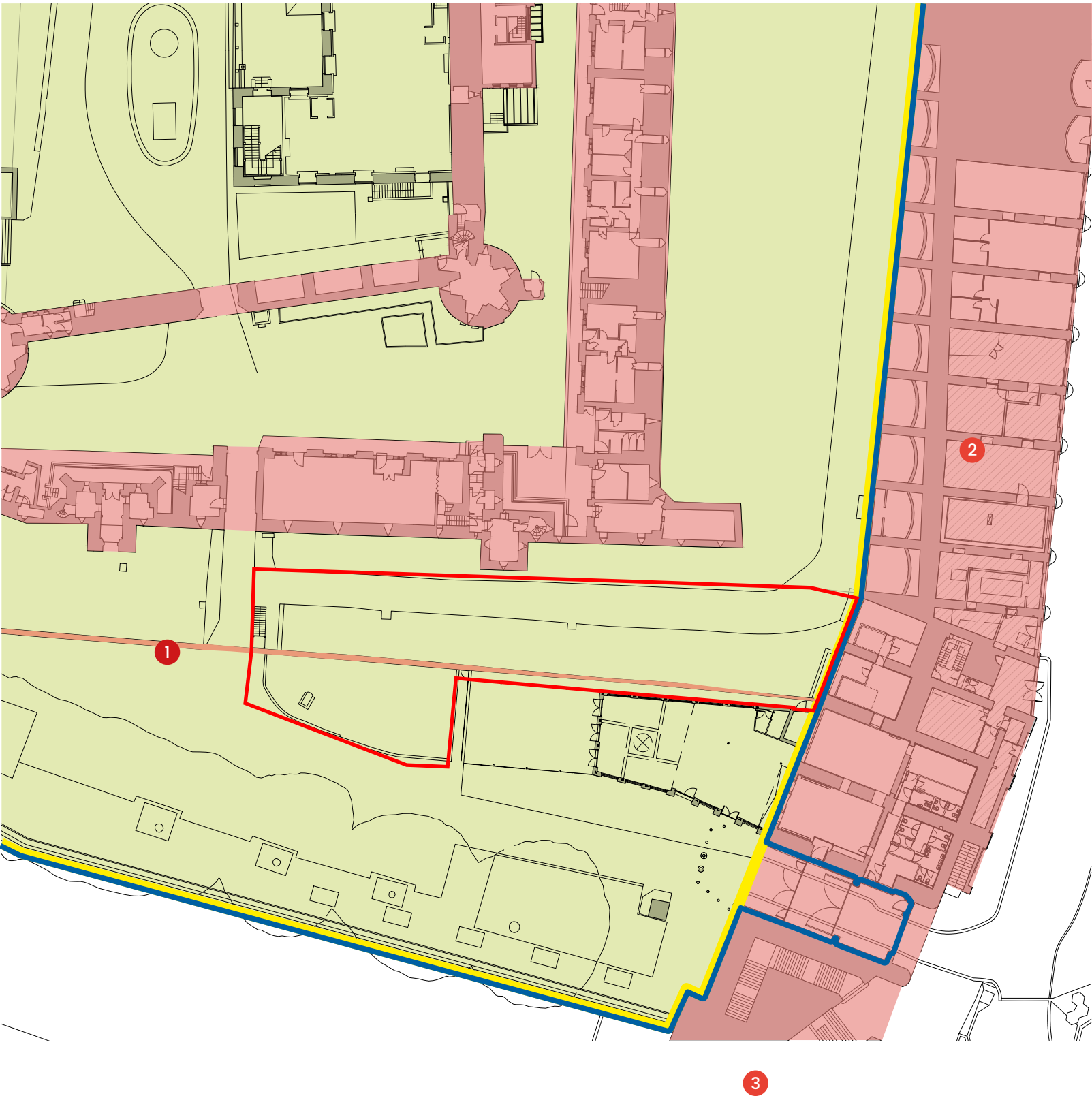
Grade I Listed Building 'Tower Bridge Approach' (List ID 1065833)
- 3

Grade I Listed Building 'Tower Bridge (That part in London Borough of Tower Hamlets) List ID 1065833)

KEY

- The Tower Conservation Area
- Historic Royal Palaces site boundary
- Application scope - Ramp & Stair, Sentry Box, South Moat
- Scheduled Monument - Tower of London

- Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site
- Grade I Listed
- Grade II* Listed
- Grade II Listed



2.0 HERITAGE STATEMENT

2.2 PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

2.2.1 ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979

The Tower of London is defined by Historic England in the National Heritage List for England as a Scheduled Monument (1000092), as a nationally important archaeological site.

Listed Building Consent is not therefore required for works within the Tower of London, although the buildings are listed, because they are all within the Scheduled Monument.

Historic Royal Palaces is a managing body acting on behalf of the Crown. As a Scheduled Monument which is also a Crown interest, all alterations and interventions at the Tower of London are therefore obliged to gain Scheduled Monument Clearance from Historic England, in accordance with Historic England’s ‘Scheduled Monument Clearance: Revised Guidance Note for Crown Bodies’ published in December 2019.

2.2.2 ARCHAEOLOGICAL PRIORITY AREAS

Tower of London, St Mary Graces and Tower Hill APA (Tier 1)

An Archaeological Priority Area is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. APAs are set out in the London boroughs’ local plans. They inform the practical use of national and local planning policies for the recognition and conservation of archaeological interest. The Greater London APAs are based on evidence held in the Greater London Historic Environment Record (GLHER).

The Tower of London is included in the Tower of London, St Mary Graces and Tower Hill Archaeological Priority Area (APA) which is noted as Tier 1 in the Tower Hamlets Archaeological Priority Areas Appraisal published in October 2017.

The APA description does not include a detailed discussion of the Tower of London as these are included in its other designations as a World Heritage Site and Scheduled Monument. However, it summarises the area stating that ‘Across the APA archaeological significance resides not just in buried deposits but also in the standing structures and in artefacts, environmental deposits and submerged assets. The importance of these assets is such that physical preservation will usually be expected. The Tower of London is of international significance, a status reflected in its World Heritage Site inscription. The Tower is also a Scheduled Monument, as are the neighbouring Tower

Hill West and Roman City Wall Scheduled Monuments, also included in the APA. The White Tower has been described as the most complete 11th century palace in Europe and key source in understanding mediaeval military architecture. Remains of equivalent national importance can be expected elsewhere in the APA as well including on the Tower foreshore where waterlogged structures and portable antiquities are found.’

2.2.3 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT (1990)

LISTED BUILDINGS

Many of the buildings and architectural elements of the Tower of London site are Listed, as is the adjacent Tower Bridge (Grade I) and its northern approach (Grade I).

Listed Buildings are designated under the *Planning (Listed Buildings and Conservation Areas) Act 1990* for their special architectural or historic interest. Listing gives them protection as alterations, additions or demolitions are controlled by Listed Building Consent, which is required by local planning authorities when change is proposed.

Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess in the exercise of planning functions. Section 72 (1) of the Act requires that, in the exercise of planning functions, the Local Planning Authority have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas. Section 16(2) of the Act states that the Local Planning Authority shall have special regard to the desirability of preserving the Listed Building, or its setting, or any features of architectural or historic interest which it possesses when considering whether to grant Listed Building Consent.

CONSERVATION AREAS

Conservation Areas are protected under section 69 of the Planning (Listed Building and Conservation Areas) Act of 1990. The Act requires local planning authorities to identify and designate ‘areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance.’

Section 72 (1) of the Principal Act requires decision makers with respect to any buildings or other land within a conservation area to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

The site is located within the Tower Conservation Area, designated by Tower Hamlets Council.

2.2.4 LEVELLING-UP AND REGENERATION ACT 2023

Section 102 of the Levelling-up and Regeneration Act introduces a new Section 58B into the Town and Country Planning Act of 1990. This section requires that local planning authorities and the Secretary of State must have special regard to the desirability of preserving or enhancing a range of heritage assets or their setting when granting planning permission or permission in principle. The relevant assets outlined the Act are World Heritage Sites, Registered Parks and Gardens, Protected Wrecks and Scheduled Monuments.

Note: a large proportion of this Act came into force in December 2023, but further provisions coming into force over future years.

2.2.5 NATIONAL PLANNING POLICY

THE NATIONAL PLANNING POLICY FRAMEWORK (UPDATED DECEMBER 2024)

The National Planning Policy Framework establishes the government’s planning policies for new development within England and how these are expected to be applied.

The following sections of most relevance to the proposed development:

Section 12 – Achieving well-designed places

131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

135. Planning policies and decisions should ensure that developments:

a will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Section 16 – Conserving and Enhancing the Historic Environment

200. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.

2.0 HERITAGE STATEMENT

2.2 PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

203. In determining applications, local planning authorities should take account of:

a the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c the desirability of new development making a positive contribution to local character and distinctiveness

205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

206. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

207. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a the nature of the heritage asset prevents all reasonable uses of the site; and

b no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d the harm or loss is outweighed by the benefit of bringing the site back into use.

208. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Paragraph 2 of the NPPF states "Planning policies and decisions must also reflect relevant international obligations and statutory requirements." Amongst these international obligations are those under the 1972 UNESCO World Heritage Convention.

The Heritage Impact Assessment for the Schools & Communities Project at the Tower of London Project has been evolved through robust testing of the scheme and its public benefits through pre-application discussions with conservation and planning officers at LB Tower Hamlets Council and Historic England and uses as its basis the rigorous research undertaken by Historic Royal Palaces and included within the bibliography that accompanies this document.

2.2.6 THE NATIONAL PLANNING PRACTICE GUIDANCE (UPDATED 2024)

On March 6th 2014 the Department for Communities and Local Government (DCLG) launched the Planning Practice Guidance website which includes the section 'Historic Environment'. The guidance is a live document intended to provide further detailed information about the implementation of the NPPF.

The PPG on the Historic Environment also includes specific reference to and guidance on World Heritage Sites, aligned with UNESCO Operational Guidelines for the Implementation of the World Heritage Convention which have therefore been referred in scheme development.

2.2.7 THE LONDON PLAN

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for London's development over the next 20-25 years.

The policies most relevant here are:

Policy HC1 Heritage conservation and growth

C Boroughs should, in consultation with Historic

England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

D Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

1. setting out a clear vision that recognises and embeds the role of heritage in place-making

2. utilising the heritage significance of a site or area in the planning and design process

3. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place

4. delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and reuse.

7.1.3 Ensuring the identification and sensitive management of London's heritage assets, in tandem with promotion of the highest standards of architecture, will be essential to maintaining the blend of old and new that contributes to the capital's unique character. London's heritage reflects the city's diversity, its people and their impact on its structure. When assessing the significance of heritage assets, it is important to appreciate the influence of past human cultural activity from all sections of London's diverse community. Every opportunity to bring the story of London to people and improve the accessibility and maintenance of London's heritage should be exploited. Supporting infrastructure and visitor facilities may be required to improve access and enhance appreciation of London's heritage assets.

7.1.5 As set out in Policy D1 London's form, character and capacity for growth, Development Plans and strategies should demonstrate a clear understanding of the heritage values of a building, site or area and its relationship with its surroundings. Through proactive management from the start of the development process, planners and developers should engage and collaborate with stakeholders so that the capital's heritage contributes positively to its future. To ensure a full and detailed understanding of the local historic environment, stakeholders should include Historic England, London's Parks and Gardens Trust, The Royal Parks, boroughs, heritage specialists, local communities and amenity societies.

7.1.6 Historically, London has demonstrated an ability to regenerate itself, which has added to the city's distinctiveness and diversity of inter-connected places. Today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement, repair and beneficial re-use of heritage assets that are on the At Risk Register. In some areas, this might be achieved by reflecting existing or original street patterns and blocks, or revealing and displaying archaeological remains; in others, it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. Policy D1 London's form, character and capacity for growth further addresses the issue of understanding character and context.

2.0 HERITAGE STATEMENT

2.2 PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

7.1.7 Heritage significance is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, as well as through historic associations between people and a place, and where relevant, the historic relationships between heritage assets. Development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.

7.1.9 Understanding of London's archaeology is continuously developing with much of it yet to be fully identified and interpreted. To help identify sites of archaeological interest, boroughs are expected to develop up-to-date Archaeological Priority Areas for plan-making and decision-taking. Up-to date Archaeological Priority Areas (APAs) are classified using a tier system recognising their different degrees of archaeological significance and potential as presently understood. Tier 1 APAs help to identify where undesignated archaeological assets of equivalent significance to a scheduled monument – and which are subject to the same policies as designated assets – are known or likely to be present.

7.1.11 Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

Policy HC2 World Heritage Sites

A Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.

B Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

C Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.

7.2.1 The UNESCO World Heritage Sites at Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey including St Margaret's Church, and **the Tower of London** are among the most important cultural heritage sites in the world and are a key feature of London's identity as a world city. In ratifying the World Heritage Convention, the UK Government has made a commitment to protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of World Heritage Sites and to protecting and conserving their settings. Much of this commitment is discharged by local authorities, including the GLA, through their effective implementation of national, regional, and local planning policies for conserving and enhancing the historic environment.

7.2.2 The context of each of the four London World Heritage Sites is markedly different and the qualities of each is conditioned by the character and form of its surroundings as well as other cultural, intellectual, spatial or functional relationships. The surrounding built environment must be carefully managed to ensure that the attributes of the World Heritage Sites that make them of Outstanding Universal Value are protected and enhanced, while allowing the surrounding area to change and evolve as it has for centuries.

7.2.3 The setting of London's World Heritage Sites consists of the surroundings in which they are experienced, and is recognised as fundamentally contributing to the appreciation of a World Heritage Site's Outstanding Universal Value. As all four of London's World Heritage Sites are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding

landscape. Changes to the setting can have an adverse, neutral or beneficial impact on the ability to appreciate the sites' Outstanding Universal Value. The consideration of views is part of understanding potential impacts on the setting of the World Heritage Sites. Many views to and from World Heritage Sites are covered, in part, by the London Views Management Framework (see Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework). However, consideration of the attributes that contribute to their Outstanding Universal Value is likely to require other additional views to be considered. These should be set out in World Heritage Site Management Plans (see below), and supported wherever possible by the use of accurate 3D digital modelling and other best practice techniques.

Policy HC4 London View Management Framework

A 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.

B Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.

C Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark should take into account the effects of distance and atmospheric or seasonal changes.

D 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.

E Viewing places should be accessible and managed so that they enhance people's experience of the view.

F 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.

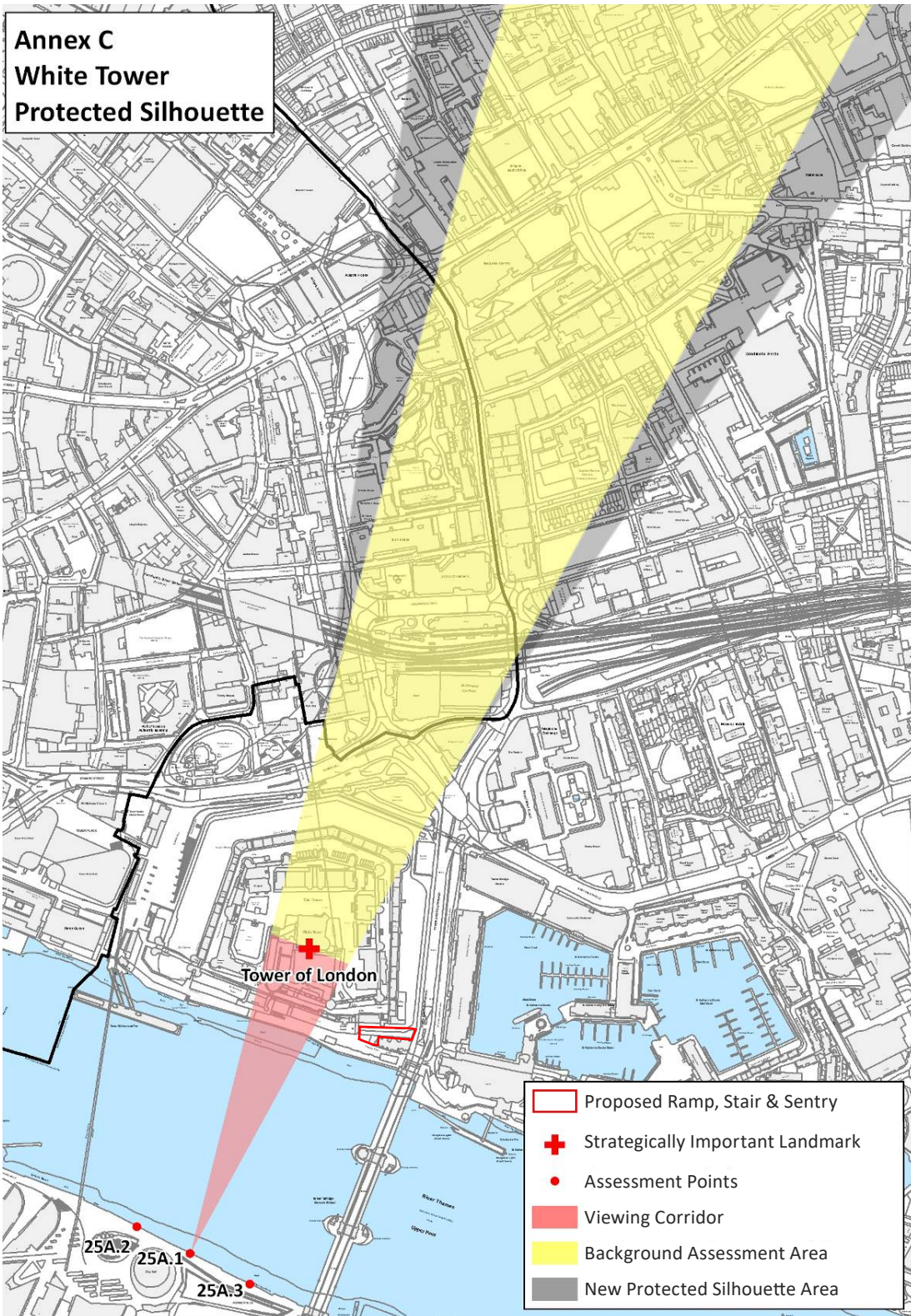
development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not.

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.

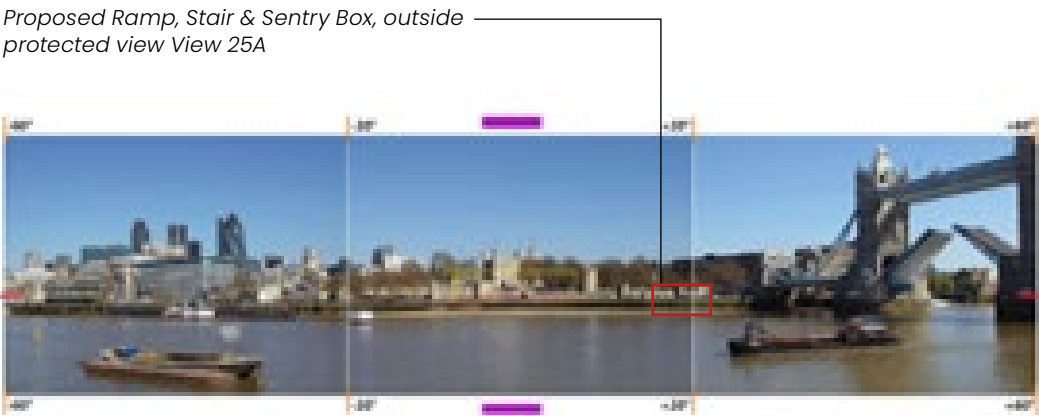
2.0 HERITAGE STATEMENT

2.2 PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

As summarised here, throughout the design process the potential impact of the development on key views including those defined within the London Plan and the World Heritage Site Management Plan has been appraised. The development sits outside of the key strategic and protected views within those Plans. The visual impact of designs on the local views in this area of the Wharf and riverside, and towards the Tower of London and Tower Bridge has also been carefully considered to mitigate impact, and where possible enhance views, as described in section 3.0 and 4.0 of this Heritage Impact Assessment.



Taken from City Corporation's Response to the Mayor's Revised Draft London View Management Framework Supplementary Planning Guidance (July 2011)



Panorama from Assessment Point 25A.3 The Queen's Walk at City Hall – close to Tower Bridge



The Mayor's London View Management Framework SPG 2012 defines the protected views of the Tower: Townscape View 25A.1-3 from the Queen's Walk at City Hall – close to Tower Bridge



View 10A Tower Bridge: Upstream – North Bastion within the Mayor's London View Management Framework was also appraised to confirm no impact from the proposed development.

2.0HERITAGE STATEMENT

2.3PLANNING & HERITAGE LEGISLATIVE CONTEXT

2.3.1 TOWER HAMLETS LOCAL PLAN

Relevant heritage policies from the adopted Tower Hamlets Local Plan 2031 (adopted Jan 2020) include:

- Policy S.DH3: Heritage and the historic environment
- Policy D.DH4: Shaping and managing views
- Policy S.DH5: World heritage sites

LB Tower Hamlets also have an Emerging Draft Local Plan, which was subject to Regulation 19 consultation in Autumn 2024. It is due shortly be submitted to the Secretary of State for independent examination (with adoption due before the end of 2025) therefore this is a material consideration in the determination of planning applications and the following draft policies within that emerging Local Plan should also be considered:

- Policy PS6 (Heritage and the historic environment)
- Policy PS7 (World Heritage Sites)
- Policy PS8 (Shaping and Managing Views)

The relevant heritage policies are very similar between the two versions of the Local Plan, and so are taken here from the Emerging Draft Local Plan:

Policy PS6 Heritage and the historic environment

1. *Proposals must conserve or, where appropriate, enhance the borough’s designated heritage assets in a manner appropriate to their significance.*
2. *Proposals affecting the significance of a heritage asset must:*
- a. *provide a clear understanding of the asset’s significance;*
- b. *provide sufficient information to demonstrate how the proposal would contribute to the asset’s conservation;*
- c. *justify any harm to the significance of the heritage asset, having regard to the public benefits of the proposal when considering designated heritage assets;*
- d. *demonstrate that all reasonable efforts have been made to sustain the existing use, find alternative uses that would avoid harm, or minimise and mitigate the extent of the harm to the asset;*
- e. *demonstrate that the works proposed are the minimum required to secure the long-term use of the asset; and*
- f. *demonstrate that efforts have been taken to retain, repair, or reinstate historic features where appropriate.*

3. *Substantial harm to or the total loss of significance of a designated heritage asset will only be supported where it is necessary to achieve substantial public benefits that outweigh that harm or loss, or the following criteria can be satisfied:*
- a. *the nature of the heritage asset prevents all reasonable uses of the site;*
- b. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. *conservation by grant-funding or some form of not-for-profit, charitable or public ownership is demonstrably not possible; and*
- d. *the harm or loss is outweighed by the benefit of bringing the site back into use.*
4. *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.*
6. *Proposals to alter or extend a heritage asset or proposals that would affect the setting of a heritage asset will only be permitted where:*
- a. *they safeguard the significance of the heritage asset, including its setting, character, fabric or identity;*
- b. *they are appropriate in terms of design, height, scale, form, detailing and materials in their local context;*
- c. *they enhance or better reveal the significance of assets or their settings;*
- d. *the building retains its character and can provide housing or other appropriate uses without damaging its historic and cultural significance to the borough;*
- e. *extensions to listed buildings, or new developments within the curtilage of listed buildings, remain subservient to the host building in terms of height, massing, and scale; and*
- f. *where proposals affect the setting of a heritage asset, they should clearly demonstrate an understanding of the setting and how that setting contributes to the significance of the heritage asset concerned.*
8. *Proposals for development within a conservation area (as shown on the policies map) or its setting must:*

- a. *preserve or enhance those elements (including unlisted buildings) which make a positive contribution to the special character or appearance of the conservation area;*
- b. *make a positive contribution to local character and the distinctiveness of the conservation area; and*
- c. *explore opportunities for new development to enhance or better reveal the significance of the conservation area.*
9. *Proposals for development that would affect scheduled monuments (as shown on the policies map) or other archaeological sites of equivalent importance must:*
- a. *justify any harm to the significance of the asset having regard to the public benefits of the proposal;*
- b. *demonstrate that all reasonable efforts have been made to mitigate the extent of any harm to the significance of the asset; and*
- c. *demonstrate that the works proposed have the minimum impact upon the asset while ensuring that its significance is maintained.*
10. *Proposals that lie within Archaeological Priority Areas (as shown on the policies map) or other areas that have the potential to contain archaeological heritage assets must:*
- a. *include an archaeological evaluation report to assess the archaeological potential of the affected area; where necessary, a field evaluation may also be required;*
- b. *conserve nationally important remains in situ, subject to consultation with Historic England;*
- c. *where other archaeological heritage assets are identified, provide sufficient information to demonstrate how the proposal would contribute to the asset’s conservation; and*
- d. *where harm can be fully justified, make provision for archaeological excavation and/or recording as appropriate, followed by analysis and publication of the results.*
14. *Retrofitting of heritage assets to achieve greater levels of energy efficiency and reductions in carbon emissions will be supported where it is proposed in a manner that conserves or enhances the significance of the heritage asset.*

Policy PS7 World Heritage Sites

1. *Development is required to ensure it safeguards and does not have a detrimental impact upon the outstanding universal value of the UNESCO world heritage sites: the Tower of London and Maritime Greenwich, including their buffer zones (as shown on the policies map) and settings.*
2. *Proposals affecting the wider setting of the Tower of London and Maritime Greenwich or those impinging upon strategic or other significant views to or from these sites (particularly around Tower Hill and Aldgate and within the buffer zone around Island Gardens) will be required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage sites.*
3. *Development within the vicinity of the Tower of London is required to demonstrate how it will improve local pedestrian and cycle access routes, particularly through signage and wayfinding in the surrounding area.*

PS8 Shaping and Managing Views

1. *Development is required to positively contribute to views and skylines within the borough, particularly those that are important components of the character of Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. Development will be required to demonstrate how it:*
- a. *complies with the requirements of the London View Management Framework and World Heritage Site Management Plans for the Tower of London and Maritime Greenwich;*
- c. *preserves or enhances the prominence of borough-designated landmarks and the skyline of strategic importance in the borough-designated views, taking into account the reasons for designation and the guidance for future development provided in the Tower Hamlets Views and Landmarks Study;*
- d. *preserves or enhances local views identified in conservation area appraisals and management guidelines;*
- e. *preserves or enhances visual connections between the public realm and water spaces and open spaces; and*
- f. *enhances, creates, or preserves townscape and views to and from the site which are important to the identity and character of the place.*

2.0HERITAGE STATEMENT

2.4GUIDANCE CONSIDERED IN THIS HERITAGE IMPACT ASSESSMENT

HISTORIC ENGLAND, CONSERVATION PRINCIPLES, 2008

The Principles, Policies and Guidance for the sustainable management of the historic environment were produced to strengthen the credibility and consistency of decisions taken and advice given by Historic England staff (formerly English Heritage).

HISTORIC ENGLAND, GOOD PRACTICE ADVICE IN PLANNING NOTE 2 – MANAGING SIGNIFICANCE IN DECISION TAKING IN THE HISTORIC ENVIRONMENT, 2015

The purpose of this note is to provide information on good practice to assist local planning authorities, consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and the related guidance contained within the National Planning Practice Guidance.

HISTORIC ENGLAND, GOOD PRACTICE ADVICE IN PLANNING NOTE 3 – THE SETTING OF HERITAGE ASSETS, (UPDATED 2017)

This note provides guidance on managing change within the settings of heritage assets and supersedes ‘The Setting of Heritage Assets’, English Heritage, 2011

HISTORIC ENGLAND ADVICE NOTE 18, ADAPTING HISTORIC BUILDINGS FOR ENERGY EFFICIENCY AND CARBON EFFICIENCY

The document sets out advice on what permissions, such as listed building consent, are needed for some of the common changes required to decarbonise and improve the energy efficiency of historic buildings. It also sets out advice for local planning authorities – and other parties involved in the planning process – in determining proposals to decarbonise and improve the energy efficiency of historic buildings to enable positive climate action.

Historic England 2019 Statements of Heritage Significance: Analysing Significance in Heritage Assets

<https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/>

HISTORIC ROYAL PALACES GUIDANCE & RESEARCH DOCUMENTS

The scheme has also been shaped by a number of Historic Royal Palaces guiding principles documents including:

Historic Royal Palaces Tower of London World Heritage Site Management Plan

- Historic Royal Palaces HM Tower of London Conservation Management Plan Draft v2 2023
- Historic Royal Palaces HM Tower of London Conservation Management Plan Gazetteer Draft v2 2023
- Archaeological research commissioned S. Maher, ‘Edward I’s Entrance Causeway at the Tower of London’, London Archaeologist (Summer 2007), pp.3-7
- A. Sadraei, ‘Statement of Significance: Middle Tower, Covered Entry Structure, Tower of London’, unpublished report for HRP (2018)
- G. Roberts, ‘Research Report: Salvin’s Pump House, Tower of London’, unpublished report (June 2017)
- Access Review of the Tower of London, Undertaken by David Owen NRAC of Goss Consultancy Ltd, 7th-12th June 2017

UNESCO GUIDANCE ON WORLD HERITAGE SITES

UNESCO Operational Guidelines for the Implementation of the World Heritage Convention – latest version published 2024

<https://whc.unesco.org/en/guidelines/>

UNESCO 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context

<https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>

2.0 HERITAGE STATEMENT

2.5 METHODOLOGY FOR ASSESSMENT OF SIGNIFICANCE

ASSESSING SIGNIFICANCE

Assessing significance is the means by which the cultural importance of a place and its component parts is identified and compared, both absolutely and relatively. The purpose of this is fundamental to the concept of conservation management planning, because the identification of elements of high and lower significance, based on a thorough understanding of a site, enables development of proposals that safeguard, respect and where possible enhance the character and cultural values of that site.

The assessment identifies areas where no change, or only minimal changes should be considered, as well as those where more intrusive changes might be acceptable and could enrich understanding and appreciation of significance.

Statutory designation is the legal mechanism by which significant historic places are identified in order to protect them. The designations for Tower of London have been given within the earlier diagrams in this section of the document. However, it is necessary to go beyond these in order to arrive at a more detailed and broader understanding of significance that considers more than archaeological, architectural and historical matters.

The assessment is structured as follows:

- this explanation of the methodology used
- a summary commentary on the historic development, and Assessment of Significance for each of the assets within the scope of the proposed development project relevant to this application and Heritage Impact Assessment
- a more detailed analysis of the significance of different aspects of the asset: below-ground archaeology and buildings or structures.

