

PURCELL

TOWER OF LONDON
SCHOOLS & COMMUNITIES – EDUCATION FACILITIES PROJECT:
PROPOSED REFURBISHMENT OF REVELLER BUILDING & MOAT ARCHES BENEATH TOWER BRIDGE AND ITS APPROACH
HERITAGE IMPACT ASSESSMENT: PLANNING, LISTED BUILDING CONSENT & SCHEDULED MONUMENT CLEARANCE
FOR HISTORIC ROYAL PALACES
18TH MARCH 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

Tower Bridge

Tower Bridge is a Grade I listed building, with its Northern Approach also Grade I listed. Whilst it is largely outside of the Tower of London Scheduled Monument and UNESCO World Heritage Site – except for its western wall which forms the edge of these designated assets – it is clearly a major landmark within the local Tower Conservation Area.

Much of Tower Bridge is outside of the demise of Historic Royal Palaces and is owned and managed by the City Bridge Foundation which in turn has the City of London Corporation as a sole trustee. Historic Royal Palaces has a flying freehold which extends into the Tower Bridge Arches and Moat Arches which form part of this scheme.

The Tower Bridge Arches are the southern-most spaces beneath and within the Northern Approach of Tower Bridge. From the date of their original construction in 1884 they have always performed a function associated with the operation of the Tower of London. Originally as Guard Room, Prisoners Cells and associated ablutions. At present they are ancillary spaces associated with the Reveller Restaurant Café, including bar, WCs, and back of house kitchen and staff spaces – all now closed, and not currently in use.

The Moat Arches are generally in use of storage and occasional welfare use by volunteer groups working with Historic Royal Palaces.

The project will refurbish and remodel these spaces within the Tower Bridge structure with the key aim of establishing sustainable and appropriate beneficial uses which support the long-term conservation of fabric of the spaces and support the wider ambitions of the Tower 2030 programme.



Tower Bridge Northern Approach

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 Refurbishment of Reveller & Arches

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 refurbishment and change of use of the Reveller building and historic arches beneath Grade I listed Tower Bridge and its approach into a flagship welcome and learning centre, the project scope covered within the application for planning permission, listed building consent 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 THIS 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 Scheduled Monument, listed buildings, the Tower of London Conservation Area, the Grade I listed Tower Bridge, and the wider UNESCO 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

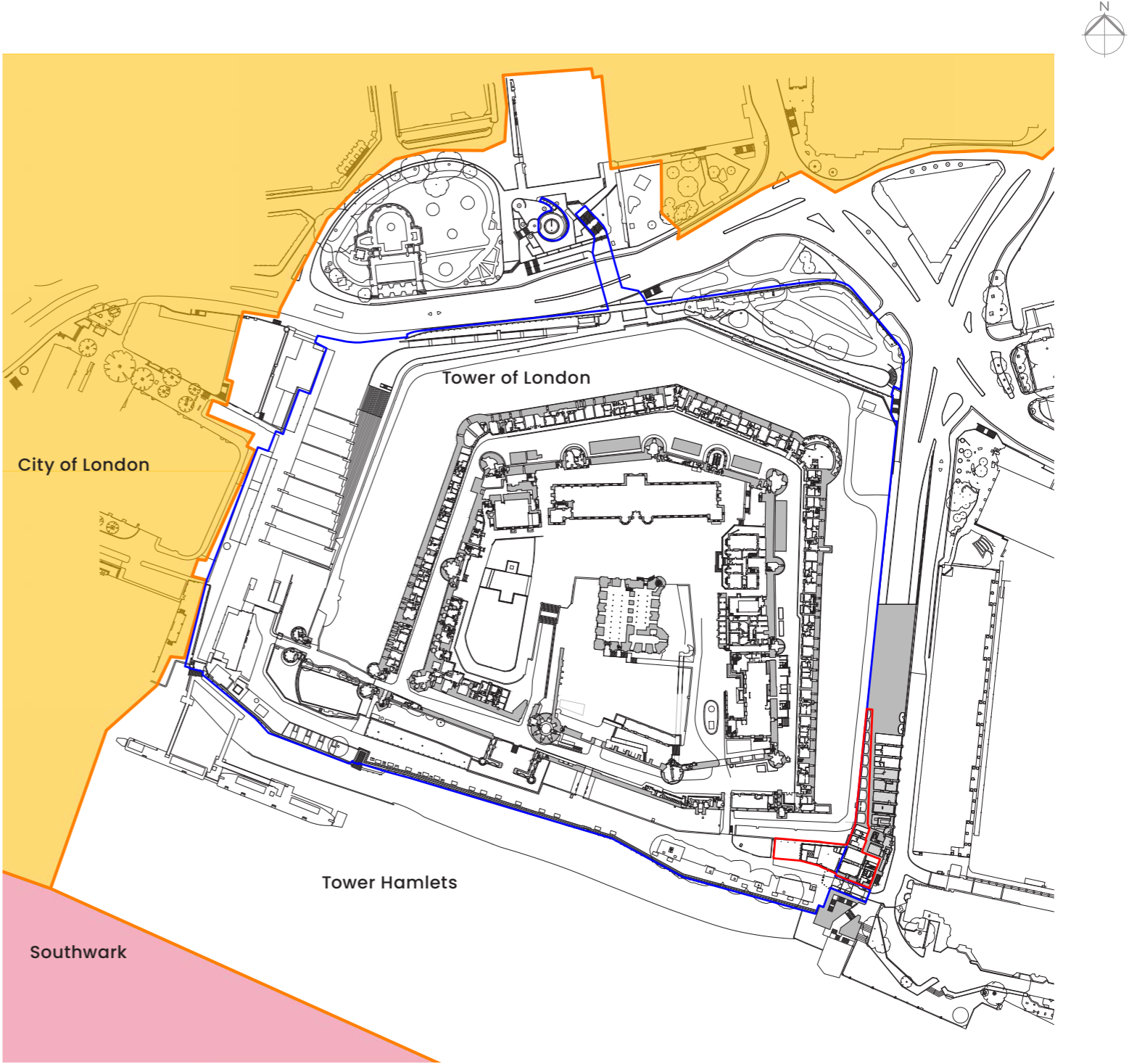
2.0 HERITAGE STATEMENT



2.0 HERITAGE STATEMENT

SITE PLAN SHOWING SITE APPLICATION AREA

- KEY
- Boundaries of Tower Hamlets, City of London & Southwark
 - City of London
 - Southwark
 - Historic Royal Palaces site boundary
 - Proposed Refurbishment of Reveller Building & Moat Arches beneath Tower Bridge and its Approach



2.0

HERITAGE STATEMENT

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

Proposed Refurbishment of Reveller Building & Moat Arches beneath Tower Bridge and its Approach

Scheduled Monument – Tower of London

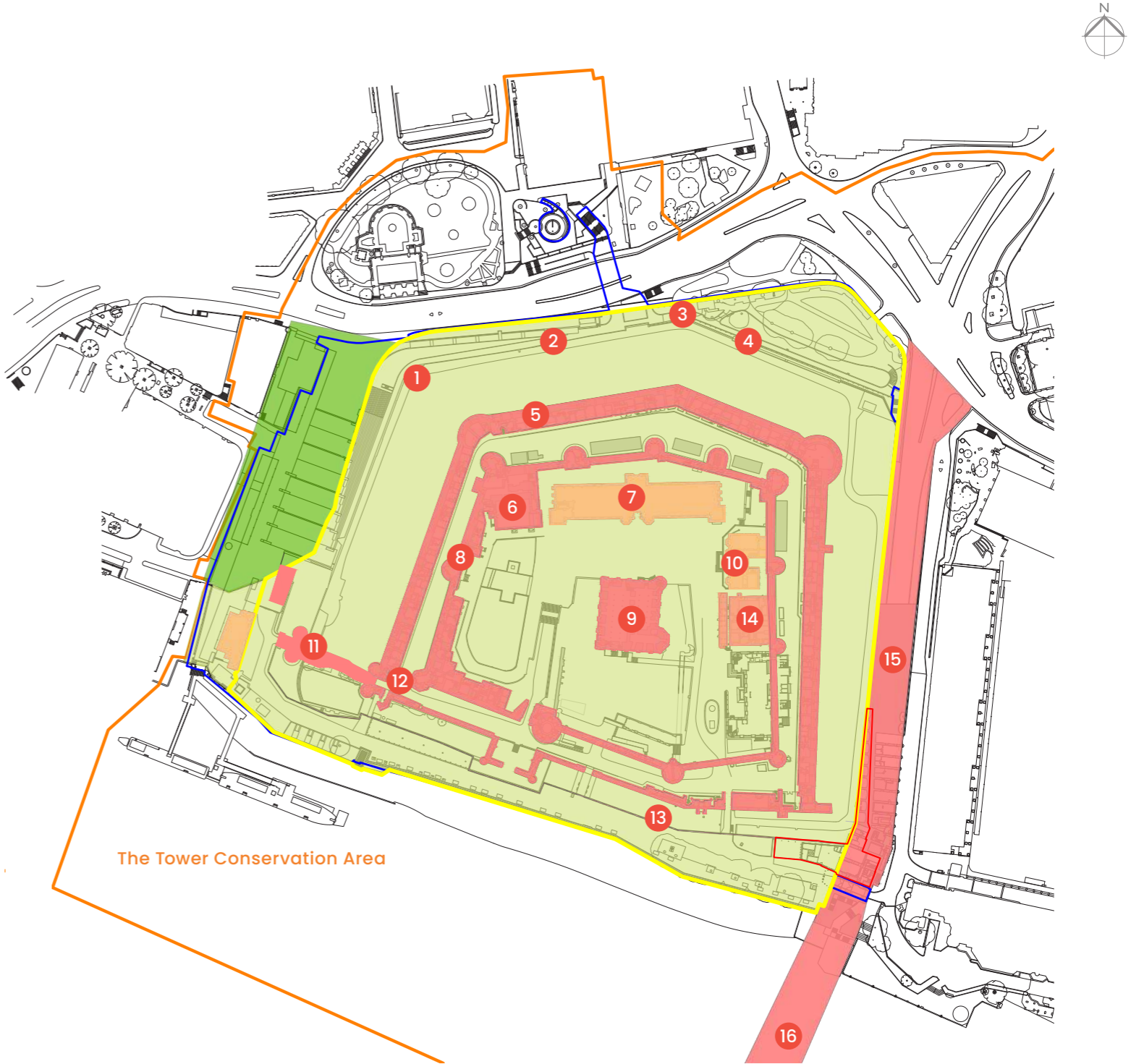
Scheduled Monument – Tower Hill West

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

RELEVANT REQUIRED CONSENTS

The scheme proposals include alterations to the Reveller building, as well as internal refurbishment and remodelling to the spaces within Tower Bridge and the Arches within the East Moat.

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

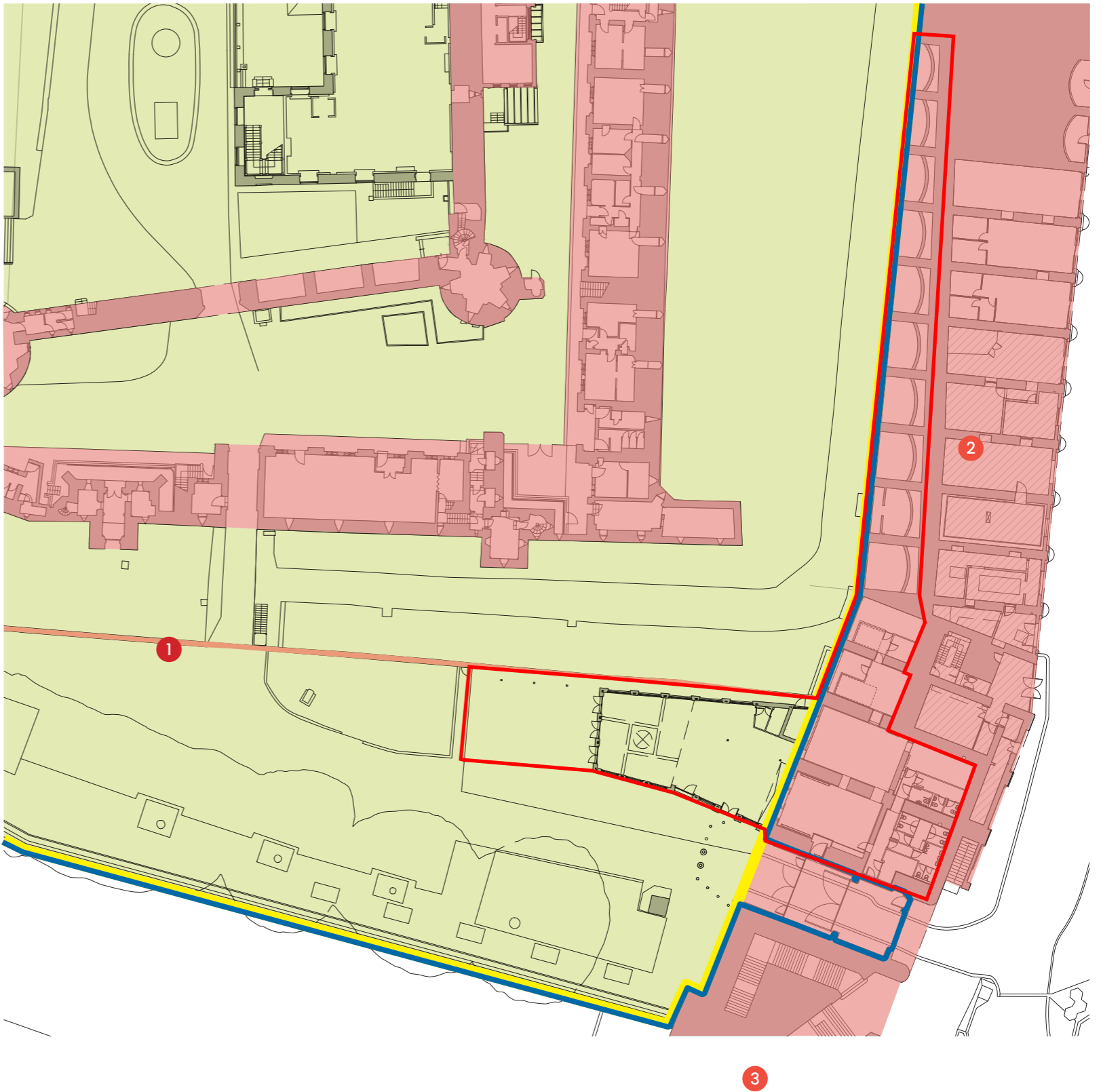
- Planning Permission
- Listed Building Consent (Tower Bridge & Tower Bridge approach are listed buildings, within the Borough of Tower Hamlets)
- Scheduled Monument Clearance (Moat Arches are within the Scheduled Monument)

- 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

- Historic Royal Palaces site boundary
- Proposed Refurbishment of Reveller Building & Moat Arches beneath Tower Bridge and its Approach
- 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

2.1 PLANNING & HERITAGE LEGISLATIVE CONTEXT

2.1.1 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.

2.1.2 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.’

2.1.3 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.

2.1.4 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.

2.1.5 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.

Paragraph 2 of the 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 following sections are 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

2.0 HERITAGE STATEMENT

2.1 PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

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.

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.

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.

2.1.6 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 .

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.

2.1.7 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

2.0 HERITAGE STATEMENT

2.1 PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

form, character and capacity for growth further addresses the issue of understanding character and context.

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.

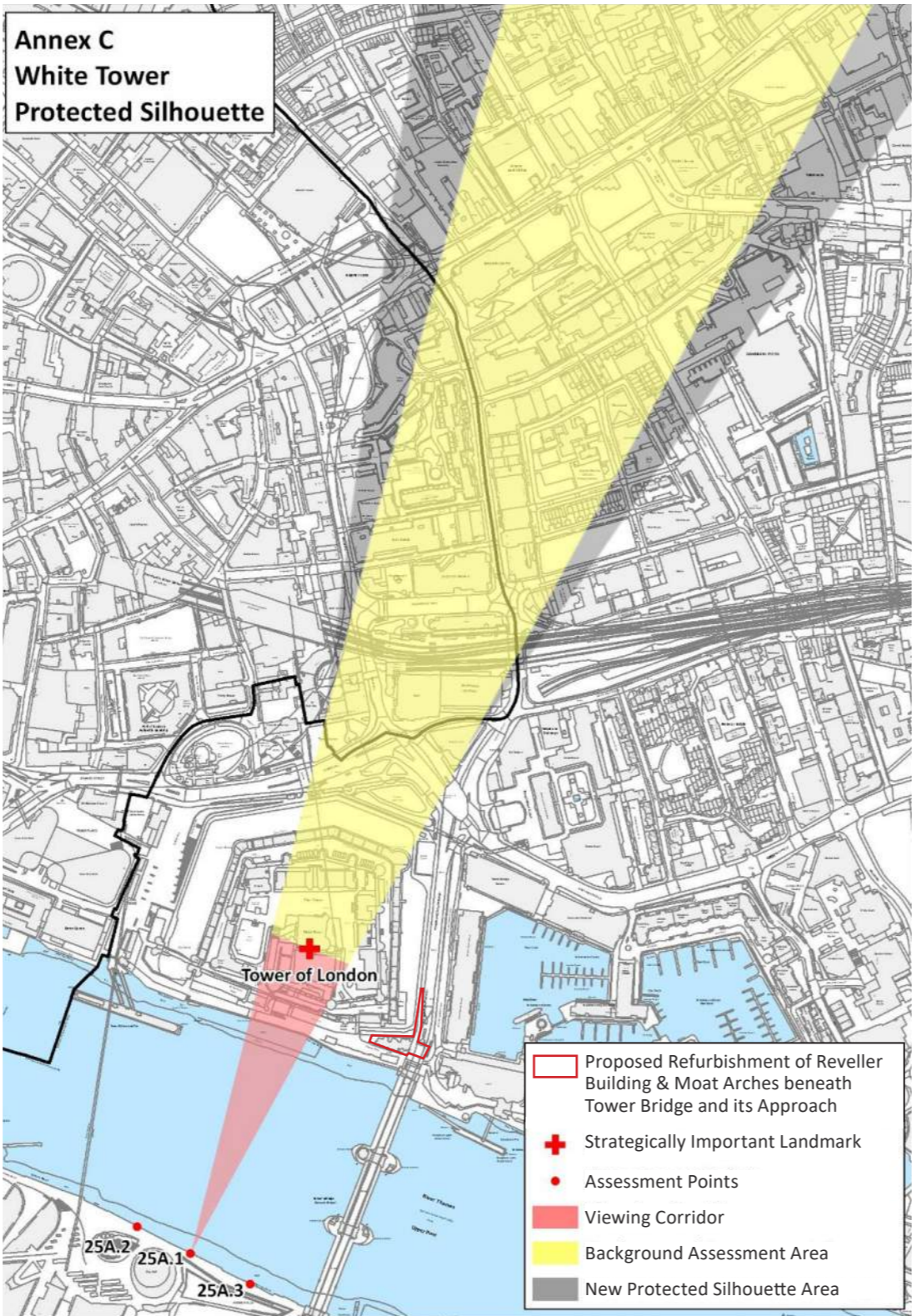
development in the Wider Setting Consultation Area should form an attractive element in its own right and preserve or enhance the viewer’s ability to recognise and to appreciate the Strategically-Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor.

development in the background should not harm the composition of the Protected Vistas, nor the viewer’s ability to recognise and appreciate the Strategically-

2.0 HERITAGE STATEMENT

2.1 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)

Proposed Refurbishment of Reveller Building & Moat Arches beneath Tower Bridge and its Approach, outside protected view View 25A



Panorama from Assessment Point 25A.3 The Queen's Walk at City Hall - foot of pathway from Potter's Fields



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.

2.0

HERITAGE STATEMENT

2.1

PLANNING & HERITAGE LEGISLATIVE FRAMEWORK

2.1.8

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

2.2GUIDANCE 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 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 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

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

2.3

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 (), “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

Exception/ 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.

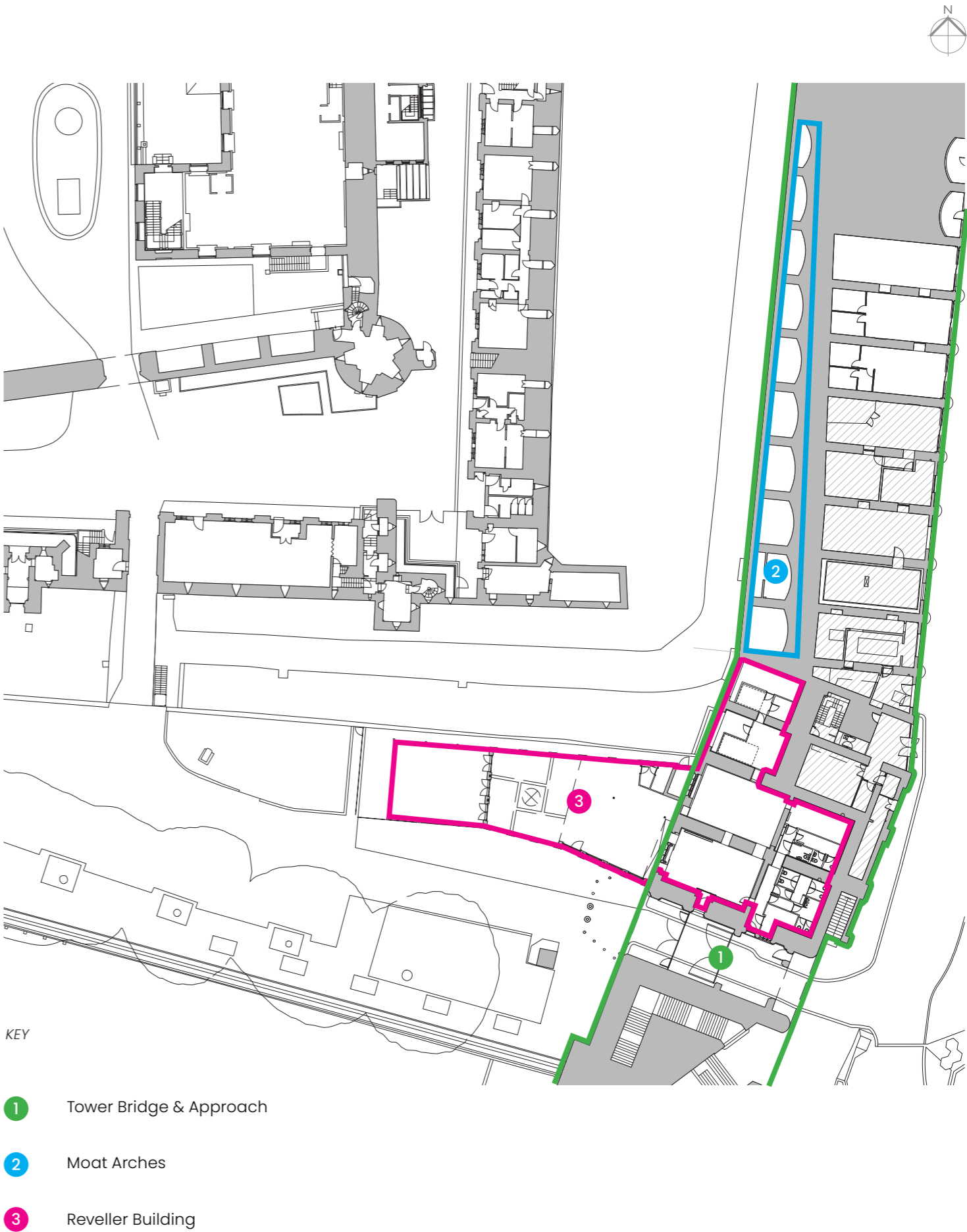
Detrimental/ Intrusive: Themes, features, buildings or spaces which detract from the values of the heritage asset, its setting, character and appearance.

2.0 HERITAGE STATEMENT

2.3 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:

- Tower Bridge (Grade I listed) and its Northern Approach (Grade I listed)
- Moat Arches, beneath the Tower Bridge Northern Approach
- Reveller building and the associated arches within Tower Bridge



2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.1 DESCRIPTION

Tower Bridge is a combined bascule and suspension bridge, designed in 1884 by Sir Horace Jones in collaboration with Sir John Wolfe Barry and later with the oversight of George Stevenson (1887-completion). The bridge was constructed between 1886-1893 to facilitate increases in trade and population in London's eastern districts without disrupting shipping access to and from the City of London's docklands.

The Northern Approach to the bridge was constructed during the same period. The northern approach is nearly 1,000 feet long and consists of brick arches (some of which historically contained guard rooms and stores) on land still owned by the Crown. Its construction resulted in the wholesale destruction at that time of a significant portion of the Tower's 17th century revetment wall and a significant reduction in the width of the eastern moat. At Moat level the western supporting wall of the northern approach, which now forms the eastern outer boundary of the moat, is largely formed of red rubbed brick in English bond with 24 regularly spaced arcade bays across approximately 120m. The southernmost section of the western supporting wall (some 60m) is dressed in Ragstone and provides access to 11 storage areas and office spaces. Surmounting the full length of this wall are painted iron block railings which form part of the overall decorative scheme of Tower Bridge.