In the National Planning Policy Framework (NPPF), “significance” for heritage policy refers to the value of a heritage asset to this and future generations because of its heritage interest. This interest can be archaeological, architectural, artistic, or historic, and it derives not only from the asset’s physical presence but also from its setting. There is an important relationship between significance of the assets and their setting, and Outstanding Universal Value as defined by UNESCO Guidelines: “For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”

HERITAGE VALUES

In our assessments of significance the ‘values’ concept set out in Historic England’s Conservation Principles, Policies and Guidance (2008, itself derived from the 1979 Burra Charter), because the system copes reasonably well with the range of disciplines under consideration.

Therefore, the following values have been used to understand significance:

- **Evidential value:** derives from the potential of a place to yield primary evidence about the past. It can be natural or man-made and applies particularly to archaeological remains, but also to other situations where there is no relevant written record;
- **Historical value:** derives from the ways in which past people, events and aspects of life can be connected through a place to the present. A place may illustrate some aspect of the past, and thus helps to interpret the past, or be associated with an important person, event or movement;
- **Aesthetic value:** this may derive from conscious design, including the work of the artist or craftsman; alternatively it maybe the fortuitous outcome of the way a building or place has evolved; and,
- **Communal value:** regardless of their historical or aesthetic value, many places are valued for their symbolic or social role, often as a source of identity to people and communities. This may encompass a spiritual or commemorative role.

The attributes of Outstanding Universal Value of the Tower of London World Heritage Site have also been carefully considered alongside these values, as summarised in section 4.3 of this document.

ASSESSMENT CRITERIA

Exceptional/ Very High: A theme, feature, building or space which is internationally important, and which makes an extremely important and character defining contribution towards the nature and appearance of the heritage asset and its setting.

High: A theme, feature, building or space which is nationally important, and which makes an important contribution towards the character and appearance of the heritage asset and its setting.

Medium: Themes, features, buildings or spaces which are important and have some contribution towards the character and appearance of the heritage asset and its setting.

Low: Themes, features, buildings or spaces which are usually of local value only but possibly of regional significance for group or their value. Minor cultural importance and contribution to the character or appearance of the heritage asset and its setting.

Neutral: These themes, spaces, buildings or features have little or no cultural value but do not detract from the character or appearance of the heritage asset and its setting.

Detrimental/ Intrusive: Themes, features, buildings or spaces which detract from the values of the heritage asset, its setting, character and appearance.

2.0 HERITAGE STATEMENT

2.5 METHODOLOGY FOR ASSESSMENT OF SIGNIFICANCE

The following section of this Heritage Impact Assessment provides a description and assessment of the following three assets potentially affected by the proposed development – and as indicated on this key plan:

- South Moat, within the Tower of London Scheduled Monument & UNESCO World Heritage Site
- South Revetment wall, Grade II* listed and within Scheduled Monument & UNESCO World Heritage Site
- The Wharf, within the Tower of London Scheduled Monument & UNESCO World Heritage Site

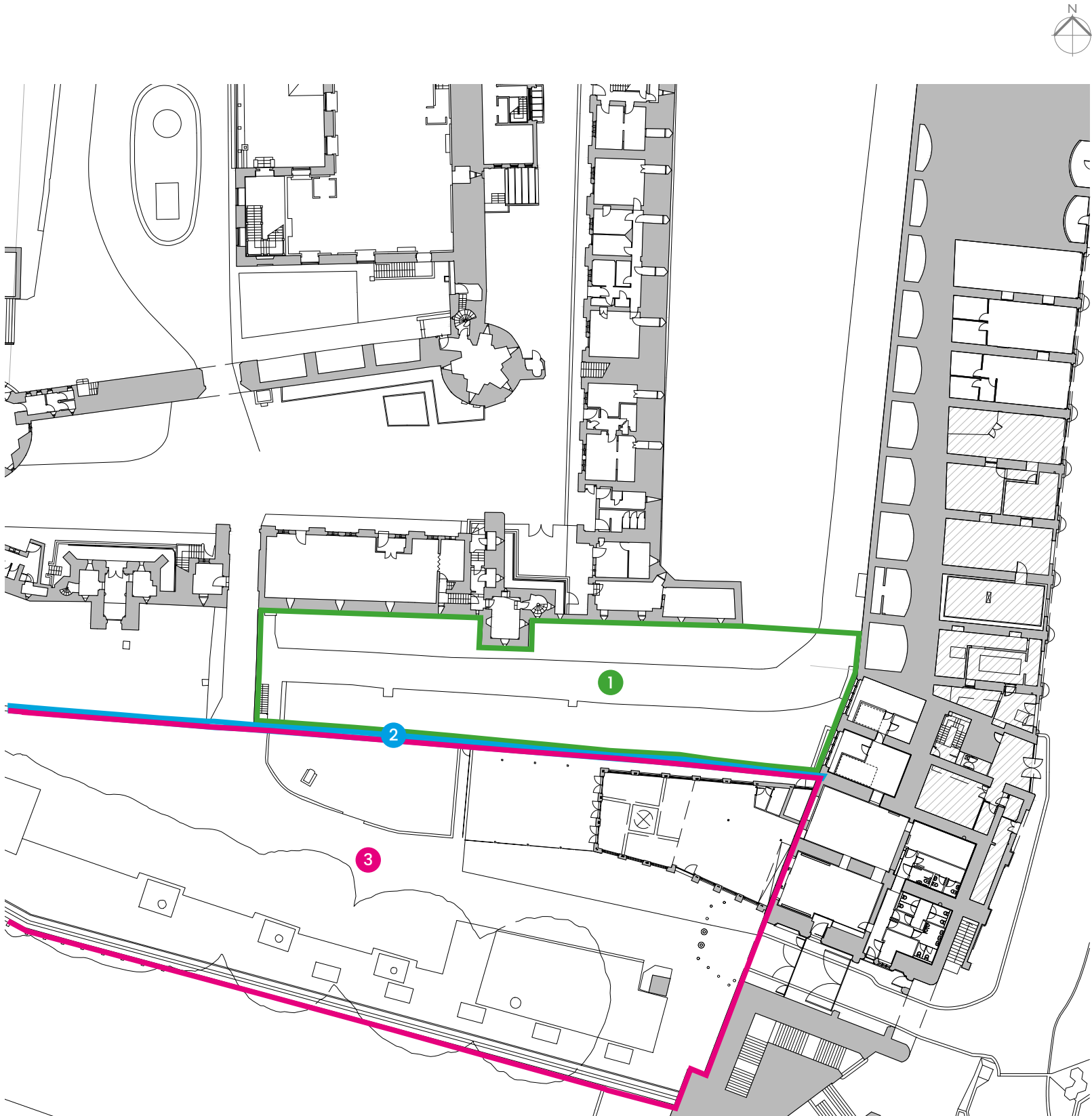
KEY

- 1

South Moat
- 2

South Revetment Wall
- 3

The Wharf



2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.1 DESCRIPTION

The South Moat is part of the moat that surrounds the historic fortress of the Tower of London, and within the Scheduled Monument and UNESCO World Heritage Site.

The South Moat is defined by the Grade II* south revetment wall as its southern boundary, and the wall of the Tower to the north, including Cradle Tower (to the west), Well Tower and Develin Tower.

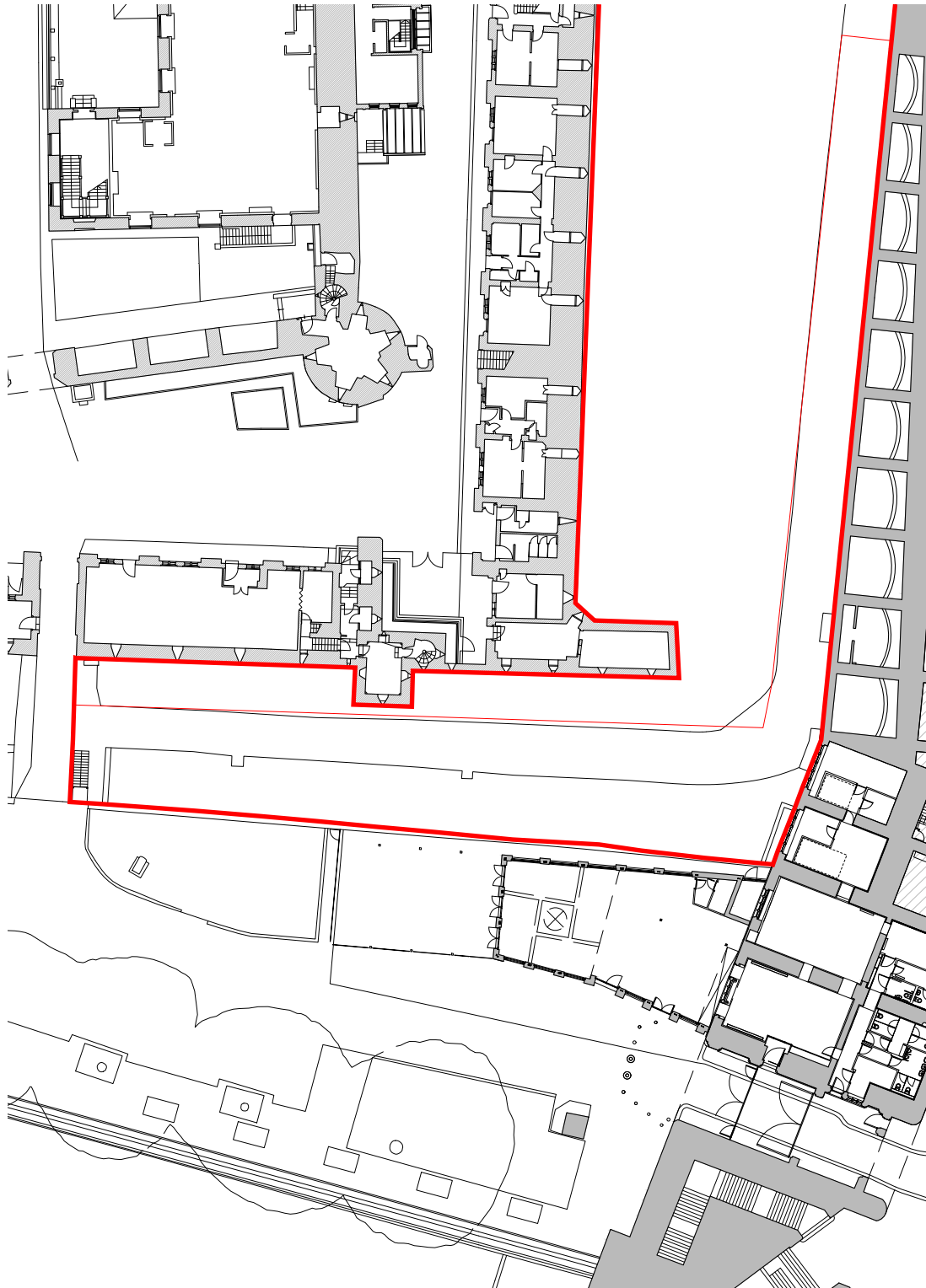
To the east area the Moat Arches of the lower levels of the Tower Bridge Approach. The western extent of the project scope area is defined by the existing timber bridge which forms a visitor entrance into the Tower of London, near Cradle Tower.

Although historically a wet moat, it is now a plain lawned area. In 2022 the Moat, including this area of the South Moat, was sown with wildflower seeds as part of the Superbloom landscape design installation which commemorated Her Late Majesty Queen Elizabeth II's Platinum Jubilee. Superbloom was the first year of a permanent transformation of the Moat, now known as the Moat Legacy Project and currently in design development.

A temporary ramp was installed in this area of the moat to provide inclusive visitor access into the South Moat from the Wharf.



The south moat seen from Tower Bridge

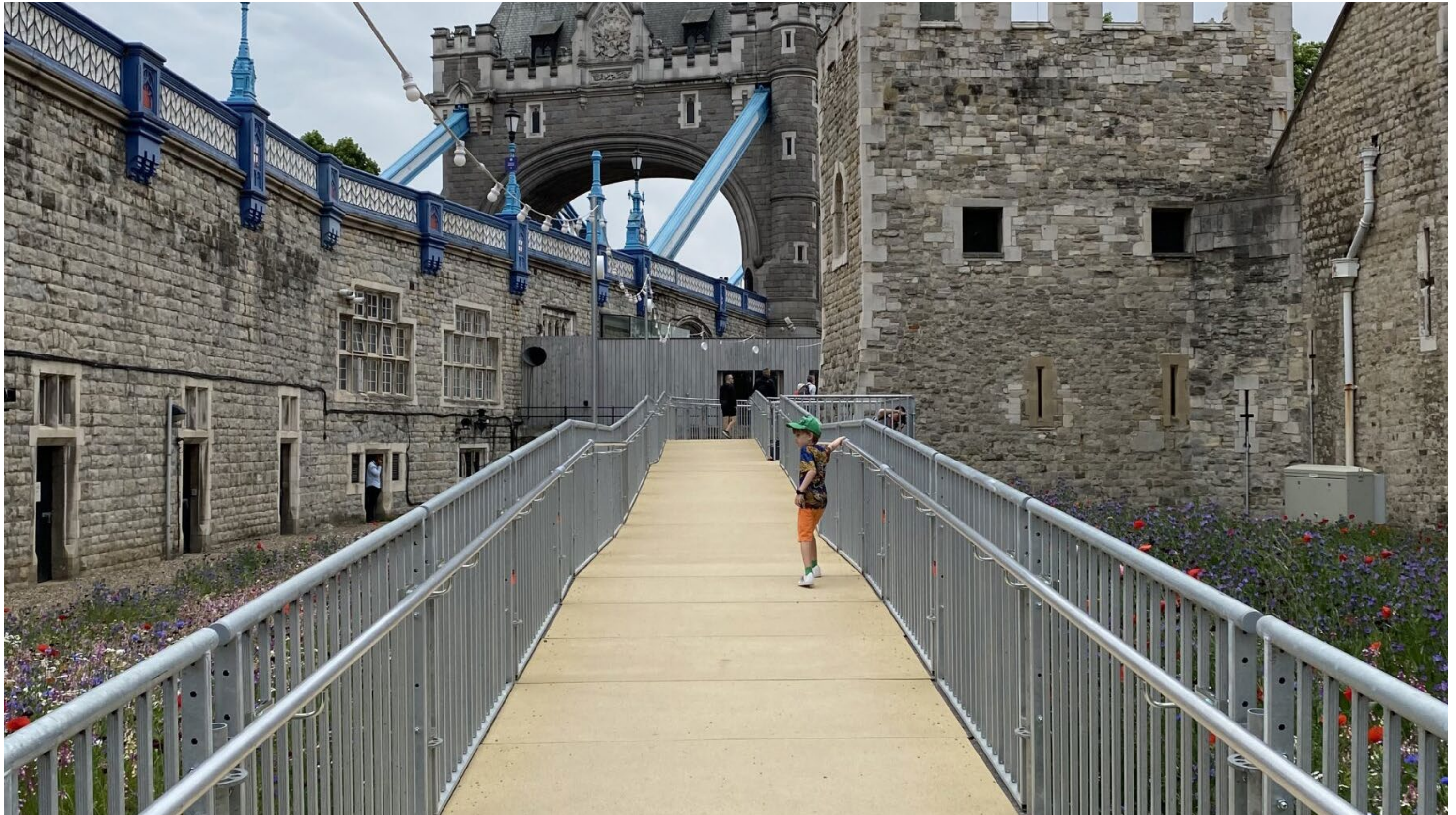


South Moat Site Plan

2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.1 DESCRIPTION



The ramp installed in this area of the South Moat to provide inclusive visitor access during Superbloom

2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.1 DESCRIPTION



KEY



Part of The Moat



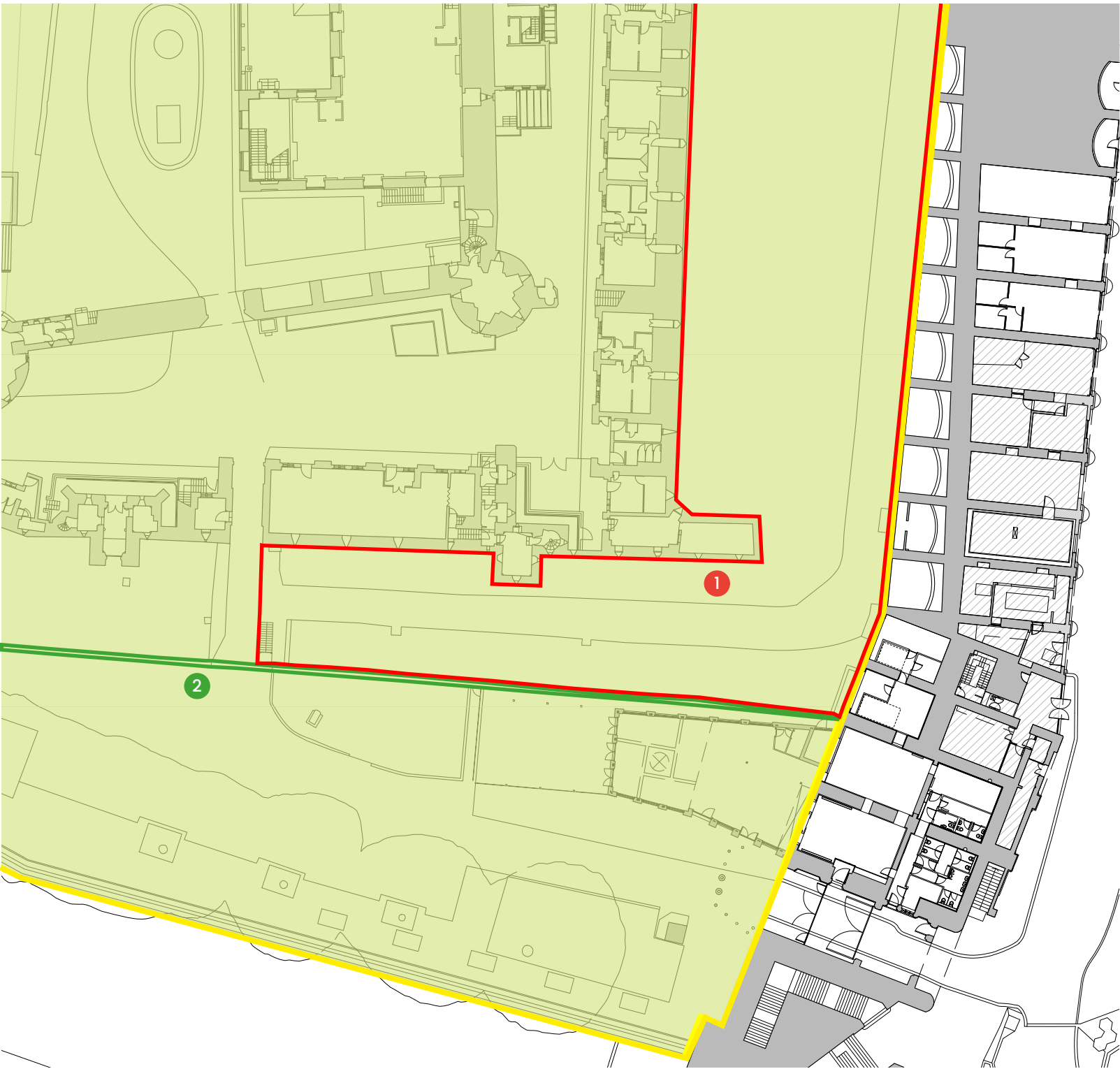
Part of Grade II* Listed Building 'Revetment wall to south side of Moat' (List ID 1065764)



'Tower of London' Scheduled Monument (List ID 1002061)



Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site



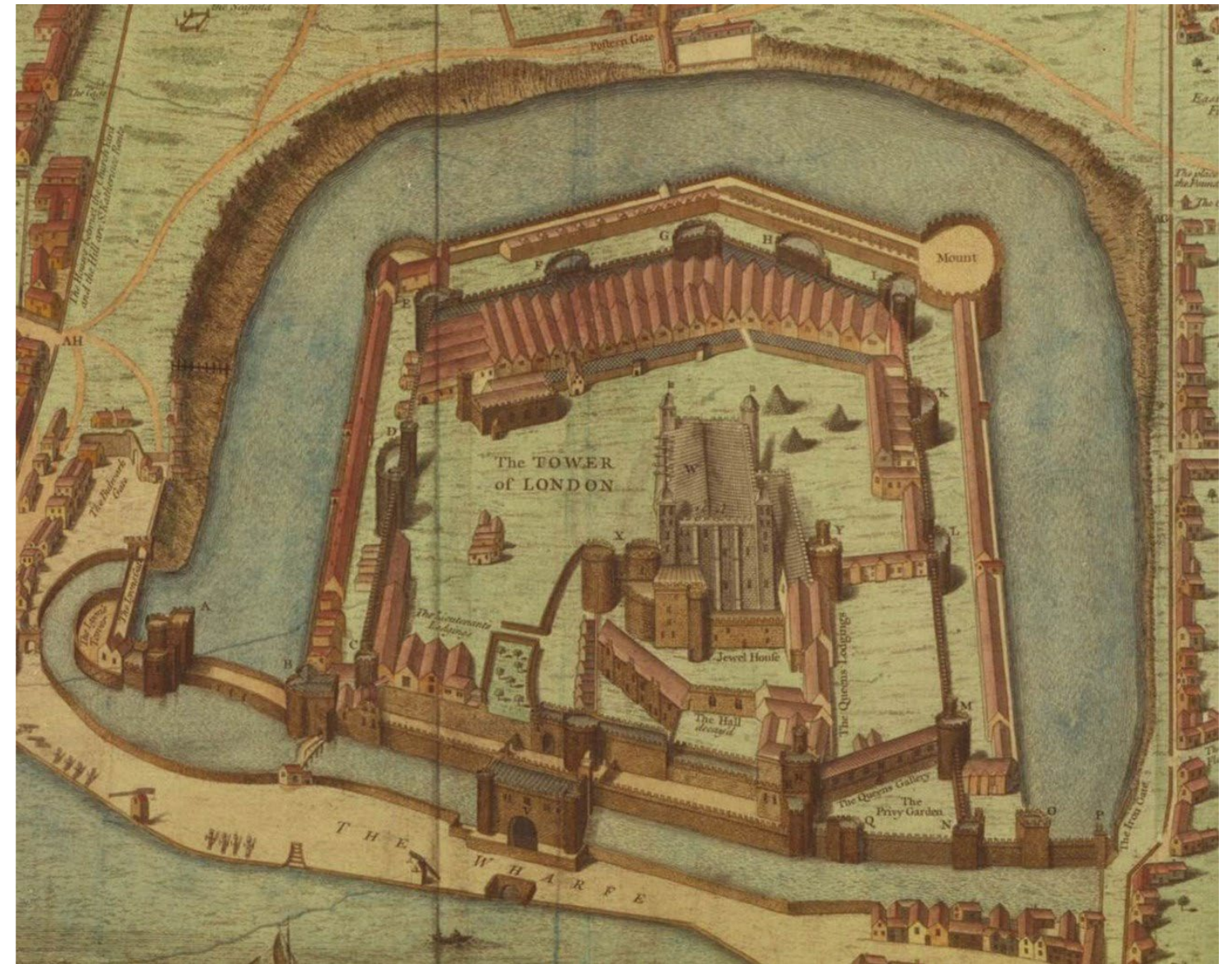
Heritage Designations Plan

2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.2 HISTORIC DEVELOPMENT

The moat as it exists today has evolved over more than seven centuries, and its development is a complex story of function, maintenance, and alteration. Five major episodes can be identified throughout its history. The first being the creation of the water-filled feature between 1275 and 1281 during the major expansion of the Tower's defences by Edward I. The second was the development of the wharf by reclaiming land from the north bank of the Thames during the 14th century. Previously the river had flowed directly against Edward I's outer curtain wall, but now the Thames was separated from the castle which instead had a wet moat fully surrounding it for the first time. The defences retained this form until the 1670s, when the third major development occurred. A brick revetment wall was built around the outer edge of the moat from 1670 to 1683 by order of the Chief Engineer of the Office of Ordnance, Sir Bernard de Gomme, to strengthen the moat's defensive capacity. At about the same time the semicircular extension of the moat around the Lion Tower was backfilled and built over. In the fourth period of change from 1843 and 1845, the Duke of Wellington's instruction to drain and backfill the moat was carried out. At about the same time buildings around the Lion Tower were demolished. Finally, the construction of Tower Bridge and its approach road in the late 1880s cut into the east side of the moat, drastically reducing its width.



Excerpt of the copy of the Haiward and Gascoyne Map of 1597 made for the Society of Antiquaries of London in 1741 (HRP HRP02178 © Crown Copyright: Historic Royal Palaces). This, the oldest reliable cartographic source showing the fortress, shows the outer circumference of the moat was formed largely of rough earth ditch.

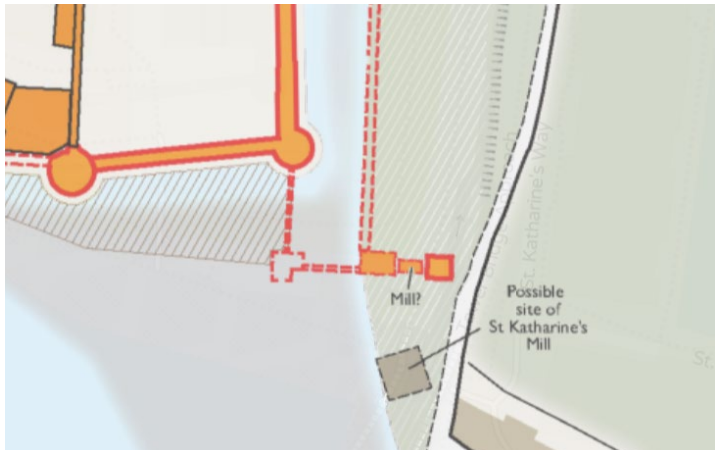
2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS

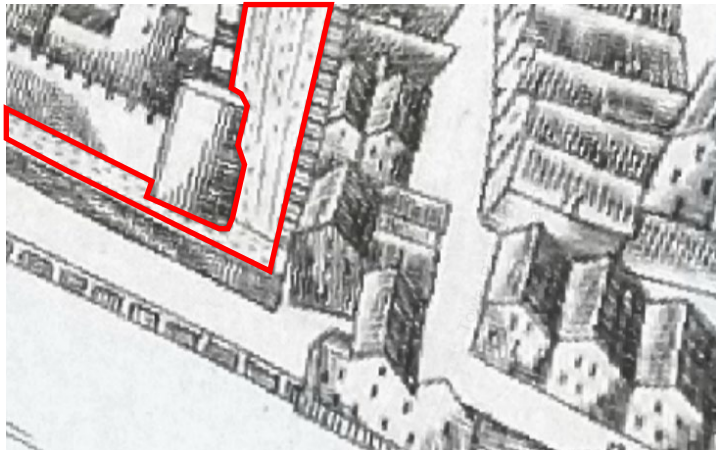
These extracts of maps and drawings show the development of the site location of the project scope area of the South Moat through the ages, from the medieval period to the current day.