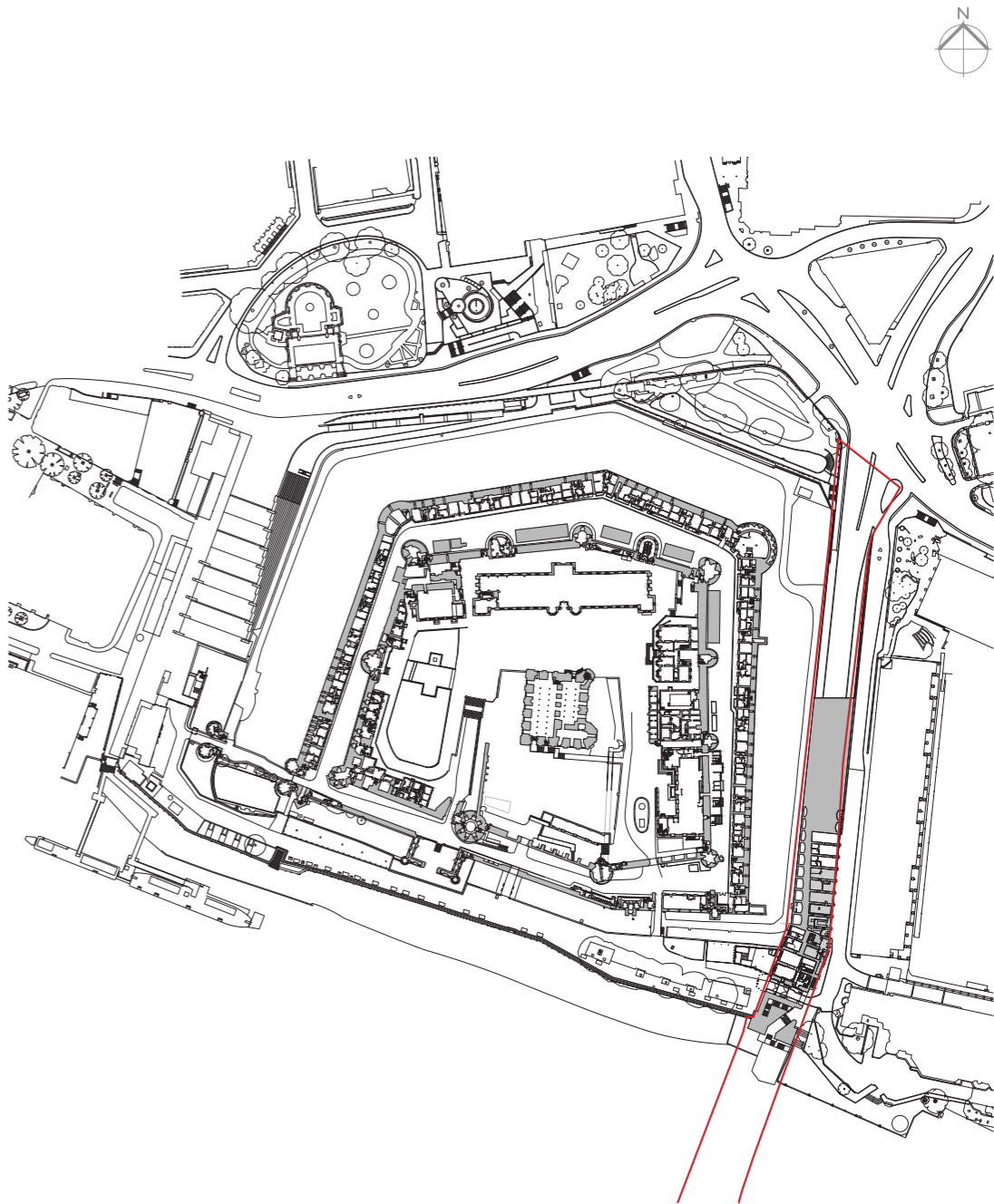
For the purposes of this Heritage Impact Assessment the Northern Approach Arches within the eastern moat of the Tower of London are described in section 2.6 as part of the Moat Arches, and the southern most interior spaces are described in section 2.5 as part of the Reveller building & Tower Bridge interior spaces.



Tower Bridge, seen from the south bank of the River Thames



Tower Bridge and its northern approach, adjacent to the East Moat of the Tower of London



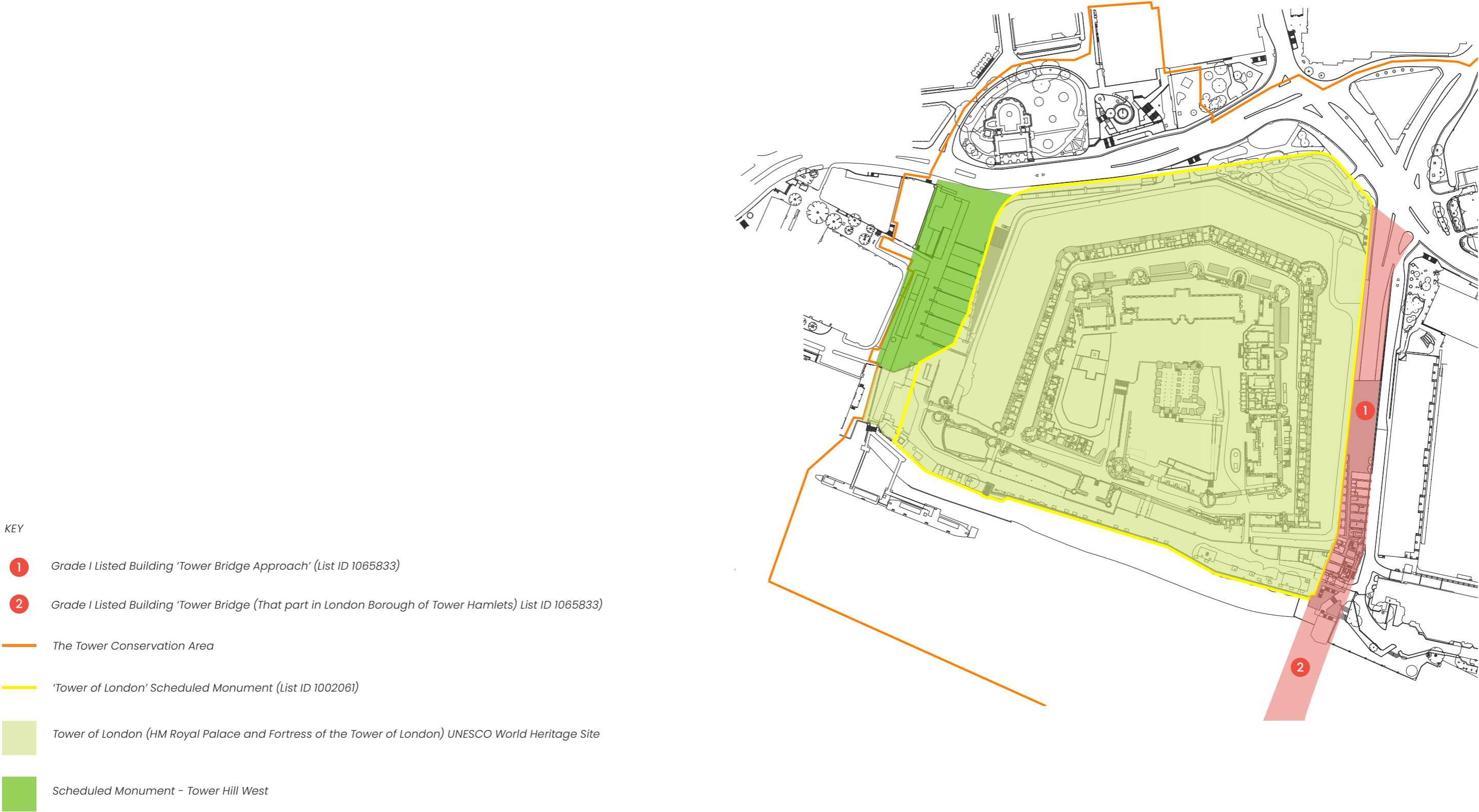
Key plan showing the location of Tower Bridge and its northern approach

2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.1 DESCRIPTION

HERITAGE DESIGNATION



2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS

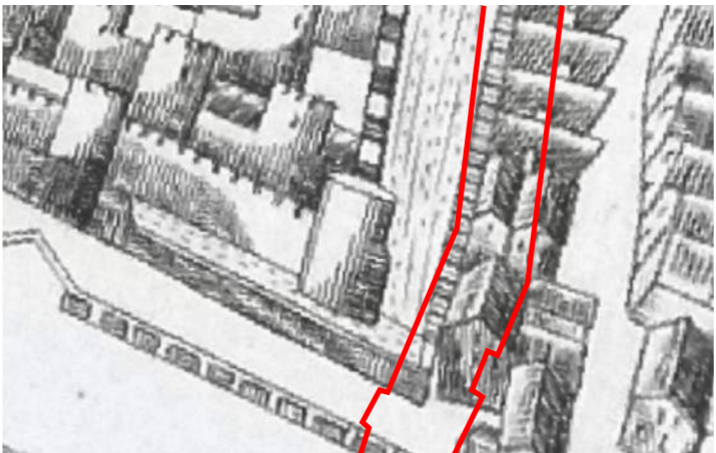
These extracts of maps and drawings show the development of the site location of the Tower Bridge through the ages, from the medieval period to the current day.



Medieval London (1270 - 1300)



Early Tudor London (1520)



Survey by Faithorne & Newcourt (1658 - 1669)



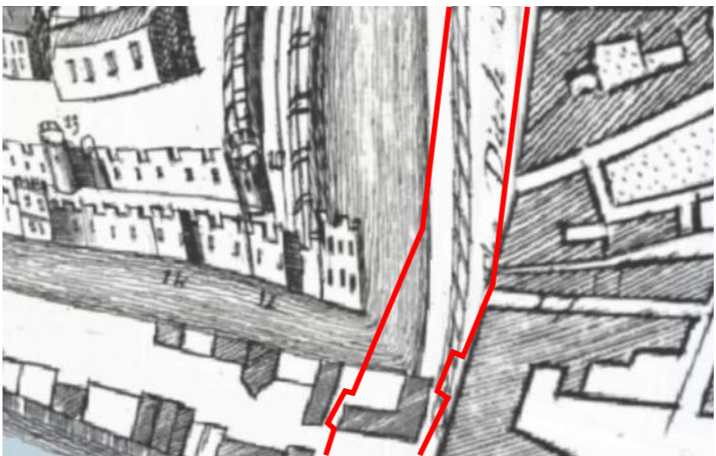
Survey by Leake (1669)



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

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

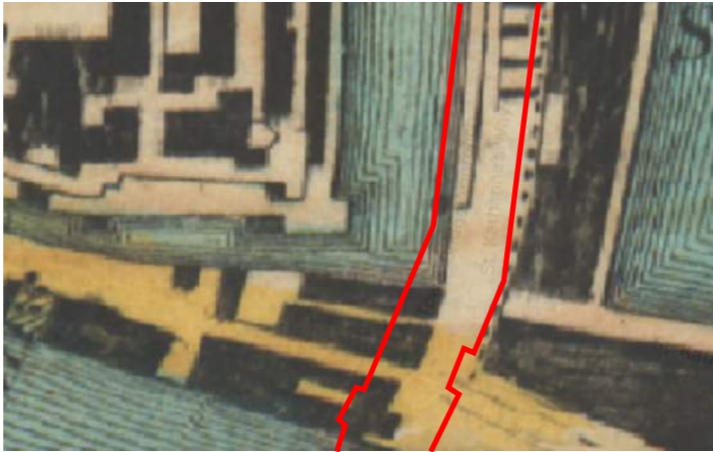
2.4.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS

These extracts of maps and drawings show the development of the site location of the Tower Bridge through the ages, from the medieval period to the current day.



Survey by R Horwood (1799)



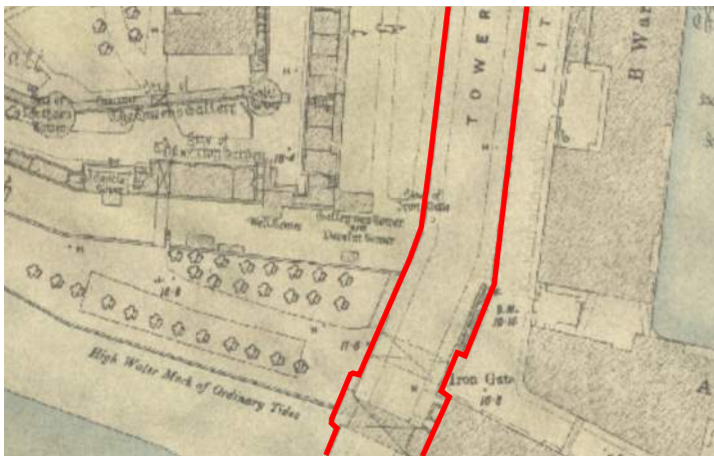
Survey by C & J Greenwood (1828)



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

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT TIMELINE



2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.2 UNDERSTANDING HISTORIC DEVELOPMENT: THE NORTHERN APPROACH

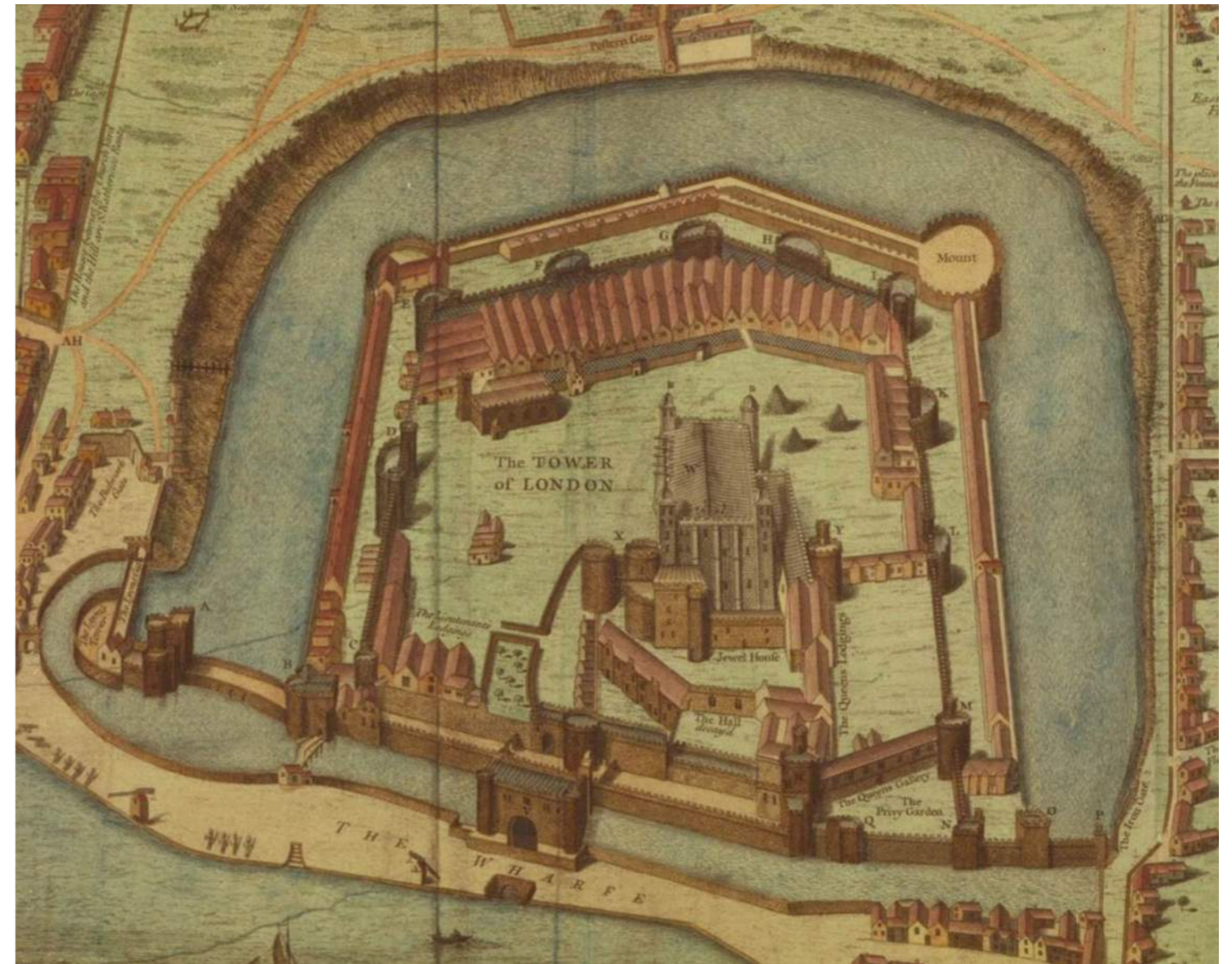
It is understood from documentary record that, aside from reinforcements surrounding the barbican and Lions Gate in the 13th century, the moat at the Tower of London prior to the 17th century was not surrounded by any form of retaining wall. The 1597 Haiward and Gascoyne plan of the Tower, which is the oldest reliable cartographic source showing the fortress, appears to support that assertion – showing that the outer circumference of the moat was formed largely of rough earth ditch.

In the 17th century the Office of Ordnance, at this point the largest single occupant of the Tower, put forward plans to alter and expand the moat to rectify this reduced defensibility. These plans were overseen by Sir Bernard de Gomme, Chief Ordnance Engineer. Initial proposals dated to 1666 show the complete alteration of the outer ballium into a star shaped bastion with angular outer fortifications akin to the defences seen at Tilbury and Portsmouth constructed by De Gomme during the same period. De Gomme's initial plans were not put into action and instead it was opted to construct a near vertical revetment wall across the outer circumference of the moat. This work was completed in 1672 at a cost of over £1500. These works resulted in the moat being reduced in width by approximately 5m, but also included the deepening of the remainder of the area. It is unknown what Medieval or Tudor remains were demolished or concealed during these works, if any. The process of building the revetment wall began initially with the excavation of a foundation trench that has been shown by modern excavations to cut through the post medieval and medieval deposits into the natural London clay. The revetment wall was then constructed within this trench, as a battered construction consisting of a core of English bonded brick, faced with Flemish bond with buttresses on both the front and rear elevations. Most of the revetment wall on the southern elevation of the northern and western sections is material laid according to de Gomme's plans, although altered throughout its history.

The eastern leg of the revetment wall was largely destroyed by the construction of Tower Bridge. In 1876, the Corporation of London approached the Bridge House Estates Committee proposing the construction of a new bridge which sat between Little Tower Hill and Iron Gate Stairs to the east of the Tower. In order for the construction of the proposed Tower Bridge to begin, De Gomme's retaining wall had to be demolished. This was met with fierce criticism from the Constable of the Tower who was concerned that the reduction in the width of the moat would further erode the Tower's defensive capability. These concerns though, were outweighed by the continued development of the docklands and in 1886, De Gomme's eastern retaining wall was demolished and the Northern Tower Bridge approach was constructed in its stead.

The new structure stood closer to the outer ballium of the fortress than the previous retaining wall, leading to a significant amount of width being lost on the eastern area of the moat and a significant reduction in the archaeological potential of that area.

As stated in the site description, the western supporting wall of the northern approach, which now forms the eastern outer boundary of the moat, is largely formed of red rubbed brick in English bond with 24 regularly spaced arcade bays across approximately 120m, all dating from the period of construction of Tower Bridge 1886-1893.

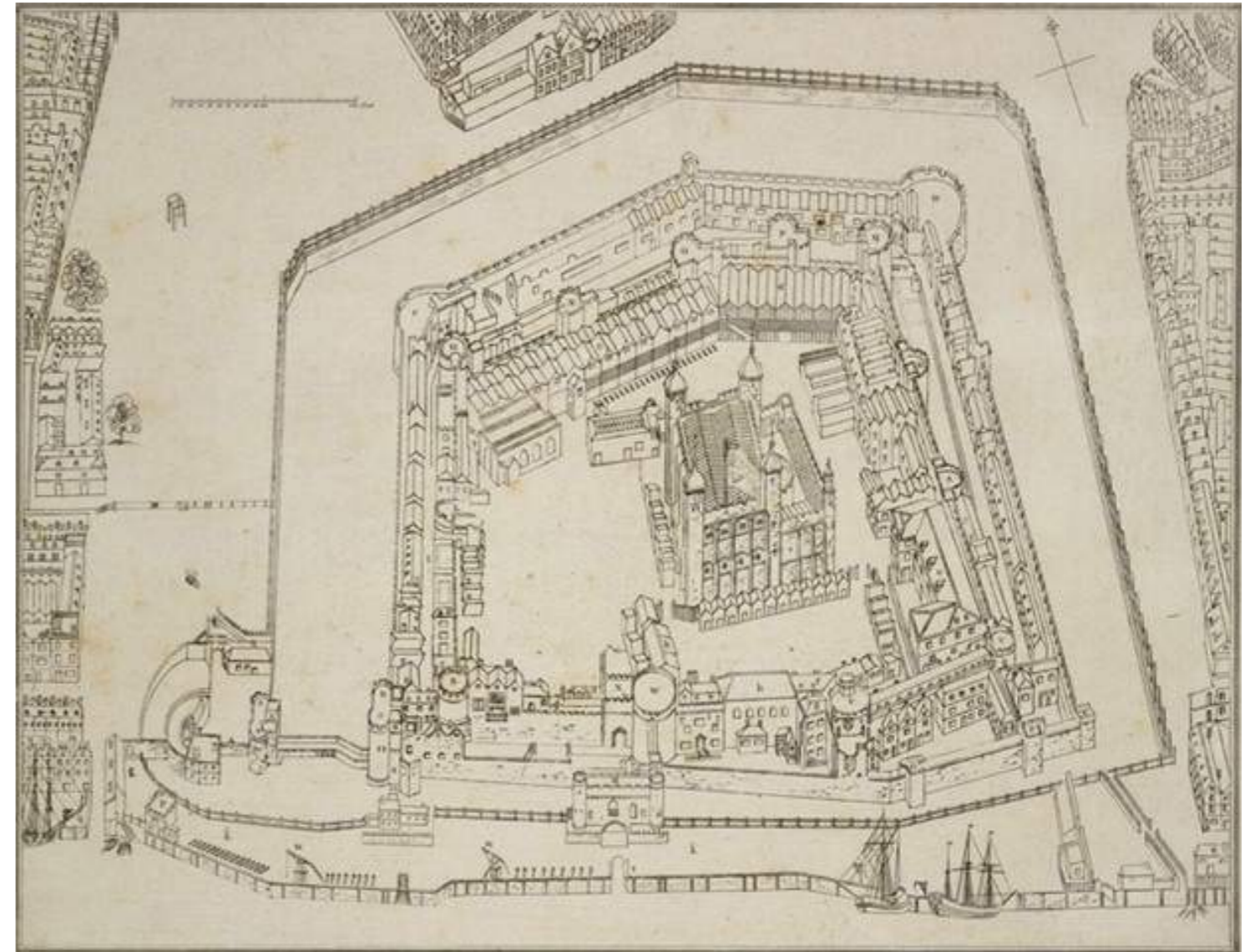


Excerpt of the copy of the Haiward and Gascoyne Map of 1597 made for the Society of Antiquaries of London in 1741 (HRP HRP02178 © Crown Copyright: Historic Royal Palaces). This, the oldest reliable cartographic source showing the fortress, shows the outer circumference of the moat was formed largely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

2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.2 UNDERSTANDING HISTORIC DEVELOPMENT: THE NORTHERN APPROACH

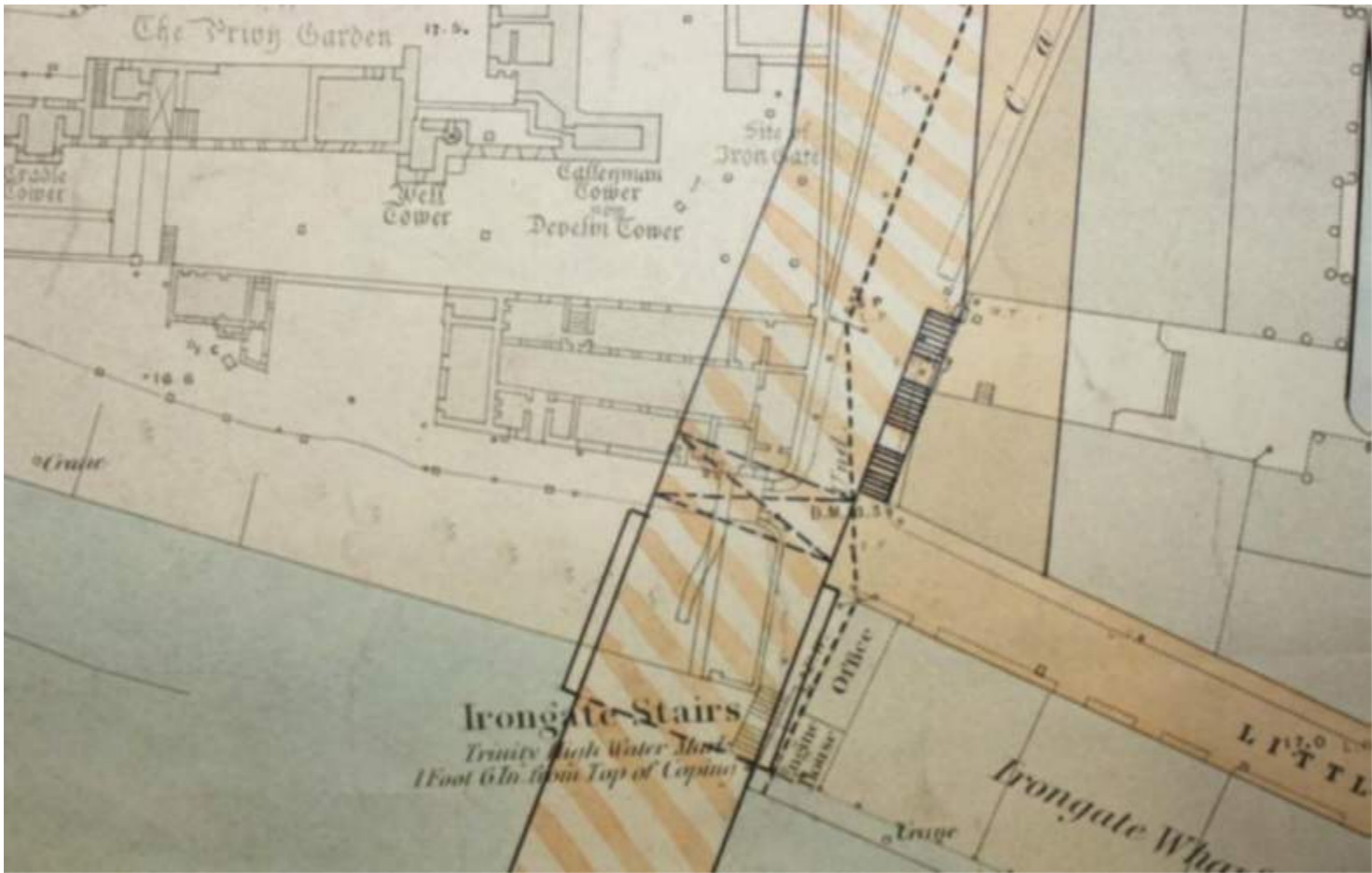


A survey of the Tower of London by Holcroft Blood by order of Lord Dartmouth, Master General of the Ordnance, 1681-1689, (HRP13858 © Historic Royal Palaces). This shows the vertical revetment wall completed in 1872 that narrowed the east moat.