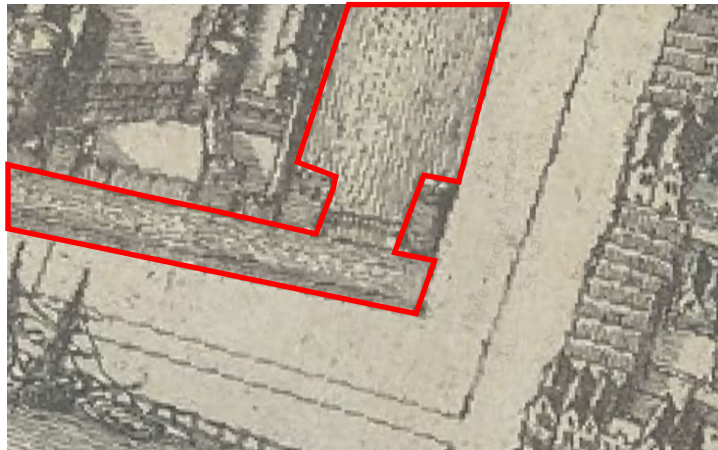
Medieval London (1270 - 1300)



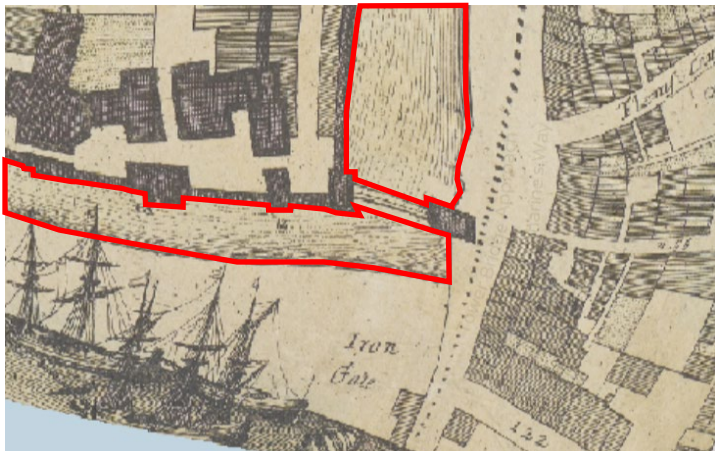
Early Tudor London (1520)



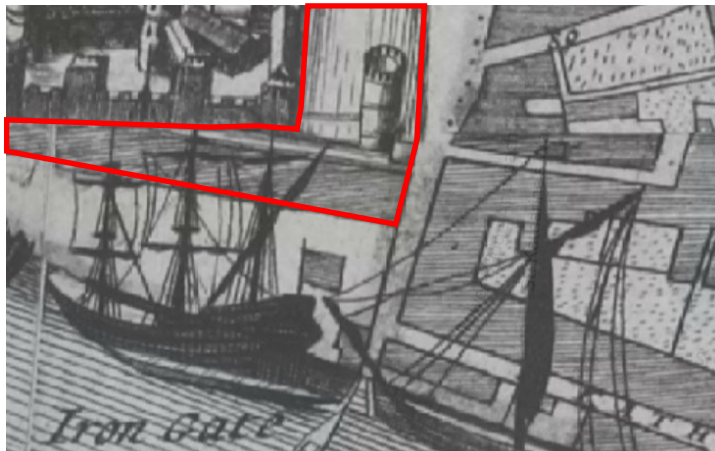
Survey by Faithorne & Newcourt (1658 - 1669)



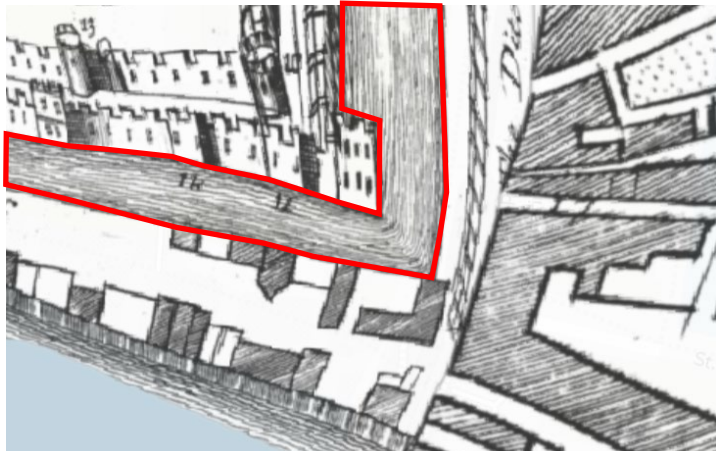
Survey by Leake (1669)



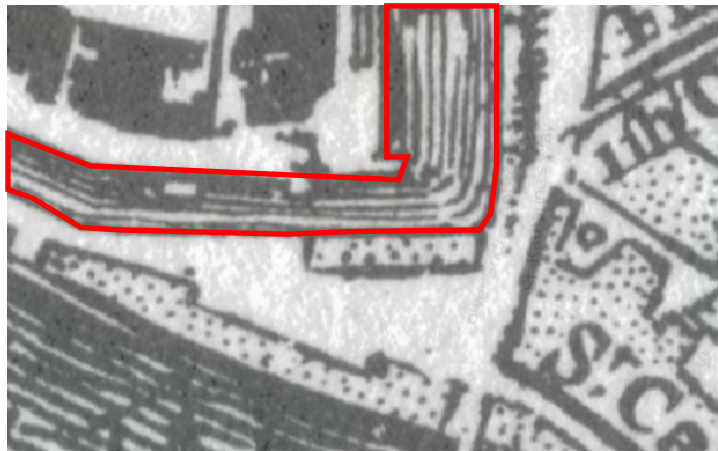
Survey by Ogilby & Morgan (1676)



Survey by William Morgan (1682)



Survey by Blome & Strype (1694 - 1720)



Survey by John Rocque (1746)

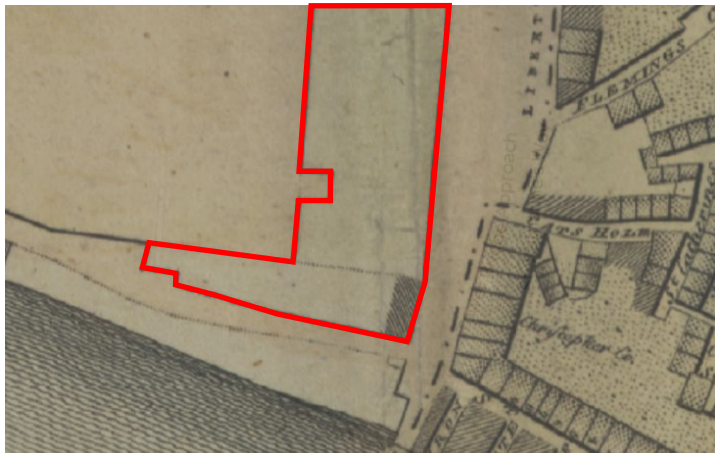
2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

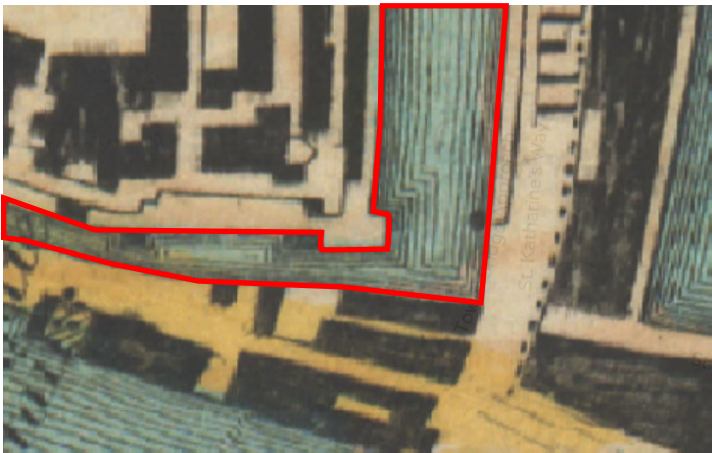
2.6.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS

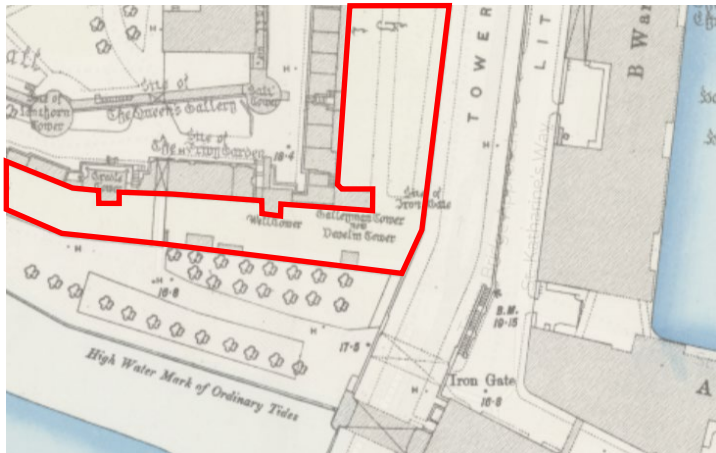
These extracts of maps and drawings show the development of the site location of the project scope area of the South Moat through the ages, from the medieval period to the current day.



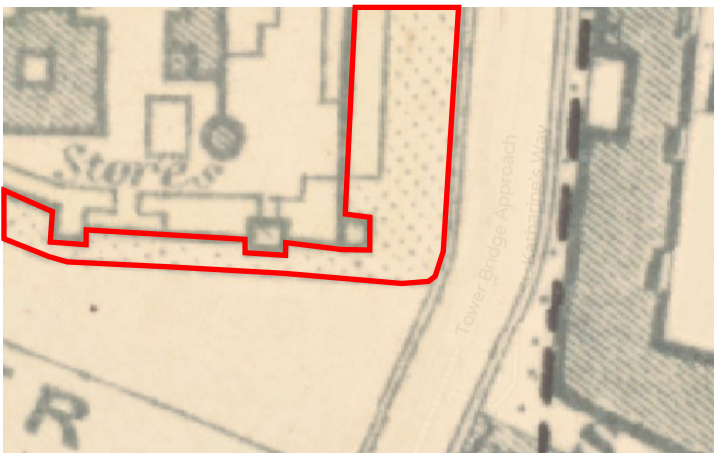
Survey by R Horwood (1799)



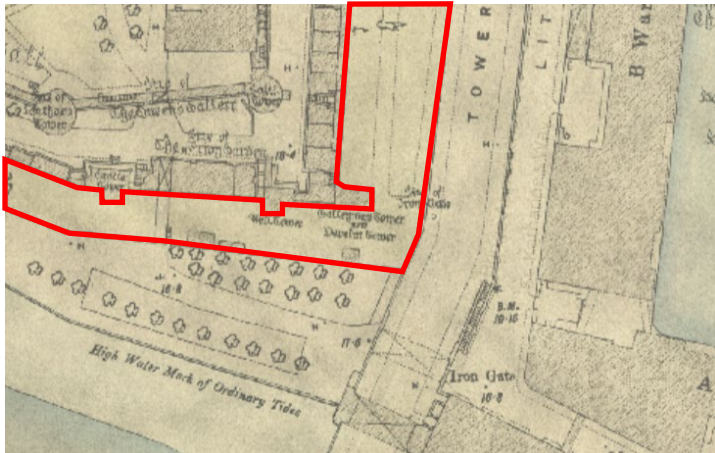
Survey by C & J Greenwood (1828)



OS Map 1893



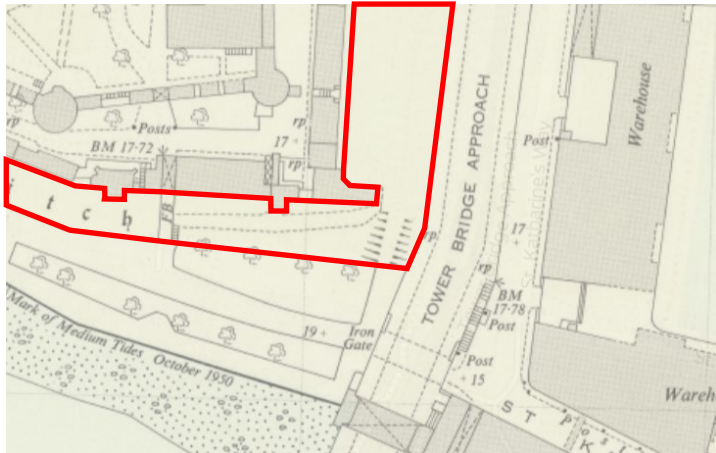
Charles Booth's Poverty Map (1886 - 1903)



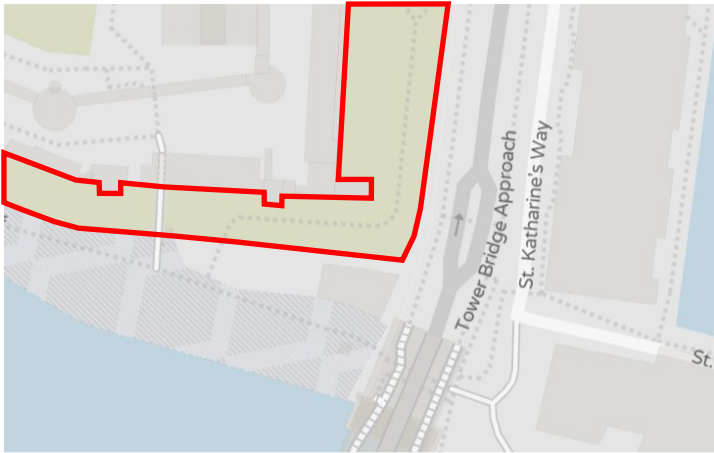
Inland Revenue Valuation Office Survey (1910 - 1915)



Bomb Damage Map (1945)



OS Map (1940s - 1960s)



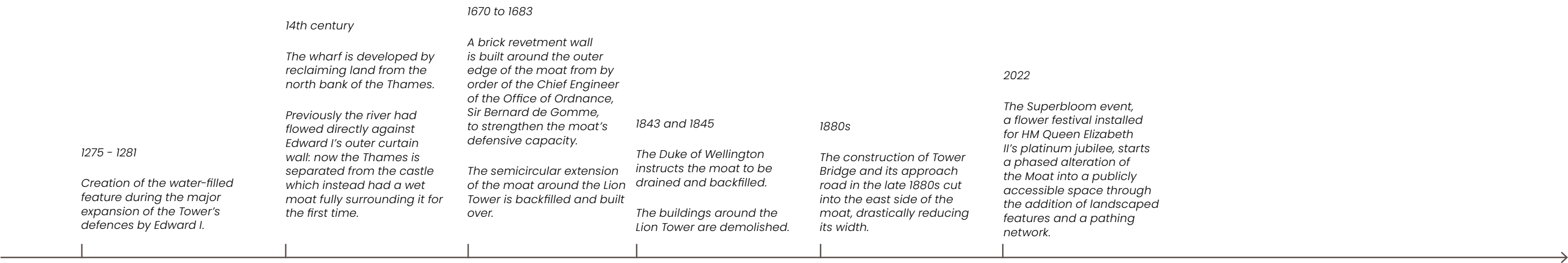
Contemporary OS Map

2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.2 HISTORIC DEVELOPMENT

TIMELINE OF HISTORIC BACKGROUND

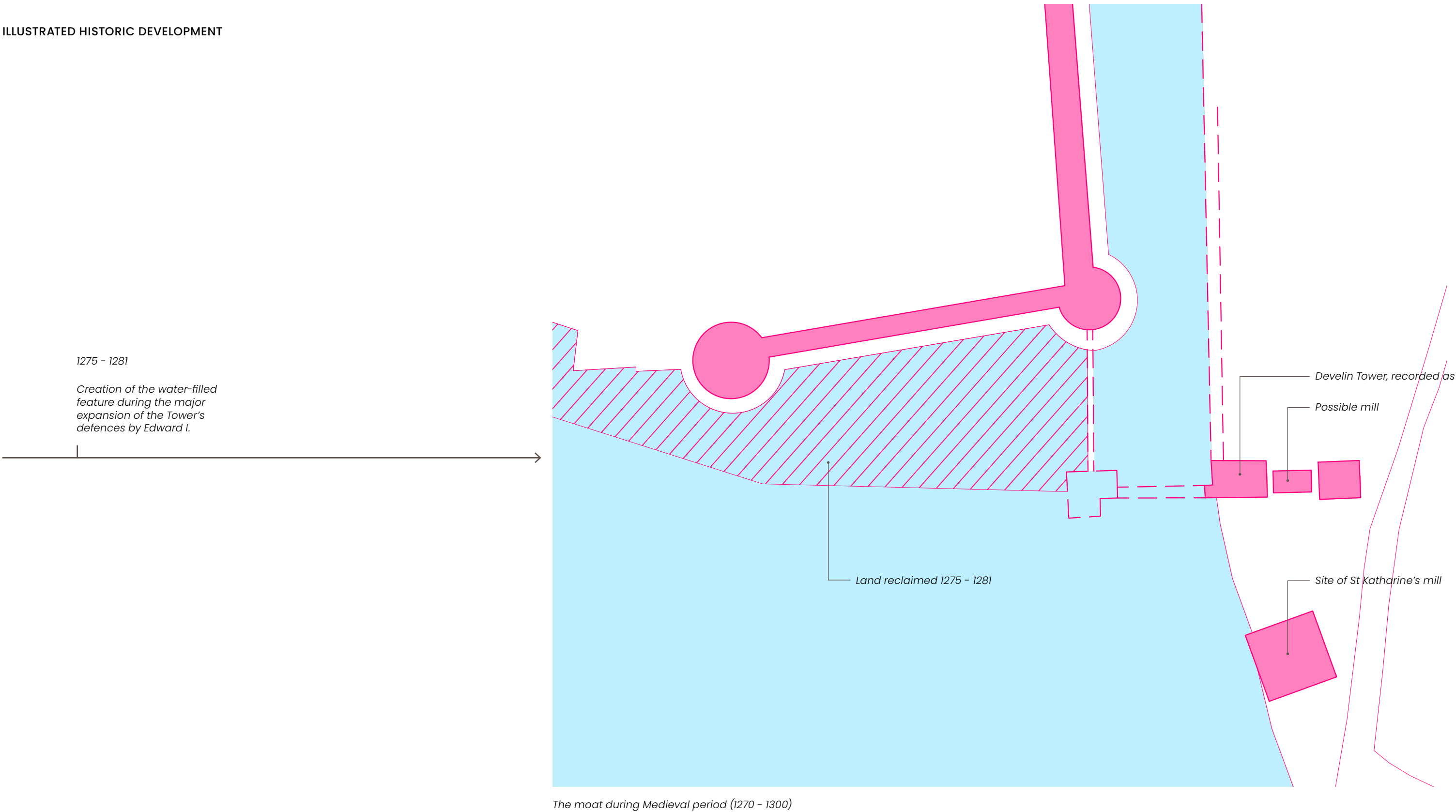


2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.2 HISTORIC DEVELOPMENT

ILLUSTRATED HISTORIC DEVELOPMENT

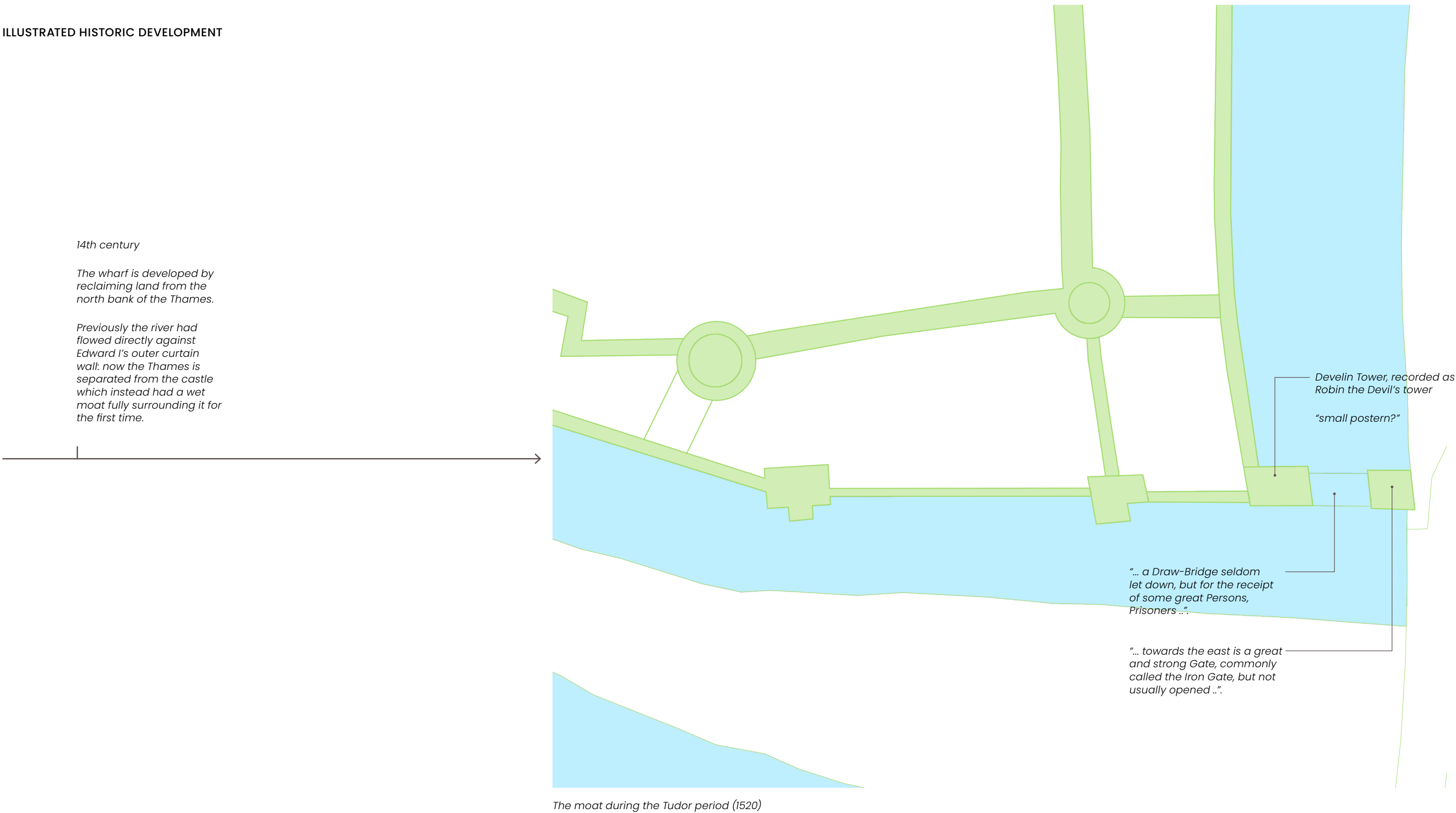


2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.2 HISTORIC DEVELOPMENT

ILLUSTRATED HISTORIC DEVELOPMENT

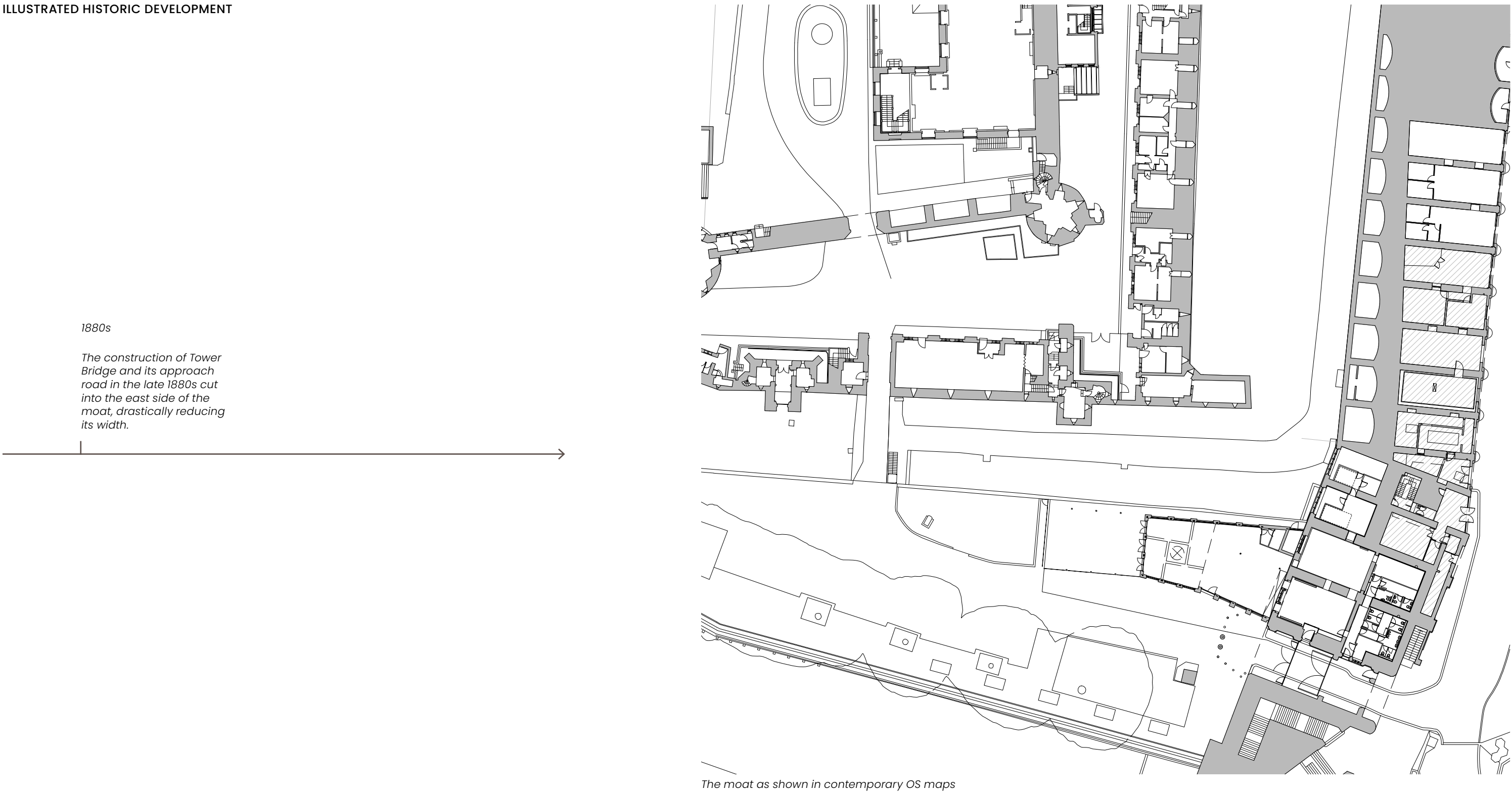


2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.2 HISTORIC DEVELOPMENT

ILLUSTRATED HISTORIC DEVELOPMENT



2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.3 ASSESSMENT OF SIGNIFICANCE

The South Moat is part of the moat that surrounds the historic fortress of the Tower of London, and within the Scheduled Monument and UNESCO World Heritage Site.

The Moat is of Exceptional significance due to the contribution it makes to the ensemble of buildings and spaces at the Tower of London.

This attribution of significance is owed to a number of characteristics, ranging from historical associations with important people and events at the Tower throughout history and into the present day, and the iconic contribution it makes and has historically made to Tower of London’s setting and landscape.

These elements, combined with several other important heritage values, combine to contribute to the overall Exceptional/Very High significance of the Moat.

When assessed against the Heritage Values outlined in English Heritage guidance “Conservation Principles, Policies and Guidance”, the South Moat is found to be of Exceptional/Very High significance with regards to Evidential, Historical, Architectural & Aesthetic, and Communal Values.

The key points of each value are outlined here:

EVIDENTIAL VALUE: EXCEPTIONAL

- For the known survival of buried timber and masonry structures dating from the 13th century reigns of Henry III and Edward I, as well as of later eras up to and including the 19th century.
- For its great archaeological potential for artefacts and waterlogged deposits of the medieval period.
- For its further archaeological potential. Much may still be learnt about the development of this area of the site through additional investigation and research – whether that concerns the earlier phases of the area, the buried remains of earlier activities beneath, or new insights into previously assessed features within the Moat.
- The moat has proved the extraordinary potential for revealing lost phases of the Tower’s development, and studies of the standing buildings have also revealed unexpected archaeological potential. The physical remains of more recent periods – both in below-ground archaeology and as surviving buildings – are

an under-appreciated resource. All these aspects of the Tower’s heritage fall within nationally-recognised criteria for archaeological research priorities.

HISTORICAL VALUE: EXCEPTIONAL

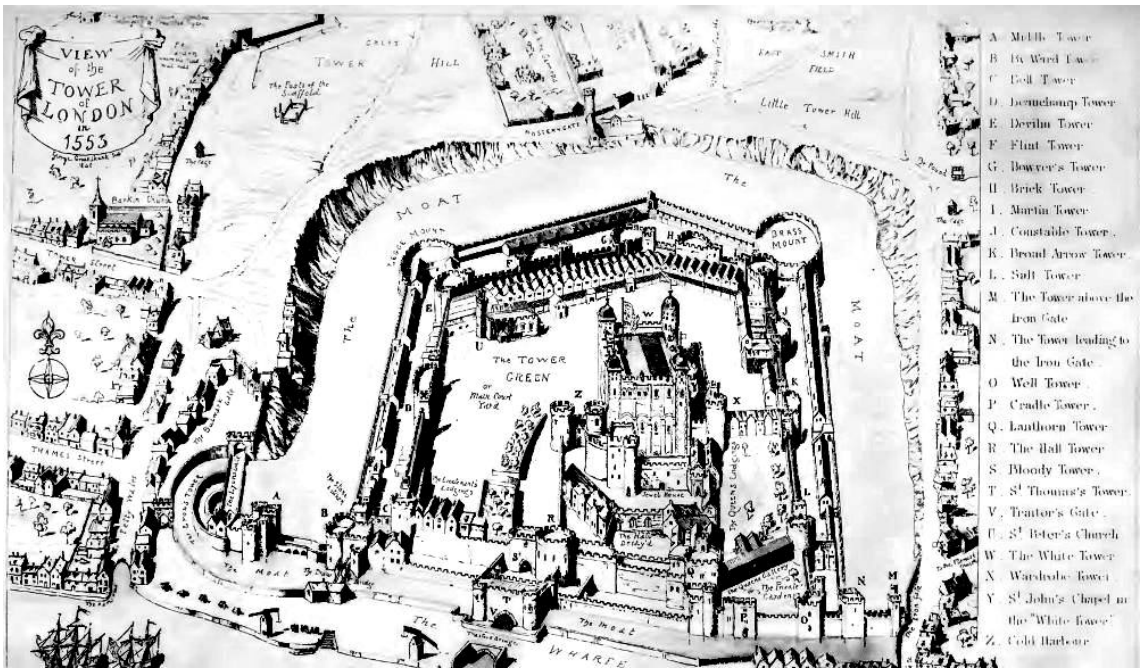
- As a defining element of the extent and development of the medieval fortress. With the creation of the Moat, Edward had transformed the Tower into one of the most formidable concentric castles in Europe.
- For its military/defensive aspects.
- For the historical associations of the use of the Moat, particularly with the recruitment and training of soldiers during the First and Second World Wars

ARCHITECTURAL & AESTHETIC VALUE: EXCEPTIONAL

- As a key aspect and iconic element of the Tower of London’s landscape and setting.
- As a deliberately ostentatious feature of the Tower of London, contributing to the way that site asserted a dominating presence over the city of London and its people.

COMMUNAL VALUE: EXCEPTIONAL

- As it forms an important part of the visitor experience, providing the opportunity to appreciate the Tower as a defended castle.
- The moat, laid to grass in the mid-19th century, houses some recreational facilities for the Tower’s resident community, particularly in the area to the South.
- For the historical institutional associations of the use of the Moat, particularly with the recruitment and training of soldiers during the First and Second World Wars.
- For its position within British national memory as the location of commemorative events for the centenary of the First World War. In 2014, it held the WW1 commemorative art installation ‘Blood Swept Lands and Seas of Red.’

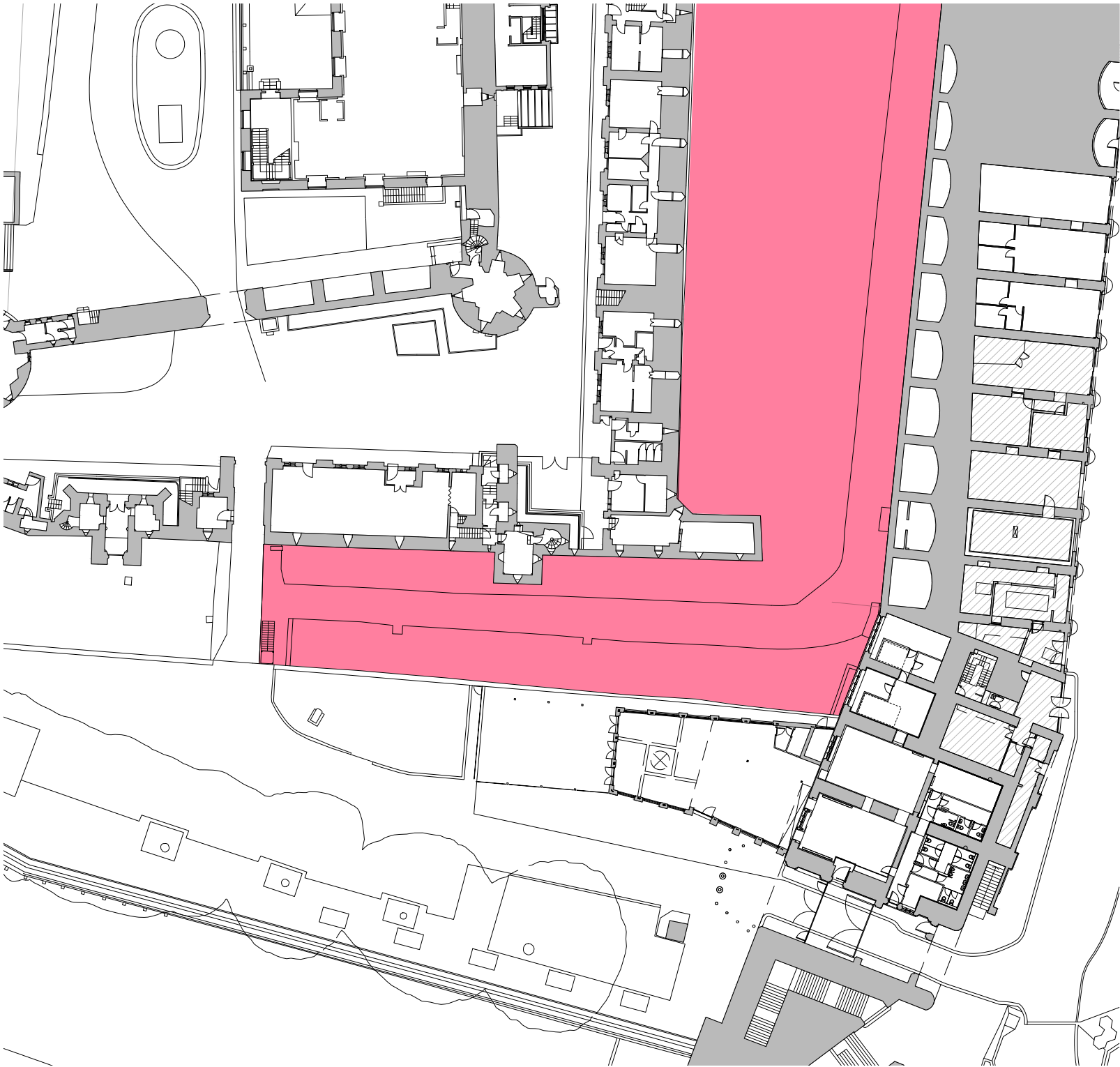
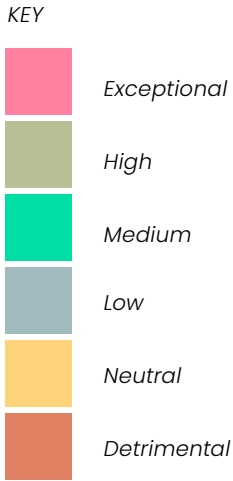


View of the Tower of London in 1555 — George Cruikshank. Seventh instalment, July 1840

2.0 HERITAGE STATEMENT

2.6 SOUTH MOAT

2.6.3 ASSESSMENT OF SIGNIFICANCE



Significance Plan

2.0 HERITAGE STATEMENT

2.7 SOUTH REVETMENT WALL

2.7.1 DESCRIPTION

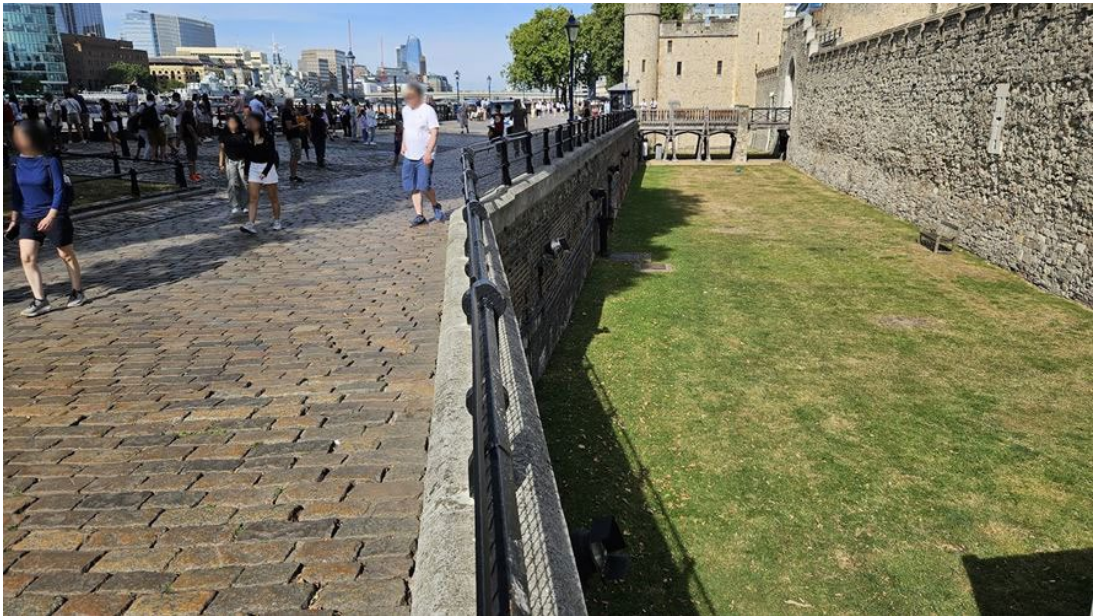
The South Revetment Wall is the Grade II* listed wall which forms the southern wall edge to the South Moat, and also forms the north side of Tower Wharf, as it runs between the Northern Approach to Tower Bridge to the east, and the approach to Middle Tower to the west.

The wall is faced in red brick, mostly of 18th and 19th century date though with a section of rebuild to the eastern end following partial collapse in 2003. The wall is ragstone to the western end likely dating from 19th century.

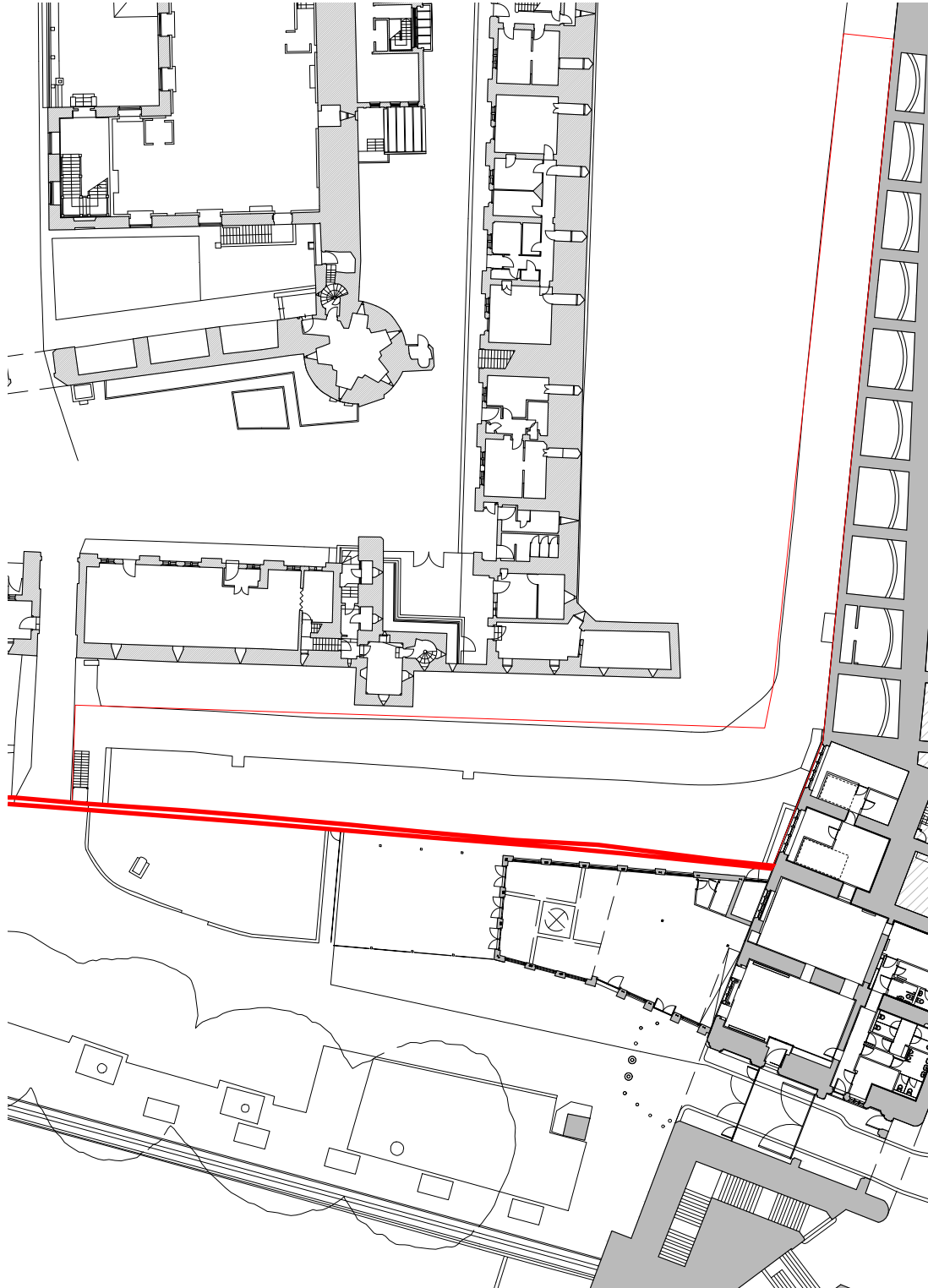
The wall has a coping stone throughout its length within the project scope area, which receives the railings to the edge of the Wharf.



South Revetment Wall viewed from Moat level looking west



South Revetment Wall viewed from Moat level looking west



2.0 HERITAGE STATEMENT
2.7 SOUTH REVETMENT WALL
2.7.1 DESCRIPTION



KEY



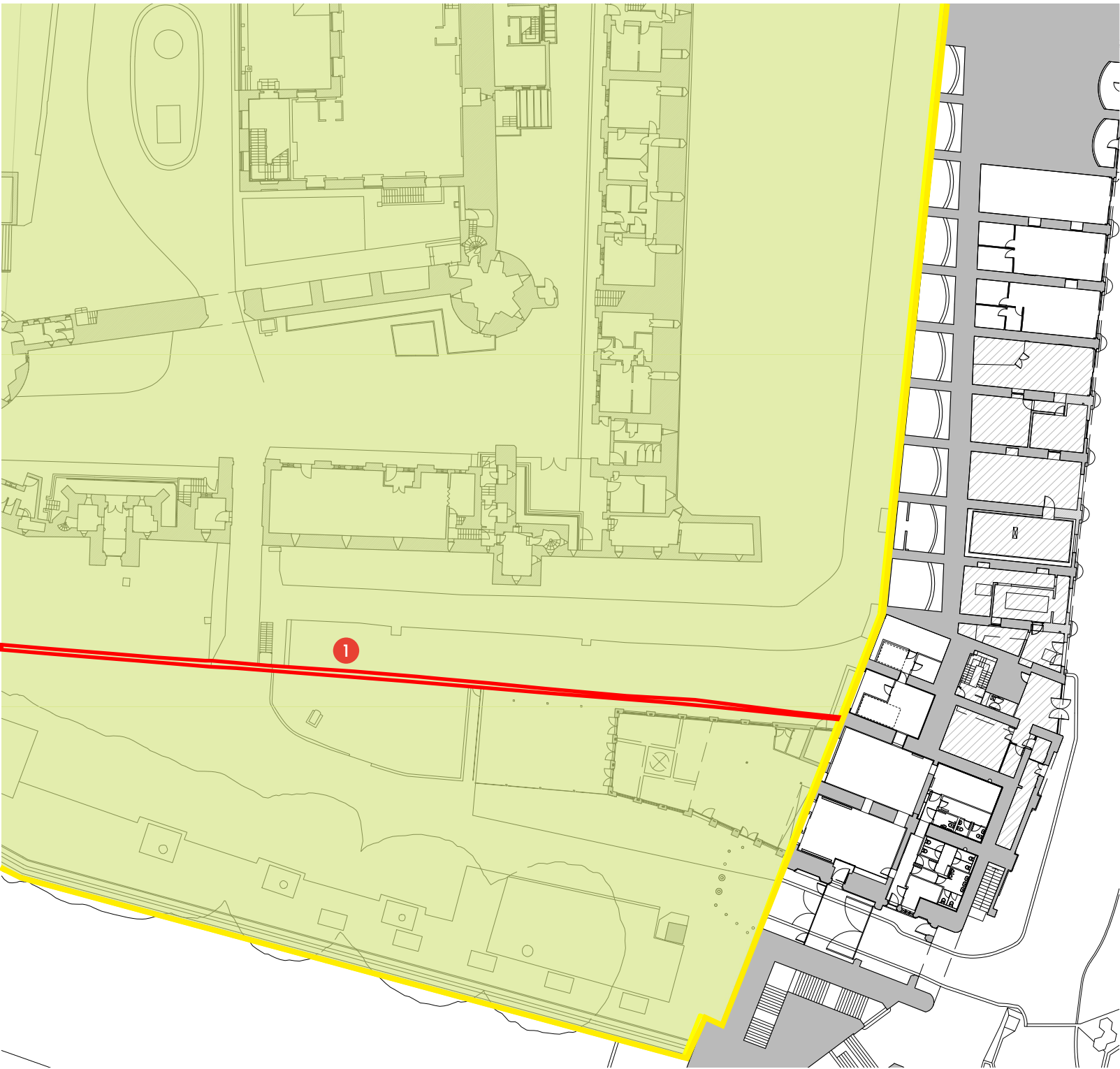
Part of Grade II* Listed Building 'Revetment wall to south side of Moat' (List ID 1065764)



'Tower of London' Scheduled Monument (List ID 1002061)



Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site



Heritage Designation Plan

2.0 HERITAGE STATEMENT

2.7 SOUTH REVETMENT WALL

2.7.2 HISTORIC DEVELOPMENT

Due to the Tower's increased role as a military storehouse and supply depot, The Wharf to the immediate south of the Tower of London, between it and the River Thames, was constructed in three main stages c1276-1324, 1338 and 1389-91, with Tower Dock, infilled in the 1950s, at its west end.

The South Moat Revetment Wall is formed by the northern side of the Wharf wall and therefore partially dates from this period. The period 1389-91 saw the Wharf extended from the 'east end wall', likely the Develin Tower, of the Tower to the 'watergate'. The walls were to be made of Ragstone and chalk, 8ft thick at the base and 16.5ft in height. This structure was re-clad in ashlar by 1500 and, with its completion, the essential form of the castle was complete, and with the exception of limited alterations around the periphery, it has largely retained this shape. The South Moat Revetment Wall is formed by the northern side of the Wharf wall and therefore partially dates from this period.

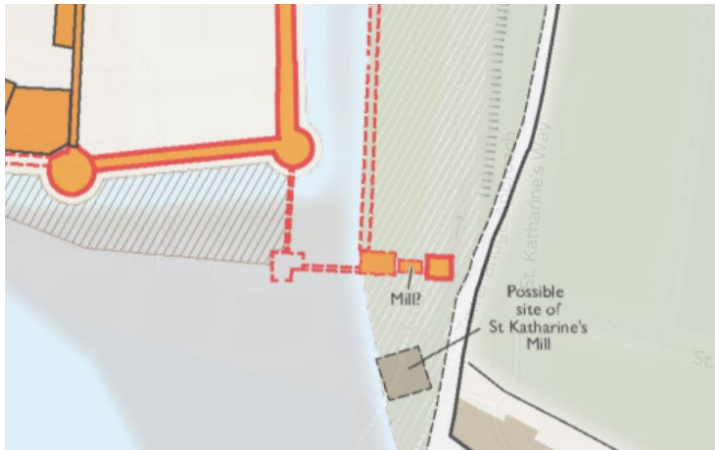
The defences of the moat were improved by Sir Bernard de Gomme in 1670-83, who built the North and West Moat Revetment Wall in brick. The South Revetment Wall was substantially rebuilt at this time, and refaced in stone and brick during the 17th (in this period), and again in the 18th, and 19th-centuries. To the west end the wall was repaired in stone during the mid-late 19th-century.

Part of the east end of the South Revetment Wall collapsed in 2003 and was subsequently rebuilt after full archaeological investigation. Several London Plane trees on the wharf behind the wall were cut down as preventative measures after this, as root damage had been the cause of the wall's collapse. A further area to the west of the section repaired in 2003 was at risk of collapse in 2020 and was similarly repaired following investigations.

Excavations in by Peter Curnow in 1957/8, and by Graham Keevill in 1996-7, showed that the wall is supported by timber piles and beams. The piles had been driven into the Thames foreshore, and the beams placed across and between them. Curnow's work also showed that the timberwork goes back under the core of the wharf. The moat wall collapse of 2003 revealed the existence of medieval Reigate stone walls behind the north wharf revetment wall, and also the core of the medieval wharf.

2.0 HERITAGE STATEMENT
2.7 SOUTH REVETMENT WALL
2.7.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS



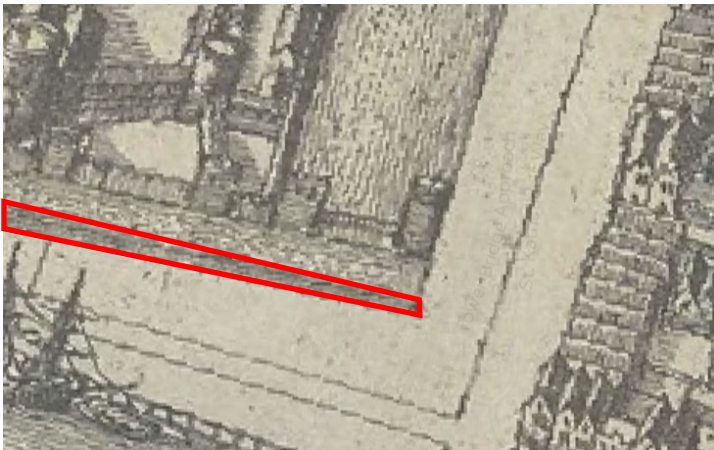
Medieval London (1270 - 1300)



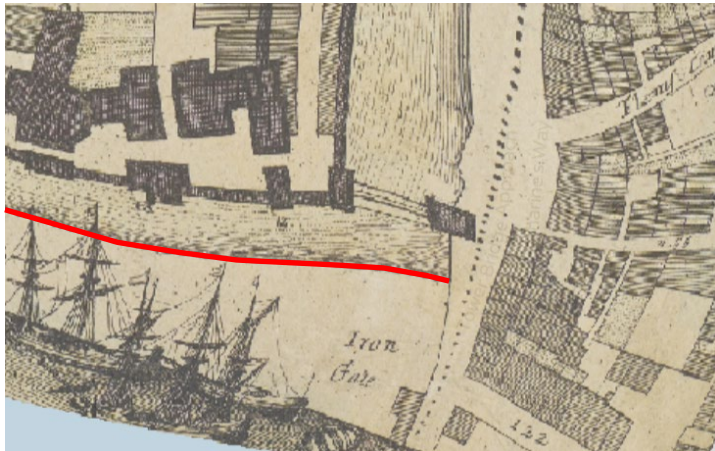
Early Tudor London (1520)



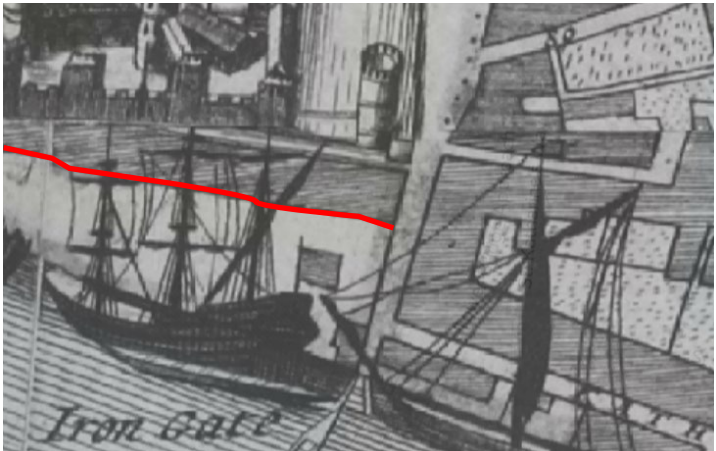
Survey by Faithorne & Newcourt (1658 - 1669)



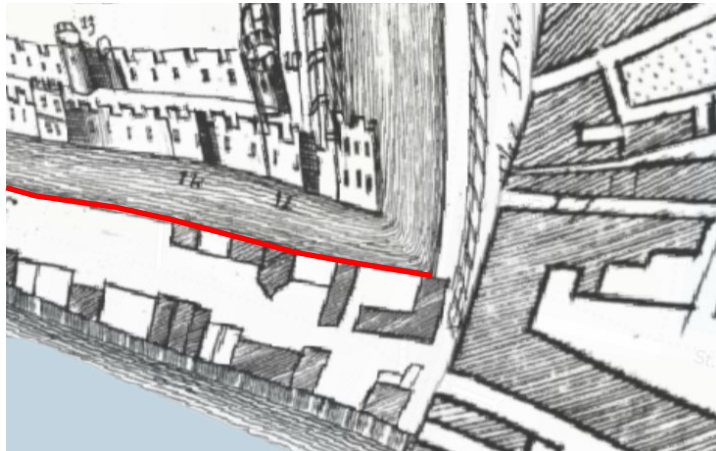
Survey by Leake (1669)



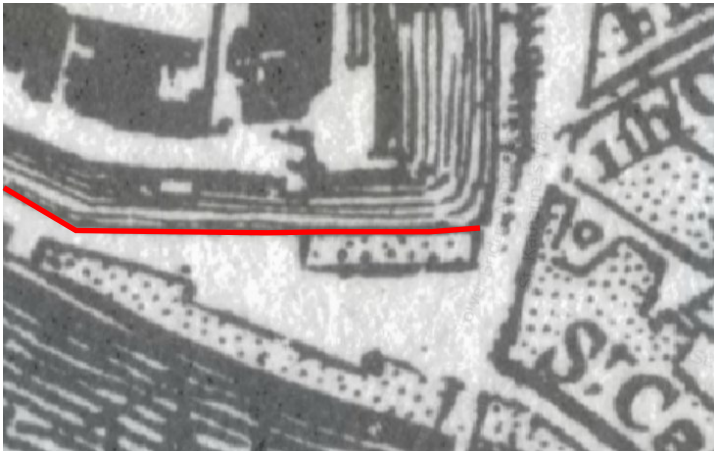
Survey by Ogilby & Morgan (1676)



Survey by William Morgan (1682)



Survey by Blome & Strype (1694 - 1720)



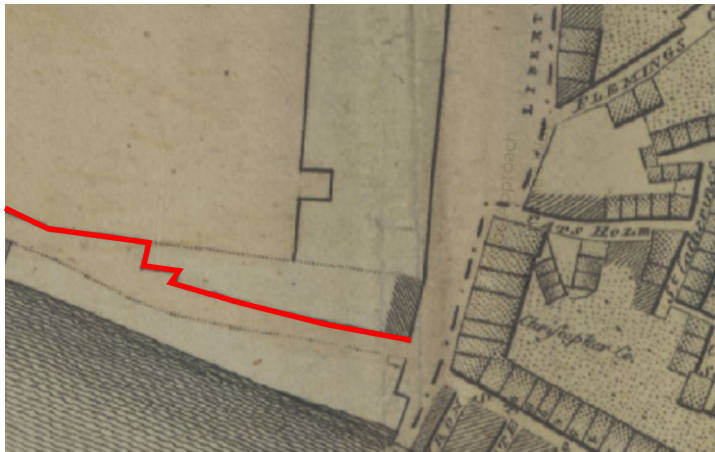
Survey by John Rocque (1746)

2.0 HERITAGE STATEMENT

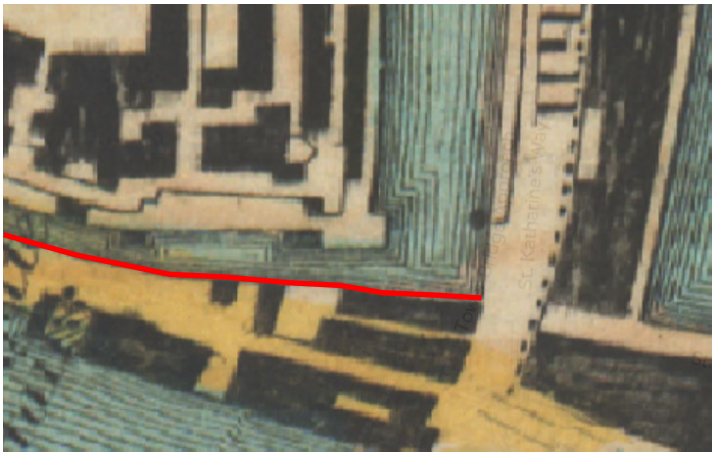
2.7 SOUTH REVETMENT WALL

2.7.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS



Survey by R Horwood (1799)



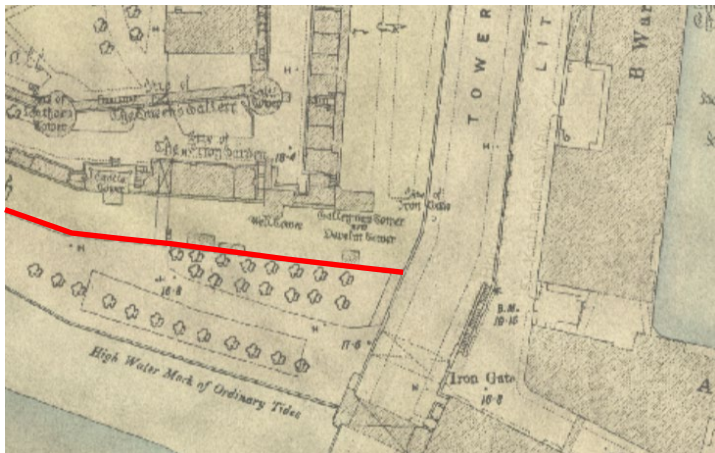
Survey by C & J Greenwood (1828)



OS Map 1893



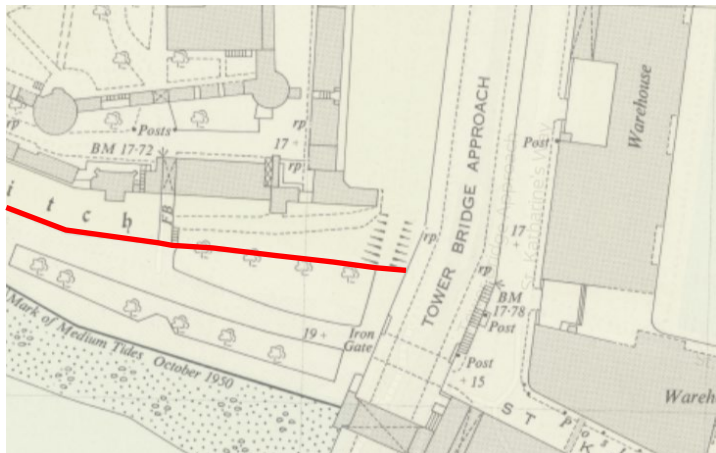
Charles Booth's Poverty Map (1886 - 1903)



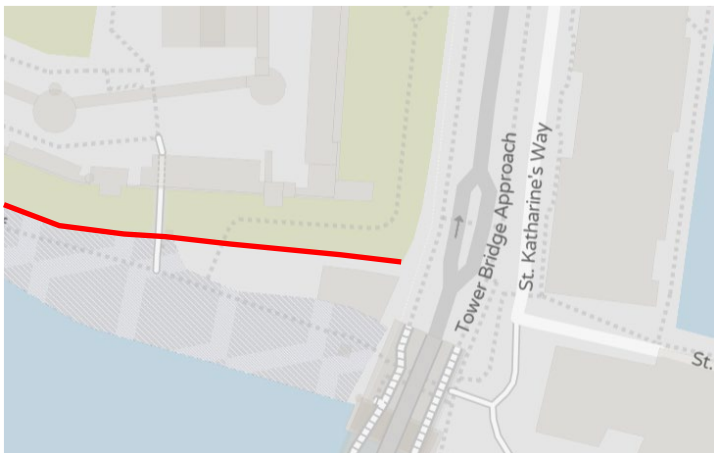
Inland Revenue Valuation Office Survey (1910 - 1915)



Bomb Damage Map (1945)



OS Map (1940s - 1960s)



Contemporary OS Map

2.0

HERITAGE STATEMENT

2.7

SOUTH REVETMENT WALL

2.7.3

ASSESSMENT OF SIGNIFICANCE

The South Moat is part of the moat that surrounds the historic fortress of the Tower of London, and within the Scheduled Monument and UNESCO World Heritage Site.

The Moat is of **Exceptional** significance due to the contribution it makes to the ensemble of buildings and spaces at the Tower of London.

This attribution of significance is owed to a number of characteristics, ranging from historical associations with important people and events at the Tower throughout history and into the present day, and the iconic contribution it makes and has historically made to Tower of London’s setting and landscape.

These elements, combined with several other important heritage values, combine to contribute to the overall **Exceptional/Very High** significance of the Moat.

When assessed against the Heritage Values outlined in English Heritage guidance “Conservation Principles, Policies and Guidance”, the South Revetment Wall is found to be of **Exceptional/Very High** significance with regards to Evidential, Historical, Architectural & Aesthetic, and Communal Values.

The key points of each value are largely similar to those of the South Moat described on p29 of this document. The following additional points are considered more specific to the South Revetment Wall:

EVIDENTIAL VALUE: EXCEPTIONAL

- For its further archaeological potential. The archaeology of the Revetment Wall is complex with several layers of historic development, concealed behind the existing wall. Much may still be learnt about the construction of this area of the site through additional investigation and research – whether that concerns the earlier phases of the area, the buried remains of earlier activities beneath and behind, or new insights into previously assessed features of the Revetment Wall.

HISTORICAL VALUE: EXCEPTIONAL

- As a defining element of the extent and development of the medieval fortress, and of the military, civic and other activities that took place along the Wharf.
- For its military/defensive aspects.
- For the use of this area of the South Moat as allotment gardens for the Tower community in the later 19th and early 20th centuries, and especially for its role as Dig for Victory gardens during the Second World War.

ARCHITECTURAL & AESTHETIC VALUE: EXCEPTIONAL

- As a key aspect and iconic element of the Tower of London’s landscape and setting.

COMMUNAL VALUE: EXCEPTIONAL

- As part of the Moat and the Wharf, the South Revetment Wall carries similar communal value attributions as the Moat (p29).