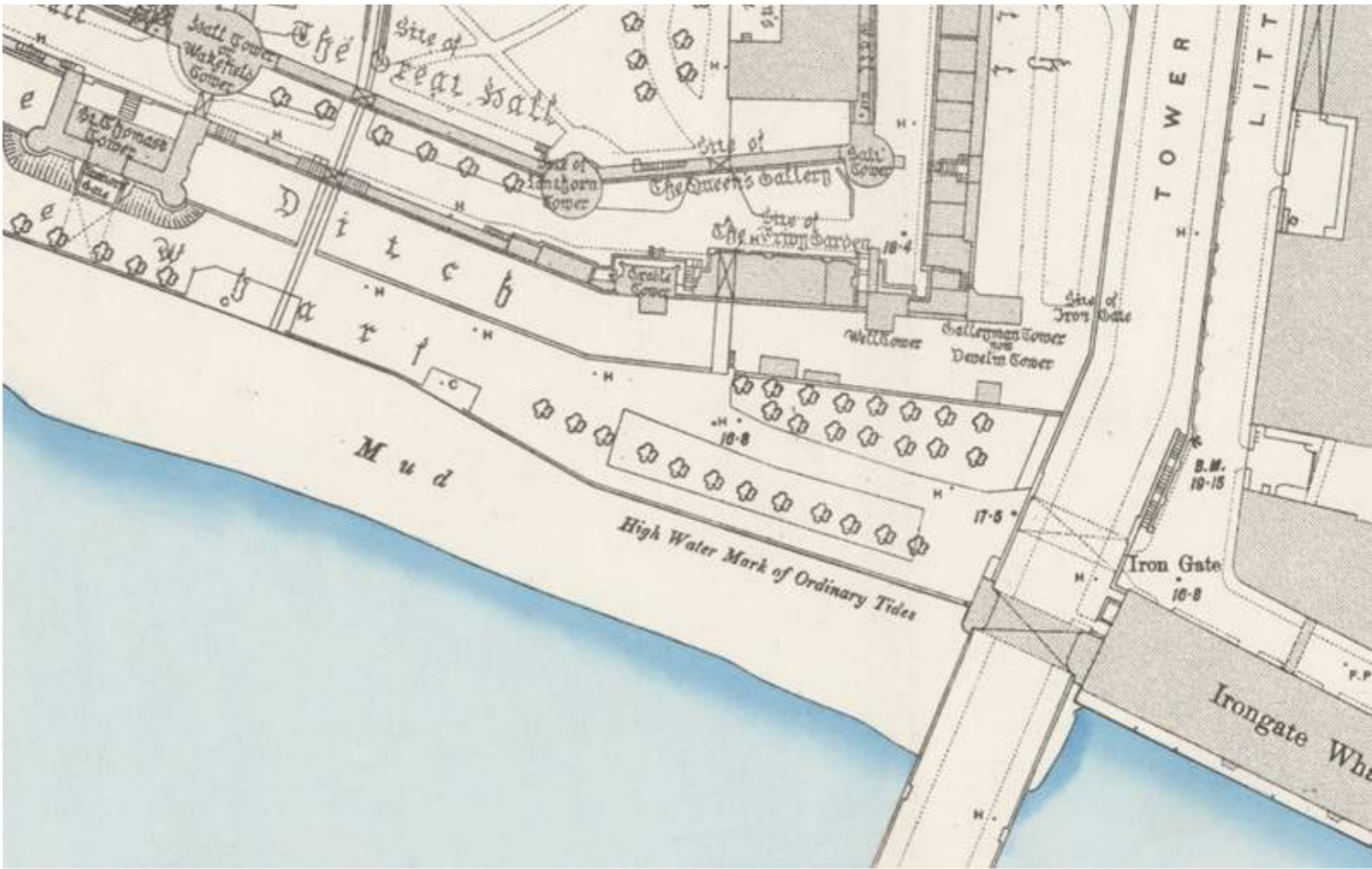
2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.2 UNDERSTANDING HISTORIC DEVELOPMENT: THE NORTHERN APPROACH



Extract from 1873 OS 1st edition, which shows the proposed location for Tower Bridge already determined.



London VII.77 Revised: 1894, Published: 1896. This 1896 map shows the completed Tower Bridge, which largely destroyed the eastern revetment wall of the moat.

2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.3 ASSESSMENT OF SIGNIFICANCE

Tower Bridge is undeniably one of the most iconic and significant structures in Britain and is certainly one of the most significant bridges in the world. This attribution of significance is owed to a number of characteristics, ranging from historical associations with important people and events to the technological advancements in its design and construction and the continued retention of increasingly rare historic machinery.

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

The importance of the Bridge is demonstrated by its status as a Grade I listed structure (with further Grade II structures within the site) and its inclusion within two Conservation Areas – both of which include the Bridge. The bridge spans two London boroughs, with the northern half and its approach in Tower Hamlets, the southern half in Southwark.

Tower Bridge forms an important focal point in both long-range and short-range views in the surrounding area, particularly from the Tower of London, Shad Thames and the banks of the Thames River.

When assessed against the Heritage Values outlined in English Heritage guidance “Conservation Principles, Policies and Guidance”, Tower Bridge 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, which have been evolved with reference to the Conservation Management Plan & Gazetteer for Tower Bridge by Purcell in October 2013, updated in February 2018:

EVIDENTIAL VALUE: VERY HIGH

- The survival of the original form, layout and much historic built fabric of the Bridge is of Very High value, along with its continued functional operation since its opening. While the banks of the Thames have changed considerably in the past 125 years, and continue to do so with ongoing development, Tower Bridge has remained largely unchanged as a key historic and iconic structure – its retention a physical reminder of the design, style, grandeur and ingenuity of the Victorian era.
- The continued retention of the steel structure and historic machinery is of Very High value in particular, with the potential that these have for understanding the construction and continuous use of the Bridge for

over 100 years. Tower Bridge is an important example of an early steel suspension bridge with the typically Victorian addition of stone cladding. Although repairs have been made to the structure in places using welding rather than the original method of riveting, the structure remains almost entirely intact. The greatest loss of original and historic physical evidence has been the removal of some of the historic machinery. This includes, for example: the loss of historic implements and tools in the workshops.

- The wealth of known and potential archival evidence. The construction of the Bridge and its machinery is well documented in contemporary sources, including accounts of commissioning, design and fabrication of various elements and their construction on site. These documents are clearly comparable High value to the physical evidence which remains in situ, and as such it provides a tangible understanding of how the Bridge was built.
- The Archaeological record reflects that the Tower Bridge site occupied a key river crossing within an area of evolving riverside settlement in London since pre-historic and Romano-British periods. The buried archaeological potential regarding development of riverside jetties and wharves across all periods but particularly dating from the 18th and 19th Centuries is High.

HISTORICAL VALUE: VERY HIGH

- Associations with the development of London, The Thames and Britain. Tower Bridge is located in the heart of the city of London, where human activity dates from the Mesolithic period and settlement dates from the Romano-British era (AD 47-410). Just upstream from here the Romans constructed a crossing on the site of London Bridge, thus marking the importance of this point as a river crossing from as early as the 1st century. In the 19th century Pool of London was a key point of population growth and trade circulation across London and through Britain. The Bridge is representative of a changing economy and growing city.
- The Bridge represents the power, wealth and success of Victorian Britain and in that way links to the history of the British Empire. The Bridge, with all of its technological advancements and impressive structure, makes it symbolic of the progress and success of the British Empire.
- Tower Bridge and its interior spaces provides an insight into the working conditions, construction costs, labour

and employment in London from the late 19th to the early 21st century.

- The design, construction and operation of Tower Bridge is associated with numerous individuals, including designers and constructors Sir Horace Jones, Sir John Wolfe Barry, Sir William Arnoll, and George Stevenson – to whom many of the record drawings are attributed.
- Tower Bridge has formed the centrepiece and the backdrop to countless national historic events.
- The illustrative historic value of Tower Bridge and its northern approach is illustrated through both the varied construction methods and physical uses of the area surrounding the fortress which have resulted in such a unique landscape setting, to which the bridge and approach are essential physical and visual components. Additionally, those who cross the bridge gain a shared experience of viewing an 11th century fortress framed by the modern developments of the City of London from a 19th century gothic bridge: an experience which is unique to London and of Exceptional significance.

ARCHITECTURAL & AESTHETIC VALUE: VERY HIGH

- The overall design for Tower Bridge is highly distinctive in its character – achieving a fine balance between aesthetics and engineering. It is simultaneously a structural engineering marvel of steel and concrete and designed to be sympathetic to the adjacent Tower of London. The result is in a highly distinctive romanticised neo-Gothic.
- The Bridge as an icon. The distinctive form and scale of the Bridge has become a cultural landmark on the Thames and in London, as well as a national icon of Britain. Since its construction, the Bridge has been a source of inspiration for artists of all kinds and in various medias, featuring in incalculable numbers of paintings, photographs and numerous films.
- The importance to local views. The Bridge is an Exceptional significance Grade I listed monumental landmark in central London and an important visual element in the Thames riverscape and GLA London Plan. The Bridge also contributes positively to Tower Bridge (Southwark) and Tower (Tower Hamlets) Conservation Areas, and the UNESCO World Heritage Site – which it stands on the edge of.
- Care given to the appearance of the historic machinery. Designers and manufacturers of high

quality machinery took pride in the appearance of their products, particularly where they were visible to clients or visitors. Steel cables, hydraulic pumps and bascule engines were therefore finished to high standards, with castings painted, lacquered and probably lined, and machined surfaces highly polished.

- Public appreciation for the architecture and aesthetics of the Bridge. Much of the aesthetic value of Tower Bridge is rooted in its perception and appreciation by the public. Tower Bridge is valued as a powerful landmark with emotional attachments for many people, evoking a sense of pride and place amongst locals and international visitors alike.

COMMUNAL VALUE: HIGH

- The Bridge has considerable communal value to countless individuals, from local residents and Bridge employees to national and international tourists. For many people their personal memories of the Bridge evoke nostalgia, reminiscence and a memory of positive past experiences.
- For many, the Communal Value of Tower Bridge also stems from an awareness and appreciation of all the other values that make it significant. Some find an interest in archival drawings and learning new information about how the Bridge worked. Others marvel at how the Bridge has formed such an important part of the history and development of London and still others will be drawn to it as a landmark and an important part of the London skyline. All were evident in consultation held as part of the Conservation Management Plan.
- Tower Bridge and its approaches are valued for their role in connecting communities. The Bridge plays a vital role in joining communities north and south of the river and is an important river crossing across the Thames.
- The Bridge is a considerable educational resource. This high value is linked to the various aspects of historical heritage value, and as such providing a tangible resource for teaching students and adults alike the history and development of London. Much of the original machinery and structure exists in the interior spaces. This offers the wide opportunity for vivid portrayal of what the operatives would have done to run and service the machinery and what life was like for them. It also provides a good resource for understanding the actual workings of the machinery and the ingenuity of Victorian engineering.

2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

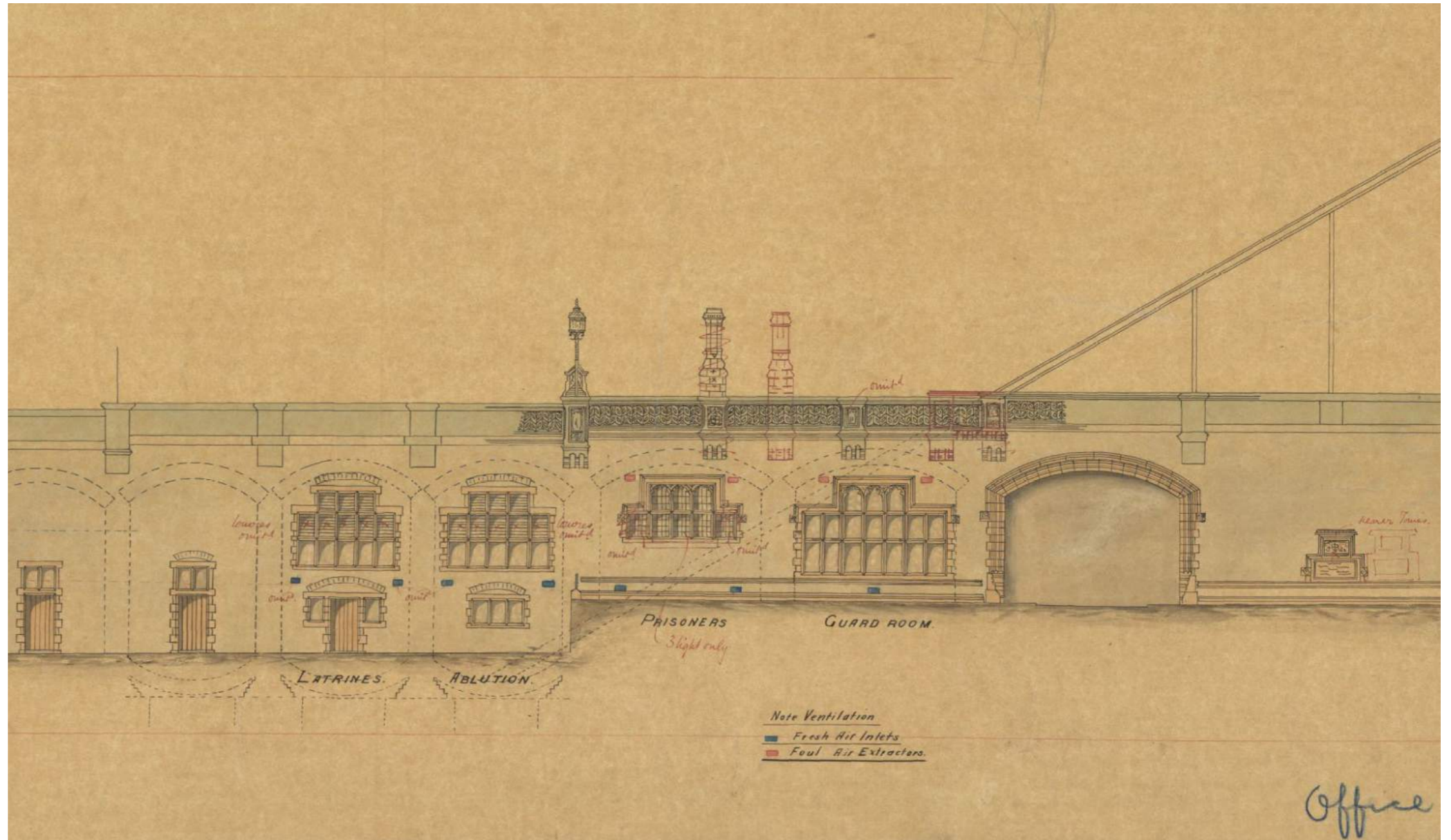
2.4.3 ASSESSMENT OF SIGNIFICANCE

It is important to consider the Bridge within a wider heritage context. When doing so it is clear that Tower Bridge is unique amongst other contemporary icons which have become emblematic of the city in which they stand such as the Eiffel Tower and Statue of Liberty. Its uniqueness in this context is derived from its use as a functional Bridge, while the other two examples act only as monuments. It is also unique amongst Bridges along the Thames, being the only Grade I listed bridge (as well as the only working lift bridge) in London. Finally, when compared to contemporary bridges, Tower Bridge stands out for its numerous functions: as a river crossing, a lift bridge, and an icon within London.

Tower Bridge has such specific qualities therefore that in the Conservation Management Plan for Tower Bridge, produced by Purcell and updated in 2018, a further heritage value has been considered in recognition of its specific characteristics:

TECHNOLOGICAL VALUE: VERY HIGH

The Bridge is also of very high Technological Value, owing to the retention of unique and increasingly rare machinery, all of which is representative of the engineering excellence of the Victorian era. It is also significant for its use of steel and the overall structural design for the Bridge, which was an incredible achievement as a bascule bridge at the time. There were also innovative techniques used during the design and construction of the Bridge, including experimentation in wind-loading, the use of Arrol's mechanical driller and hydraulic riveting system, and various elements of the hydraulic machinery.

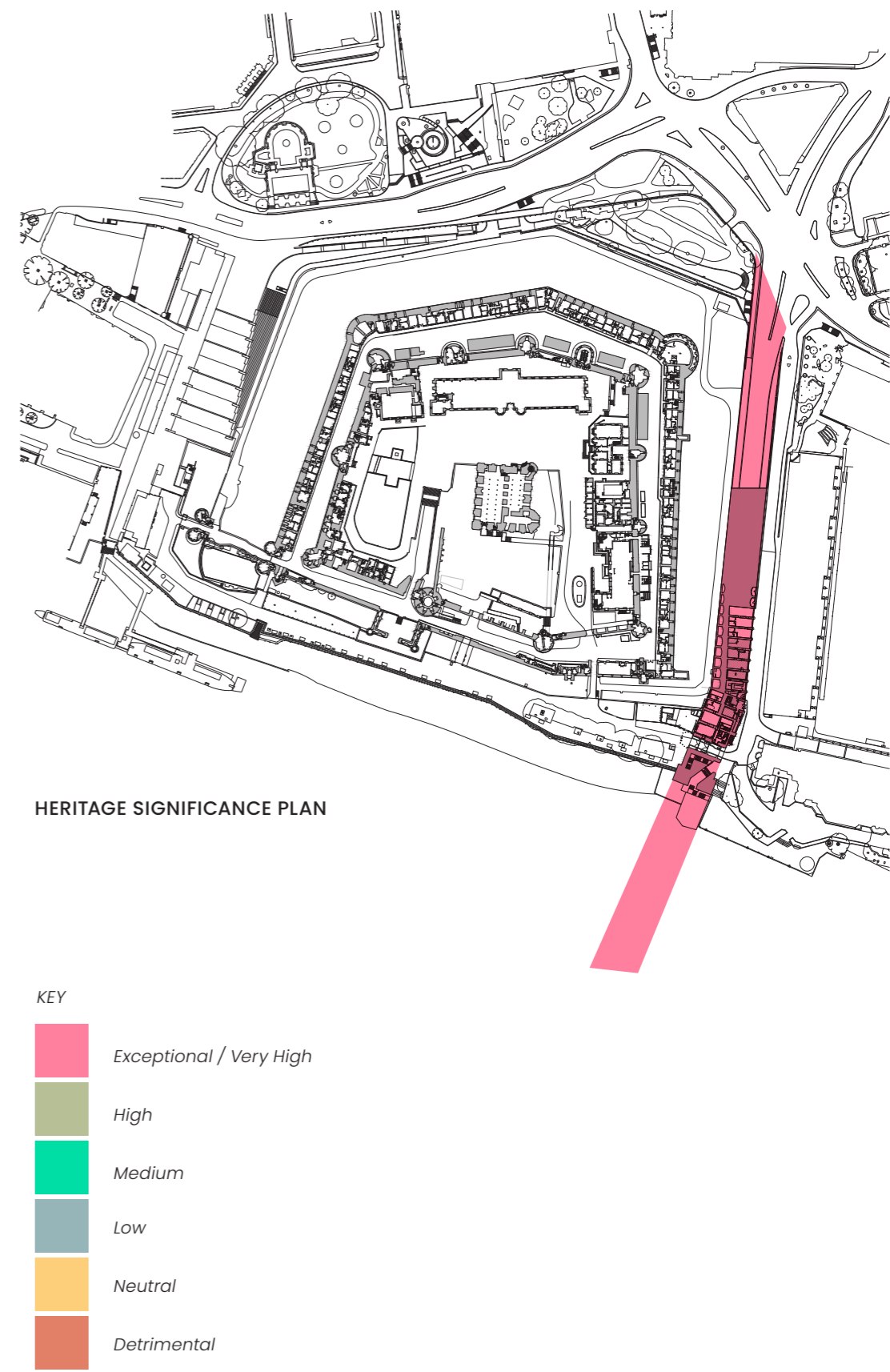


Original drawing for the Guard Room, Prisoners Cells, and associated latrines and ablutions, designed within the northern approach to Tower Bridge. A chimney stack can be seen here rising above the parapet suggesting the existing of a fireplace within the Guard Room. The chimney is still in place today though no longer in use. There is significant potential for this evidential value to be revealed and realised during proposed project works.

2.0 HERITAGE STATEMENT

2.4 TOWER BRIDGE & ITS NORTHERN APPROACH

2.4.3 ASSESSMENT OF SIGNIFICANCE



2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.1 DESCRIPTION

The Moat Arches are a series of ten arched spaces beneath the Tower Bridge northern approach road, behind the wall that forms the eastern boundary of the Tower of London moat.

The Northern Approach to the bridge was constructed with Tower Bridge in 1886-1893. The northern approach is nearly 1,000 feet long and consists of brick arches (some of which historically contained guard rooms and stores) on land still owned by the Crown. Its construction resulted in the wholesale destruction at that time of a significant portion of the Tower’s 17th century revetment wall and a significant reduction in the width of the eastern moat. The western supporting wall of the northern approach to Tower Bridge, which now forms the eastern outer boundary of the moat, is largely formed of red rubbed brick in English bond with 24 regularly spaced arcade bays across approximately 120m. The piers of the arcades continue in English bond and are surmounted by segmented brick arches formed of 5 courses of header bonded brick. The interior of the bays is dressed in English bond, although the vaults are rendered in some locations. The piers, segmented arches and interior of each arcade are formed in largely the same brick excluding some areas of patchwork repair.

The southernmost section of the western supporting wall (some 60m) is dressed in Ragstone and provides access to 11 storage areas and office spaces.

Today, the Moat Arches spaces are largely unused, except for storage. Within the southern section of the arches, Historic Royal Palaces have previously utilised some of the spaces as offices and volunteer welfare spaces, generally on occasional basis in association with events such as the installation of poppies by artist Tom Piper in the Lest We Forget, Blood Swept Lands and Seas of Red projects 2014 and 2018, and Superbloom which commemorated Her Late Majesty Queen Elizabeth II’s Platinum Jubilee in 2022.



The Moat Arches, as seen from the North-East Moat Revetment



The Moat Arches, as seen from the South Revetment Wall



Existing interior of Moat Arches used as store



Existing interior of Moat Arch 01 with suspended ceiling structure installed in the late 20th century.



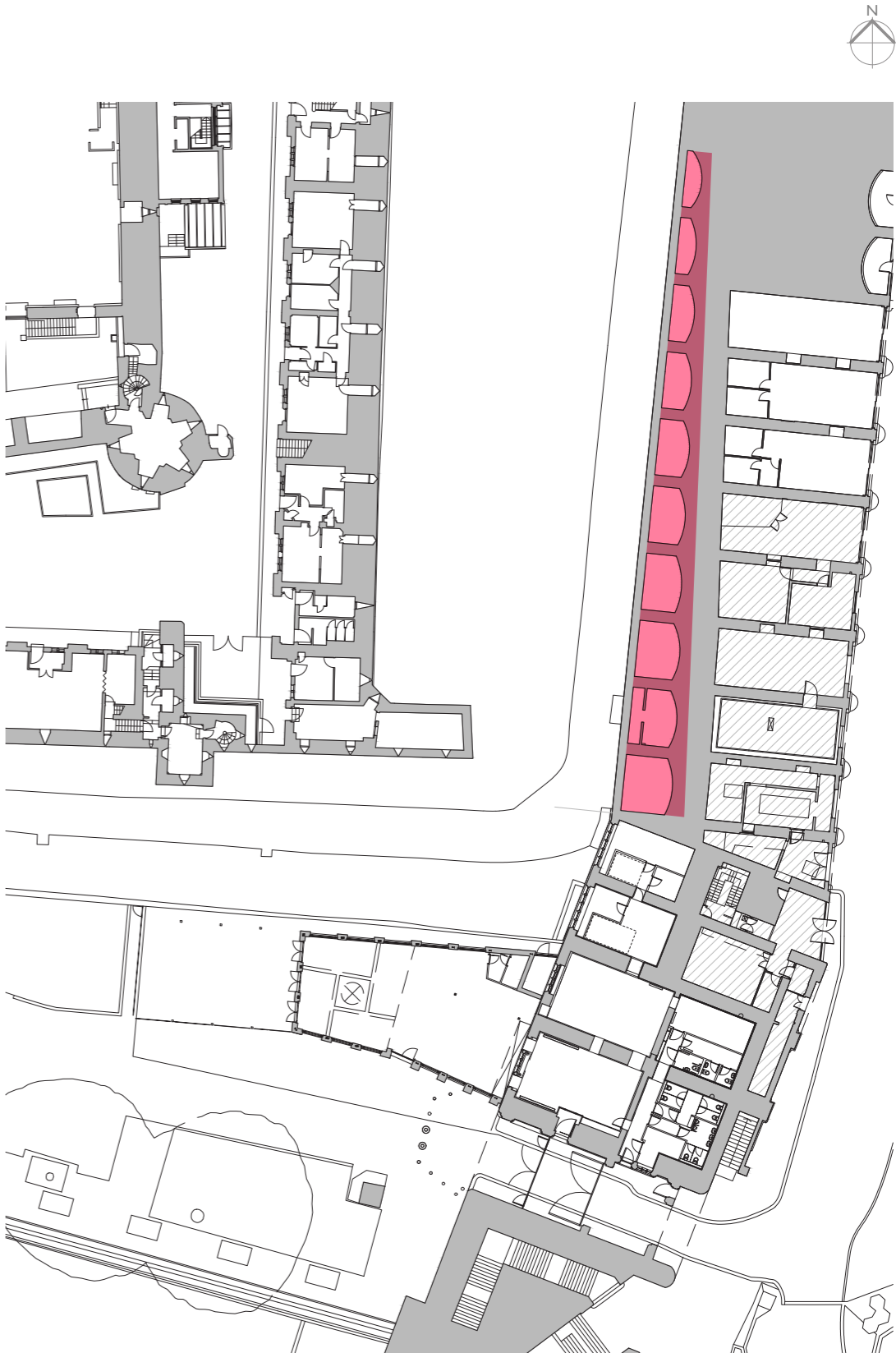
Existing typical door of Moat Arches

2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.1 DESCRIPTION

This key plan defines the ten arches beneath Tower Bridge Northern Approach that are described within this Heritage Impact Assessment as the Moat Arches, and within which scheme designs that comprise this application are proposed.



2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.1 DESCRIPTION

HERITAGE DESIGNATION

KEY

1

The Moat Arches

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)

'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



2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS

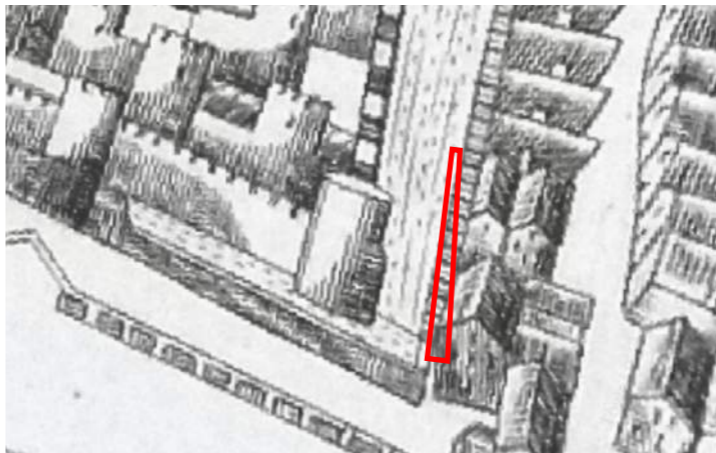
These extracts of maps and drawings show the development of the site location of the Moat Arches through the ages, from the medieval period to the current day



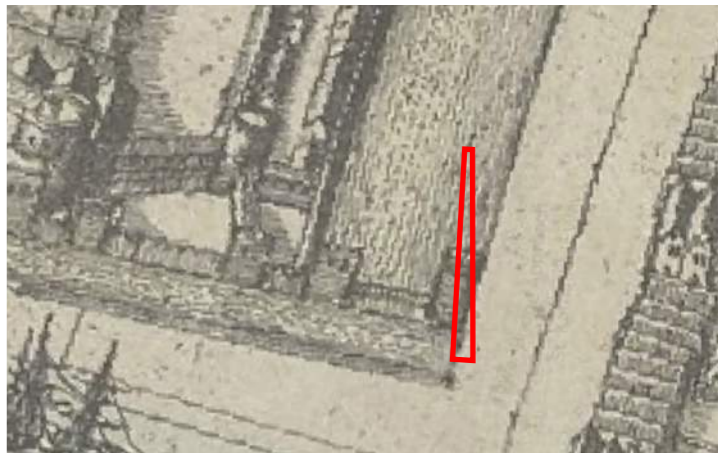
Medieval London (1270 - 1300)



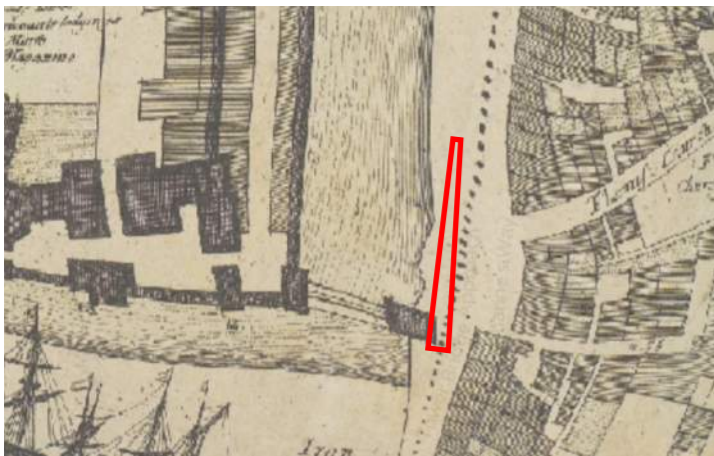
Early Tudor London (1520)



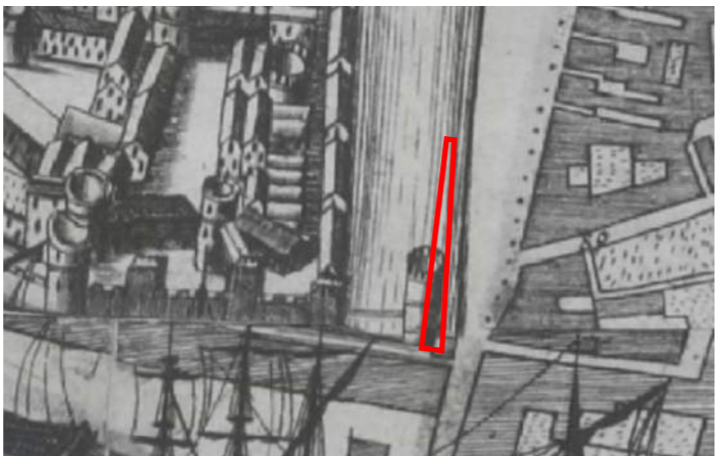
Survey by Faithorne & Newcourt (1658 - 1669)



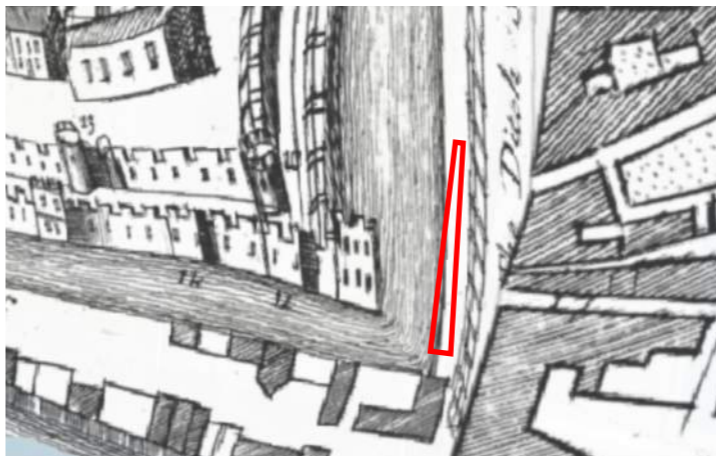
Survey by Leake (1669)



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

2.5 MOAT ARCHES

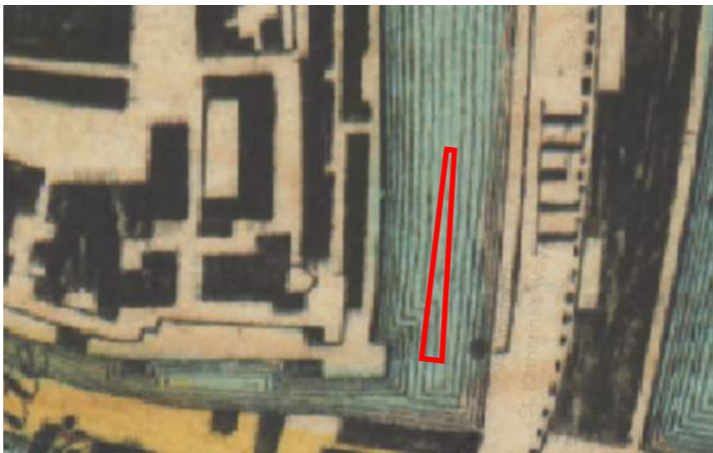
2.5.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT DRAWINGS

These extracts of maps and drawings show the development of the site location of the Moat Arches through the ages, from the medieval period to the current day



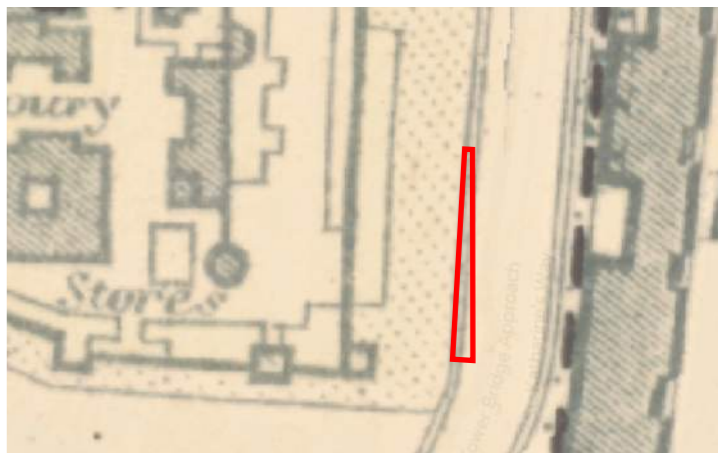
Survey by R Horwood (1799)



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

2.5 MOAT ARCHES

2.5.2 HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT TIMELINE



2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.3 ASSESSMENT OF SIGNIFICANCE

The Moat Arches contribute to the overall **Exceptional/Very High** significance of the Tower Bridge and its Northern Approach. The importance of the Tower Bridge Northern Approach is demonstrated by its status as a Grade I listed structure and its inclusion within the Tower Conservation Areas as defined by Tower Hamlets Council.

Although the Moat Arches interior spaces fall outside of the Tower of London Scheduled Monument, and the UNESCO World Heritage Site, with only the external wall forming part of these designations, the Arches undoubtedly contribute to the **Exceptional/Very High** significance of the moat as part its eastern boundary.

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

The Moat Arches are considered as part of the architectural configuration of Tower Bridge and its northern approach. As such many of the characteristics and heritage values defined in section 2.4 are also attributable here, and as such need not be repeated.

The following considerations are specific to the Moat Arches:

EVIDENTIAL VALUE: VERY HIGH

- The Moat Arches are walls of viaduct constructed of stock brick (and arches) in English bond. They form the flanking walls of the northern approach road topped by cast iron balustrades with Victorian Gothic decoration. These elements are original to the bridge and date to c.1893. The Moat Arches are an integral feature of the fabric and landscape setting of two monuments of exceptional importance; The Tower of London and Tower Bridge, and share the characteristics of evidential value of the bridge set out in section 2.4.

- The construction of Tower Bridge resulted in the wholesale destruction at that time of a significant portion of the Tower’s 17th century revetment wall and a significant reduction in the width of the eastern moat. The archaeological potential regarding development of the Tower of London and its moat across all periods but particularly dating from the 17th century is High.
- A chamber was discovered under the arches beneath the northern approach during refurbishment works in 2011. The brick chamber is presumed to have been part of a sewer. With this, and other discoveries, it is clear the Arches yield high archaeological potential.
- The moat has proved the extraordinary potential for revealing lost phases of the Tower’s development right back to its origins, and studies of the standing buildings and structures have revealed high archaeological potential. As noted in Historic Royal Palace’s Tower of London World Heritage Site Management Plan (p89) “The physical remains of more recent periods – both in below-ground archaeology and as surviving buildings – are currently an under-appreciated resource”, and this is certainly true of the underutilised arches.

HISTORICAL VALUE: VERY HIGH

- The Moat Arches are the undercrofts of the northern approach to Tower Bridge, with brick interiors. Originally, they were the only parts of the Bridge not devoted to the actual management of the bridge, lending them a unique historical value. They were on permanent loan to the Tower of London Garrison and so form a part of the Tower’s own history distinct from the Tower Bridge. They were put to various uses; a guardroom and uniform store were built into the archway closest to the Bridge’s northern abutment (further explored in section 2.6 as part of the Reveller building & Tower Bridge Arches project area).
- The Corporation of London (Tower Bridge) Act 1885 is the document which set the parameters for the construction of the Bridge and outlined its management and operation for the future. It is an important piece of history linked to the Bridge, as without it there might be a very different structure

than exists today. In 1900 the Grant of the Right to Maintain Tower Bridge was passed. This gave the Corporation of London the “*full and free right and liberty to continue and maintain and from time-to-time repair or replace any part or parts of the Tower Bridge and approaches*”. As such, this set the parameters for future upkeep of the Bridge and has ensued its ongoing repair. Even today, the 1885 Act and 1900 Grant remain an essential part of Tower Bridge – outlining the statutory obligation to lift the Bridge and also guaranteeing that the high-quality care and maintenance of the Bridge continues. However, the Act is not without its complexities – refer notes on condition and conservation issues below.

- Considered independently from the values it shares with the Tower Bridge and northern approach assets as set out in section 2.4, the façade and vaults of the Moat Arches has **high** historic value due to their use as stores during the First and Second World Wars.
- Documentary evidence, of comparable **high** historic value to the fabric itself, exists in the National Archives at Kew as letters dated 1890–93 between the Corporation of London, the Constable of the Tower of London and the Secretary of State in the Government War Department recording the purchase by the War Office of the vaults beneath the Northern Approach to Tower Bridge, and proposed alterations to them, “with a view to store carriages for mobilisation purposes”.
- The condition of the Moat Arches façade wall is **Detrimental** to the interpretation of its use during these periods. Refer notes on condition and conservation issues below.

ARCHITECTURAL & AESTHETIC VALUE: VERY HIGH

- Overall, the Moat Arches share many of the characteristics and architectural aesthetic values of Tower Bridge and its approach set out in section 2.4. Though they appear within views towards Tower Bridge, and within the Moat, most members of the public and visitors to Tower Bridge and the Tower of London are much less aware of the Moat Arches since they are concealed behind the façade wall.

- Internally, the Moat Arches are unique and beautiful brick vaulted spaces. Additionally, their architectural configuration reveals details of the construction of the bridge and its approach road contributing to a very high architectural value distinct from the wider characteristics the spaces hold as part of Tower Bridge.
- The condition of the Moat Arches façade wall is **Detrimental** to its aesthetic value. Refer notes on condition and conservation issues below.

COMMUNAL VALUE: VERY HIGH

- Whilst the Moat Arches share some of the characteristics and values of Tower Bridge and its approach defined in section 2.4, the communal value can be considered to currently be much lower in this specific area of the asset since there has never been any visiting public access to the Arches.
- The potential for communal value though is very high, since the spaces and features exemplify the evidential, historic and aesthetic values that will be enjoyed by people with an interest in learning new information about how the Bridge works and was constructed, and the stories of people that used and worked within these spaces in the past.
- Medium communal value can be attributed to the use of some of the Arches as volunteer welfare spaces in association with major events and key moments of national celebration and public engagement centred on the Tower, such as the installation of poppies by artist Tom Piper in the Lest We Forget, Blood Swept Lands and Seas of Red projects 2014 and 2018 commemorating WWI and visited by over 5m people, Beyond the Deepening Shadow light installations in 2018, and Superbloom which commemorated Her Late Majesty Queen Elizabeth II’s Platinum Jubilee in 2022.

2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.3 ASSESSMENT OF SIGNIFICANCE

CONDITION AND CONSERVATION ISSUES

The complex nature of previous development phases in the environs of the Tower is evident in the ownership pattern, particularly where sites have been acquired and cleared for highway purposes such as the Moat Arches. Construction of Tower Bridge necessitated the demolition of property and the crossing of established ownership boundaries. Consequently, much of the land which is currently under highway is now in public ownership.

The Moat Arches and the East Revetment wall are the property of the City of London as part of the Grade I listed Tower Bridge, though the East Revetment Wall forms part of the Moat and is thus part of the Tower of London Scheduled Monument. Its condition directly affects the setting of the Tower.

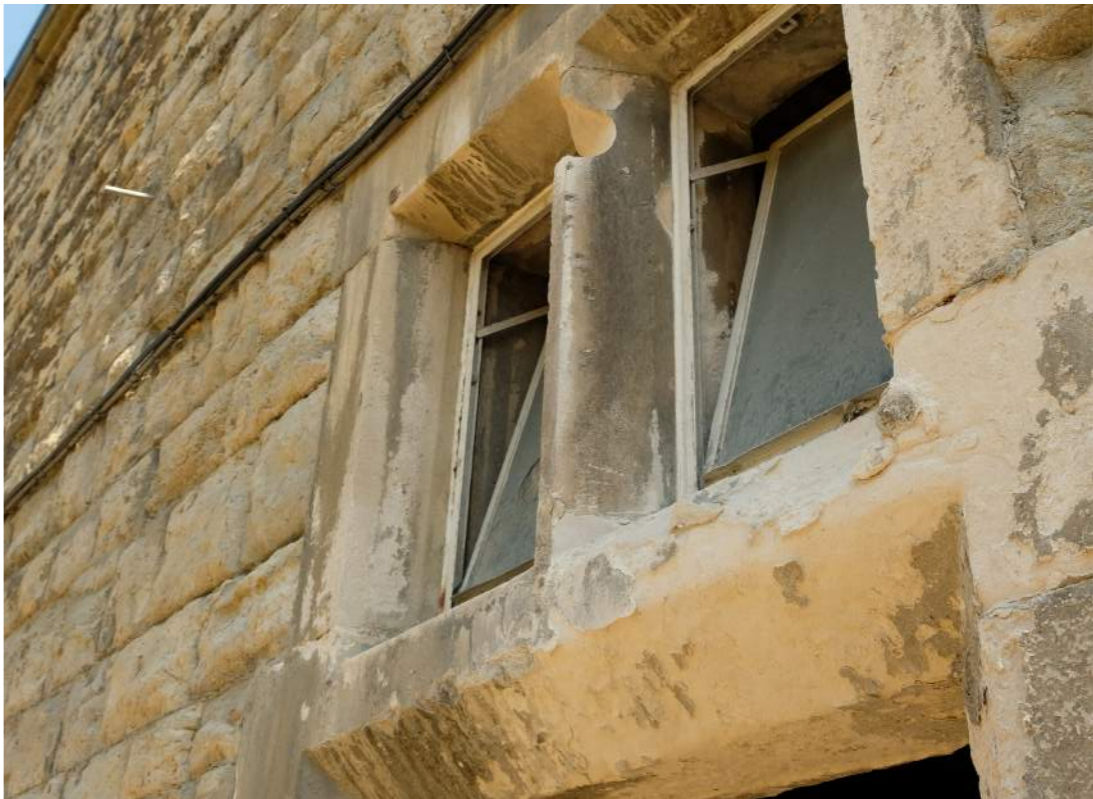
The 19th century wall is evidencing significant spalling, cracking and structural movement in large sections of brickwork due to inappropriate patchwork repairs and the use of repointing in an unsuitable hard mortar which should be addressed. The current poor condition of the wall reflects poorly on both the monuments to which it is attached and is also a safety hazard due to falling masonry. Render where it exists within the vaults is crazed. Efflorescence is consistent throughout the brickwork section of the wall and the downpipes, although functional, have not been cleaned or painted in several decades and are rusting as a result.

The southern section of the wall shows similar damage to the Ragstone facing and the fixtures.

It is clear from historic records held in the National Archives at Kew that issue of water ingress from the roadway have been affecting this wall since late 1920s, when issues were first raised in writing in letters between the Corporation of London City Surveyor and the Secretary of Her Majesty’s Office of Works and Public Buildings.



Existing poor condition of external masonry and corroded and failing windows



Friable stonework and damage to stonework



Spalling, cracking and efflorescence and staining to brickwork internally



Spalling, cracking and efflorescence and staining to brickwork internally

2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.3 ASSESSMENT OF SIGNIFICANCE



KEY

Exceptional / Very High	High	Medium	Low	Neutral	Detrimental
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2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.3 ASSESSMENT OF SIGNIFICANCE



Detrimental modern cables



Detrimental modern pipework



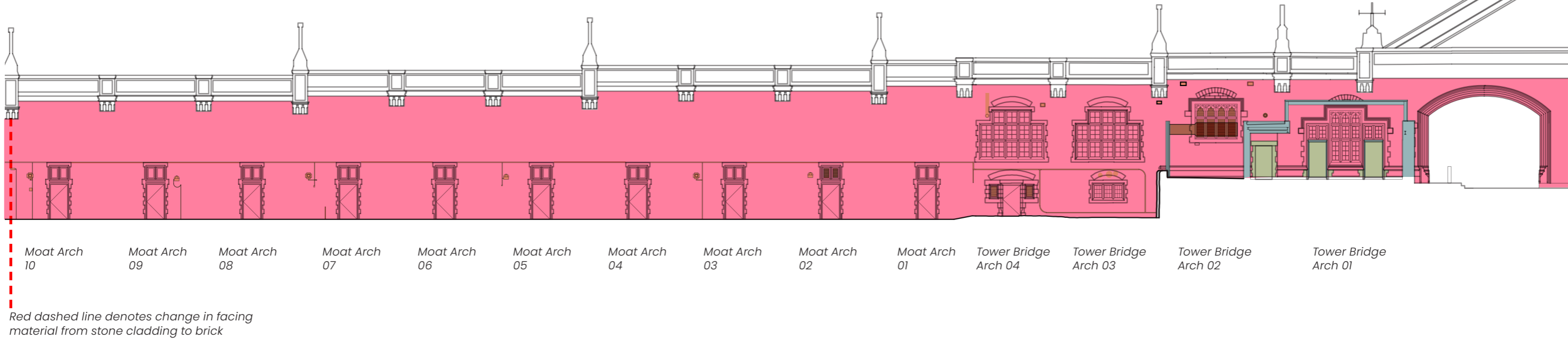
Detrimental modern louvres, lighting and cabling



Modern grilles within stonework



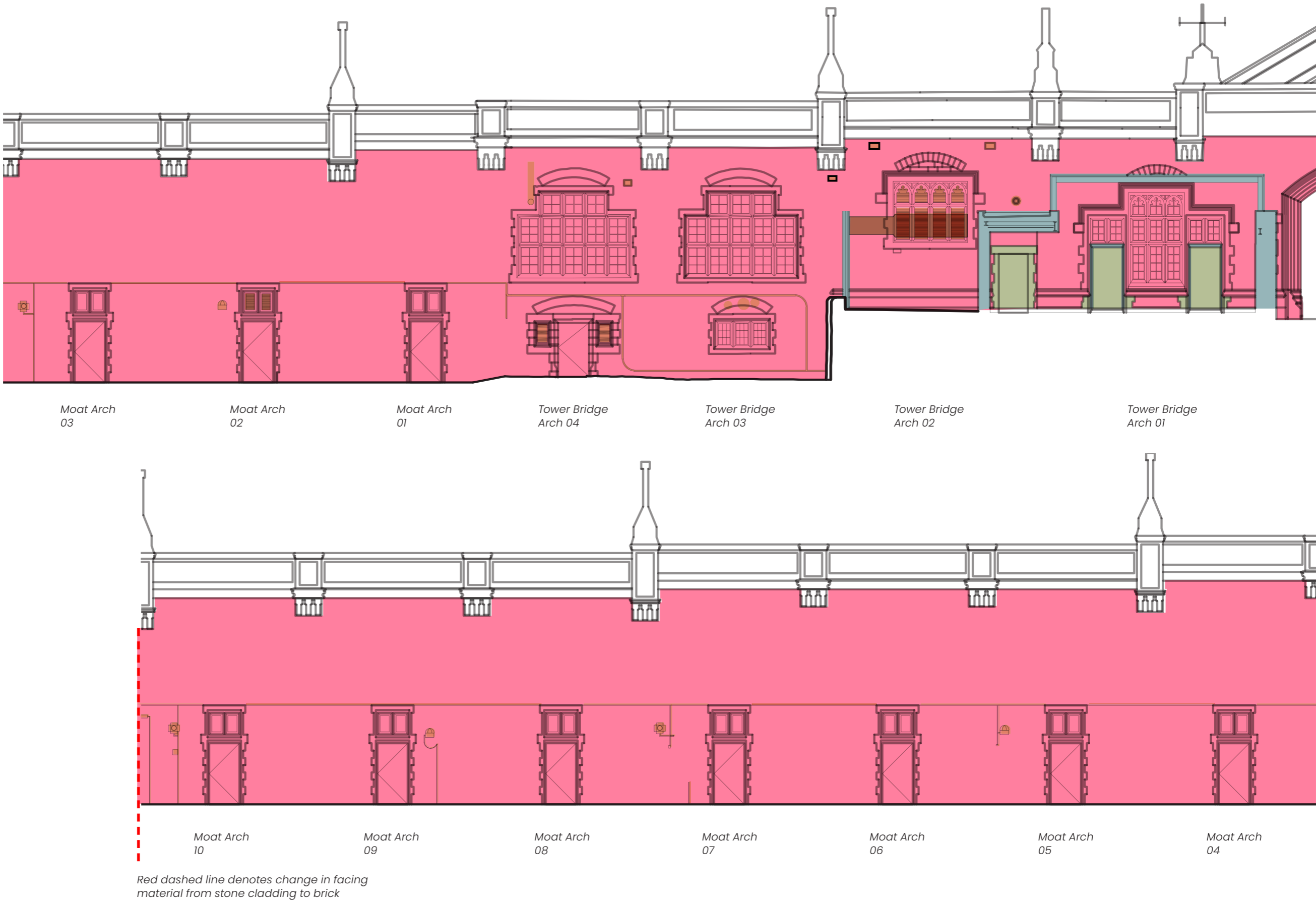
Modern grilles within stonework



2.0 HERITAGE STATEMENT

2.5 MOAT ARCHES

2.5.3 ASSESSMENT OF SIGNIFICANCE



2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.1 DESCRIPTION

THE REVELLER BUILDING

The Reveller is a small, purpose-built restaurant and events space located on the Wharf and adjoining to Tower Bridge on its west side, completed in 2012 to designs by Tony Fretton Architects.