2.0 HERITAGE STATEMENT

2.7 SOUTH REVETMENT WALL

2.7.3 ASSESSMENT OF SIGNIFICANCE

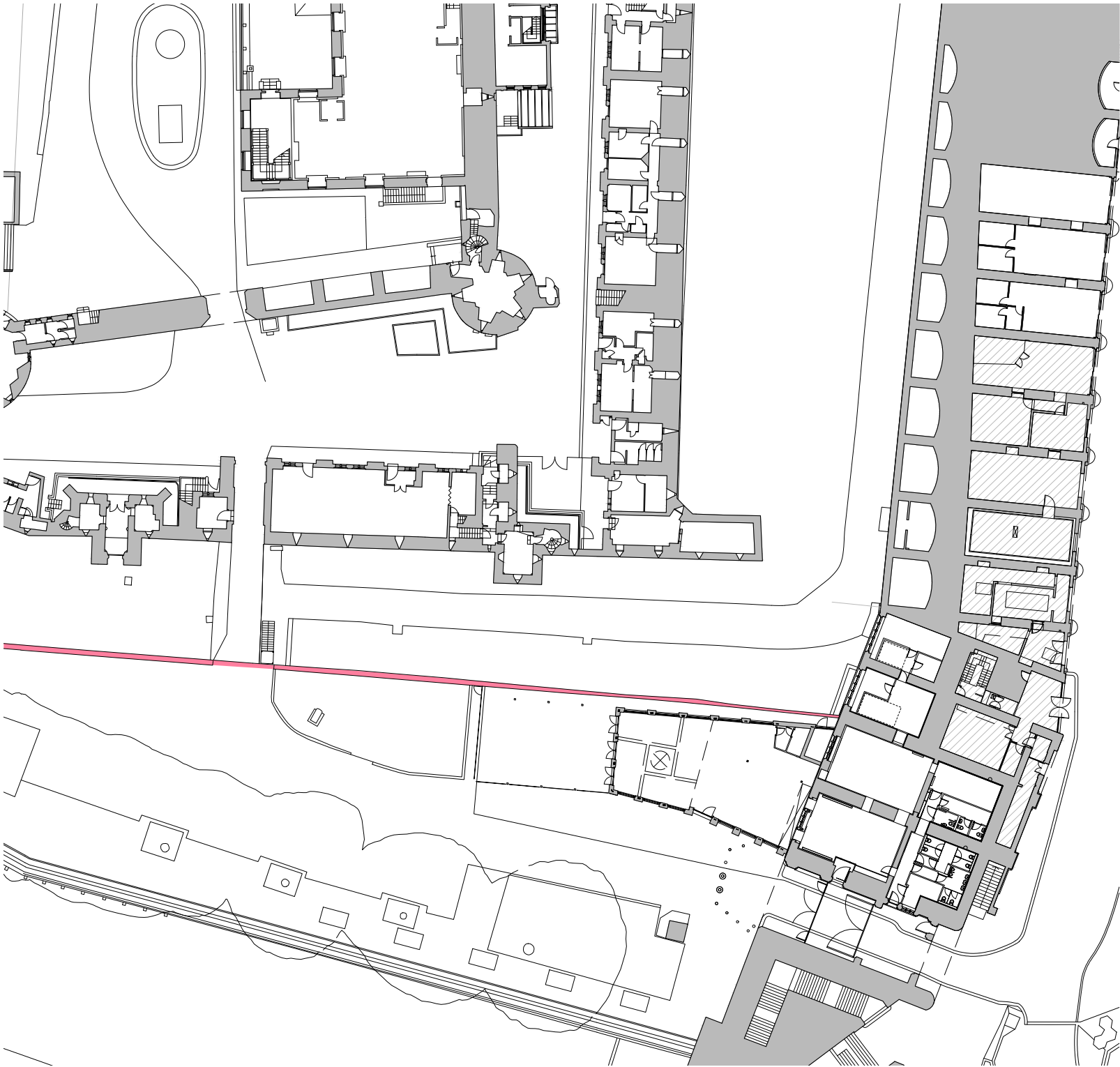
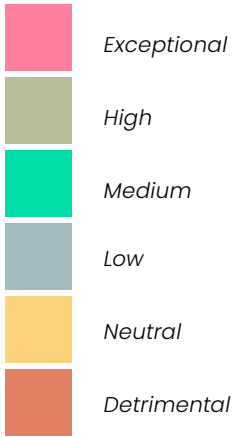
Taken from Tower of London Gazetteer, HM Tower of London, A Conservation Management Plan, Part 2: Gazetteer, Draft v.2, Historic Royal Palaces, 2024

The south moat revetment wall is of **Exceptional** Significance:

- As an integral part of the landscape setting of the monument.
- As an important 14th-century structure despite later repairs and rebuilding.
- For the archaeological potential

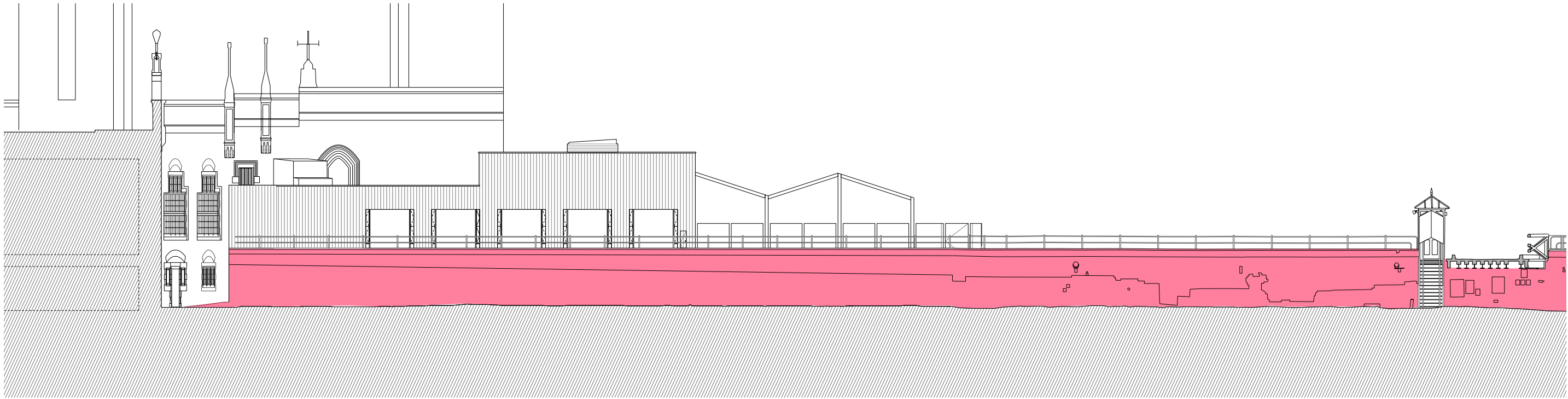
The Moat Heritage Significance Plan

KEY

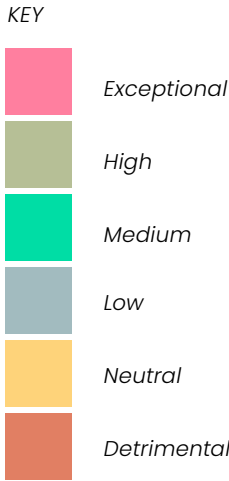


Significance Plan

2.0 HERITAGE STATEMENT
2.7 SOUTH REVETMENT WALL
2.7.3 ASSESSMENT OF SIGNIFICANCE



Heritage Significance Elevation



2.0 HERITAGE STATEMENT

2.8 THE WHARF

2.8.1 DESCRIPTION

The Wharf today forms the river bank setting to the Tower of London.

The Wharf is a Thames-side promenade for visitors, offering a panoramic view of the south bank and the Tower, between the Wharfinger Cottage to the West and Tower Bridge to the East. The largely stone-settled surface reflects its historic role, but its character is softened by London Plane trees along the edge of the moat.

The wharf is an important open space and thoroughfare along the southern edge of the Tower. It links the city to the west and St Katherine Docks to the east, though public access is currently restricted to Tower opening hours and the Wharf is therefore shut during the night. The area to the west of St Thomas's Tower is dominated by a lawn on the north side, and the Queen's Stairs on the south. The latter are blocked by a concrete upstand and wire mesh. A gun park for ceremonial salutes lies immediately to the west of the stairs on the riverside edge. There is a further refreshment kiosk to the west of the gun park. To the East, the Wharf today largely retains a character established in the 1860s, when it was developed as a Victorian promenade with lawns and London Plane trees to provide shade. The Reveller building was created in 2011-12. Mature London Planes around the Reveller and along the riverside dominate the eastern and central sections of the wharf. Four have had to be cut down since 2003 because of the damage they were causing to the wharf and South moat wall. There is also a single black poplar at the south-west corner of the central group of trees. Benches are provided along both sides of the wharf for much of its length

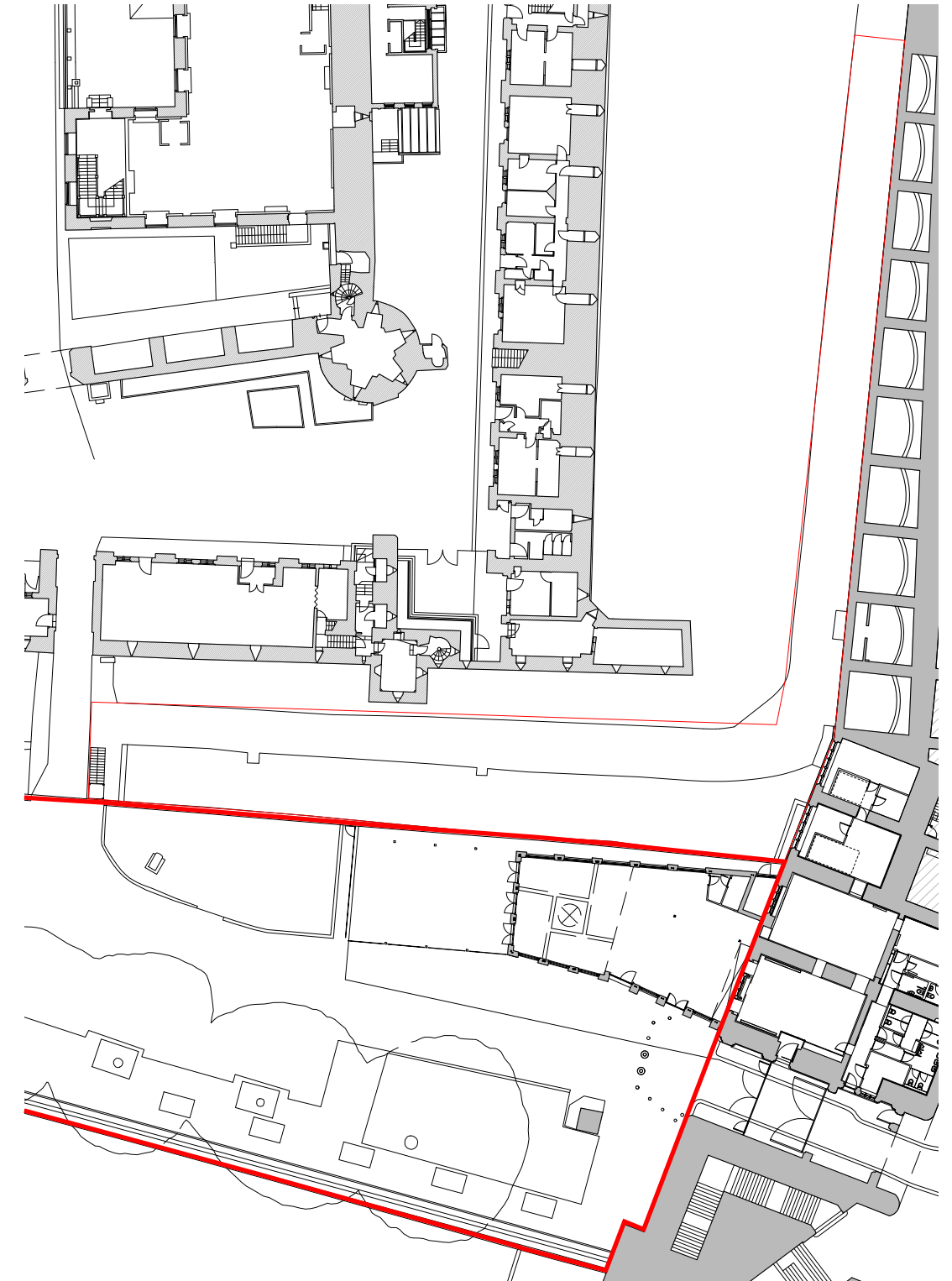
The castle can be entered and exited from the Wharf via the Middle and East Drawbridges (pedestrians and vehicles respectively), while limited parking space is provided at the east end adjacent to the East Gate where there is also a security check point and the restaurant/event space known as The Reveller.



The Wharf looking from Tower Bridge



The Wharf looking from the south bank of the Thames



2.0 HERITAGE STATEMENT

2.8 THE WHARF

2.8.1 DESCRIPTION



KEY



Part of the Wharf



Part of Grade II* Listed Building 'Revetment wall to south side of Moat' (List ID 1065764)



'Tower of London' Scheduled Monument (List ID 1002061)



Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site



Heritage Designation Plan

2.0 HERITAGE STATEMENT

2.8 THE WHARF

2.8.2 HISTORIC DEVELOPMENT

The Wharf is an important open space at the Tower of London, and part of the Scheduled Monument and UNESCO World Heritage Site.

The Wharf was the greatest 14th century creation at the Tower of London. A Kings Quay is mentioned here as early as 1228, but this is distinct from the Wharf as we understand it today. The origins of the existing structure do though date from a period of activity in the 1270s, when a short length of quay was built out from the south-west flank of the Lion Tower, as far east as the Byward Tower. Three years later records show payment was made for an earth and timber wall between the Watergate (St Thomas's Tower) and the postern beneath the King's mint (i.e. the Byward Postern). This can be seen as a precursor to the extension of the Wharf along this route later in the century.

Construction of the wharf expanded rapidly from the 1360s, presumably spurred on by the demands of the French wars. In 1365–6 work began on stonework for the wharf, large quantities of Kentish ashlar, ragstone, chalk and lime being bought for the purpose. In 1369 a large number of elms were purchased for piles, and payments were made to ditchers for 'making a certain ditch for the wharf'. This may be a reference to digging away the former foreshore at the base of the outer curtain to make a more effective moat between it and the wharf. The contract made with three masons in June 1389 to build 'a wharf with two side walls' in stone extending 'from the corner of the east end of the wall of the Tower facing St Katharine's as far as the watergate of the said Tower' marks the final phase of its construction. Interestingly this was led by the poet Geoffrey Chaucer, in his role as the Clerk of the Kings' Works, as evidenced by a contract he issued in 1389 to build 'a wharf with two side walls' in stone in this area.

By 1400 the clutter of buildings which was to survive in one form or another until the 19th century (and whose scale, form and materiality inspired the Fretton designed Reveller building) was already being established. From the mid 15th century the wharf was used for ordnance storehouses and gun foundries, and maps and plans show a cluster of buildings at the east end of the wharf from the late 16th century onwards.

In the 17th century an ordnance proof house and charging house were built, and by the beginning of the 19th century a small arms manufactory was constructed to meet the demands posed by the Napoleonic Wars.

The manufactory was eventually demolished in the 1860s, and the wharf was developed as a Victorian promenade with lawns and London Plane trees to provide shade. In the 1890s a drill battery of heavy guns were installed. Today, guns remain on the Wharf and are part of the Royal Armouries collection.

The wharf underwent substantial renovation in 2000 as part of the Tower Environs Scheme, with the riverside flood wall being reduced in height and improved in quality.

The area now occupied by the Reveller building was largely open ground following the demolition of the manufactory and until the mid 20th century when a café was installed in the mid 1970s, and it was this that was cleared to enable the construction of the Reveller building in 2011–12.

The Reveller building on the Wharf projects west from the Northern Tower Approach. The structure was built following extensive archaeological excavations during which a number of brick and masonry features were revealed which by comparison with cartographic evidence can be confidently identified as part of the late 17th-century reorganisation of the defences and construction of the Proof House. Various phases of brick building in this area of the Wharf are probably associated with a small arms factory erected in 1803 during the Napoleonic Wars. These deposits are, in some areas, less than 100mm below the floor surface and this area is one of the most archaeologically sensitive within the site.



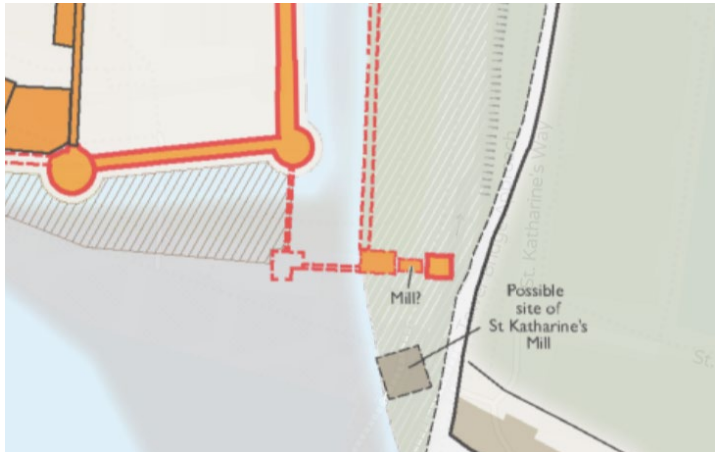
View of the Tower from the east in 1804 by T and W Daniell. In the foreground are the buildings of the Small Arms Manufactory, built in 1803 to cope with the demands of the Napoleonic Wars. (The Guildhall Library, the Corporation of London). It was these former buildings on the 19th century Wharf that Tony Fretton chose as the loose architectural precedent for the form and outline of the Reveller building in 2011–2012, which he described as "like little sketches of buildings". (Dezeen 21 October 2012)

2.0 HERITAGE STATEMENT

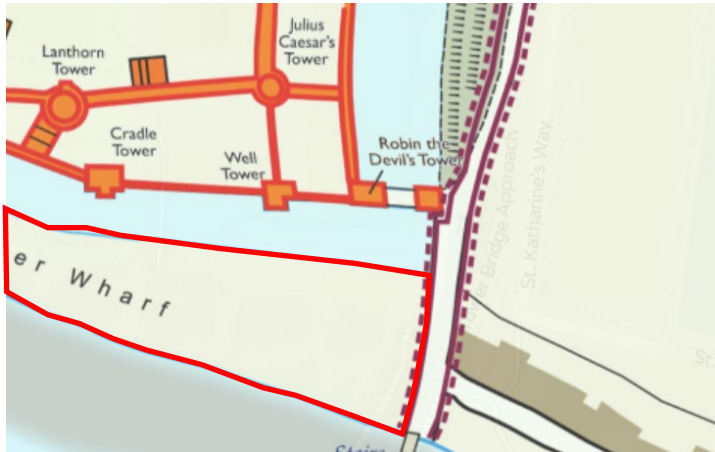
2.8 THE WHARF

2.8.2 HISTORIC DEVELOPMENT

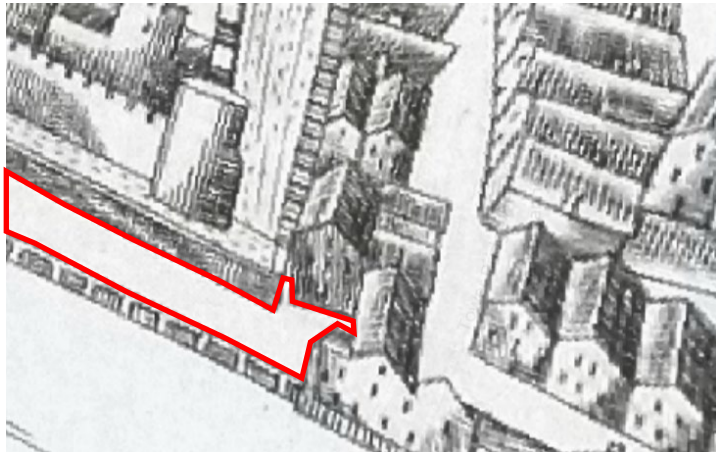
HISTORIC DEVELOPMENT DRAWINGS



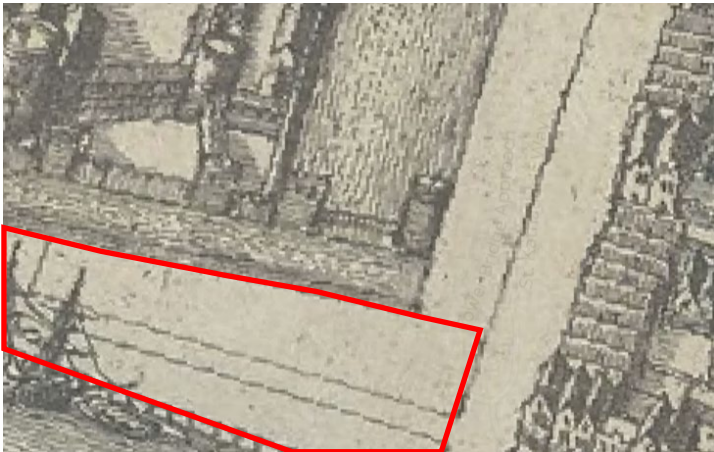
Medieval London (1270 - 1300)



Early Tudor London (1520)



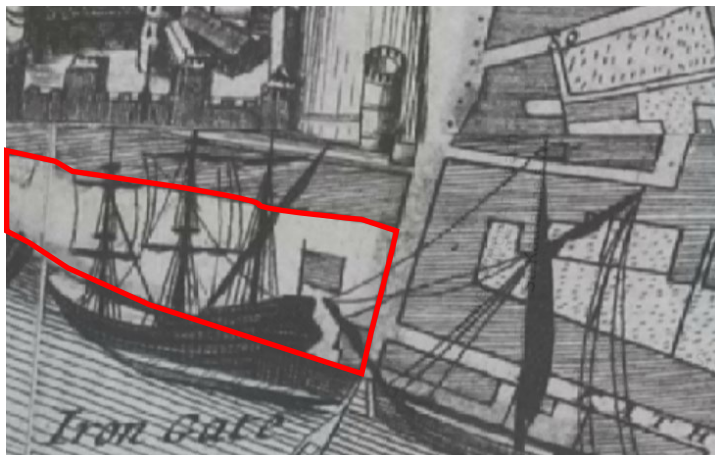
Survey by Faithorne & Newcourt (1658 - 1669)



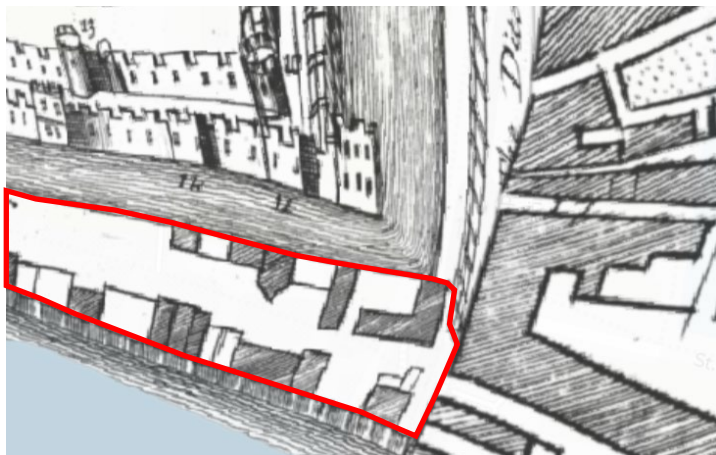
Survey by Leake (1669)



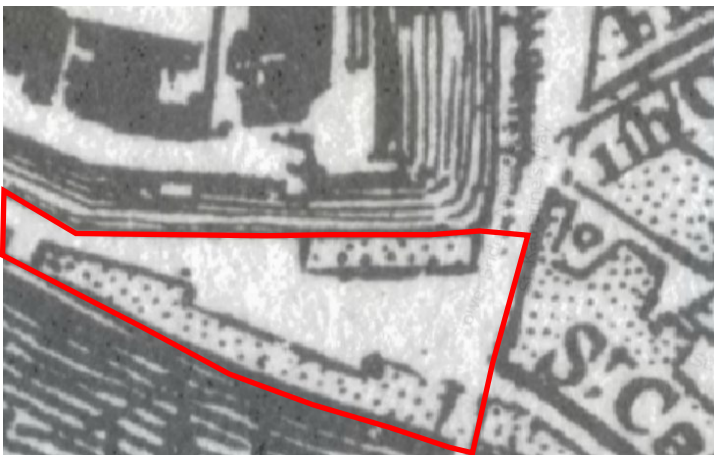
Survey by Ogilby & Morgan (1676)



Survey by William Morgan (1682)



Survey by Blome & Strype (1694 - 1720)



Survey by John Rocque (1746)

2.0 HERITAGE STATEMENT

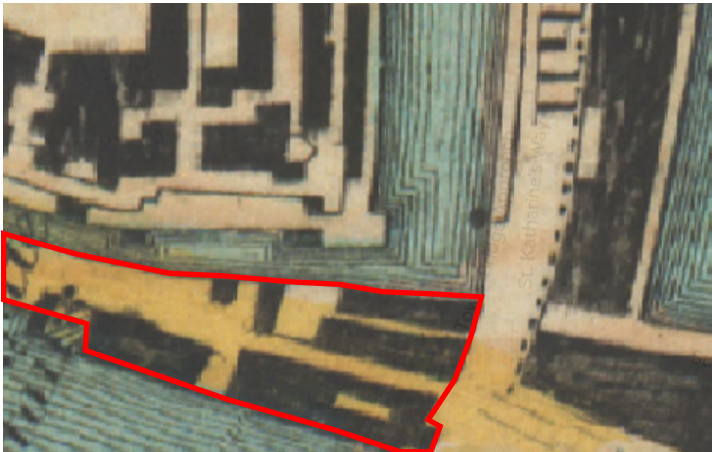
2.8 THE WHARF

2.8.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS



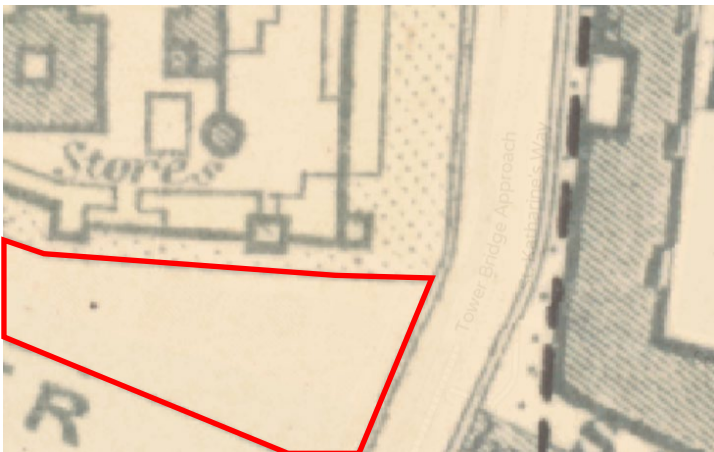
Survey by R Horwood (1799)



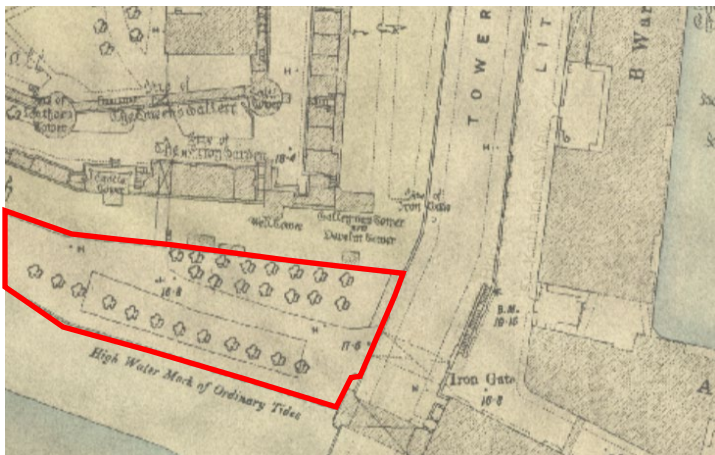
Survey by C & J Greenwood (1828)



OS Map 1893



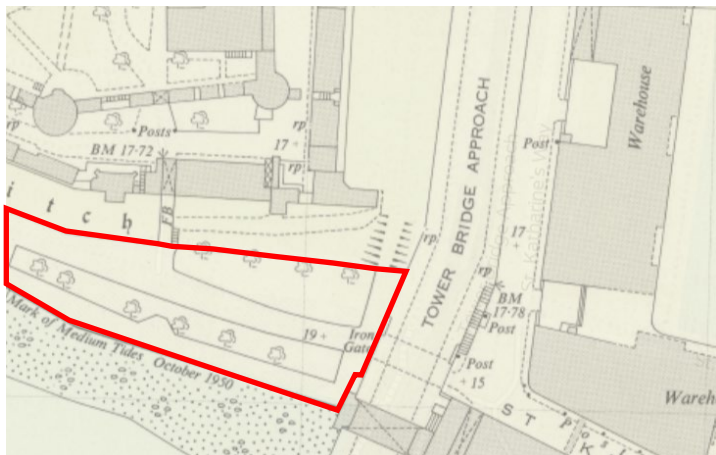
Charles Booth's Poverty Map (1886 - 1903)



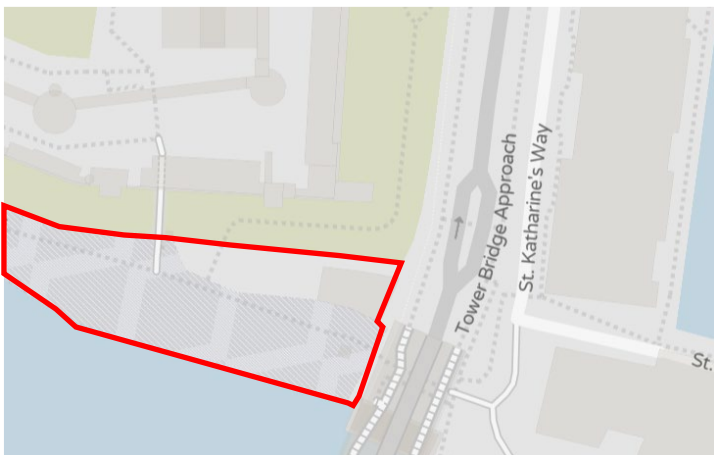
Inland Revenue Valuation Office Survey (1910 - 1915)



Bomb Damage Map (1945)



OS Map (1940s - 1960s)



Contemporary OS Map

2.0 HERITAGE STATEMENT

2.8 THE WHARF

2.8.2 HISTORIC DEVELOPMENT

Taken from Tower of London Gazetteer, HM Tower of London, A Conservation Management Plan, Part 2: Gazetteer, Draft v.2, Historic Royal Palaces, 2024

Archaeological Potential

The archaeological potential of the Wharf & Moat is high which is reflected in its status as a UNESCO World Heritage Site, Scheduled Ancient Monument and a Tier 1 Archaeological priority Area (APA). Previous investigations have identified the following

Roman: The Wharf, as a structure principally dated to the thirteenth and fourteenth centuries, has a negligible potential to encounter in-situ deposits related to the Roman period. However, backfill material may be present across the area as a result of other works and there is a high probability that Roman artefacts have been redeposited on the Tower foreshore. As a result, there is a limited potential to encounter redeposited material across the structure, though any analytical value of such finds may be somewhat reduced as there is no probable chance of encountering in-situ deposits.

Medieval:

The thirteenth and fourteenth century structure, principally formed of a raft foundation driven through with beech piles surmounted by a rubble core, remains present throughout the structure at lower levels. Surmounting this, at the western end, remnants of the Lion Tower, Lion Gate, and Bulwark, defensive structures dating from the reign of Edward I but heavily altered, may be encountered.

The 15th century construction of the Bulwark and the subsequent development of the Petty Wales, located at the extreme western extent of the wharf, is also of extreme importance to the area and excavations have demonstrated extremely well preserved sections of these building remain in-situ in the area of the approach from the west.

Across the wharf, remnants of cranes and other pre-industrial deposits have been encountered at relatively low levels. Such cranes are principally documented from the sixteenth century though it is likely that they are replacements of prior structures and are in turn replaced in later periods.

At the eastern extent of the Wharf the remnants of a defensive wall likely dating from the fifteenth century and elements related to the construction of numerous buildings in the sixteenth century have been encountered, though these were heavily altered and replaced numerous times in the post medieval period.