Externally it reads as two flat-roofed single storey bays of differing heights clad in vertical rough-sawn English Sweet Chestnut timber boarding with a light grey paint wash, in a colour derived from the weathered Kentish Ragstone of the Tower, and the Cornish granite stone blocks of Tower Bridge.

To their west is a covered patio with a painted steel framed pitched canopy structure over, and to their east they adjoin to and interconnect with Tower Bridge, which contains the restaurant's kitchens and other services.

TOWER BRIDGE ARCHES

These are the arches and internal spaces (6 nr in total) under the southern section of the Tower Bridge northern approach. They currently accommodate kitchen, staff and office space, and visitor WCs refurbished in 2011-12 and associated with the previous use of the Reveller as café restaurant.



The Reveller from the north



The Reveller from the south



Tower Bridge Arch 01 as existing - former bar space



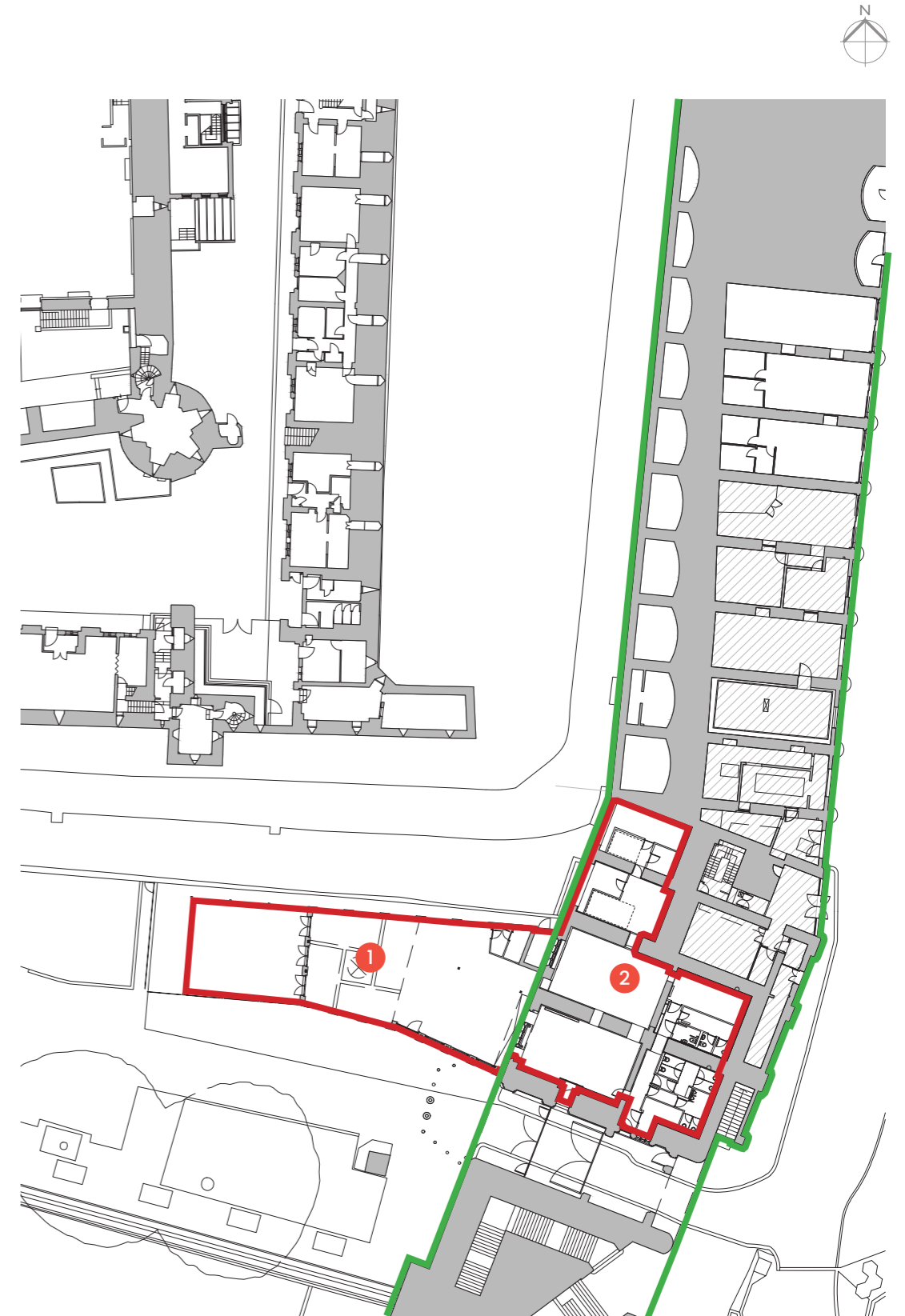
Tower Bridge Arch 02 as existing - kitchen

2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.1 DESCRIPTION

Key plan showing the location of the Reveller building (1) and associated arches under Tower Bridge (2).



2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.1 DESCRIPTION

HERITAGE DESIGNATION

KEY

1

The Reveller Building, designed by Tony Fretton Architects, 2011

2

Spaces occupied by the The Reveller within Grade I Listed Building 'Tower Bridge Approach' (List ID 1065833)

3

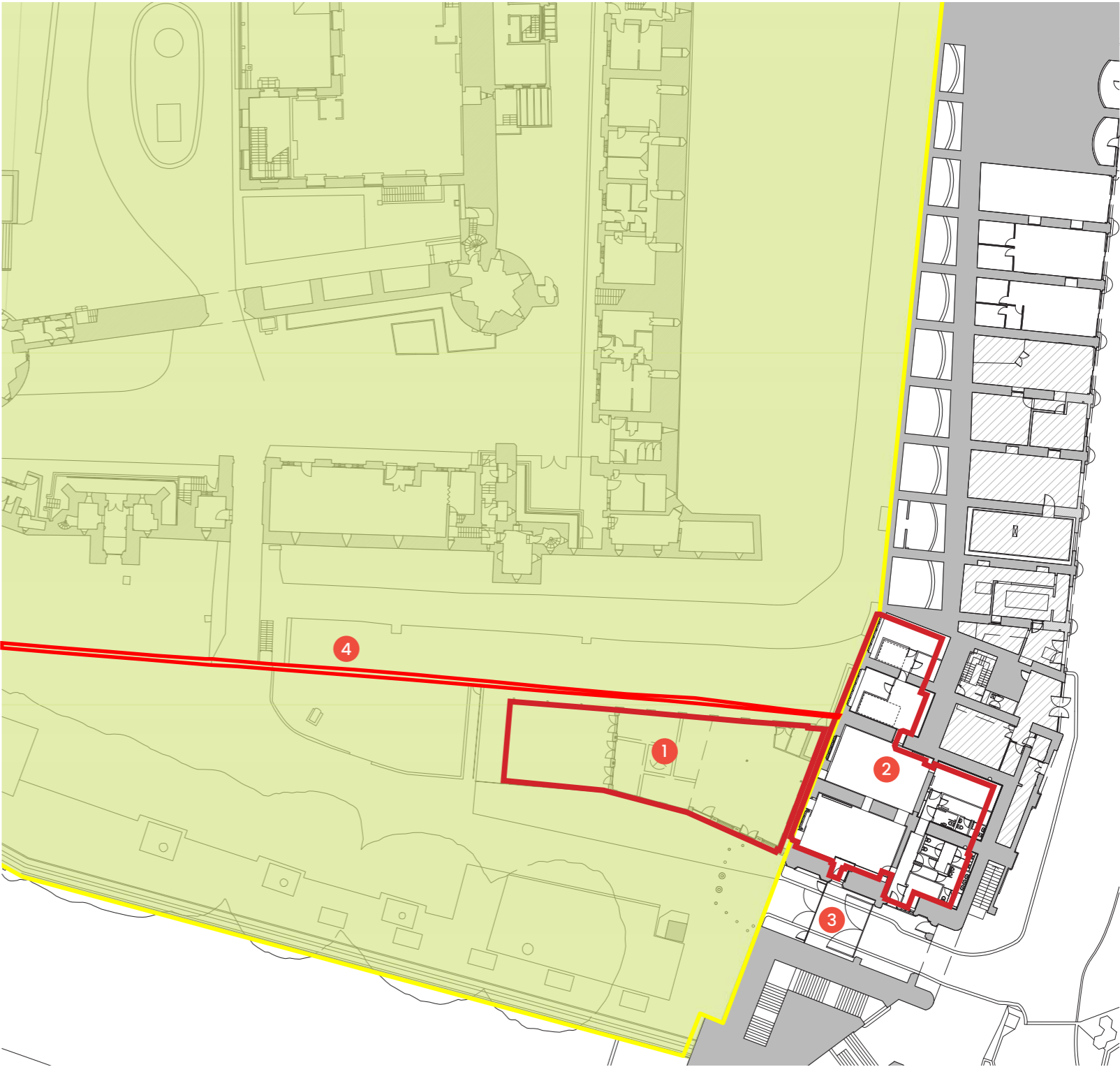
Grade I Listed Building 'Tower Bridge (That part in London Borough of Tower Hamlets) List ID 1065833)

4

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



2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.2 HISTORIC DEVELOPMENT

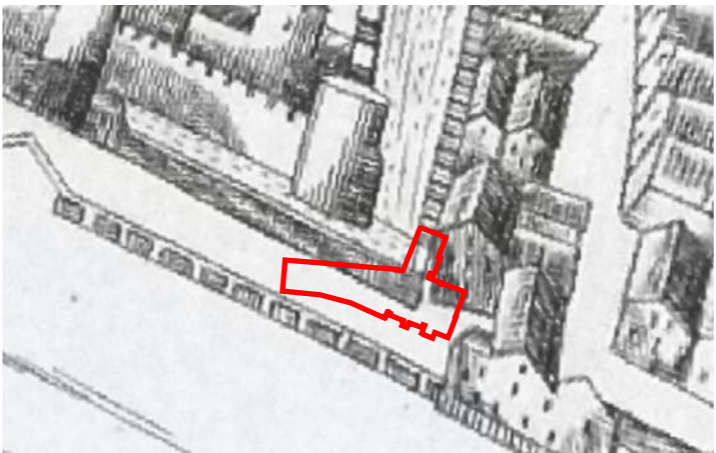
These extracts of maps and drawings show the development of the site location of the Reveller building and Tower Bridge Arches through the ages, from the medieval period to the current day.



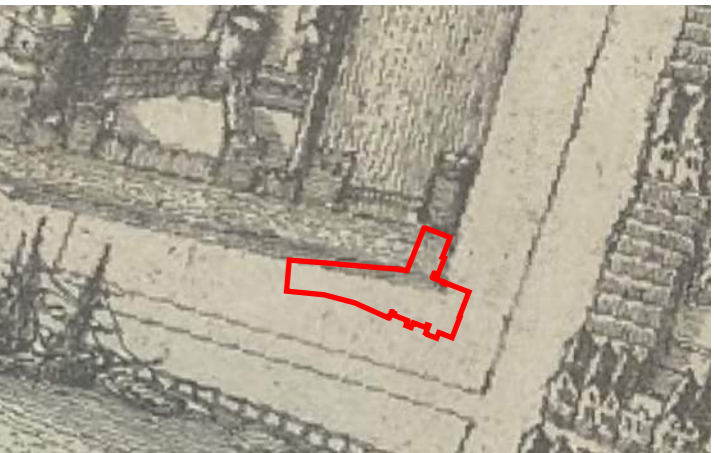
Medieval London (1270 - 1300)



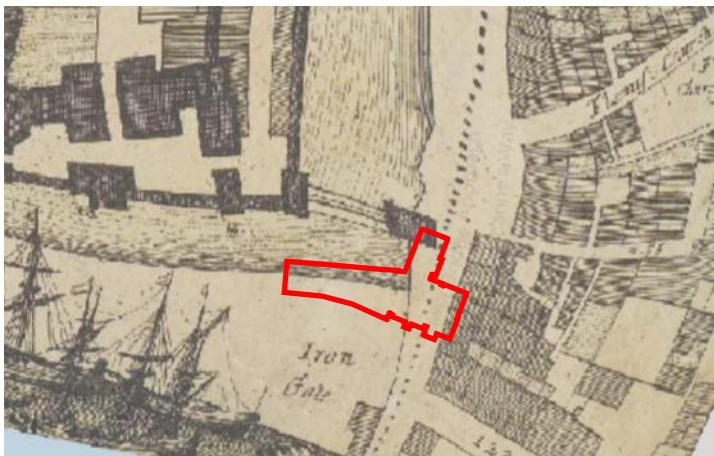
Early Tudor London (1520)



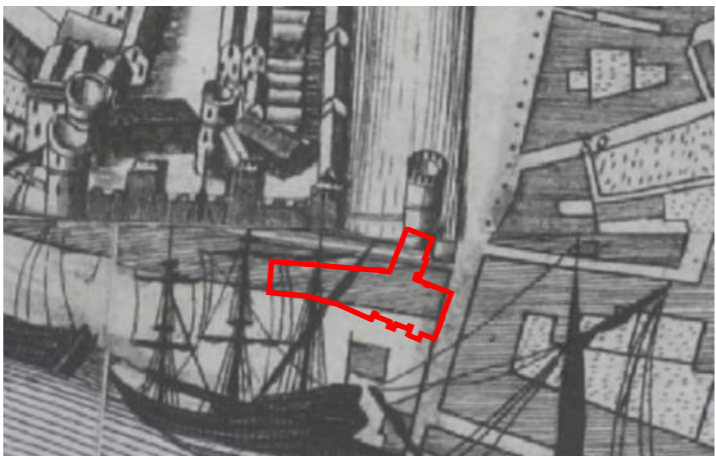
Survey by Faithorne & Newcourt (1658 - 1669)



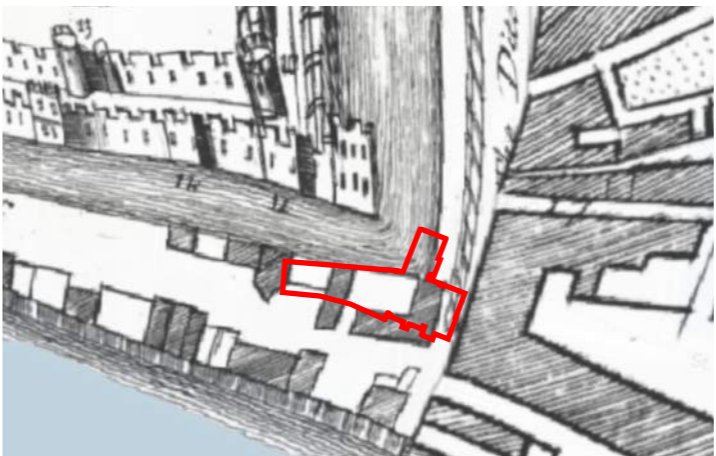
Survey by Leake (1669)



Survey by Ogilby & Morgan (1676)



Survey by William Morgan (1682)



Survey by Blome & Strype (1694 - 1720)



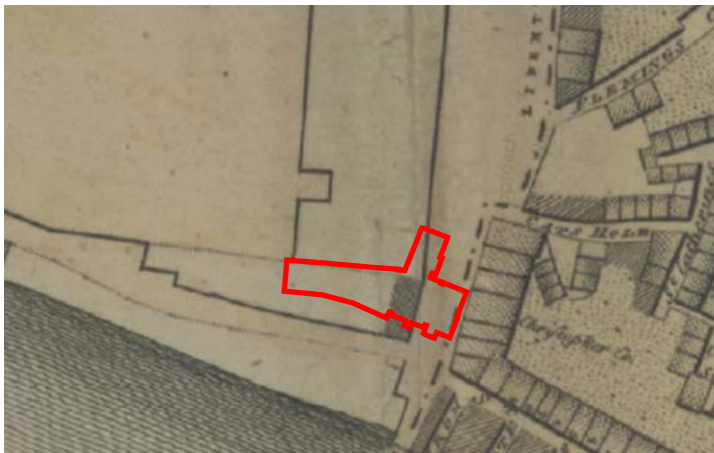
Survey by John Rocque (1746)

2.0 HERITAGE STATEMENT

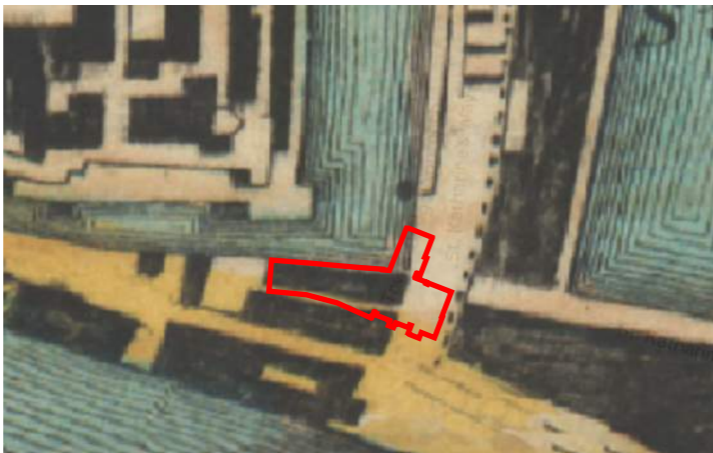
2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.2 HISTORIC DEVELOPMENT

These extracts of maps and drawings show the development of the site location of the Reveller building and Tower Bridge Arches through the ages, from the medieval period to the current day.



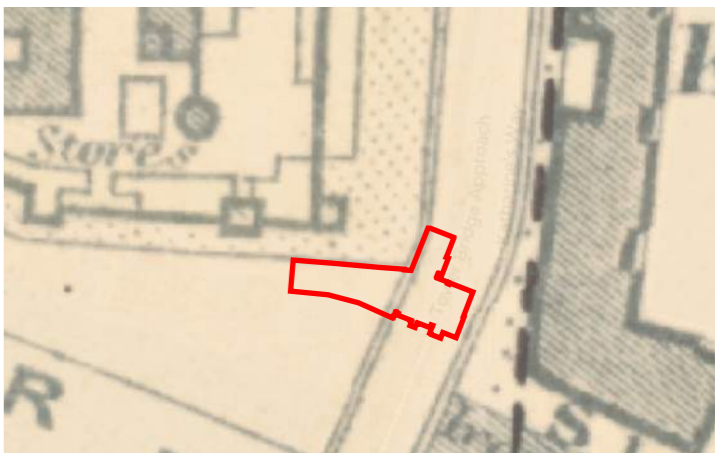
Survey by R Horwood (1799)



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)



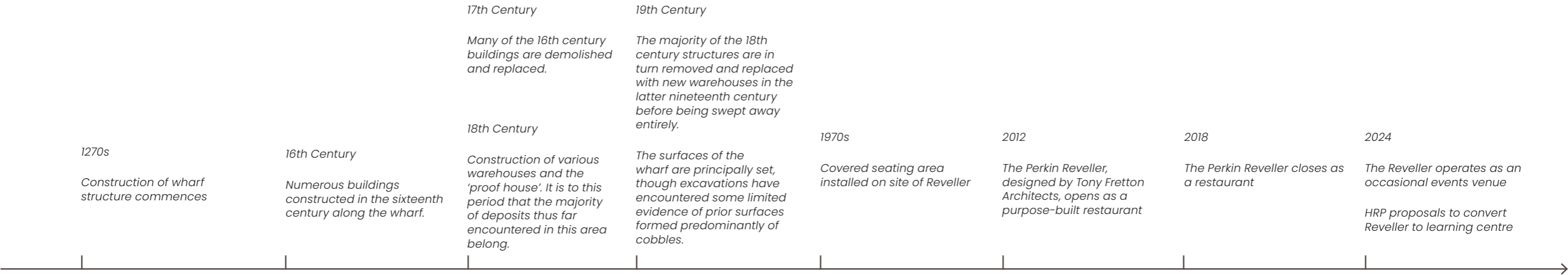
Contemporary OS Map

2.0HERITAGE STATEMENT

2.6REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.2HISTORIC DEVELOPMENT

HISTORIC DEVELOPMENT TIMELINE



2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.2 HISTORIC DEVELOPMENT

UNDERSTANDING HISTORIC DEVELOPMENT: THE WHARF

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 understand it today. The origins of the existing structure do though date from a period of activity in 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, and construction activity continued through following decades. 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 1890s a drill battery of heavy guns were installed, only two or three of which remain today.

The area now occupied by the Reveller building was largely open ground 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.



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

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

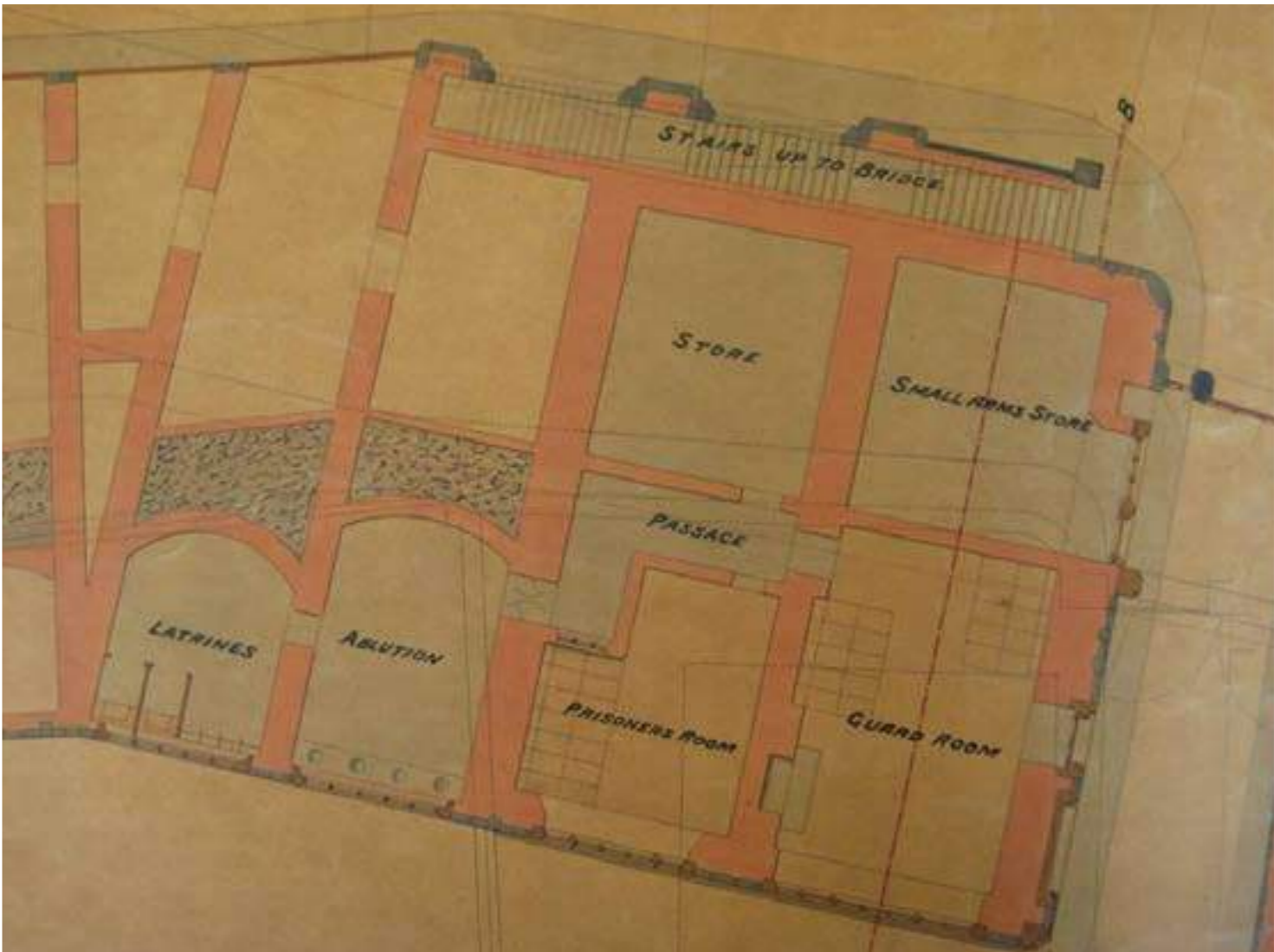
2.6.2 HISTORIC DEVELOPMENT

The existing wall lining in Tower Bridge Arch 01, the former guard room, is to be removed and the finishes taken back to bare painted brickwork.

Following strip-out, it will be possible to ascertain the condition of the fabric behind, including any evidence of the fireplace shown in the attached plan. It is the team's intention to reveal, conserve and represent this feature as far as possible to enhance the historic and evidential value of the former use of this space, with an approach to be determined based on further research for documentary and fabric evidence.



Existing lining covering location of fireplace within Tower Bridge Arch 01



Detail of Tower Bridge: northern approach including Iron Gate stairs; Tower Bridge Act 1885; casements granted by Office of Woods to City Corporation maintenance

2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.2 HISTORIC DEVELOPMENT

The existing historic external door and surround to the former guard room, which dates to the original construction of Tower Bridge Arch 01 is to be retained.

This door is currently only used in case of emergency. Since the 2019 closure of the bar in this space, to which it provided independent access when the restaurant was not open, it has not been used either by members of the public or operationally.

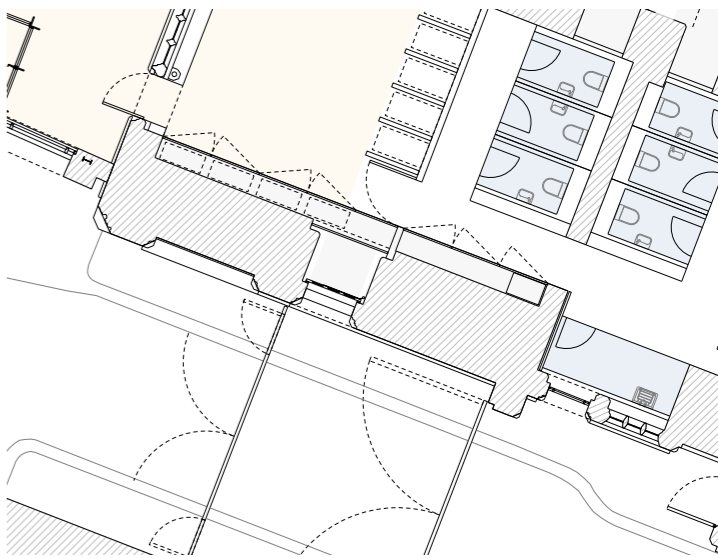
The fire design of the proposed scheme does not require the use of this door for fire egress, and in line with the proposed security and fire design consultations, this door will remain permanently closed and inaccessible from the interior of the space.

The modern lobby, installed during the Tony Fretton scheme, will be removed and replaced with a cupboard integrated into the Jamie Fobert Architects' interior design scheme.

The historic external door and surround will be retained insitu, with no heritage impact.



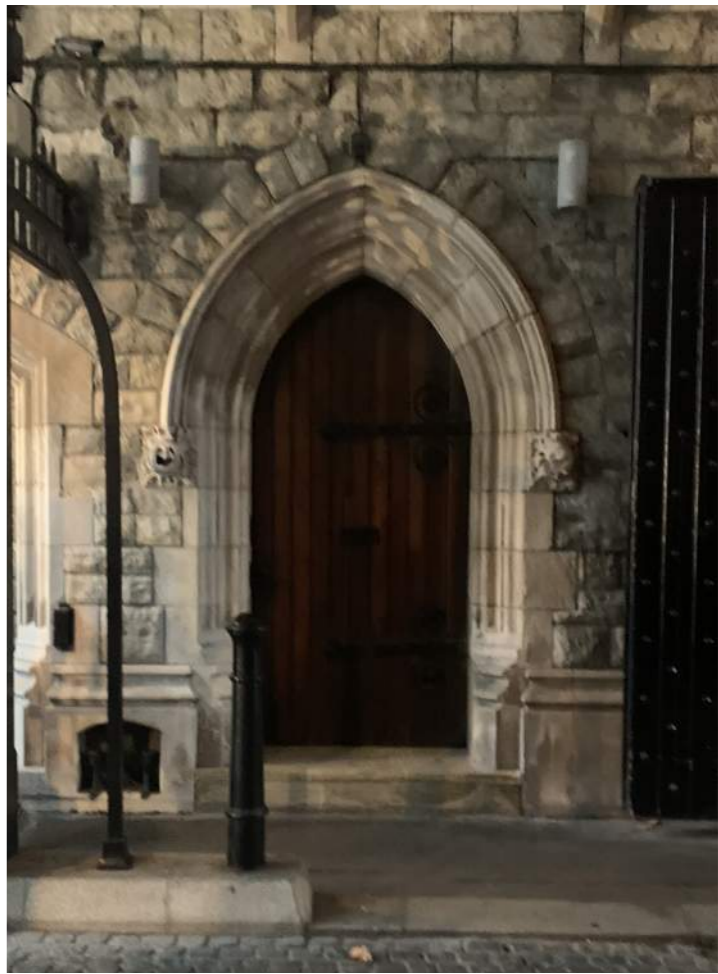
Tower Bridge Arch 01 - removals plan showing south wall



Tower Bridge Arch 01 - proposed plan showing south wall



Existing modern door to south of Tower Bridge Arch 01



Existing door to south of Tower Bridge Arch 01

2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

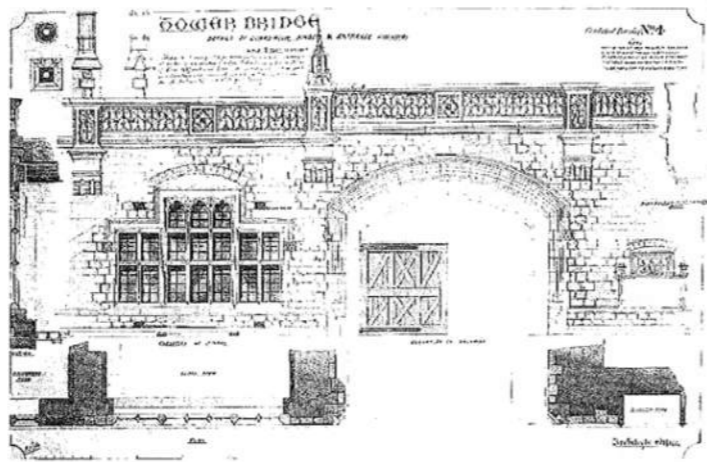
2.6.2 HISTORIC DEVELOPMENT

The configuration of windows and doors to the western façade of Tower Bridge has changed a little since its original construction detail, as recorded on this historic drawing – understood to be one of a set by George Stevenson dating from the completion of Tower Bridge in 1893. The drawing denotes the historic uses of the Tower Bridge Arch spaces, as guard room, prisoners cells, munitions and ablutions.

The early 20th century photograph shows this same window configuration, with the Wharf and its young London plane trees planted in the late 19th century to create a green open space for amenity.

In the 1970s the former Guard Room was converted to a café space, with an external canopy placed over the green area, and the removal of the trees. As part of these alterations two bays of the historic window were altered to become external doorways – since internalised with the addition in 2012 of the Reveller building, but remaining as openings.

An additional doorway further north also appears to have been installed in the 1970s as part of these café alterations, providing access into the space which had formerly been the prisoners cells (and therefore specifically did not have an external door) and was converted into the café kitchen. Though low significance and no longer required for access and egress, this door remains within the scheme proposals.



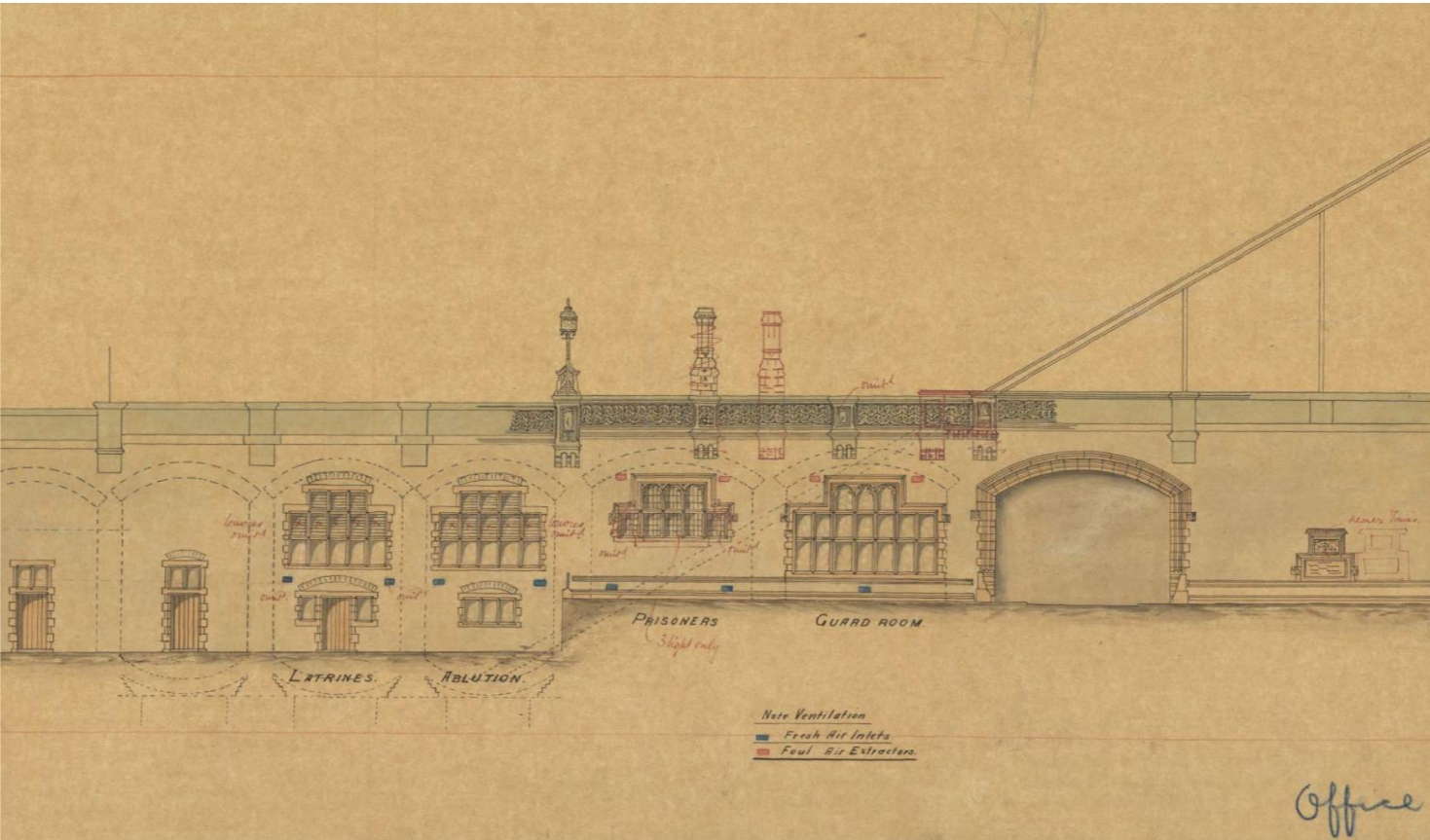
Details of the guardroom window and entrance archway. Elevation drawing by Corporation of London Records Office, copied from Godfrey, 1988, 63



1891 - 1901 photograph of the East gate of the Wharf



The 1970's canopy structure which existed on the site until the beginning of 2010, viewed from Tower Bridge



The 1970's canopy structure which existed on the site until the beginning of 2010, viewed from the Wharf

2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.3 ASSESSMENT OF SIGNIFICANCE

The Reveller is not a listed building, but it is within the Scheduled Monument of the Tower of London, the Tower Conservation Area and within the UNESCO World Heritage Site. It is also adjoined to the Grade I listed Tower Bridge.

The Arches, referred here for the purposes of this Heritage Impact Assessment as Tower Bridge Arches, are part of the Grade I listed Tower Bridge.

The Tower Bridge Arches contribute to the overall Exceptional/Very High significance of the Tower Bridge and its Northern Approach. They are considered as part of the architectural configuration of Tower Bridge and its northern approach. As such, many of the characteristics and heritage values defined in section 2.4 are also attributable here, and as such need not be repeated.

When assessed against the Heritage Values outlined in English Heritage guidance “Conservation Principles, Policies and Guidance”, the Tower Bridge Arches are found to be of **Medium** significance with regards to Evidential, Historical, Architectural & Aesthetic, and Communal Values, whilst the Reveller building itself is found to be of **Low** significance.

The following considerations are specific to the Reveller and the Tower Bridge Arches:

EVIDENTIAL VALUE: MEDIUM

- The Tower Bridge Arches are original to the bridge and date to c.1893. They are an integral feature of Tower Bridge, and share the characteristics of evidential value of the bridge set out in section 2.4.
- The survival of the original form, layout and much historic built fabric of the Tower Bridge Arches is of Very High value, their retention – as that of Tower Bridge itself – a physical reminder of the design, style, grandeur and ingenuity of the Victorian era.
- The continued retention of the steel structure of the cables within the Arches is of Very High value in particular, with the potential that these have for understanding the construction and continuous use of the Bridge for over 100 years. Tower Bridge is an important example of an early steel suspension bridge with the typically Victorian addition of stone cladding.

- However, the interior spaces of the Tower Bridge Arches are currently fitted out with somewhat incongruous modern commercial kitchen fittings, equipment and finishes, as well as MEP services and WC installations. These modern features, the fabric condition, and the current redundant nature of the spaces are detrimental to the interpretation of their historic use and significance.
- The construction of the Bridge and its machinery is well documented in contemporary sources, including accounts of commissioning, design and fabrication of various elements and their construction on site. These documents are clearly comparable High value to the physical evidence which remains in situ, and as such it provides a tangible understanding of how the Bridge was built.
- The Reveller building sits above dense and significant archaeological deposits on the Wharf and is supported on a floating cantilevered edge-thickened concrete raft that ensured deposits could remain undisturbed in situ, and that no load is imposed upon the fragile (Grade II* listed) Moat South Revetment Wall. The buried archaeological potential regarding development of the riverside wharf is Very High.

HISTORICAL VALUE: MEDIUM

- Originally, the Tower Bridge Arches (along with the Arches beneath the Northern Approach) were the only parts of the Bridge not devoted to the actual management of the bridge, lending them a unique historical value. They were on permanent loan to the Tower of London Garrison and so form a part of the Tower’s own history distinct from the Tower Bridge. They were put to various uses; a guardroom and uniform store were built into the archway closest to the Bridge’s northern abutment, and the adjacent spaces were used as Munitions storage and spaces for Ablutions. Several alterations to support these uses are manifest in the fabric today, including alterations to window and door openings.

ARCHITECTURAL & AESTHETIC VALUE: MEDIUM

- The Reveller was completed in 2012 to designs by Tony Fretton Architects. It replaced a 1970s covered seating area which had previously existed in this area of the Wharf, associated with a café that had been created in the 1970s within the Tower Bridge Arches and which had become outdated and tired.
- Fretton’s Reveller building was designed to be subservient to its significant location while presenting as world-class 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. Additionally, the design of the building was specifically envisaged to engage with the architecture of the Tower, with the window arrangement in the central section described by Fretton as an upside-down interpretation of the castellated walls of the Tower. As such, the Reveller holds some architectural value as an example of innovative contemporary architecture by a significant 21st century designer in a heritage setting.
- While the design intent of the Reveller aims at achieving a clever interplay functionally and aesthetically between the contemporary and historic, in reality its execution at times detracts from this ambition. Certain detailing, especially around key interfaces with historic fabric, could be handled with more sensitivity and care towards historic surfaces, materials and details. It is the aim of the proposals outlined within this project to address these shortcomings, and to support and enhance the positive attributes outlined in HRP’s assessment of significance.
- The Reveller building, and the 6 nr spaces beneath Tower Bridge, are currently redundant and therefore presenting unattractively as disused. Historic Royal Palaces own Investigate potential new uses and opportunities for careful adaptation of the buildings.
- The interior spaces of the Tower Bridge Arches (including the former Guardroom converted in the 1970s into a café, and in 2011-12 into a bar) are currently fitted out with somewhat incongruous modern commercial kitchen fittings, equipment and finishes, as well as MEP services and WC installations. These modern features, the fabric condition, and the current redundant nature of the spaces are detrimental to the aesthetic value.

COMMUNAL VALUE: LOW

- Whilst the Tower Bridge Arches share some of the characteristics and values of Tower Bridge and its approach defined in section 2.4, the communal value can be considered to currently be much lower in this specific area of the asset since there is limited public access to these spaces.
- The potential for communal value though within the Tower Bridge Arches is very high, since the spaces and features exemplify the evidential, historic and aesthetic values that will be enjoyed by people with an interest in learning new information about how the Bridge works and was constructed, and the stories of people that used and worked within these spaces in the past.
- The Reveller was built as a public café and restaurant and serving the 2.5 million annual visitors to the Tower since 2012, as well as playing host to many events and functions, lending it some communal value. Upon its completion it was a significant addition to the cultural life of the Wharf, and London more broadly, and was completed in time to host national events for the London Olympics.

2.0 HERITAGE STATEMENT

2.6 REVELLER BUILDING & TOWER BRIDGE ARCHES

2.6.3 ASSESSMENT OF SIGNIFICANCE

HERITAGE SIGNIFICANCE PLAN



3.0 SCHEME PROPOSALS



3.0 SCHEME PROPOSALS

The Tower of London is one of England's most evocative ancient monuments. There is a tangible sense of history in every tower and around every corner, making it an endlessly fascinating place for visitors from all round the world. The buildings and layout that we see today stand as the culmination of a sequence which started around 1067: they have developed dynamically ever since, in line with the changing needs of the site's occupants, users and visitors.

As set out in the introduction to this document, Historic Royal Palaces have defined a vision for the Tower of London to continue to evolve to as source of pleasure, inspiration, surprise and debate for everyone, while preserving the unique heritage significance of the built fabric and archaeology at this important historic place.

A significant aspect of the 2030 vision is a series of projects to transform the schools and community programme at the Tower, aimed at ensuring the Tower of London remains a vital educational and cultural resource for future generations.

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 wholly inadequate, with very limited facilities and poor inclusive access at present.

The proposals address this need for change, envisaging engaging and inspiring facilities for schools and community groups including a dedicated welcome space and new classrooms and lunchrooms with direct inclusive access into the Tower moat.

By focusing the provision of learning facilities on the 2011 Reveller building, major enhancements to the current learning offer at the Tower can be achieved whilst avoiding and minimising impact on the heritage significance of the Scheduled Monument and wider UNESCO World Heritage Site.

The scheme makes sensitive proposals for rehabilitation of the Reveller building. This is a low significance heritage asset which is currently redundant and without a use since the restaurant café function for which it was designed has now ceased. The design interventions evolve the function of the building into a learning centre through a series of discreet moves which retains its primary architectural characteristics and the values which contribute to its heritage significance.

The scheme proposals seek to deliver a publicly accessible use for the arches within Tower Bridge, currently redundant and without a use since the Reveller café which utilised these spaces as bar and back of house kitchens closed. The Moat Arches, which have never had a visitor use, are also bought into beneficial use for schools and community group visitors.

As well as the considerable public benefits the scheme will deliver to a broad range of visitors through these new learning facilities open to schools and communities from across the world, the proposals also offer considerable heritage benefits through the conservation repair and representation of the 19th century Moat Arches and Tower Bridge internal spaces as described within this document.

These spaces have their own unique histories that are currently untold – the Moat Arches were once used for storage prior to and during WWI & WW2, whilst the Tower Bridge Arches have had various uses since their original construction as Guard Rooms, Munitions and Ablutions spaces for the Tower Garrison. Opening the spaces to visitors and revealing historic features during their refurbishment will enable further research to be undertaken into the construction detail of these spaces, and for that research to potentially inform interpretation within the new learning spaces.

The architectural proposals do, however, necessitate some loss of primary historic fabric of the Grade I listed Tower Bridge arches in 5 nr localised sections of brickwork masonry within the dividing walls between the existing spaces within Tower Bridge, and a secondary dividing wall.

These removals, and ways of avoiding and minimising the heritage impact, have been carefully considered through the design development process. In conclusion, it was felt that these localised removals were necessary to ensure functionality and achieve operational connections between the three arches that will become learning spaces, ensure compliant fire escape routes, and facilitate inclusive access between the learning spaces – as well as to the new inclusive access lift and stair route that will connect schools and community group visitors directly into the Moat.

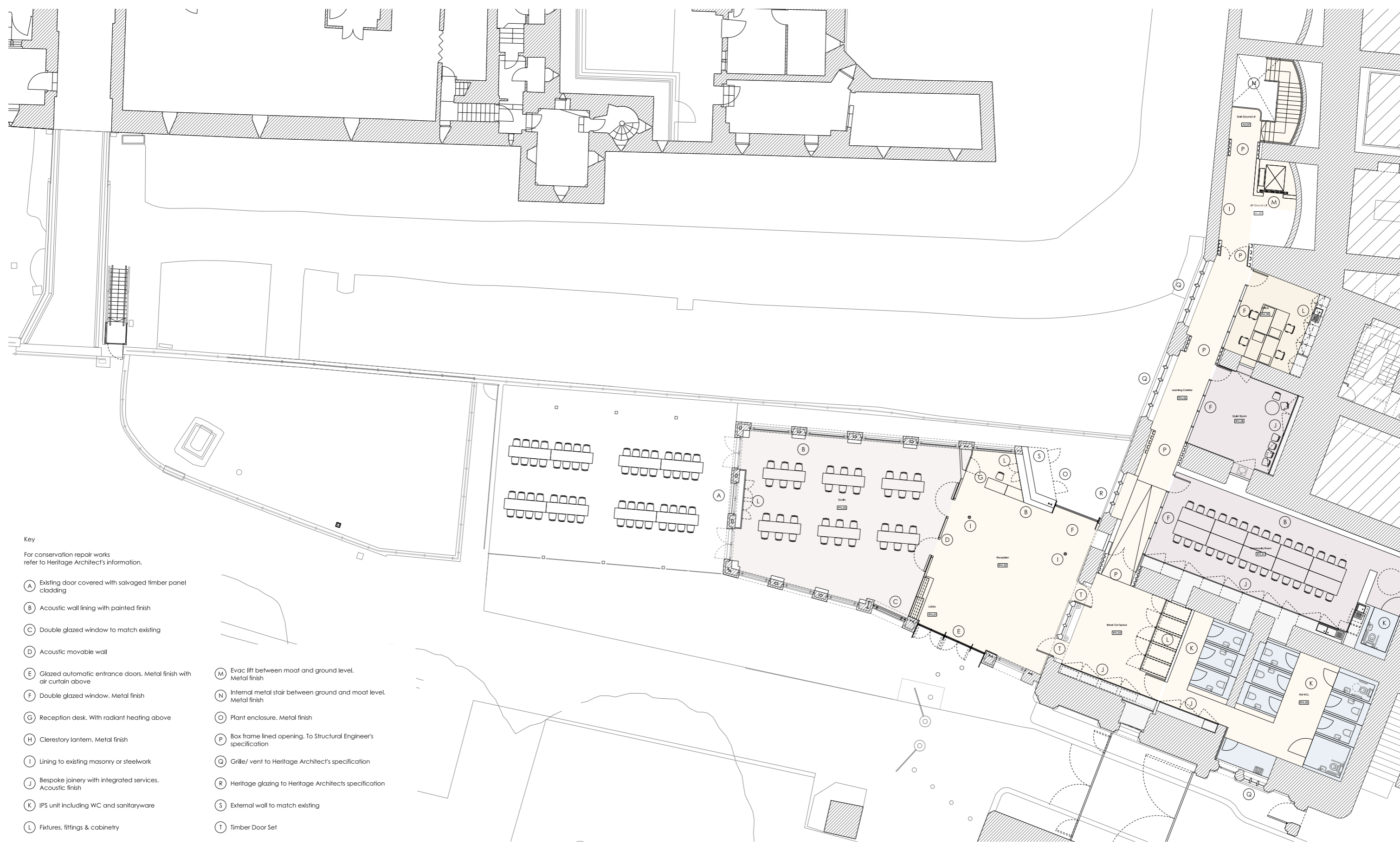
Under NPPF, it is assessed that overall the scheme proposals have less than substantial harm when considered as a whole. This is further explained in the following section of this document.

Overall then, and as further explored within the Heritage Impact Assessment in section 4.0 of this document, it is considered that these losses in fabric represent less than substantial harm and are outweighed by the considerable public and heritage benefits the scheme brings to the Tower of London, and its diverse global visitor audiences.

3.0

SCHEME PROPOSALS

REVELLER BUILDING & ARCHES – PROPOSED PLAN AT WHARF LEVEL



3.0

SCHEME PROPOSALS

MOAT ARCHES – PROPOSED PLAN

Key

For conservation repair works
refer to Heritage Architect's information.