Elements of the northern and southern elevation walls have been shown to contain limited medieval features. As a result of these factors, the Wharf is considered to have a high potential to encounter medieval deposits throughout the structure, with the eastern and western extremities being particularly sensitive.

Post-medieval:

The post medieval development of the Wharf is principally connected to the expansion of the operations of the Office/Board of Ordnance from the sixteenth century onwards.

At the western extent various residential buildings are constructed by the middle of the seventeenth century. In the same period, a number of buildings are constructed on the northern side of the structure located between the Byward Tower and St Thomas’s Tower in an area now known as the ‘Orchard’. These buildings were removed during the nineteenth century, though remnants of them have been encountered.

At the eastern extent of the structure, it appears that many of the buildings constructed in the sixteenth century were swept away and replaced by the end of the seventeenth century, with the principal phases of development in this area being related to the eighteenth and nineteenth century construction of various warehouses and the ‘proof house’. It is to this period that the majority of deposits thus far encountered in this area belong. The majority of these structures were in turn removed and replaced with new warehouses in the latter nineteenth century before being swept away entirely.

The northern and southern elevations have been shown to contain numerous phases of post-medieval development from the sixteenth to the nineteenth centuries. These elevations are complex constructions and should be considered to be extremely sensitive.

The surfaces of the wharf were principally set in the nineteenth century, though excavations have encountered some limited evidence of prior surfaces formed predominantly of cobbles. Prior surfaces should be fully recorded regardless of date in order to inform subsequent resurfacing.

Due to the presence of these features, which have been displayed in numerous excavations, the Wharf should be considered to have an exceptionally high potential to encounter deposits related to the post-medieval development of the structure, with this sensitivity being particularly evident at the extremities of the structure to the northern stretch between the Byward and St Thomas’s towers, the northern and southern retaining walls and at the eastern and western extremities.

2.0 HERITAGE STATEMENT

2.8 THE WHARF

2.8.3 ASSESSMENT OF SIGNIFICANCE

The Wharf is part of the landscape that surrounds the historic fortress of the Tower of London, and within the Scheduled Monument and UNESCO World Heritage Site.

The Wharf is of **Exceptional** significance due to the contribution it makes to the ensemble of buildings and spaces at the Tower of London.

This attribution of significance is owed to a number of characteristics, ranging from its rich archaeological potential through to the iconic contribution it makes and has historically made to Tower of London’s setting and landscape.

These elements, combined with several other important heritage values, combine to contribute to the overall **Exceptional/Very High** significance of the Wharf.

When assessed against the Heritage Values outlined in English Heritage guidance “Conservation Principles, Policies and Guidance”, the Wharf is found to be of **Exceptional/Very High** significance with regards to Evidential, Historical, Architectural & Aesthetic, and Communal Values.

The key points of each value are largely similar to those of the South Moat described on p29 of this document. The following additional points are considered more specific to the Wharf:

EVIDENTIAL VALUE: EXCEPTIONAL

The archaeological potential of the Wharf & Moat is Very High which is reflected in its status as a UNESCO World Heritage Site, Scheduled Ancient Monument and a Tier 1 Archaeological priority Area (APA). Previous investigations have identified the following:

Medieval:

The thirteenth and fourteenth century structure, principally formed of a raft foundation driven through with beech piles surmounted by a rubble core, remains present throughout the structure at lower levels.

The 15th century construction of the Bulwark and the subsequent development of the Petty Wales, located at the extreme western extent of the wharf, is also of extreme importance to the area and excavations have demonstrated extremely well preserved sections of these building remain in-situ in the area of the approach from the west.

Across the wharf, remnants of cranes and other pre-industrial deposits have been encountered at relatively low levels. Such cranes are principally documented from the sixteenth century though it is likely that they are replacements of prior structures and are in turn replaced in later periods.

At the eastern extent of the Wharf the remnants of a defensive wall likely dating from the fifteenth century and elements related to the construction of numerous buildings in the sixteenth century have been encountered, though these were heavily altered and replaced numerous times in the post medieval period. Elements of the northern and southern elevation walls have been shown to contain limited medieval features.

As a result of these factors, the Wharf is considered to have a Very High potential to encounter medieval deposits throughout the structure, with the eastern and western extremities being particularly sensitive.

Post-medieval:

The post medieval development of the Wharf is principally connected to the expansion of the operations of the Office/Board of Ordnance from the sixteenth century onwards.

At the eastern extent of the structure, it appears that many of the buildings constructed in the sixteenth century were swept away and replaced by the end of the seventeenth century, with the principal phases of development in this area being related to the eighteenth and nineteenth century construction of various warehouses and the ‘proof house’. It is to this period that the majority of deposits thus far encountered in this area belong. The majority of these structures were in turn removed and replaced with new warehouses in the latter nineteenth century before being swept away entirely.

The northern and southern elevations have been shown to contain numerous phases of post-medieval development from the sixteenth to the nineteenth centuries. These elevations are complex constructions and should be considered to be extremely sensitive.

The surfaces of the wharf were principally set in the nineteenth century, though excavations have encountered some limited evidence of prior surfaces formed predominantly of cobbles. Prior surfaces should be fully recorded regardless of date in order to inform subsequent resurfacing.

Due to the presence of these features, which have been displayed in numerous excavations, the Wharf should be considered to have an exceptionally high potential to encounter deposits related to the post-medieval development of the structure, with this sensitivity being particularly evident at the extremities of the structure to the northern stretch between the Byward and St Thomas’s towers, the northern and southern retaining walls and at the eastern and western extremities.

HISTORICAL VALUE: EXCEPTIONAL

- As a defining element of the extent and development of the medieval fortress, and of the military, civic and other activities that took place along the Wharf.
- As an integral part of the Tower’s landscape setting.
- As the late medieval reclamation of the Thames waterfront to create the Tower’s own private dockside.
- As the former site of many medieval and later buildings (guardhouses, Ordnance workshops and stores etc).

ARCHITECTURAL & AESTHETIC VALUE: EXCEPTIONAL

- As a key aspect and iconic element of the Tower of London’s landscape and setting, including as a key feature within GLA London Views Management Framework.

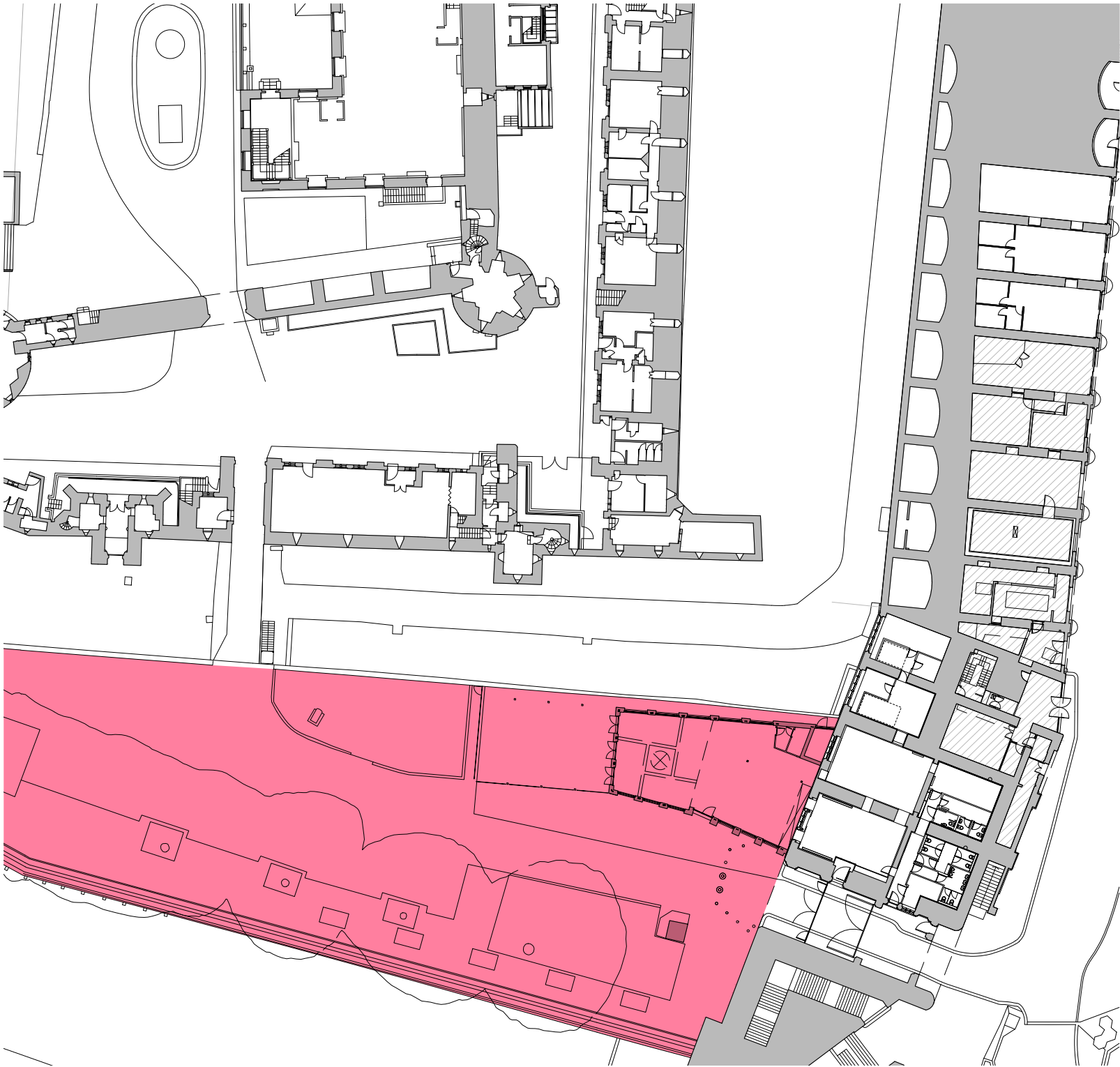
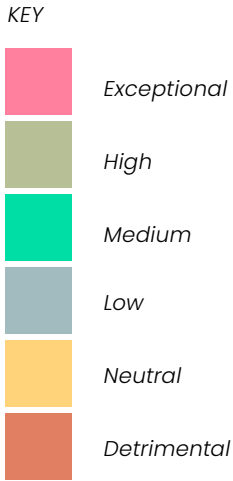
COMMUNAL VALUE: EXCEPTIONAL

- As part of the Moat and the Wharf, the South Revetment Wall carries similar communal value attributions as the Moat (p23).
- As the public access route around the south side of the Tower (as part of the Thames Riverside Path) and into it.

2.0 HERITAGE STATEMENT

2.8 THE WHARF

2.8.3 ASSESSMENT OF SIGNIFICANCE



Significance Plan

3.0 SCHEME PROPOSALS



3.0 SCHEME PROPOSALS

3.1 OUTLINE PROJECT BRIEF

During the course of design development, historic precedents of military sentry boxes and warder shelters were studied, and their formal and material qualities considered, particularly those which stood on the Wharf.

It was determined through pre-application conversations with Historic England that the new sentry box should relate to these historic examples, whilst being evidently of its time, and a piece of high-quality design in its own right.

It was therefore decided that the new sentry box should have a pitched roof, and a timber-clad exterior.

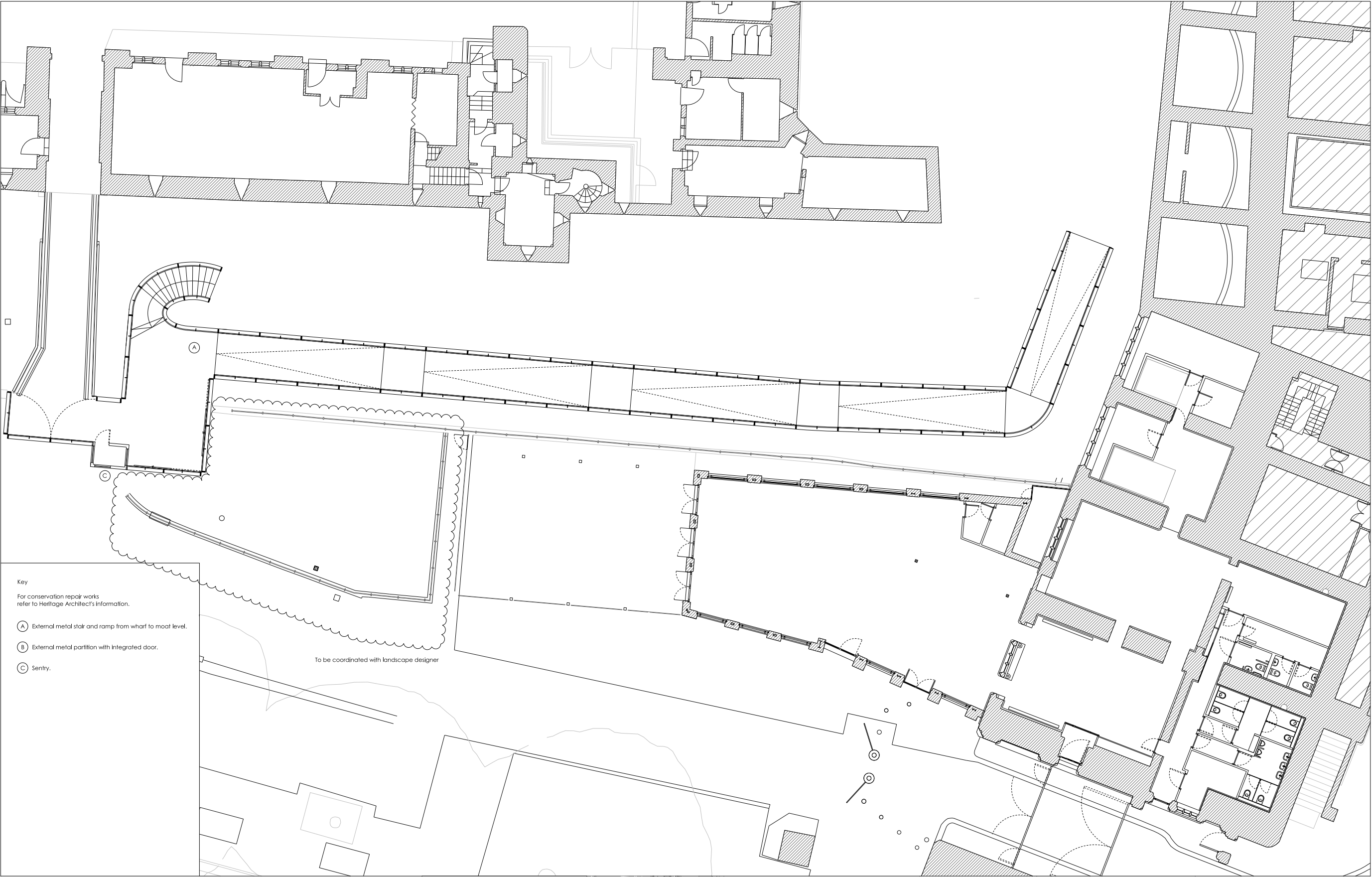


Sample images taken from an outline taxonomy of sentry boxes by Jamie Fobert Architects

3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX - PLAN



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

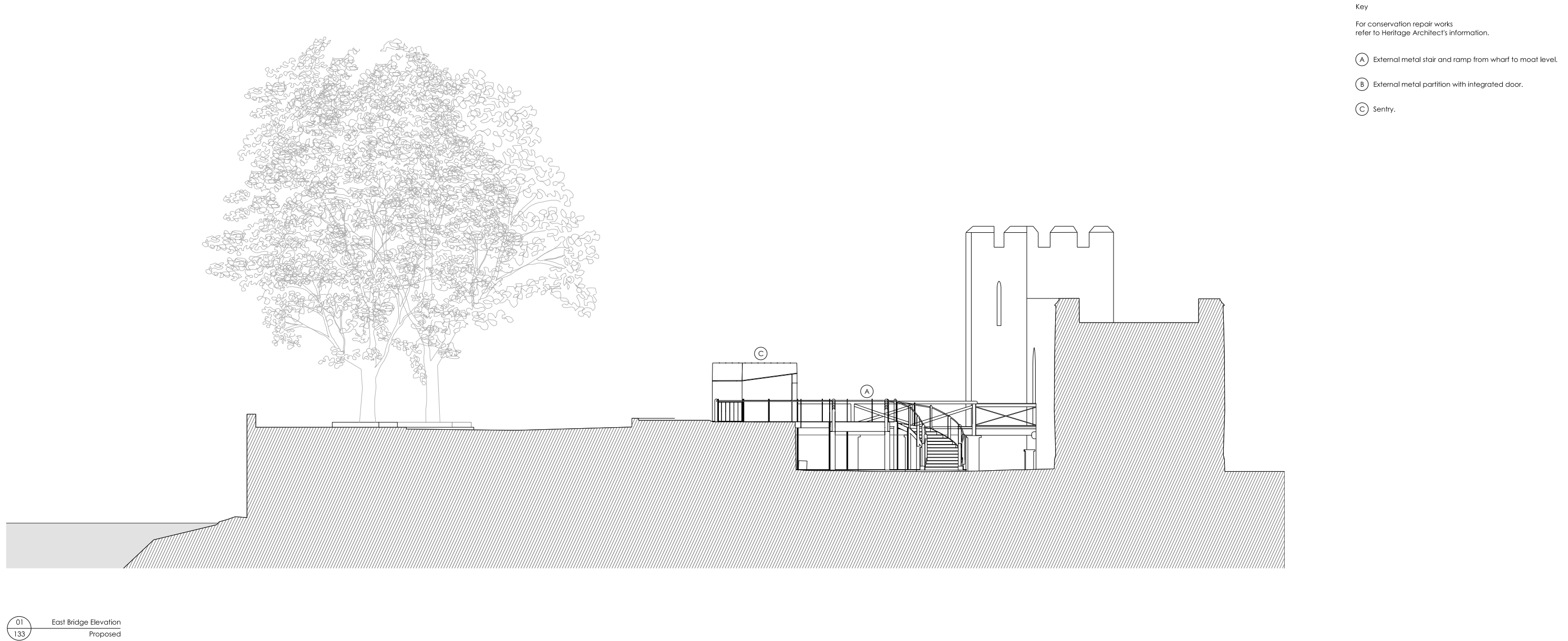
3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX – ELEVATION



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX – ELEVATION



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX - VISUAL



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX - VISUAL



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX – VISUAL

This aspect of the proposal seeks to construct a new permanent metal structure that enables visitors to access the moat directly from the wharf. It is proposed that the ramp is constructed from prefabricated steel box frame sections, bolted together on site with a balustrading comprised of threaded rods and a mesh infill that reflects those wrought iron railings typically found throughout The Tower of London.

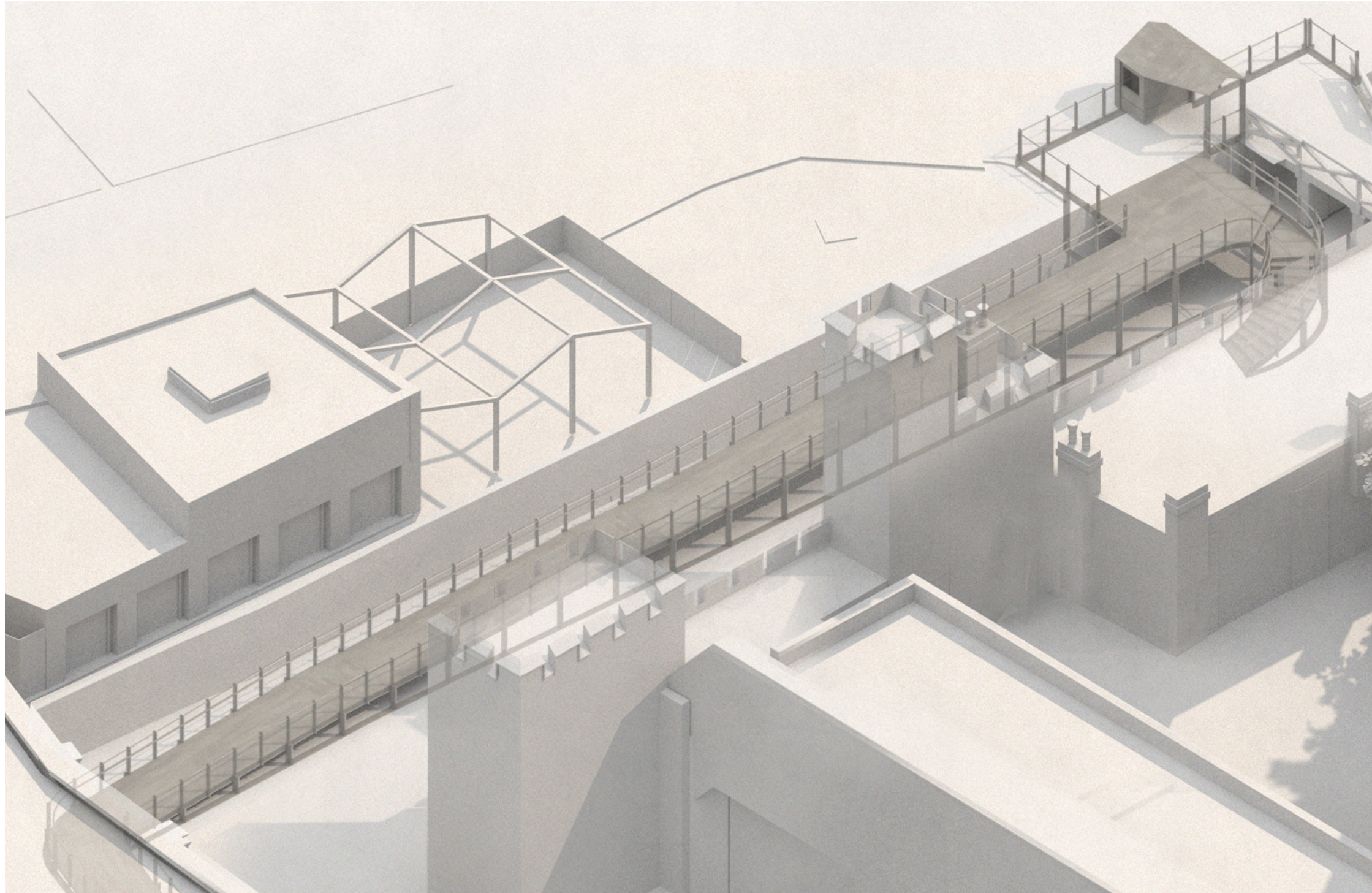
The gently sloped surface provides an incline at less than 1:20 and includes a 2.5m wide platform with balustrading either side. In order to minimise the impact on views of the Tower, the ramp is located towards and standing off the southern revetment wall of the moat. A gently elliptical stair provides an alternative means of access from the wharf with a defined entrance/exit that is clearly distinct from the adjacent Middle Drawbridge route.



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.1 PROPOSED RAMP, STAIR & SENTRY BOX – VISUAL



3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.2 PROPOSED LANDSCAPE DESIGN

The narrative established across the wider moat, centred on a naturalistic, wild approach, defined by untamed planting, rich biodiversity and a rugged organic character, will be continued into the South-East Moat and South-East Wharf planting areas. This approach reinforces the theme of nature reclaiming space while echoing the moat’s historic role as a defensive barrier.

The adjacent diagram illustrates how the two key habitat typologies, characterised as:

The Tower Meadow and the Tower Provides connect to the wider moat by wrapping around the corner creating a seamless transition.

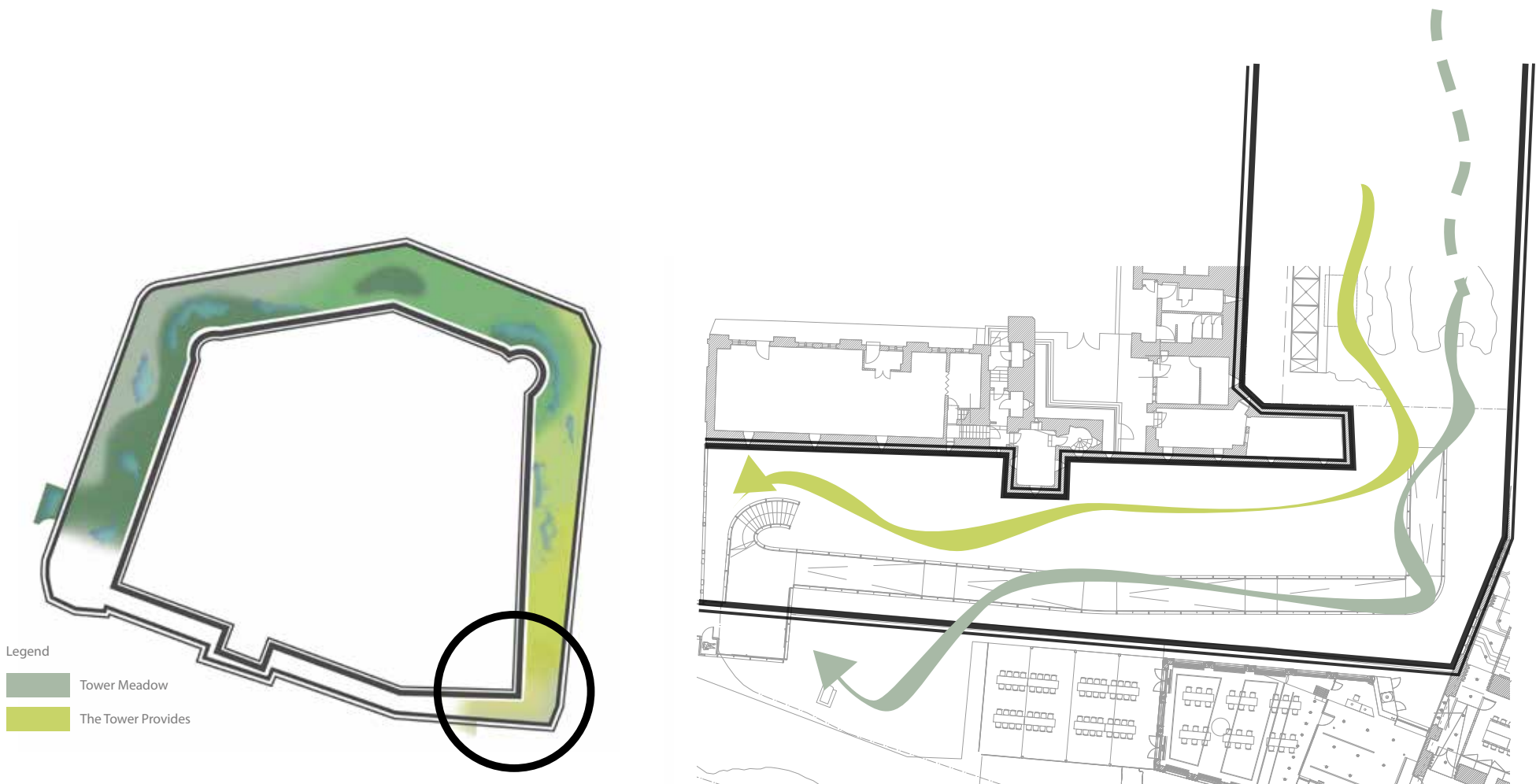
The proposed species palette will predominantly consist of low-growing, non-shrubby vegetation that flow continuously from one character area to another, to achieve a soft feathered transition and promoting a sense of ecological continuity and natural progression.

Tower Meadow

- This is habitat that is redolent of old hay meadows, with abundant flowers and forage grasses in season.
- In this part of the moat due to the shade condition, however, there will be a local variant with characteristics of woodland fringe and glade.

The Tower provides

- Is largely non-native planting based on the concept of a productive landscape, showcasing edible or otherwise useful plants that featured in the history of the Tower, or which were found in London’s Roman deposits, combined with areas where food can be grown to showcase current and possible future urban food crops as well as space dedicated to community growing. It should be noted that it was the South moat where food growing was focussed in the Dig for Victory movement of the world wars.



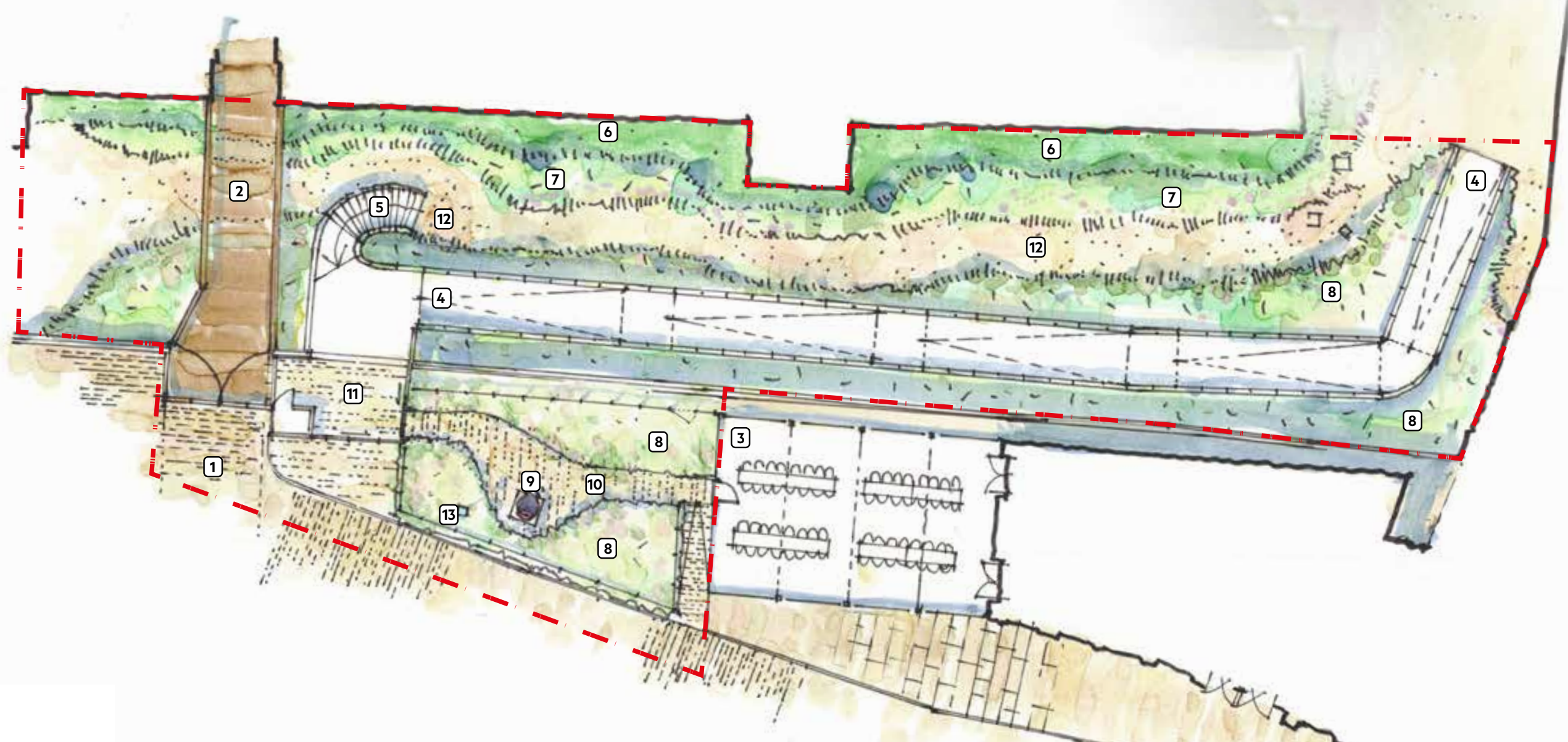
3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

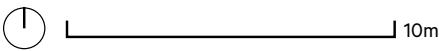
3.2.2 PROPOSED LANDSCAPE DESIGN

Illustrative Plan

- 1. The Wharf
- 2. East Drawbridge
- 3. Education & Community facilities within The Reveller building.
- 4. Ramp Entry/Exit into the South Moat.
- 5. Stair Entry/Exit into the South Moat.
- 6. Maintenance zone around perimeter of inner walls on all sides of moat.
- 7. Created Moat Habitat: The Tower Provides.
- 8. Created Moat Habitat: Tower Meadow.
- 9. Relocated existing Mortar.
- 10. Access route from Reveller to South Moat Ramp/Stair Entry/Exit.
- 11. Access route from Tower Wharf to South-East Moat Ramp/Stair Entry/Exit.
- 12. Hard landscape finish in a buff colour to complement Tower walls.
- 13. Existing lamp column to be retained.