- (A)

Existing door covered with salvaged timber panel cladding
- (B)

Acoustic wall lining with painted finish
- (C)

Double glazed window to match existing
- (D)

Acoustic movable wall
- (E)

Glazed automatic entrance doors. Metal finish with air curtain above
- (F)

Double glazed window. Metal finish
- (G)

Reception desk. With radiant heating above
- (H)

Clerestory lantern. Metal finish
- (I)

Lining to existing masonry or steelwork
- (J)

Bespoke joinery with integrated services. Acoustic finish
- (K)

IPS unit including WC and sanitaryware
- (L)

Fixtures, fittings & cabinetry

(M)

Evac lift between moat and ground level. Metal finish

(N)

Internal metal stair between ground and moat level. Metal finish

(O)

Plant enclosure. Metal finish

(P)

Box frame lined opening. To Structural Engineer's specification

(Q)

Grille/ vent to Heritage Architect's specification

(R)

Heritage glazing to Heritage Architects specification

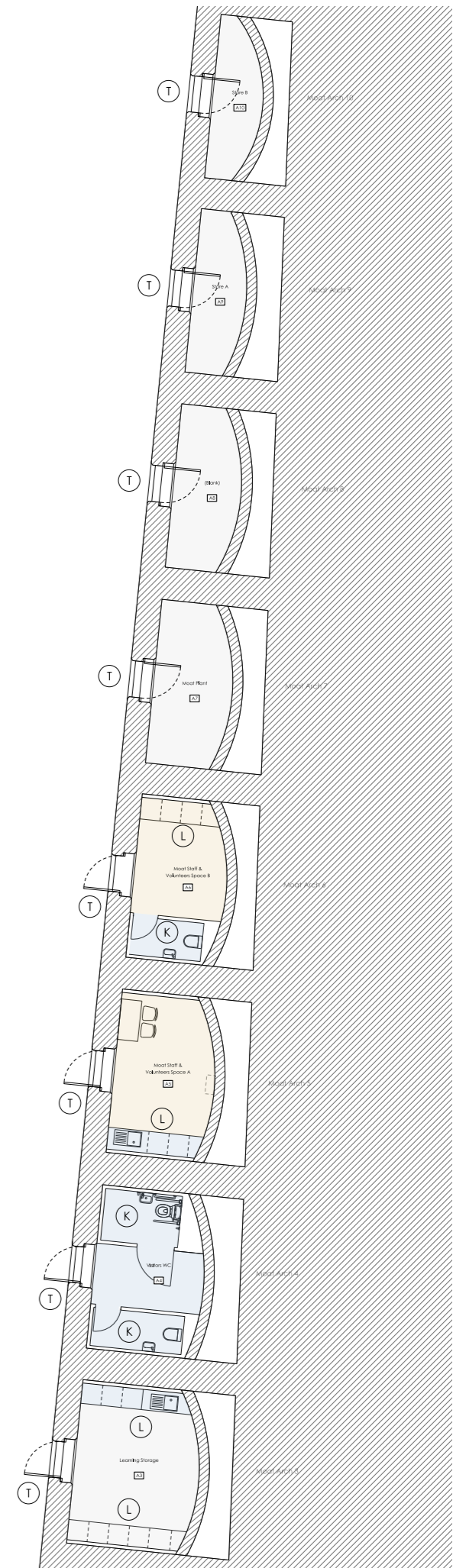
(S)

External wall to match existing

(T)

Timber Door Set

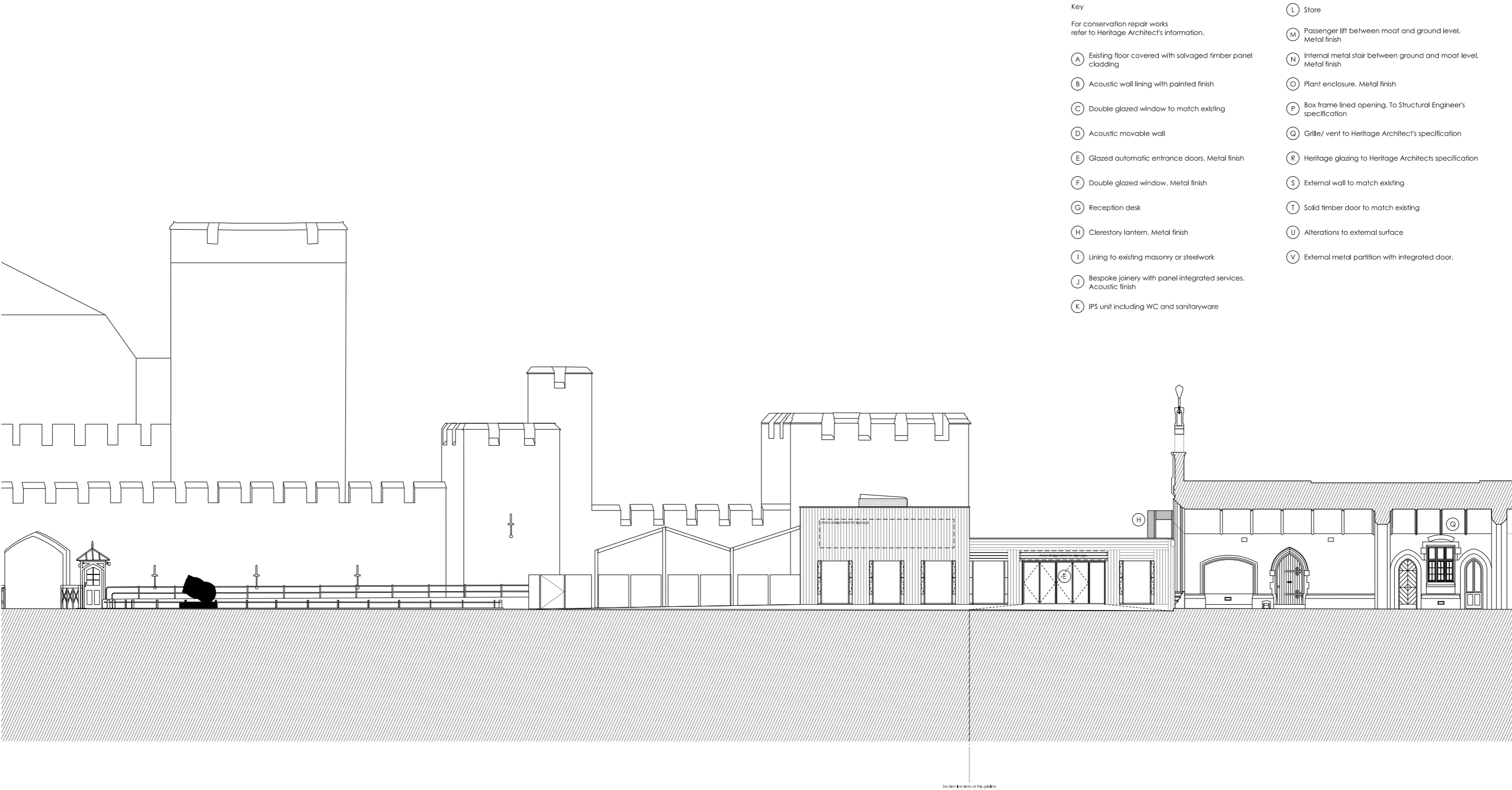
(U)

Bat Loft

3.0

SCHEME PROPOSALS

REVELLER BUILDING & ARCHES – PROPOSED NORTH ELEVATION



3.0 SCHEME PROPOSALS

VISUALISATIONS OF PROPOSED INTERNAL SPACES

Jamie Fobert Architects' – Proposed view of Welcome Centre reception and route through into the Reveller Arches beneath Tower Bridge

The proposed refurbishment of the former Reveller building café transforms it into a vibrant new Schools & Community Groups Welcome Centre. The proposals bring a new use to this Low significance heritage asset at the Tower of London creating a Learning Centre that connects directly to the adjacent moat and provides a dedicated school's entrance within the current building footprint. The scheme re-purposes the contemporary structure and connects through into the existing vaults of Tower Bridge Approach., a large multi-functional space, a community room, quiet room, and associated ancillary spaces.

The proposed interventions to the 2011 building retain the primary characteristics which to contribute to its Low heritage significance without adverse impact, whilst making enhancements to its functionality in this new use, as well as its MEP infrastructure and fabric energy efficiency to comply with modern building regulations.

By altering windows to the north side of the Reveller building to increase the amount of glazing, the scheme proposals open-up visual connections between the new entrance lobby looking out onto a newly created lightwell and through into the moat, increasing schools and community group visitors' awareness of this area of the Moat and supporting their engagement and connection with it as part of their learning experience.

This increased size panel of glazing to the north, as well as the modifications to the roof lantern which adjoins the former Reveller building to the west façade of Tower Bridge, help visually clarify the distinction between the 2011 building and the Grade I listed Tower Bridge, contributing moderately therefore to the heritage significance of the bridge and views towards it from the Wharf and riverside.



3.0 SCHEME PROPOSALS

VISUALISATIONS OF PROPOSED INTERNAL SPACES

Jamie Fobert Architects' – Proposed view of community room created within the Arches beneath Tower Bridge

The scheme proposals remove modern MEP installations, kitchen equipment, commercial kitchen finishes and back of house areas associated with the previous use of the Reveller building and create new publicly accessible schools and community learning spaces within the Grade I listed spaces. The designs reveal, repair and restore historic features such as 19th century stonework windows.



3.0 SCHEME PROPOSALS

FABRIC REPAIRS

Alongside the refurbishment of the spaces to provide schools and communities learning facilities, the scheme also includes a scope of sensitive strip out to remove modern fittings and finishes, and conservation repairs to preserve and protect original 19th century fabric of the Tower Bridge Arches. This scope of conservation repair is detailed with Purcell drawings included within this application, and comprises repairs and repointing to historic glazed brickwork finishes, poultice removal of paintwork and historic paint investigations to stone window mullions and transoms, stonework repair and repointing (to be defined following strip-out), and sensitive overhaul to historic windows to ensure effective operation.



Existing view within Tower Bridge Arch 01



Existing condition of window to Tower Bridge Arch 01 with steel portal frame partially concealing damaged stonework



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 TOWER BRIDGE & TOWER BRIDGE APPROACH

Heritage Significance of Existing Condition:

Tower Bridge – **Exceptional/Very High**

Tower Bridge Approach – **Exceptional/Very High**

Tower Bridge is arguably one of the most famous and significant bridges in the world. The Bridge is undeniably one of the most iconic and significant structures in Britain and is certainly one of the most significant bridges in the world. This attribution of significance is owed to several characteristics, ranging from historical associations with important people and events to the technological advancements in its design and construction and the continued retention of increasingly rare historic machinery.

The importance of the Bridge is demonstrated by its status as a Grade I listed structure (with further Grade II structures within the site) and its inclusion within two Conservation Areas – both of which include the Bridge.

The Bridge is monumental in its architectural expression and forms an important focal point in views in the surrounding area, particularly from the Tower of London and the Thames River.

Proposed Alterations to Tower Bridge:

The proposed alterations to Tower Bridge within the scheme for which Planning, Listed Building Consent and Scheduled Monument Clearance is sought comprise:

- Conservation repairs to the external and internal fabric of the Arches beneath Tower Bridge, which adjoin and are part of the facility of the adjacent Reveller building.
- Sensitive refurbishment of the currently underutilised spaces within Tower Bridge & its approach associated with the Reveller to be used by the visiting public as part of the Learning & Community Centre at the Tower of London.
- Alterations to the glazed roof lantern interface at the roof of the Reveller building to Tower Bridge west façade.

Heritage Impact Assessment:

Medium Beneficial

The alterations enhance to a clearly discernible extent the heritage asset or the ability to appreciate its significance.

- The proposals focus on existing spaces within Tower Bridge and its approach that are currently underutilised. Their last use was as staff, kitchen and back of house spaces associated with the former Perkin Reveller restaurant. They will be cleared of existing intrusive MEP, commercial kitchen equipment and finishes, and staff WCs, to restore the volumes and original historic fabric surfaces of the unique spaces.
- The proposals include conservation repair to 19th Century historic brickwork, historic metal windows, stonework transoms and mullions, and early 20th Century glazed brick finishes, within the fabric of Tower Bridge and its approach.
- The scheme proposals do, however, necessitate some loss of primary historic fabric of the Grade I listed Tower Bridge arches in 5 nr localised sections of brickwork masonry within the dividing walls between the existing spaces within Tower Bridge, and a secondary dividing wall. These removals, and ways of mitigating the heritage impact, have been carefully considered through the design development process. In conclusion, it was felt that these localised removals are necessary to ensure functionality and achieve operational connections between the three arches that will become learning spaces, ensure compliant fire escape and emergency egress routes, and facilitate inclusive access between the learning spaces – as well as to the new inclusive access lift and stair route that will connect schools and community group visitors directly into the Moat.
- Additionally, the scheme proposes removal of two existing panes within a historic window in Tower Bridge’s west façade, to install ventilation grilles for the new learning spaces.
- Overall, the impact of these two above losses of historic fabric are considered to be outweighed by the public and heritage benefits the proposals bring.

- The contemporary element and glazed lantern in the roof of the Reveller building presently has an awkward interface to the historic façade of Tower Bridge. The scheme proposal adjusts this by increasing the amount of glazing, enhancing the visual separation between the Reveller and Tower Bridge, and better articulating the monumentality of iconic Tower Bridge in views of the Bridge from the Wharf and River.

4.2 HERITAGE IMPACT ASSESSMENT

4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

Heritage Impact Assessment on OUV and contribution to the WHS:

Tower Bridge is a unique heritage landmark which contributes positively to the WHS. This contribution is primarily to setting, as since its 19th Century construction Tower Bridge has become associated with the Tower of London in iconic river views celebrated across the globe.

Since they have such distinct histories, characters, and values, the Tower Bridge does not specifically contribute to the significance of the Tower of London, though it can certainly be understood to make some contribution to attributes and values of the Outstanding Universal Values of the World Heritage Site in terms of:

Contribution to the Tower of London as an international famous monument and part of the distinctive silhouette of the Tower of London (OUV Attribute 1, and key component 2)

The scheme proposals have no impact on the contribution Tower Bridge makes to this OUV since there is no proposed change to the external appearance of the bridge within the wider WHS setting.

The minor alterations proposed to the contemporary element and glazed lantern in the roof of the Reveller building currently presently has an awkward interface to the historic façade of Tower Bridge. The scheme proposal adjusts this by increasing the amount of glazing, enhancing the visual separation between the Reveller and Tower Bridge, and better articulating the monumentality of iconic Tower Bridge in views of the Bridge from the Wharf and River.

Contribution to the Tower of London's Landmark siting and close relationship to the River (OUV Attribute 2, and key component 1)

The scheme proposals have no impact on the contribution Tower Bridge makes to this OUV since there is very limited change to the external appearance of the bridge (limited only to the minor alterations described above, which are positive in terms of localised enhancements to the legibility of Tower Bridge's historic fabric distinct from the modern Reveller building adjacent.

Contribution to the Tower of London's physical historical associate evidence, including dungeons and cells (OUV Attribute 7, and key component 1)

The proposals make minor interventions to spaces within Tower Bridge to facilitate their uses as spaces for Schools & Communities visiting the Tower of London. The proposals have a positive impact through undertaking conservation repair, ensuring the fabric is in good order, and making these underutilised spaces beneficially useful for the visiting public to better tell the rich histories of the Tower and Tower Bridge to a broad range of audiences. These spaces within the Tower Bridge Arches were historically Guards Room and Prisoner cells, and since their original construction were always used as part of the Tower of London complex. As such they make a positive contribution to this OUV of the WHS, and the scheme proposals positively enhance this contribution.

Public and Heritage Benefits achieved through the Proposed Interventions:

Public benefits:

- The existing arches are not currently open to the public. Their last use was as staff, storage and back of house functions.
- Since the Reveller ceased operation as a restaurant they have been underutilised space, The scheme proposals bring them into active beneficial use, better supporting their long-term conservation.
- The scheme proposes sensitive refurbishment to the spaces beneath Tower Bridge and its Approach to enable them to be used by a broad range of public visitors to the Tower of London, as part of the new Learning & Community Centre. Interpretation will be included within the spaces to better tell the rich stories of the history of the Tower and the Moat in this area of the World Heritage Site.
- The removal of modern linings, kitchen fittings and MEP installations from these spaces enables more of the historic fabric to be revealed for the first time since prior to the installation of café facilities in the 1970s. This offers an exciting opportunity to reveal much more of the evidential value of these spaces, with potential new learnings about their use as Guardrooms, munitions rooms and ablutions spaces associated with the Tower of London Garrison from the 19th century.
- Historic features of Tower Bridge, such as the ironwork cable connection, are revealed as unique moments within the visitor experience of the new spaces, with interpretation added to better engage visitors with the unique construction detail of Tower Bridge, enhancing its evidential and historic value.

Heritage benefits:

- The scope of these repairs includes addressing water ingress from above, conservation repairs to glazed brick finishes within the spaces to address spalling and gaps in pointing from water damage, repairs to historic windows.

4.2 HERITAGE IMPACT ASSESSMENT

4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

The interior spaces of the Tower Bridge Arches are currently fitted out with somewhat incongruous modern commercial kitchen fittings, equipment and finishes, as well as MEP services and WC installations. These modern features, the fabric condition, and the current redundant nature of the spaces are detrimental to the interpretation of their historic use and significance.

The scheme proposals seek to deliver a publicly accessible use for the arches within Tower Bridge, currently redundant and without a use since the Reveller café which utilised these spaces as bar and back of house kitchens closed.

As well as the considerable public benefits the scheme will deliver to a broad range of visitors through these new learning facilities open to schools and communities from across the world, the proposals also offer considerable heritage benefits through the conservation repair and representation of the 19th century Tower Bridge internal spaces as described within this document.



Existing condition of Tower Bridge Arch 02, with modern commercial kitchen fittings, equipment and services. Photograph is taken looking west.



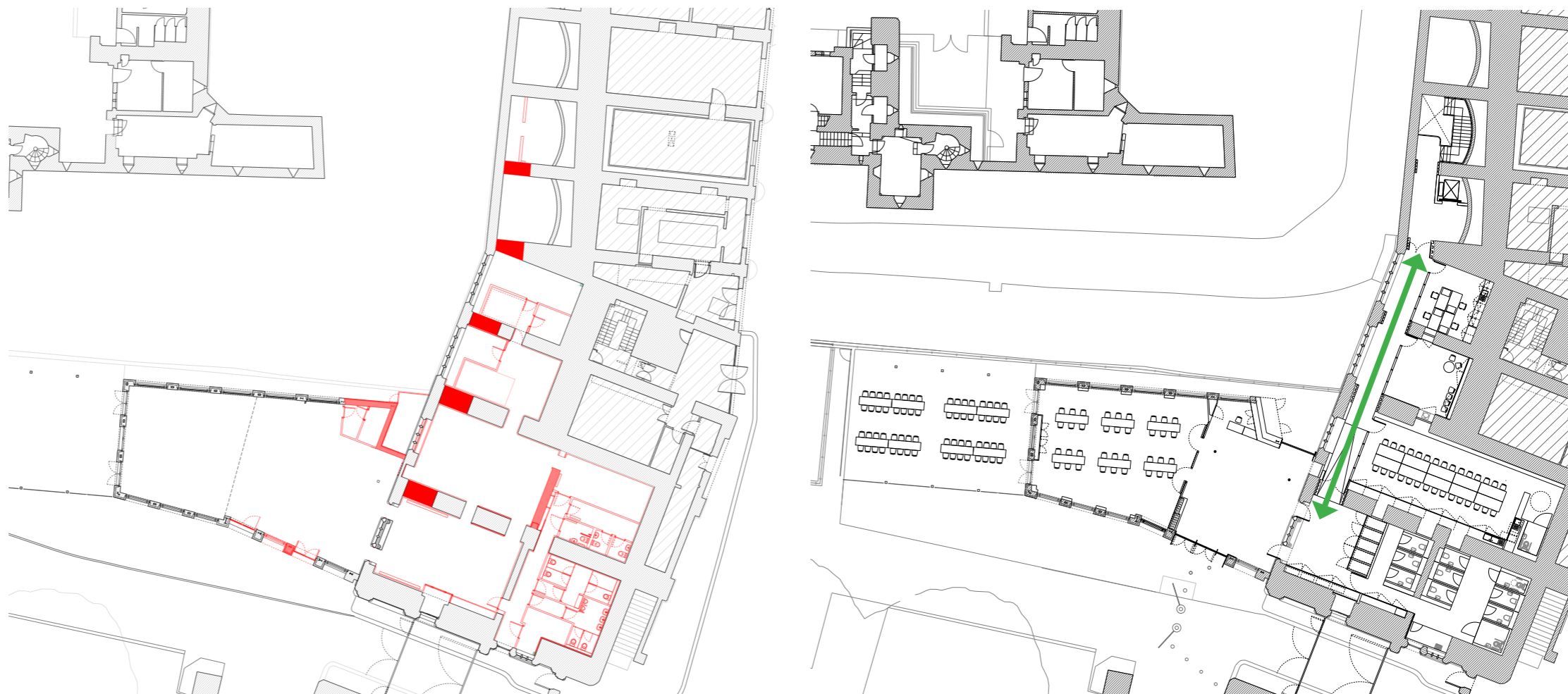
Jamie Fobert Architects' visualisation of Tower Bridge Arch 02 used as a learning and community space. View is oriented looking west.

4.2 HERITAGE IMPACT ASSESSMENT

4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

The architectural proposals do, however, necessitate some loss of primary historic fabric of the Grade I listed Tower Bridge arches in 5 nr localised sections of brickwork masonry within the dividing walls between the existing spaces within Tower Bridge, and a secondary dividing wall.

These removals, and ways of mitigating the heritage impact, have been carefully considered through the design development process. In conclusion, it was felt that these localised removals were necessary to ensure functionality and achieve operational connections between the three arches that will become learning spaces, ensure compliant fire escape routes, and facilitate inclusive access between the learning spaces – as well as to the new inclusive access lift and stair route that will connect schools and community group visitors directly into the Moat.



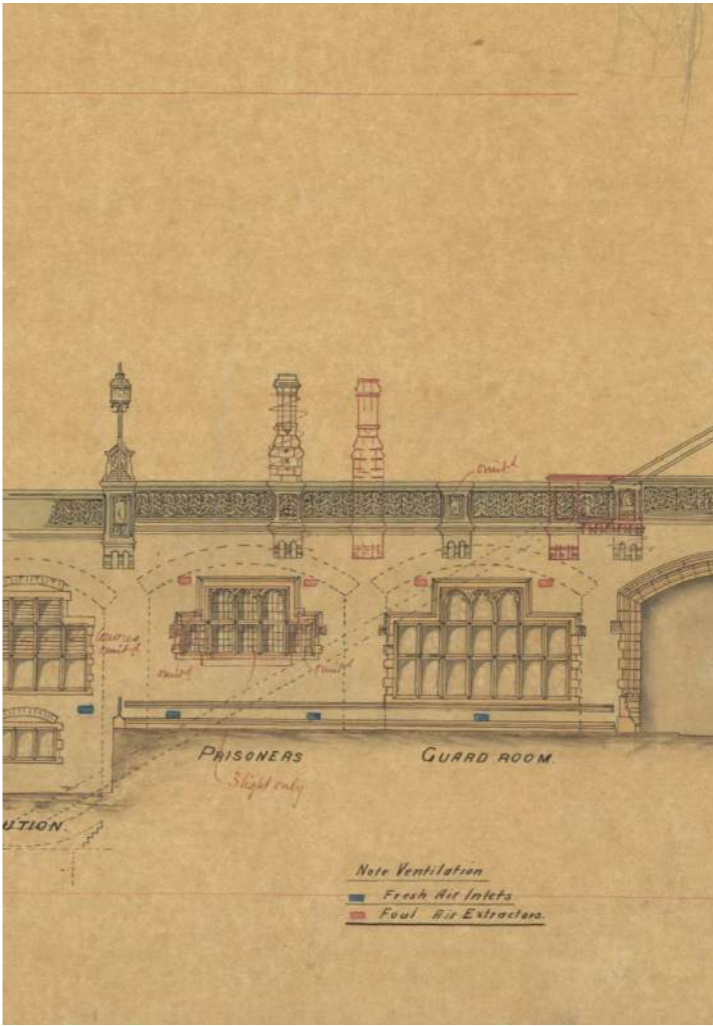
4.2 HERITAGE IMPACT ASSESSMENT

4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

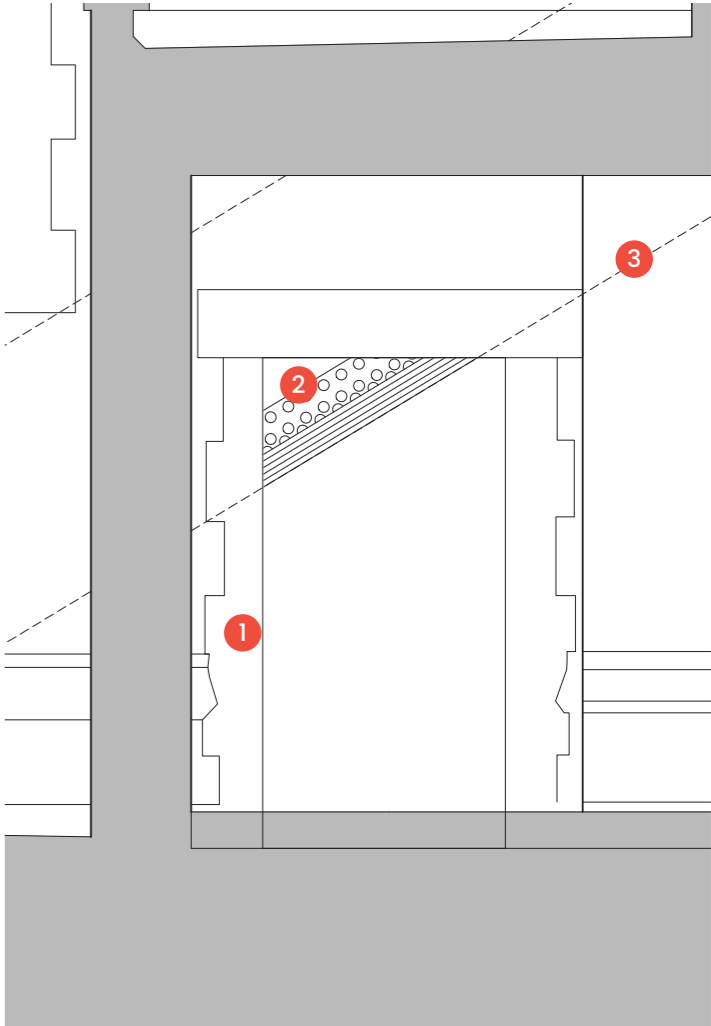
Historic features of Tower Bridge, such as the ironwork cable connection, are revealed as unique moments within the visitor experience of the new spaces, with interpretation added to better engage visitors with the unique construction detail of Tower Bridge, enhancing its evidential and historic value.