Above: Illustrative Plan



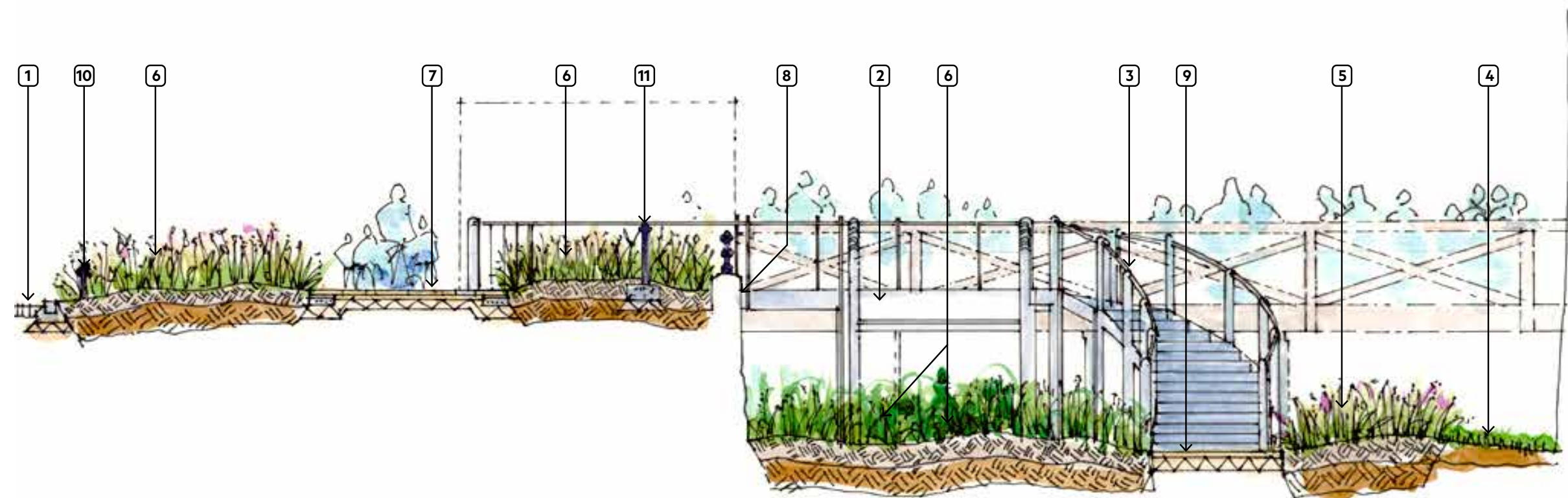
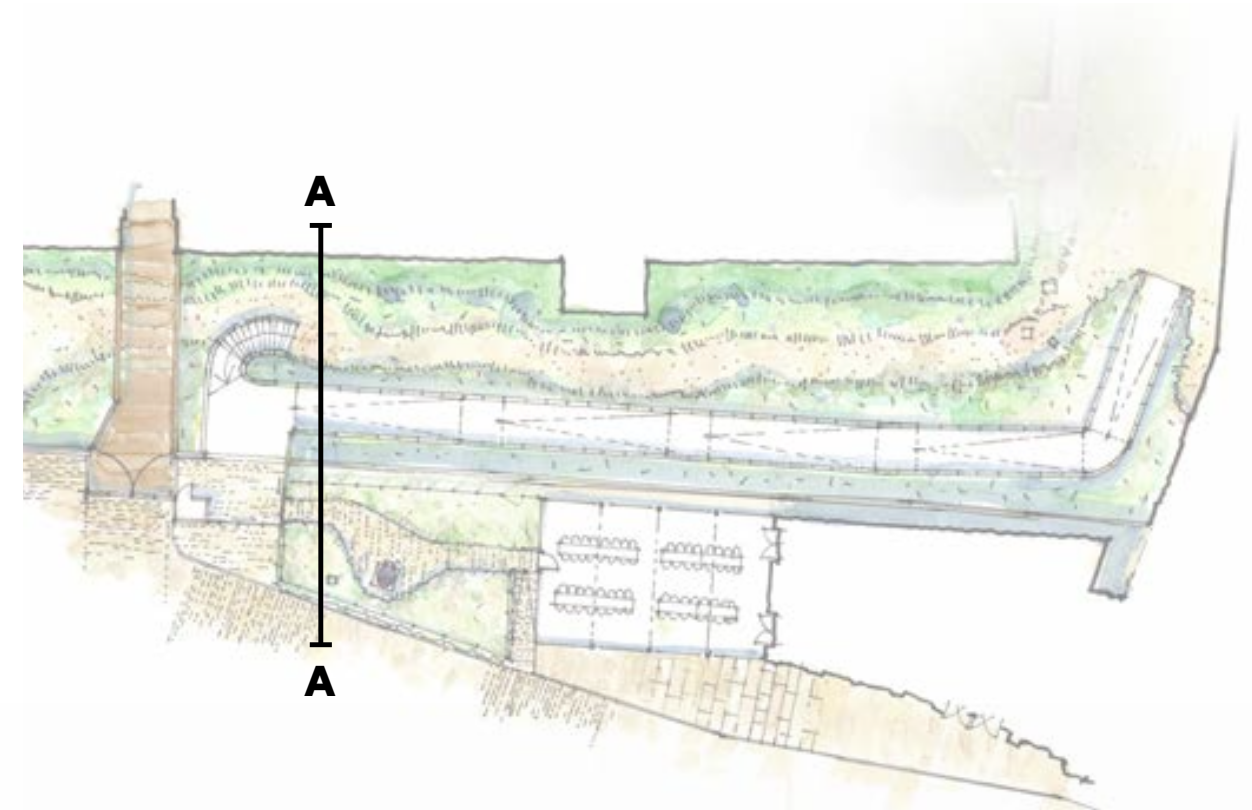
3.0 SCHEME PROPOSALS

3.2 SCHEME DESIGN

3.2.2 PROPOSED LANDSCAPE DESIGN

Illustrative Section

1. The Wharf.
2. Ramp Entry/Exit into the South-East Moat.
3. Stair Entry/Exit into the South-East Moat.
4. Maintenance zone around perimeter of inner walls on all sides of moat.
5. Created Moat Habitat: The Tower Provides.
6. Created Moat/Wharf Habitat: Tower Meadow.
7. Access route from The Reveller to the South-East Moat Ramp/Stair Entry/Exit.
8. Existing revetment wall and handrail.
9. Hard landscape finish in a buff colour to complement Tower walls.
10. Knee Rail: Cast black metal knee rail to be retained, extended around planting perimeter.
11. Hand Rail: Black metal uprights to match existing wharf profile, with horizontal square section bar and stainless steel webnet mesh.



Above: Transverse Section AA through the South Moat

4.0 HERITAGE IMPACT ASSESSMENT



4.0HERITAGE IMPACT ASSESSMENT

4.1METHODOLOGY FOR ASSESSMENT

Understanding the impact of change to historic fabric

Our assessment of impact measures the identified levels of significance against the degree of change proposed is summarised on the table shown here, and following the guidance set out in the National Planning Policy Framework document: Chapter 16. Conserving and Enhancing the Historic Environment.

Throughout our assessment of impact in line with National Planning Policy, we have also been cognisant of UNESCO’s position on harm to OUV in line with UNESCO 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context where each element of impact must be separately considered. This process is summarised within the following pages, and the table in section 4.3 of this document.

Understanding impact on setting of listed buildings and Scheduled Monument

This outline Heritage Impact Assessment also uses Historic England Historic Environment Good Practice guidance on ‘The Setting of Heritage Assets’ to consider the impact of the proposed interventions on the listed buildings, Scheduled Monument and wider World Heritage Site.

Notes

Less than Substantial Harm Does Not Necessarily Equate to Acceptable Harm

Substantial Harm represents a considerable loss of significance. However, significance can be gradually lost and eroded over time through the carrying out of change which equates to less than substantial harm. Therefore the long term effects of change – even that resulting in less than substantial harm – should be carefully considered.

Potential Level of Harm	Magnitude of Impact	Definition
Proposals with the majority of changes in these categories will generally be considered of less than substantial harm	High Beneficial	The alterations considerably enhance the heritage asset or the ability to appreciate its significance.
	Medium Beneficial	The alterations enhance to a clearly discernible extent the heritage asset or the ability to appreciate its significance.
	Low Beneficial	The alterations enhance to a minor extent the heritage asset or the ability to appreciate its significance.
	Neutral	The alterations do not affect the heritage asset or the ability to appreciate its significance.
	Low Adverse	The alterations harm to a minor extent the heritage asset or the ability to appreciate its significance.
Proposals with one or more changes resulting in high adverse impact may be considered to be of substantial harm	Medium Adverse	The alterations harm to a clearly discernible extent the heritage asset or the ability to appreciate its significance.
	High Adverse	The alterations severely harm the heritage asset or the ability to appreciate its significance.

Potential Level of Harm and Magnitude of Impact

4.2 HERITAGE IMPACT ASSESSMENT

4.2.1 SOUTH MOAT

Heritage Significance of Existing Condition:

Exceptional

Proposed Alterations to the South Moat:

The proposed alterations to the South Moat within the scheme for which Planning and Scheduled Monument Clearance is sought comprise:

- Proposed new ramp and stair structure
- Relandscaping to create a new visitor garden as part of the wider Moat landscape.

Heritage Impact Assessment on OUV and contribution to the WHS:

As well as being of Exceptional significance as assessed within preceding sections of this document, the South Moat contributes greatly to the setting of the Tower of London and the wider UNESCO World Heritage Site.

The South Moat can be understood to make some contribution to attributes and values of the Outstanding Universal Values of the World Heritage Site, particularly in terms of:

- Contribution to the Tower of London as an internationally famous monument and as the distinctive concentric defences around the White Tower (OUV Attribute 1, and key component 3)
- As a symbol of Norman Power (OUV Attribute 3, and key component 2) (Although the Moat is not in itself a Norman feature)
- As part of the Concentric Defences at the Tower of London (OUV Attribute 5, and key components 1,2 & 3)
- Buried archaeological remains of components superseded or altered (OUV Attribute 5, and key component 3)

The scheme proposals to add the new ramp and stair structure within the South Moat have been detailed carefully and in consideration of the OUV of the WHS. Design solutions minimise physical impact of the new ramp and stair on any historic fabric within the South Moat, and thus on the relevant WHS attributes and key components as defined above. The construction detail of the ramp has been designed with localised screw piles into the ground surface of the South Moat to minimise impact on buried archaeological remains beneath the South Moat.

These moves in the design solution successfully mitigate physical impact on the attributes which contribute to the OUV of the WHS, as identified above.

Whilst the physical impact is minimised, clearly the ramp and stair are a large new structure within the South Moat and therefore do have significant visual impact. This visual impact is though limited to the local area within the South Moat, and as proposed views included within this Heritage Impact Assessment demonstrate, the new ramp and stair are not visible from the Wharf nor from the publicly accessible areas of the wall walks around the Tower of London. The visual impact is therefore not considered harmful to any of the OUV of the WHS, or its key attributes and components.

It is considered that the visual impact of the proposed ramp and stair, though considerable in that particular area of the South Moat, is so localised that the proposal will not change the overall architectural language and character of the concentric defences at the Tower of London or the attributes that contribute to the wider WHS and its OUV.

Overall, the scheme proposals are considered to have a positive impact on the South Moat through:

- i. enhancing visitor experience for the visiting public at this important entry point into the Tower’s Moat, achieving for the first time a fully inclusive and accessible connection between the Tower and its Moat for a broad range of audiences, enabling new stories to be told about the history of the Moat at the Tower of London.
- ii. providing an improved landscape setting in the South Moat.

With these benefits it is considered that the proposals meet key aims and objectives defined within the World Heritage Site Management Plan (pp117-123) including:

- C – To preserve and enhance the local and wider setting of the Tower of London
- E – To communicate the stories of the Tower and promote the OUV of the Tower through engaging and effective interpretation, and Objective 18.1 to enhance visitor experience and interpretation at the Tower.
- F – To ensure the complete visitor experience is reflective of the Tower’s WHS status, and specifically Objective 23.2 Explore the feasibility of opening up the moat to visitors.

The scheme proposals for the new ramp and stair in the South Moat support the Tower of London’s long-term continued maintenance through income generation and enabling the Tower to be presented and interpreted to a broad range of visitors. Here it is considered the scheme may relate and contribute to achieving the overarching responsibilities under the World Heritage Convention to identify, present and transmit OUV to future generations

as a new starting point for the visitor journey around the Moat conveying the rich history of the Moat and the Tower of London to a broad range of audiences.

Heritage Impact Assessment – South Moat:

Medium Adverse

The alterations harm to a minor extent the heritage asset or the ability to appreciate its significance.

Overall, and as further explored within the Heritage Impact Assessment as follows, it is considered that the impacts of the scheme proposals represent less than substantial harm to heritage significance at the South Moat at the Tower of London, and are outweighed by the considerable public and heritage benefits the scheme brings to the Tower of London, and its diverse global visitor audiences.

- The proposed interventions to create the new ramp and stair and new visitor garden within the South Moat respect and enhance the significance of the South Moat as part of the Scheduled Monument at the Tower of London and are considered high-quality designs for a unique new route on the visitor journey around this internationally important heritage site. This new route is fully inclusive and commensurate in quality with the enhancements proposed to Schools & Communities Group entrance point at the Wharf as part of the wider Schools & Communities Project.
- The archaeological impacts have been minimised through a structural design which requires minimal excavation through the provision of localised piling. New foundational supports to the Tower Hill sentry have been placed so that they minimise impact on uncovered and underground archaeology in this area.
- A Written Scheme of Investigation and Archaeological Watching Brief will be developed and implemented as the project proceeds through next design and construction stages to ensure no impact on significant archaeology in the South Moat. Design changes to the proposed new structures will be made in response to the results of archaeological investigations in order to further mitigate any harm.
- The proposals for the new ramp and stair intentionally adopt an architectural language that clearly defines them as contemporary additions associated with the visitor journey around this area of the Moat, and distinct from the historic architecture of the concentric defences at the Tower of London. In this distinctiveness the new interventions reflect and respond the architectural character of this special historic place as appropriate, vibrant and worthy additions within a

tradition of the Tower’s architectural development and design language.

- Whilst the proposed interventions of the new ramp and stair will be clearly visible in views in this local area of the Moat and so have some visual impact on heritage significance in this area of the Tower of London Scheduled Monument, it is considered that the proposed interventions are so localised that they do not detract from the significance of this ensemble as a series of medieval defences at the entrance to the Tower.
- Designs have been carefully considered to avoid any impact on key views within the WHS Management Plan and London Local Plan from the Wharf or the Tower wall walks into the Moat.

Public and Heritage Benefits achieved through the Proposed Interventions:

Public benefits:

- The ramp provides, for the first time, a fully accessible and inclusive access visitor route from the Tower to this area of the South Moat, for a broad range of visitors to enjoy.
- The proposed ramp and stair builds upon the previous principle of the temporary access ramp in this area of the South Moat, established by Superbloom for Her Late Majesty Queen Elizabeth II’s Platinum Jubilee. The scheme proposals significantly enhance that temporary ramp by creating an inclusive visitor route and exquisitely detailed permanent intervention.
- The new ramp and stair enable the South Moat to be presented as a part of a new journey to better interpret the relevance of the Moat in the rich history of the Tower of London, in line with the overarching responsibilities under the World Heritage Convention to identify, present and transmit OUV to future generations at the Tower of London.
- The new garden introduces an attractive and biodiverse landscape into this area of the South Moat as part of an enhanced setting to the Tower of London (in accordance with WHS Management Plan Aim C) and a space for visitors to enjoy.
- The scheme proposals achieve aims and objectives set out within the Tower of London World Heritage Site to ensure the complete visitor experience is reflective of the Tower’s WHS status, and specifically Objective 23.2 Explore the feasibility of opening up the moat to visitors.

4.2 HERITAGE IMPACT ASSESSMENT

4.2.2 SOUTH REVETMENT WALL

Heritage Significance of Existing Condition:

Exceptional

As a Grade II* listed feature forming the southern edge of the Moat to the Tower of London, and part of the wider Scheduled Monument and UNESCO World Heritage Site.

Proposed Alterations to the South Revetment Wall:

The proposed alterations to the South Revetment Wall within the scheme for which Planning and Scheduled Monument Clearance is sought comprise:

- Proposed new ramp and stair structure alongside the South Revetment Wall within the South Moat, including localised removal of stonework at threshold connection, and works to form connection from the Wharf.

Heritage Impact Assessment on OUV and contribution to the WHS:

As well as being of Exceptional significance as assessed within preceding sections of this document, the South Revetment Wall contributes greatly to the setting of the Tower of London and the wider UNESCO World Heritage Site.

The South Revetment Wall can be understood to make some contribution to attributes and values of the Outstanding Universal Values of the World Heritage Site, particularly in terms of:

- Contribution to the Tower of London as an internationally famous monument and as the distinctive concentric defences around the White Tower (OUV Attribute 1, and key component 3)
- As a symbol of Norman Power (OUV Attribute 3, and key component 2) (Although the Moat is not in itself a Norman feature)
- As part of the Concentric Defences at the Tower of London (OUV Attribute 5, and key components 1,2 & 3)
- Buried archaeological remains of components superseded or altered (OUV Attribute 5, and key component 3)

The scheme proposals to add the new ramp and stair structure within the South Moat have been detailed carefully in consideration of the South Revetment Wall, and the OUV of the WHS. Similar to the appraisal in preceding section 4.2.1, design solutions and proposed construction detailing minimise physical impact of the new ramp and stair on any historic fabric of the South Revetment Wall as far as possible, and thus on the relevant WHS attributes and key components as defined above.

The drawings on the following pages of this document define how the construction detail of the connection for the new ramp and stair to the Wharf successfully mitigate physical impact on the South Revetment Wall as a component part of the Tower which contributes to the relevant attributes OUV of the WHS, as identified above.

Heritage Impact Assessment – South Revetment Wall:

Low Adverse

The alterations harm to a minor extent the heritage asset or the ability to appreciate its significance.

Overall, and as further explored within the Heritage Impact Assessment as follows, it is considered that the impacts of the scheme proposals represent less than substantial harm to heritage significance at the South Revetment Wall, and are outweighed by the considerable public and heritage benefits the scheme brings to the Tower of London, and its diverse global visitor audiences.

- The proposed interventions to create the new ramp and stair and new visitor garden within the South Moat respect and enhance the significance of the South Revetment Wall as a Grade II* listed feature and part of the Scheduled Monument at the Tower of London and are considered high-quality designs for a unique new route on the visitor journey around this internationally important heritage site. This new route is fully inclusive and commensurate in quality with the enhancements proposed to Schools & Communities Group entrance point at the Wharf as part of the wider Schools & Communities Project.

- The proposals for the new ramp and stair intentionally adopt an architectural language that clearly defines them as contemporary additions associated with the visitor journey around this area of the Moat, and distinct from the historic architecture of the concentric defences at the Tower of London.

- The proposals for the new ramp and stair are carefully detailed to minimise any physical impact on the historic fabric of the South Revetment Wall, and in this way their impact on heritage significance of this Grade II* listed feature of the Scheduled Monument is considered to be Low.

- A Written Scheme of Investigation and Archaeological Watching Brief will be developed and implemented as the project proceeds through next design and construction stages to ensure no impact on significant archaeology, or the Exceptional evidential heritage value, of the South Revetment Wall.

- The South Revetment Wall is faced in red brick, mostly of 18th and 19th century date. The wall is ragstone to the western end likely dating from 19th century. This western end is the area where the proposed interventions have been detailed to interface with the wall, thereby avoiding any impact on 14th century fabric through the rest of the wall's length.

- As demonstrated on proposed detail drawings on the following pages, only presumed 20th century fabric (balustrading and coping stones forming the edge condition to the Wharf) deemed of lower significance than the rest of the wall is proposed to be permanently removed from the wall. Some 19th century stonework will be temporarily removed to affect the connection, but will be carefully recorded prior to removal and reinstated in the same location once the connection is formed.

- Detailed significance assessment supported by petrology surveys and analysis will be needed of the stones proposed to be removed prior to any removal work proceeding, and all findings will be carefully recorded and shared with Historic Royal Palaces and Historic England.

- The proposed location of the new ramp and stair relative to the South Revetment Wall has been carefully considered throughout design development, and options discussed with Historic Royal Palaces and Historic England. The design objective was to achieve a location that was close enough to the wall that it would minimise visual impact of the ramp on the South Moat and the Tower of London behind when viewed from the Wharf. This objective needed though to be balanced with consideration of long-term maintenance and conservation of the South Revetment Wall. Design options were developed to show how maintenance inspections and repair projects could continue to the South Revetment Wall with the ramp in place, and a distance of 1.5m from the wall to the ramp was considered optimum to enable safe scaffold access for the wall to continue to be installed in future.

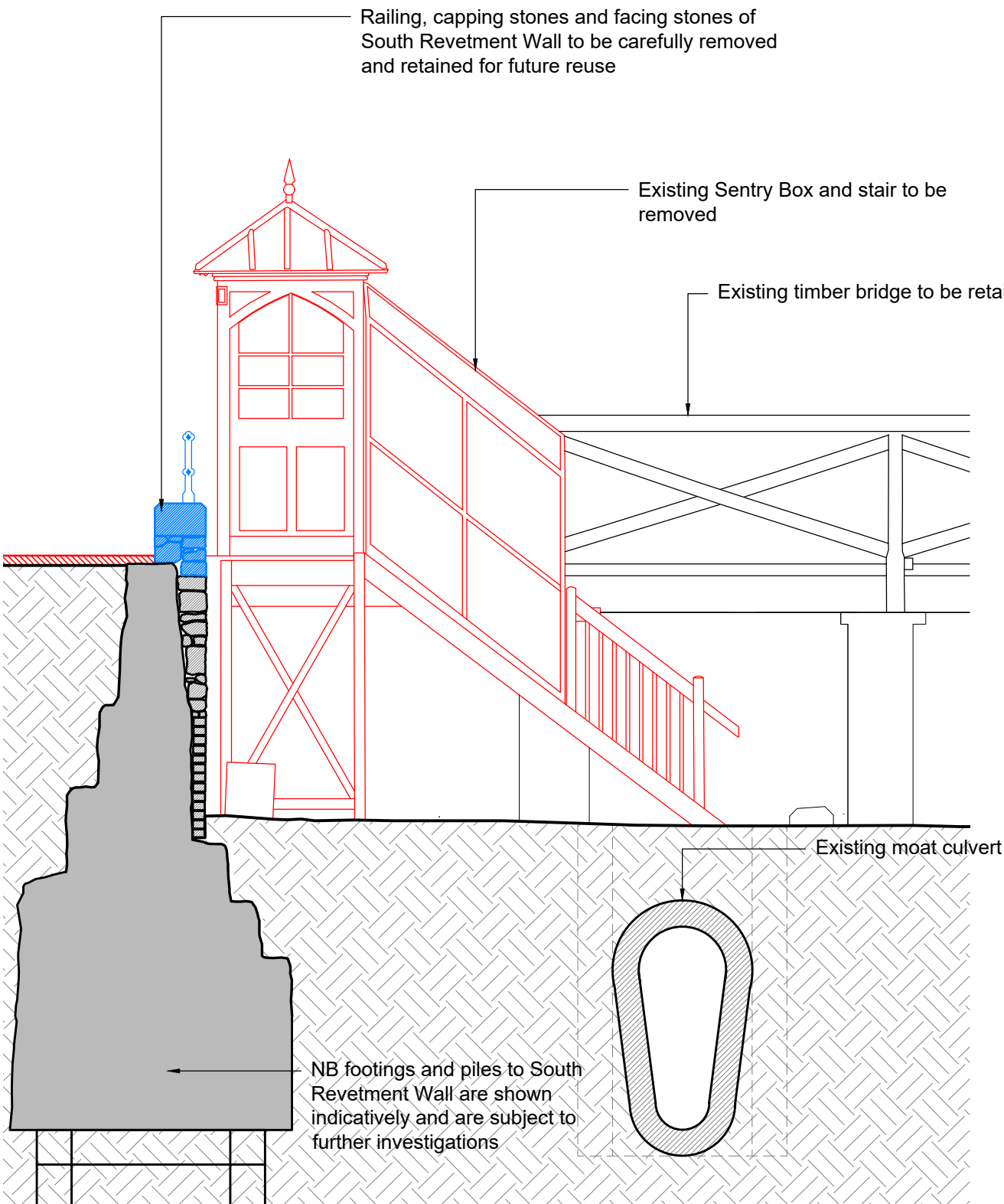
Public and Heritage Benefits achieved through the Proposed Interventions:

Public benefits:

- The public benefits achieved by the proposed scheme interventions are as described above in section 4.2.1.

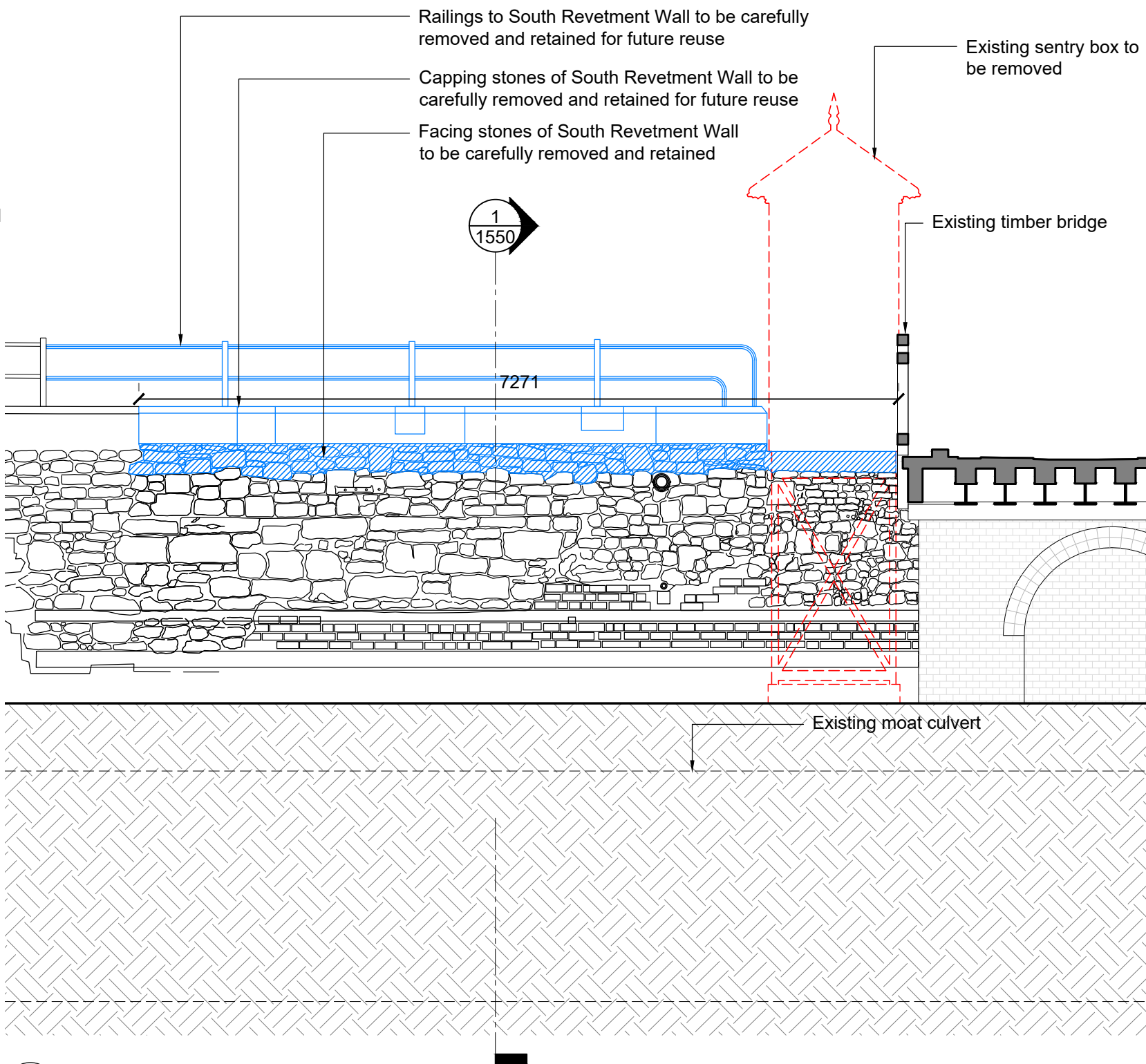
4.2 HERITAGE IMPACT ASSESSMENT

4.2.2 SOUTH REVETMENT WALL



1 Section - South Revetment Wall
1550 1:50

Section Showing Removals - South Revetment Wall

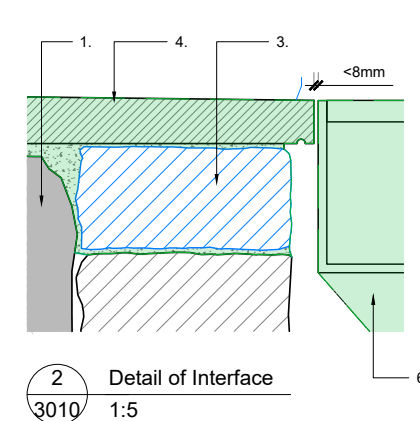
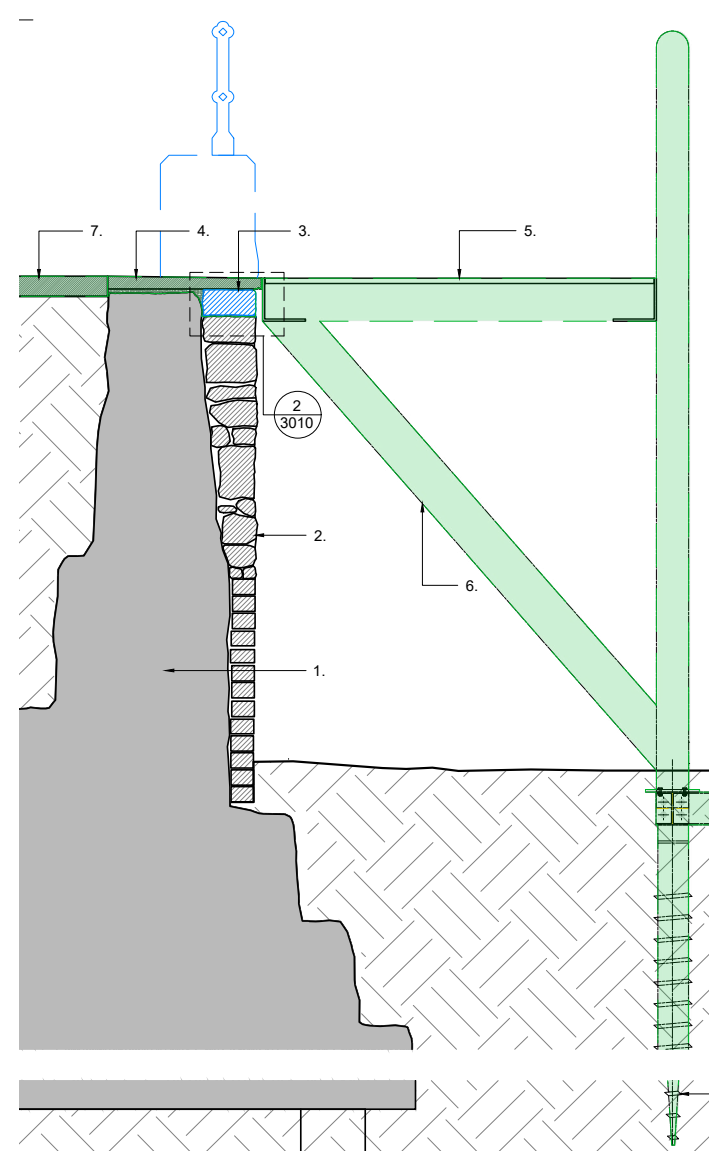
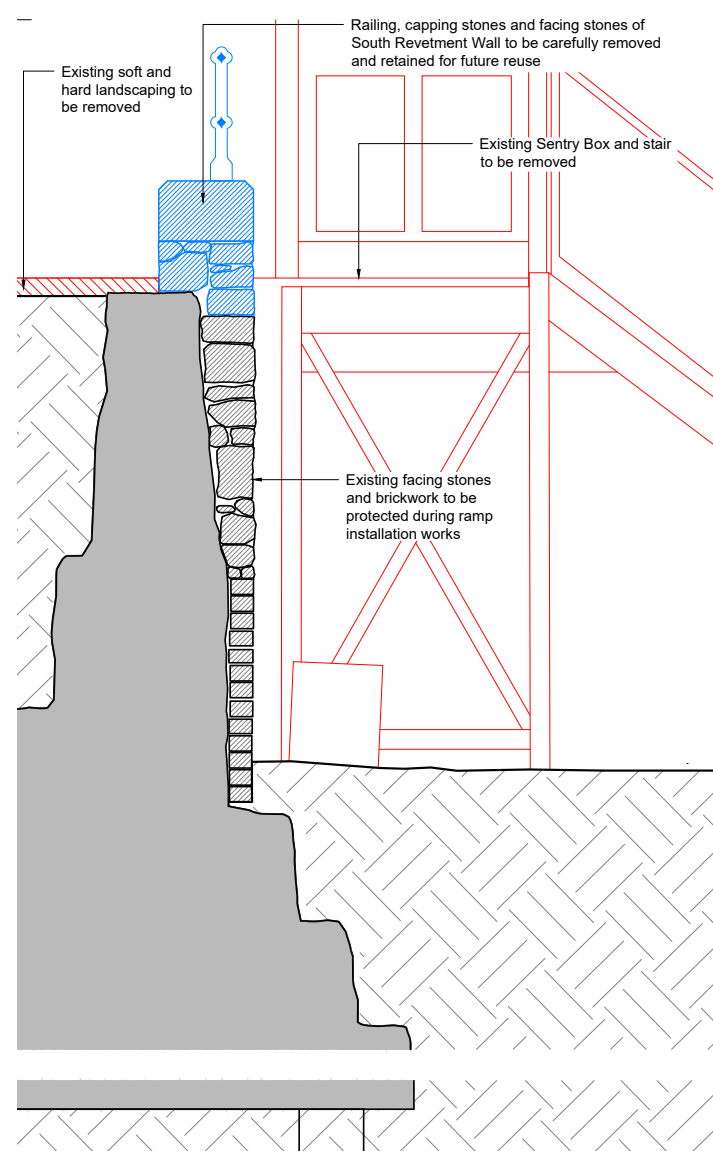
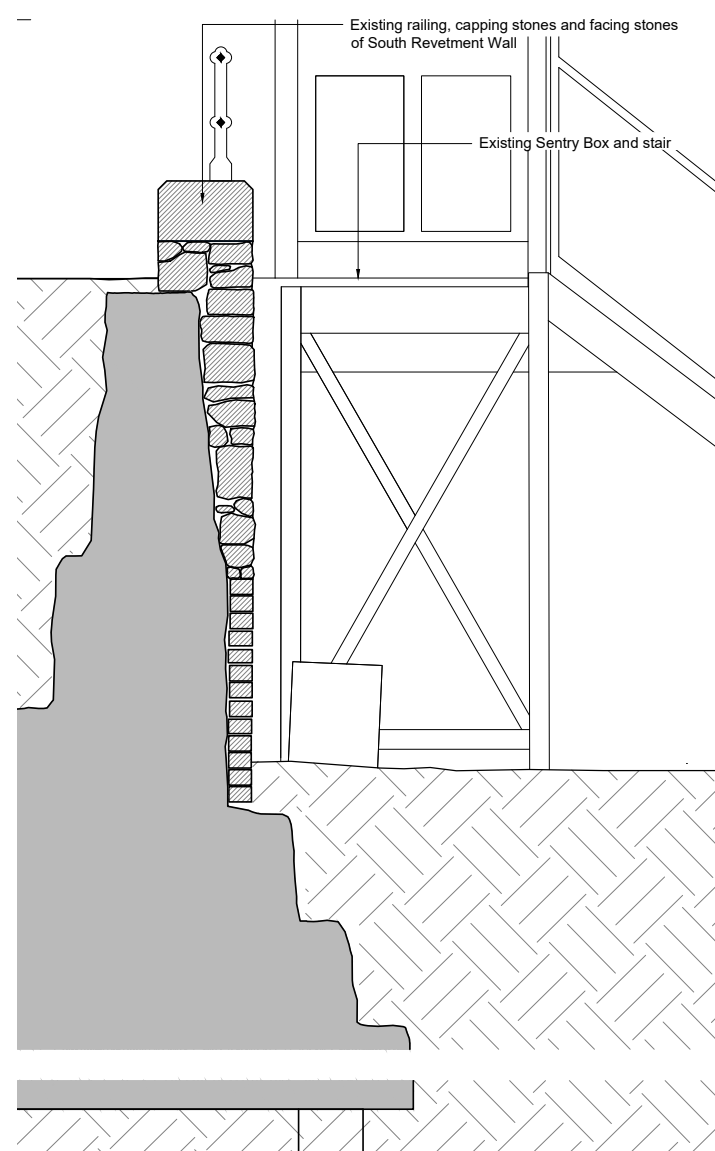


2 Elevation - South Revetment Wall
1550 1:50

Elevation Showing Removals - South Revetment Wall

4.2.2 SOUTH REVETMENT WALL

The design of the ramp has been developed to have minimal impact



4.2 HERITAGE IMPACT ASSESSMENT

4.2.3 THE WHARF

Heritage Significance of Existing Condition:

Exceptional

Proposed Alterations to the Wharf:

The proposed alterations to the Wharf within the scheme for which Planning and Scheduled Monument Clearance is sought comprise:

- A new sentry box enabling School and Community Group visitors to access the Moat from the Wharf, via the new education facility in the former Reveller building.
- Localised landscape enhancements to facilitate new visitor routes as above.

Heritage Impact Assessment on OUV and contribution to the WHS:

As well as being of Exceptional significance as assessed within preceding sections of this document, the Wharf contributes greatly to the setting of the Tower of London and the wider UNESCO World Heritage Site.

The Wharf can be understood to make some contribution to attributes and values of the Outstanding Universal Values of the World Heritage Site, particularly in terms of:

- 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 (OUV Attribute 1, and key component 4)
- The Wharf and the historically-famous Water (or Traitor’s) Gate, known world-wide from its depiction in literature and pictorial representations (OUV Attribute 1, and key component 5)
- The Wharf / River wall (OUV Attribute 2, and key component 4)

The scheme proposals to add the new Sentry box on the Wharf have been detailed carefully in consideration of the OUV of the WHS, and especially the distinct characteristics the Wharf itself contributes to the WHS.

The proposed Sentry Box is a small but new intervention on the Wharf. During design of the Sentry Box its appearance in views towards the Tower from the Wharf, river, and south bank of the Thames have been carefully considered to mitigate any impact in views of the Tower from the Wharf and river. The scale and location of the Sentry box is designed to be as minimal as possible to mitigate impact in the view from the Wharf to the Tower. The design has effectively safeguarded the primacy of the Tower, which is undominated by the new intervention.

In this way, the OUV of the Wharf in connection with the above identified attributes is unaffected by the scheme proposals.

Overall, the scheme proposals are considered to have a positive impact on the Tower of London through enhancing visitor experience for the visiting public at this important entry point into the Tower’s Moat, achieving for the first time a fully inclusive and accessible connection between the Tower and it’s Moat for a broad range of audiences, enabling new stories to be told about the history of the Moat at the Tower of London.

The new entry point into the Moat works together with the proposed Schools & Community Groups welcome facility in the former Reveller building to meet key aims objectives within the Tower of London World Heritage Site Management Plan (pp117-123) including:

- Objective 18.4 – Complete the review of Tower schools programmes
- Objective 19.1 – Develop learning and interpretative programmes that demonstrate the relevance of the Tower’s history with modern society in a way that encourages participation from a wider audience.)
- Objective 23.2 – Explore the feasibility of opening up the moat to visitors.

Heritage Impact Assessment – the Wharf:

Low Adverse

The alterations harm to a minor extent the heritage asset or the ability to appreciate its significance.

Overall, and as further explored within the Heritage Impact Assessment as follows, it is considered that the impacts of the scheme proposals represent less than substantial harm to heritage significance at the Wharf, and are outweighed by the considerable public and heritage benefits the scheme brings to the Tower of London, and its diverse global visitor audiences.

- Localised landscape works have been detailed to avoid visual impact on this area of the WHS, utilising buff colour finishes to harmonise with the stone walls of the Tower and be recessive within key protected views of the WHS.
- As described above the new Sentry Box has been carefully considered in terms of proposed location, size, form, colour and materiality to minimise adverse physical and visual impact on either the Tower of London behind or within the Wharf location.
- Moreover, the design of the proposed Sentry box seeks to make a positive architectural contribution in design dialogue with the new Schools & Communities Group welcome facility proposed within the former Reveller building nearby.
- The architectural language of the Sentry Box has been designed to be in timber, to be of a family with the other Sentry Boxes in this area of the eastern Wharf. During the course of design development, historic precedents of military sentry boxes and warder shelters were studied, and their formal and material qualities considered, particularly those which stood on the Wharf since the early 20th century, and earlier (refer p48).
- It was determined through pre-application consultations with Historic England that the new sentry box should relate to these historic examples, whilst being evidently of its time, and a piece of high-quality design in its own right.

- The new Sentry Box recedes as a secondary item blending with the other ancillary structures along the Wharf.
- Though of low significance and not a contributing factor to the significance of the Tower of London, the Reveller building somewhat contributes to the setting of the Tower as high-quality contemporary addition which evokes the scale and materiality of historic buildings which once stood in this area of the Wharf. Fretton’s Reveller building was designed to be subservient to its significant location while presenting as high-quality piece of architecture in its own right and recalling the scale, form and materiality of workshop buildings that once occupied this part of the Wharf.
- By adopting an architectural language similar to the Reveller, and which is fundamentally derived from the Wharf’s history in a contemporary design expression, the proposed new Sentry box establishes a coherent architectural language of visitor facing facilities in this area of the Wharf, distinct and secondary to the primacy of the stone Tower walls, whilst also evoking the scale and materiality of historic workshop buildings which once stood on the Wharf in the 19th century, and enhancing our understanding of the Wharf’s rich history.

Public and Heritage Benefits achieved through the Proposed Interventions:

Public benefits:

- The public benefits achieved by the proposed scheme interventions are as described above in section 4.2.1.
- Subject of a separate Planning, Listed Building & Scheduled Monument Consent application, the former Reveller building will become the new Learning & Community Centre at the Tower of London, welcoming a broad range of Schools and Community Groups as public visitor audiences to the Tower and Moat, enabling learning and engagement with this part of the Tower of London and its rich histories. The new Sentry box works in unison with this new facility, providing a managed entry point into the Moat for Schools and Community Group visitors, ensuring a safe, secure and inclusive access for them distinct and separate from general ticket visitors.

4.2 HERITAGE IMPACT ASSESSMENT

4.2.4 CONCLUSION

Conclusion of impact assessment according to NPPF definitions

Overall, it is concluded that the development proposal will lead to **less than substantial harm** to the significance of the designated heritage asset of the Tower of London, including each of the heritage assets explored above.

The impacts of this less than substantial harm are outweighed by the considerable public benefits of the proposal, as listed in this document.

4.0 HERITAGE IMPACT ASSESSMENT

4.3 ASSESSMENT OF IMPACT ON OUV OF THE WHS

In order to assess the impact on Outstanding Universal Value, the guidance and tools referenced in UNESCO's document *UNESCO 2022 Guidance and Toolkit for Impact Assessments in a World Heritage Context* has been used.

First in accordance with Tool 1 the Attributes and Values, and key components contributing to this attribute of the Tower's OUV, have been summarised – as identified in the Statement of OUV adopted by UNESCO for the Tower of London World Heritage Site, and summarised in the Tower of London World Heritage Site Management Plan as well as from Tower of London's Conservation Management Plan by Historic Royal Palaces.

Then, the elements of the proposals (or proposed actions) which have the potential to cause an impact were analysed and listed against the components contributing to this attribute of the Tower's OUV.

These were then combined in the attached matrix, adapted from Tool 3 listed in the UNESCO document *Guidance & Toolkit for Impact Assessment in a World Heritage Context*.



Tower of London (HM Royal Palace and Fortress of the Tower of London) UNESCO World Heritage Site

4.0HERITAGE IMPACT ASSESSMENT

4.3ASSESSMENT OF IMPACT ON OUV OF THE WHS

Attribute of the Tower's OUV	Attribute expressed through:	Key components contributing to this attribute of the Tower's OUV	Element of proposed action	Description of Potential Impact	Frequency of Action	Duration of Action	Reversibility of Action	Reversibility of Change to the Attribute	Longevity of Change to the Attribute	Degree of Change to the Attribute	Quality of Change to the Attribute	Evaluation of Impact
					Once/ intermittent/ continuous	Short-term/ long-term	Reversible/ irreversible	Reversible/ irreversible	Temporary/ permanent change	None/ negligible/ some/ large change	Positive/ negative change	Neutral/ minor/ moderate/ major impact (negative and positive)
An internationally famous monument	Form and design; use and function	1. The iconic White Tower, its physical form and visual dominance;	N/A – not affected by scheme proposals.									Neutral – no impact
		2. 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). 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	Proposed new Sentry Box for security check of visitor entry point on Wharf at top of new ramp and stair into the South Moat	The proposed Sentry Box is a small but new intervention on the Wharf. The Sentry Box is just outside of the specific protected view, and therefore has no impact on it. During design of the Sentry Box its appearance in views towards the Tower from the Wharf, river, and south bank of the Thames have been carefully considered to mitigate any impact in the longer views. The architectural language of the Sentry Box has been designed to be in timber, to be of a family with the other Sentry Boxes in this area of the eastern Wharf. The scale and location has been designed to be as minimal as possible to mitigate impact in the view from the Wharf to the Tower. The design has effectively safeguarded the primacy of the Tower, which is undominated by the new intervention. The new Sentry Box recedes as a secondary item blending with the other ancillary structures along the Wharf.	Once	Long-term	Reversible	Reversible	Permanent	Negligible	n/a – Neutral	Neutral – no impact on the protected view
		3. 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	Proposed new ramp and stair in South Moat	The proposed ramp and stair is a new structure within the South Moat, and will be visible from above – included within the views appraised within this HIA. The ramp and stair design have been carefully considered to be distinctly different from the monumental architecture of the Tower, articulated in metalwork to be lightweight, visually open, and of a family of other visitor focused interventions – retaining the visual dominance of the Tower. The proposed ramp, stair and sentry box will be sited within the concentric defences around the White Tower, between the Outer Curtain Wall and the Moat Revetment Wall. Being to the south of the Outer Curtain Wall. The ramp will be sited so that it is 1.5m away from the South Revetment Wall which, in addition to allowing essential access for maintenance to the wall, will also add visual distance and clarity between the line of the moat and the new structure.	Once	Long-term	Reversible	Reversible	Permanent	Some	Negative (visual impact) & Positive (in terms of public benefits)	Minor negative impact (in terms of visual impact of the ramp and stair within the South Moat), but overall the ramp and stair are considered to have a positive impact by making this currently undervisited area of the historic Moat accessible and creating a fully inclusive route for the visiting public to better tell the rich histories of the Tower to a broad range of audiences.

4.0HERITAGE IMPACT ASSESSMENT

4.3ASSESSMENT OF IMPACT ON OUV OF THE WHS

Attribute of the Tower's OUV	Attribute expressed through:	Key components contributing to this attribute of the Tower's OUV	Element of proposed action	Description of Potential Impact	Frequency of Action	Duration of Action	Reversibility of Action	Reversibility of Change to the Attribute	Longevity of Change to the Attribute	Degree of Change to the Attribute	Quality of Change to the Attribute	Evaluation of Impact
					Once/ intermittent/ continuous	Short-term/ long-term	Reversible/ irreversible	Reversible/ irreversible	Temporary/ permanent change	None/ negligible/ some/ large change	Positive/ negative change	Neutral/ minor/ moderate/ major impact (negative and positive)
		4. 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	Proposed new Sentry Box for security check of visitor entry point on Wharf at top of new ramp and stair into the South Moat	The proposed Sentry Box is a small but new intervention on the Wharf. During design of the Sentry Box its appearance in views towards the Tower from the Wharf, river, and south bank of the Thames have been carefully considered to mitigate any impact in views of the Tower from the Wharf and river. The architectural language of the Sentry Box has been designed to be in timber, to be of a family with the other Sentry Boxes in this area of the eastern Wharf. The scale and location has been designed to be as minimal as possible to mitigate impact in the view from the Wharf to the Tower. The design has effectively safeguarded the primacy of the Tower, which is undominated by the new intervention. The new Sentry Box recedes as a secondary item blending with the other ancillary structures along the Wharf.	Once	Long-term	Reversible	Reversible	Permanent	Negligible	n/a - Neutral	Neutral
		5. The Wharf and the historically-famous Water (or Traitor's) Gate, known world-wide from its depiction in literature and pictorial representations	Proposed new Sentry Box for security check of visitor entry point on Wharf at top of new ramp and stair into the South Moat	(Refer above notes which similarly apply here)	Once	Long-term	Reversible	Reversible	Permanent	Negligible	n/a - Neutral	Neutral
Landmark siting	Form and design; use and function; location and setting	1. The Tower's close physical relationship with the river, its proximity to the water, and siting on a bend to enhance its visibility both upstream and downstream	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute since they do not affect the Tower's relationship to the river.								Neutral - no impact
		2. The visible elements and line of the Roman wall	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute since they are not in the proximity of the Roman wall.								Neutral - no impact
		3. The Tower's relationship to the City	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute since they do not affect the Tower's relationship to the City.								Neutral - no impact

4.0 HERITAGE IMPACT ASSESSMENT

4.3 ASSESSMENT OF IMPACT ON OUV OF THE WHS

Attribute of the Tower's OUV	Attribute expressed through:	Key components contributing to this attribute of the Tower's OUV	Element of proposed action	Description of Potential Impact	Frequency of Action	Duration of Action	Reversibility of Action	Reversibility of Change to the Attribute	Longevity of Change to the Attribute	Degree of Change to the Attribute	Quality of Change to the Attribute	Evaluation of Impact
					Once/ intermittent/ continuous	Short-term/ long-term	Reversible/ irreversible	Reversible/ irreversible	Temporary/ permanent change	None/ negligible/ some/ large change	Positive/ negative change	Neutral/ minor/ moderate/ major impact (negative and positive)
		4. The Wharf / River wall	Proposed new Sentry Box for security check of visitor entry point on Wharf at top of new ramp and stair into the South Moat	The proposed Sentry Box is a small but new intervention on the Wharf. During design of the Sentry Box its appearance in views towards the Tower from the Wharf, river, and south bank of the Thames have been carefully considered to mitigate any impact in views of the Tower from the Wharf and river. The architectural language of the Sentry Box has been designed to be in timber, to be of a family with the other Sentry Boxes in this area of the eastern Wharf. The scale and location has been designed to be as minimal as possible to mitigate impact in the view from the Wharf to the Tower. The design has effectively safeguarded the primacy of the Tower, which is undominated by the new intervention. The new Sentry Box recedes as a secondary item blending with the other ancillary structures along the Wharf.	Once	Long-term	Reversible	Reversible	Permanent	Negligible	n/a - Neutral	Neutral
		5. Key views of the Tower up, down, across and from the river	Proposed new Sentry Box for security check of visitor entry point on Wharf at top of new ramp and stair into the South Moat	(Refer above notes which similarly apply here)	Once	Long-term	Reversible	Reversible	Permanent	Negligible	n/a - Neutral	Neutral
		6. The Tower's skyline (silhouette) as seen from the river and from across the river	Proposed new Sentry Box for security check of visitor entry point on Wharf at top of new ramp and stair into the South Moat	(Refer above notes which similarly apply here)	Once	Long-term	Reversible	Reversible	Permanent	Negligible	n/a - Neutral	Neutral
		7. The open quality of the Liberties (on the Tower's landward sides)	N/A - not affected by scheme proposals.	The project proposals have no impact on this component of the attribute since they are not in the proximity of the Liberties.								Neutral - no impact

4.0 HERITAGE IMPACT ASSESSMENT

4.3 ASSESSMENT OF IMPACT ON OUV OF THE WHS

Attribute of the Tower's OUV	Attribute expressed through:	Key components contributing to this attribute of the Tower's OUV	Element of proposed action	Description of Potential Impact	Frequency of Action	Duration of Action	Reversibility of Action	Reversibility of Change to the Attribute	Longevity of Change to the Attribute	Degree of Change to the Attribute	Quality of Change to the Attribute	Evaluation of Impact
					Once/ intermittent/ continuous	Short-term/ long-term	Reversible/ irreversible	Reversible/ irreversible	Temporary/ permanent change	None/ negligible/ some/ large change	Positive/ negative change	Neutral/ minor/ moderate/ major impact (negative and positive)
Symbol of Norman power	Form and design; materials and substance; use and function	1. The fabric of the White Tower, particularly the Caen and other types of stone used in its construction	N/A – not affected by scheme proposals.	The project proposals have no impact on this component of the attribute since they include no work to the White Tower.								Neutral – no impact
		2. Its plan and three dimensional form	Proposed new ramp and stair in the South Moat	The proposed ramp and stair is a new structure within the South Moat, and therefore a new intervention within the plan and three dimensional form of the tower. The ramp and stair design have been carefully considered to be distinctly different from the monumental architecture of the Tower, articulated in metalwork to be lightweight, visually open, and of a family of other visitor focused interventions – retaining the visual dominance of the Tower. The ramp will be sited so that it is 1.5m away from the South Revetment Wall which, in addition to allowing essential access for maintenance to the wall, will also add visual distance and clarity between the new structure and the historic plan and three-dimensional form of the historic structures.	Once	Long-term	Reversible	Reversible	Permanent	Negligible – the impact of the ramp on the overall plan and three dimensional form of the Tower of London is very minor, given it is so local and small in scale in comparison to the whole.	Negative (very minor impact on plan and three-dimensional) & Positive (in terms of public benefits)	Minor negative impact (in terms of impact of the ramp and stair within the South Moat, representing a very minor impact on the overall plan and three-dimensional form of the Tower of London), but overall the ramp and stair are considered to have a positive impact by making this currently undervisited area of the historic Moat accessible and creating a fully inclusive route for the visiting public to better tell the rich histories of the Tower to a broad range of audiences.
		3. Its relationship to the adjacent foundations of the remains of the Roman land and river walls	N/A – not affected by scheme proposals.	The project proposals have no impact on this component of the attribute since they include no work to the Roman remains.								Neutral – no impact
Physical dominance [of the White Tower]	Form and design; materials and substance; location and setting	1. The fabric and physical form of the White Tower	N/A – not affected by scheme proposals.	The project proposals have no impact on this component of the attribute since they include no work to the White Tower. The project proposals no visual impact on this component of the attribute as they continue to respect and not disturb the primacy and monumentality of the White Tower's physical form.								Neutral – no impact
		2. 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	N/A – not affected by scheme proposals.	The project proposals have no impact on view or the silhouette of the Tower.								Neutral – no impact

4.0HERITAGE IMPACT ASSESSMENT

4.3ASSESSMENT OF IMPACT ON OUV OF THE WHS

Attribute of the Tower's OUV	Attribute expressed through:	Key components contributing to this attribute of the Tower's OUV	Element of proposed action	Description of Potential Impact	Frequency of Action	Duration of Action	Reversibility of Action	Reversibility of Change to the Attribute	Longevity of Change to the Attribute	Degree of Change to the Attribute	Quality of Change to the Attribute	Evaluation of Impact
					Once/ intermittent/ continuous	Short-term/ long-term	Reversible/ irreversible	Reversible/ irreversible	Temporary/ permanent change	None/ negligible/ some/ large change	Positive/ negative change	Neutral/ minor/ moderate/ major impact (negative and positive)
Concentric defences	Form and design; materials and substance; use and function	1. 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)	Proposed new ramp and stair in the South Moat	The proposed ramp and stair is a new structure within the South Moat, and will be visible from above. The ramp and stair design have been carefully considered to be distinctly different from the monumental architecture of the Tower, articulated in metalwork to be lightweight, visually open, and of a family of other visitor focused interventions - retaining the visual dominance of the Tower. The proposed ramp, stair and sentry box will be sited within the concentric defences around the White Tower, between the Outer Curtain Wall and the Moat Revetment Wall. Being to the south of the Outer Curtain Wall. The ramp will be sited so that it is 1.5m away from the South Revetment Wall which, in addition to allowing essential access for maintenance to the wall, will also add visual distance and clarity between the line of the moat and the new structure.	Once	Long-term	Reversible	Reversible	Permanent	Some	Negative (very minor impact on plan and three-dimensional) & Positive (in terms of public benefits)	Minor negative impact (in terms of impact of the ramp and stair within the South Moat, representing a very minor impact on the overall plan and three-dimensional form of the Tower of London), but overall the ramp and stair are considered to have a positive impact by making this currently undervisited area of the historic Moat accessible and creating a fully inclusive route for the visiting public to better tell the rich histories of the Tower to a broad range of audiences.
		2. The remaining structure and form of the barbican	N/A - not affected by the scheme proposals	The project proposals have no impact on the structure and form of the barbican at the Tower of London.								Neutral - no impact
		3. Buried archaeological remains of components superseded or altered	Proposed new ramp and stair in the South Moat	The project proposals have been designed in a manner that ensures no impact on buried archaeological remains.								Neutral - no anticipated impact (to be confirmed and managed by an Archaeological Watching Brief)
		4. Presence of the wall-walks and their visual linkage with the surrounding cityscape and river, which demonstrate use and function	Proposed new ramp and stair in the South Moat	The proposed ramp and stair is a new structure within the South Moat, and will be visible from above. The ramp and stair design have been carefully considered to be distinctly different from the monumental architecture of the Tower, articulated in metalwork to be lightweight, visually open, and of a family of other visitor focused interventions - retaining the visual dominance of the Tower.								Neutral - no impact

4.0HERITAGE IMPACT ASSESSMENT

4.3ASSESSMENT OF IMPACT ON OUV OF THE WHS

Attribute of the Tower's OUV	Attribute expressed through:	Key components contributing to this attribute of the Tower's OUV	Element of proposed action	Description of Potential Impact	Frequency of Action	Duration of Action	Reversibility of Action	Reversibility of Change to the Attribute	Longevity of Change to the Attribute	Degree of Change to the Attribute	Quality of Change to the Attribute	Evaluation of Impact
					Once/ intermittent/ continuous	Short-term/ long-term	Reversible/ irreversible	Reversible/ irreversible	Temporary/ permanent change	None/ negligible/ some/ large change	Positive/ negative change	Neutral/ minor/ moderate/ major impact (negative and positive)
Surviving medieval remains	Materials and substance; use and function	1. 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	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute.								Neutral - no impact
		2. Buried remains, particularly those of the medieval palace	Proposed new ramp and stair in the South Moat	The project proposals have been carefully designed to ensure minimised impact on any buried remains. Full Archaeological Watching Brief to be established to ensure impact is mitigated during construction phases.								Neutral - impact to be managed by an Archaeological Watching Brief
		3. 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	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute.								Neutral - no impact
Physical [historical] associative evidence	Use and function; traditions; spirit and feeling	1. The dungeons and cells, illustrating how historic prisoners were confined and tortured	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute.								Neutral - no impact
		2. The Royal execution site, depicted in many contexts and representations and associated, particularly, with the execution of Anne Boleyn	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute.								Neutral - no impact
		3. The Water (Traitor's) Gate, symbolically the gateway to incarceration and potential execution	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute.								Neutral - no impact
		4. Historic graffiti left by prisoners, providing a unique record of their experiences	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute (unless discovered during the course of the project. If discovered, any graffiti will be retained insitu, protected, and recorded to be notified to Historic England).								Neutral - no impact