Existing condition of the Tower Bridge anchor cable within Tower Bridge Arch 02



Elevation from 1886 showing the relationship of anchor cable with interior spaces beneath the bridge



Proposed representation of Tower Bridge anchor cable

- KEY
- 1 Existing aperture within western elevation of Tower Bridge to be revealed and stonework restored (scope to be determined post strip-out)
 - 2 Ironwork cable of Tower Bridge to be revealed as much as possible during strip out while retaining all historic fabric.
 - Cable to be incorporated and presented within interior scheme, if allowed by fire design and requirements of City Bridge Foundation/ City of London Corporation
 - Paintwork scheme to be determined in consultation with client, curatorial team, architect, City Bridge Foundation/ City of London Corporation
 - 3 Dashed lines indicate concealed path of concealed cable embedded within masonry of Tower Bridge elevation

4.2 HERITAGE IMPACT ASSESSMENT

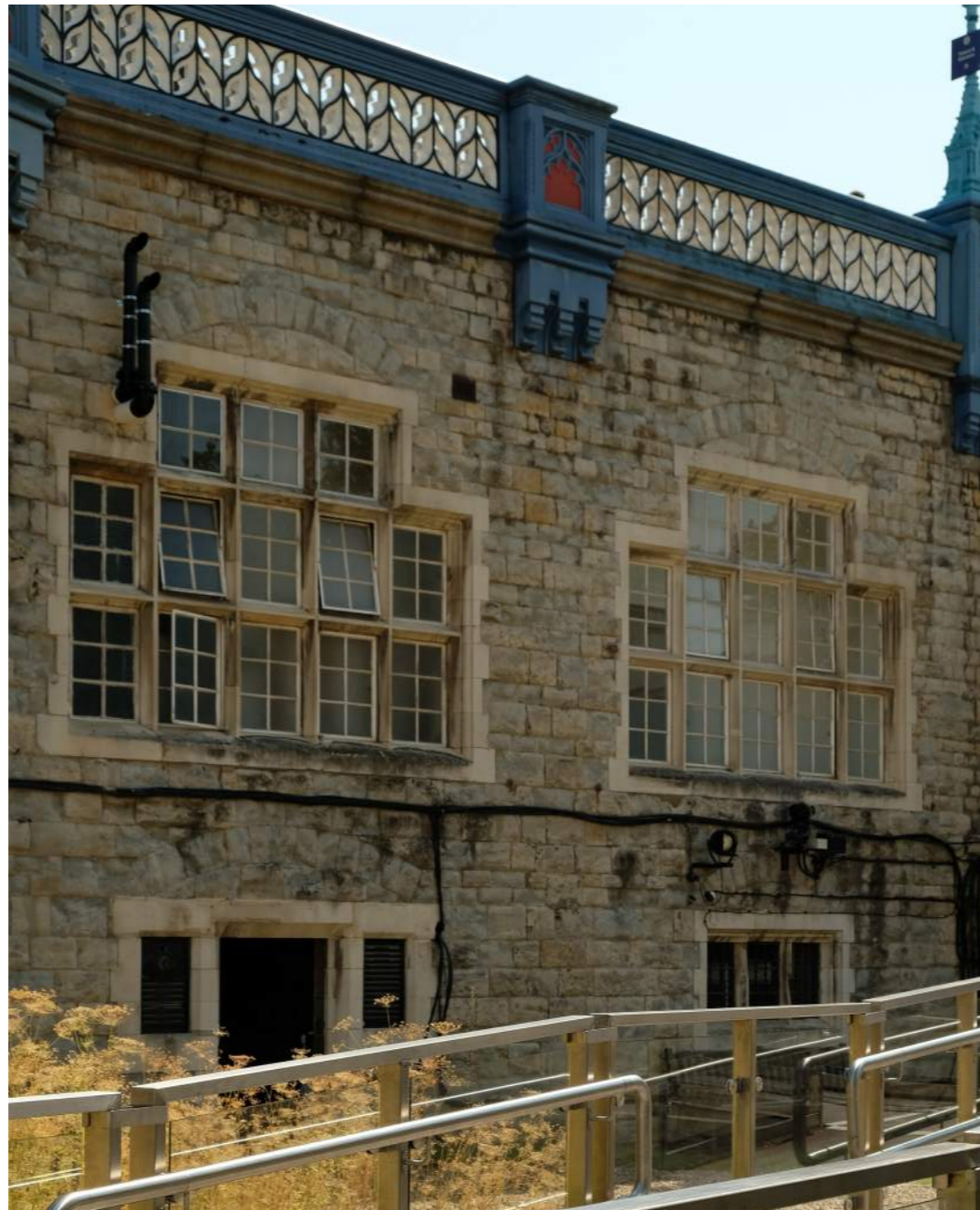
4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

It is proposed that the top panes of the windows serving Tower Bridge Arches 03 & 04, shown adjacent, are to be utilised to service the spaces beneath the bridge. This strategy will enable the spaces to be comfortably occupied by groups of schoolchildren and members of the public.

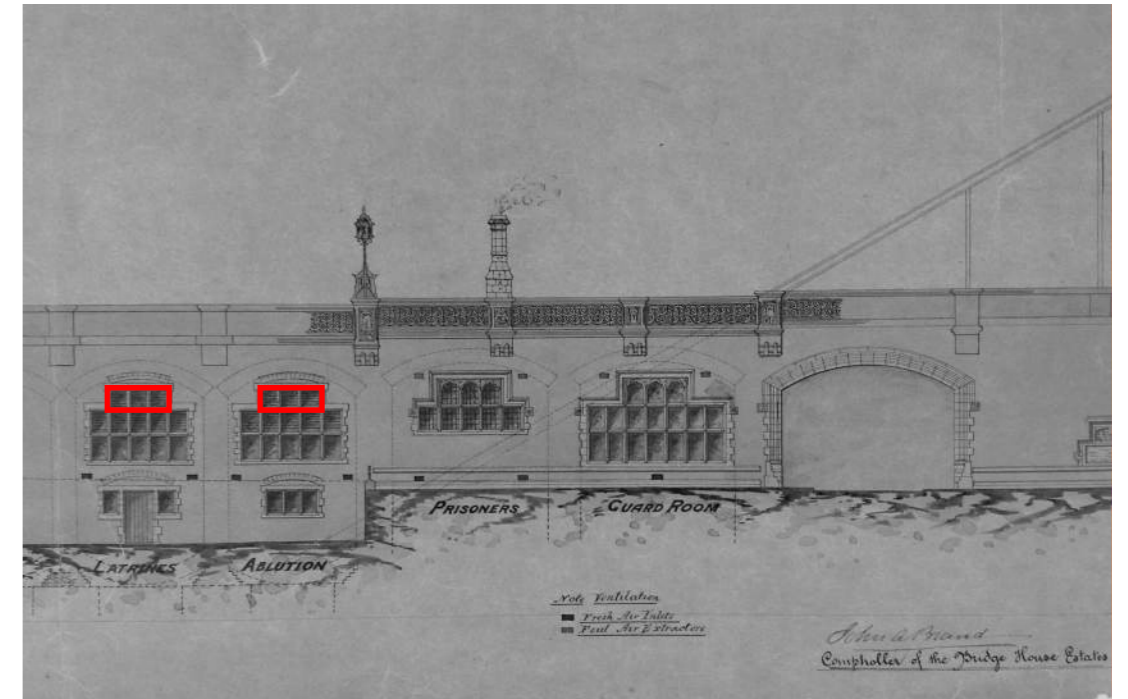
The top row of windows within these openings will be carefully removed and stored for future reuse. The rebated stone surrounds will be restored, and fitted with new bespoke steel frames. These frames will support proposed grilles with minimal impact or change to the historic fabric.

The design of these grilles will be informed by historic drawings, which suggest that the top two levels of these windows were originally intended to be fitted with louvres. It is assumed that this provided ventilation to the WCs and washing facilities behind.

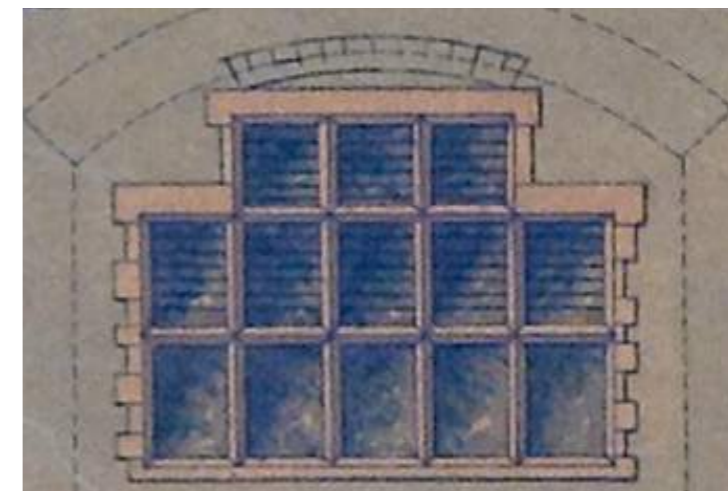
While starting with this historic precedent, practical considerations will be carefully considered with the design of the new grilles which may require a departure from historic precedent. Care will be taken, for example, to provide required free area and flow rates, whilst also concealing insect guards and fans behind the louvres.



Existing windows within Tower Bridge Arches 3 & 4



West elevation of Tower Bridge northern approach c. 1889, with red outlines indicating windows with proposed louvres at high level



Detail of original elevation drawing from c. 1889 showing horizontal lines across panes to indicate louvres

4.2 HERITAGE IMPACT ASSESSMENT

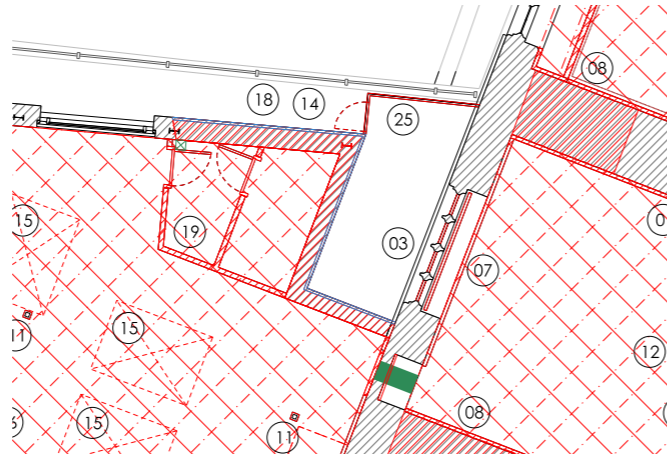
4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

As part of the proposals, the scheme includes the removal of the external section of the Reveller building to reveal and restore the presumed original configuration of the window.

It is believed that the glazing of this window was removed during the construction of the Reveller in 2010-11, to enable the installation of air handling units and associated attenuation for the kitchen space within Tower Bridge 02. The open reveals and extent of ductwork can be seen behind boarding in the adjacent images.

The reinstatement of this window will enhance the historic, aesthetic and evidential value of this space, the former prisoners cells, delivering significant heritage and public benefit, restoring this part of the façade and completing the original elevation, while providing daylight and enhanced views of the Tower of London site to a historic space within Tower Bridge.

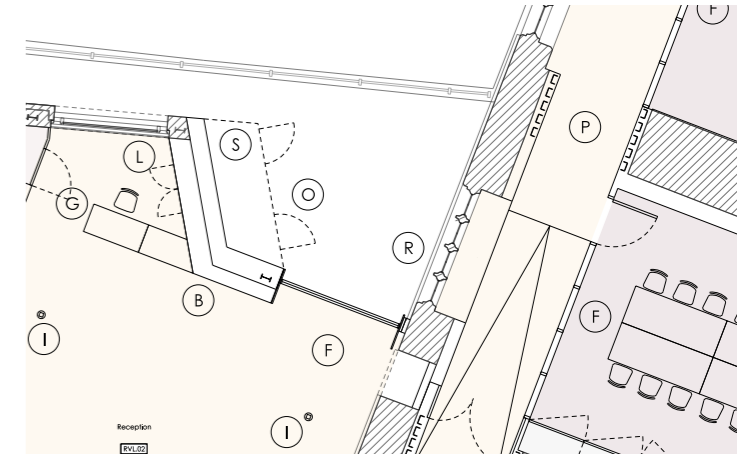
There is potential for the historic use of the space to be explained through interpretation, informed by further documentary and fabric research as the building finishes and alterations are removed.



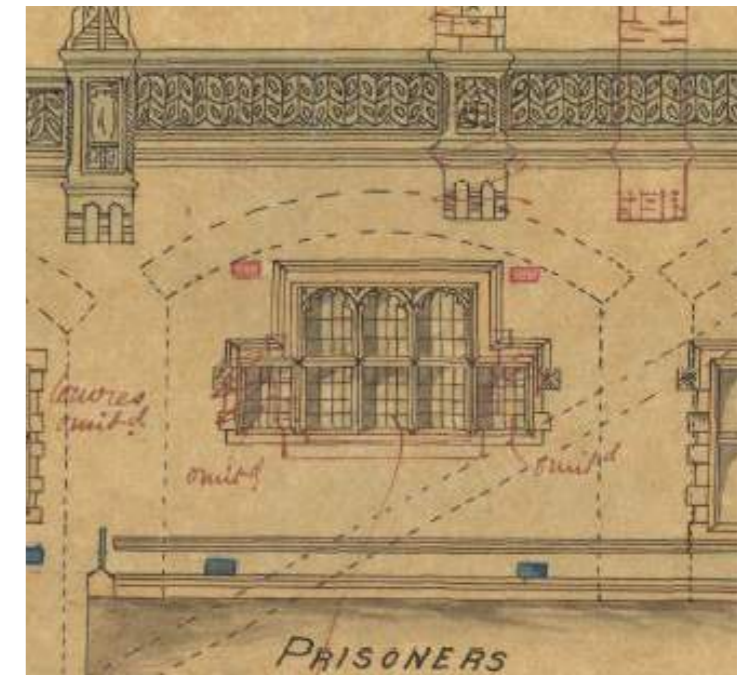
Detail of Reveller Ground Floor Plan showing removals



Existing condition of window to Tower Bridge Arch 02 with removed glazing and MEP ductwork penetrations



Detail of Reveller Ground Floor Plan showing proposed opening up works



Elevation drawing from 1886 showing small leaded lights within stone tracery window, although as-built window would appear to have four windows in a row.

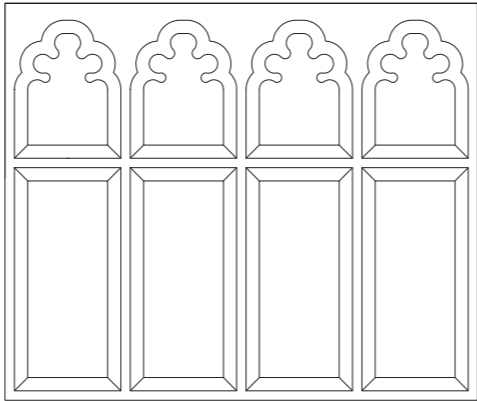
4.2 HERITAGE IMPACT ASSESSMENT

4.2.1 TOWER BRIDGE & TOWER BRIDGE APPROACH

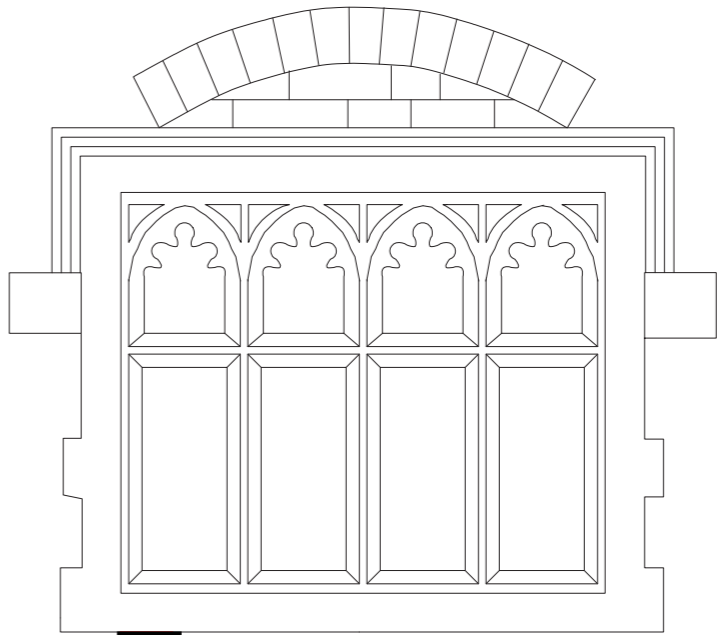
Where Portland stone tracery has been damaged due to previous removal of windows, doors or ductwork, the stone will be dressed to match the existing and new stone sourced to match where stone needs to be replaced.

New stone will be carved, where required, to match existing face and edge styles, proportions and profiles.

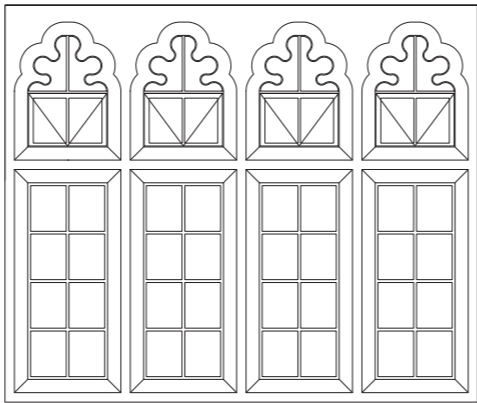
New window frames and casements will be made up to match surrounding historic examples, and fitted with new single glazed handmade crown glass to match historic examples elsewhere on the elevation and fixed with lime putty.



Existing condition of window to Tower Bridge Arch 02 with removed glazing and MEP ductwork penetrations - interior view



Existing condition of window to Tower Bridge Arch 02 with removed glazing and MEP ductwork penetrations - exterior view



Proposed condition of window to Tower Bridge Arch 02 with reinstated glazing and frames and restored stonework tracery - interior view



Proposed condition of window to Tower Bridge Arch 02 with reinstated glazing and frames and restored stonework tracery - exterior view

4.2 HERITAGE IMPACT ASSESSMENT

4.2.2 MOAT ARCHES

Heritage Significance of Existing Condition:

Exceptional

The wall which includes the entrances into the Moat Arches also forms the eastern boundary of the Moat around the Tower of London, and is part of the Scheduled Monument. The Arches are brickwork vaulted spaces beneath the Grade I listed Tower Bridge Approach.

Proposed Alterations to Moat Arches

The scheme proposes a light touch refurbishment to the Moat Arches to achieve beneficial use within these currently under-utilised spaces.

The proposed alterations to the Moat Arches within the scheme for which Planning, Listed Building Consent and Scheduled Monument Clearance is sought comprise:

- Conservation repairs to the fabric of the Moat arches beneath Tower Bridge Northern Approach. Whilst Historic Royal Palaces do not have maintaining responsibility for the brickwork façade wall of the Arches so no work is proposed to it within the scope of this application, the scheme proposals do seek to undertake repairs where possible including light brush cleaning and lime mortar repointing within the masonry arches.
- Sensitive refurbishment of the currently underutilised Moat Arches to be used by the visiting public and volunteers as part of the Schools & Communities learning facilities at the Tower of London.

Heritage Impact Assessment:

Medium Beneficial

The alterations enhance to a clearly discernible extent the heritage asset or the ability to appreciate its significance.

Heritage Impact Assessment on OUV and contribution to the WHS:

The Moat Arches contribute to the significance and setting of the Tower of London and its WHS primarily as they have formed the eastern boundary edge to the East Moat since their construction in the mid 19th Century.

The Moat Arches are understood to make some contribution to attributes and values of the Outstanding Universal Values of the World Heritage Site in terms of:

Contribution to the Tower of London’s concentric defences including the Moat (OUV Attribute 5, and key component 1)

The scheme proposals have no impact on the contribution the Moat Arches makes to this OUV since there is very limited change to the external appearance of the Moat Arches and the external wall which forms the eastern edge to the Moat.

Here it is considered the scheme may relate and contribute to achieving the overarching responsibilities under the World Heritage Convention to identify and present and transmit OUV to future generations.

Public and Heritage Benefits achieved through the Proposed Interventions:

Public benefits:

- The Arches are currently underutilised space, either empty or in use for materials storage. The scheme proposals bring them into active beneficial use.
- The Arches will be open to visitors to the Tower of London as part of a suite of new Learning spaces across the Tower, available for use by a broad range of audiences including Schools and Community groups and volunteers supporting the learning programmes.
- The spaces provide for the first time dedicated and inclusive WC facilities and volunteer welfare spaces in this area of the Tower.
- Access to the Arches enables a broader range of people to experience and enjoy these vaulted brickwork spaces beneath Tower Bridge.
- Through removal of an intrusive modern mezzanine structure within the arches, a new lift and stair installation which facilitates inclusive access connections directly between the Learning Centre and the new landscape gardens and external learning space within the East Moat.

Heritage benefits:

- The internal masonry within the Moat Arches is to be lightly cleaned and repointed in lime mortar with essential conservation repairs where necessary, supporting their protection.
- Securing this new use of visitor access and learning ancillary spaces necessitates limited intervention into the fabric of the Arches and will be positive in supporting their long-term conservation.
- Existing items stored within the Arches will be removed, enabling improved air flow within the spaces to support a more ventilated environment for mitigating damp (which to date has been an issue) within the historic floors, brickwork walls and vaults.
- Established inspection and maintenance regimes will be supplemented by a more active use pattern.

4.2 HERITAGE IMPACT ASSESSMENT

4.2.2 MOAT ARCHES

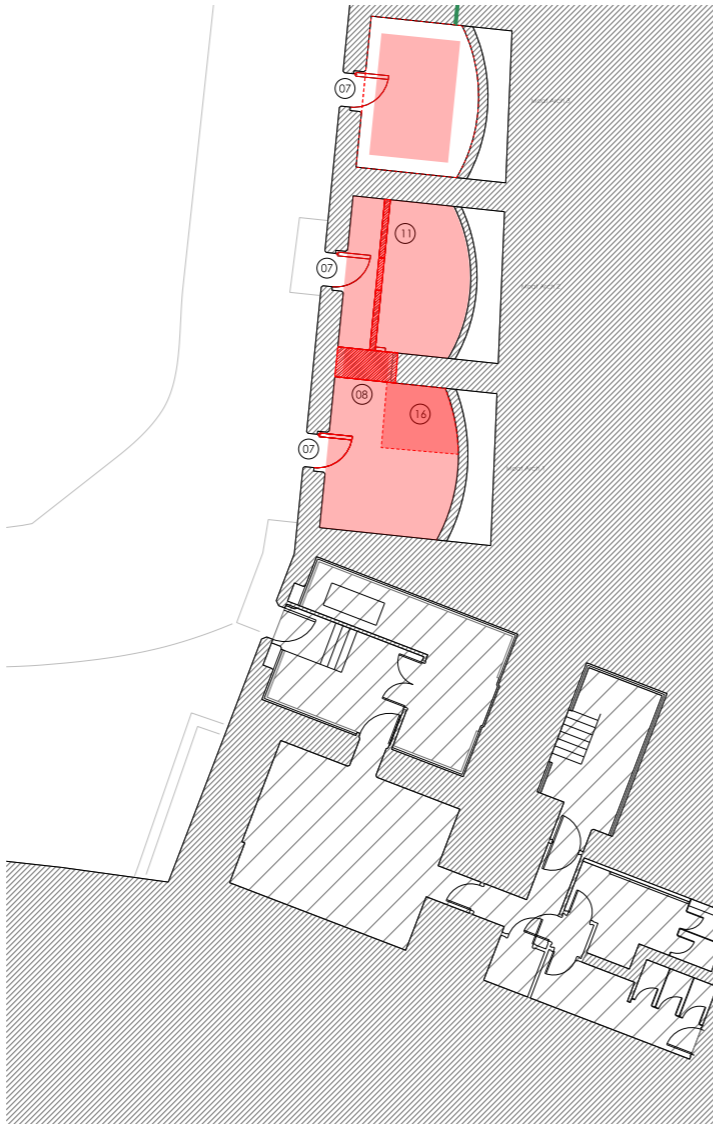
A crucial part of the proposed scheme is the creation of new access routes between the proposed learning centre and the Moat.

In order to achieve this, some historic fabric will be removed in the floor of Moat Arches 01 & 02, as well as the creation of a new opening between them to allow operational and inclusive access.

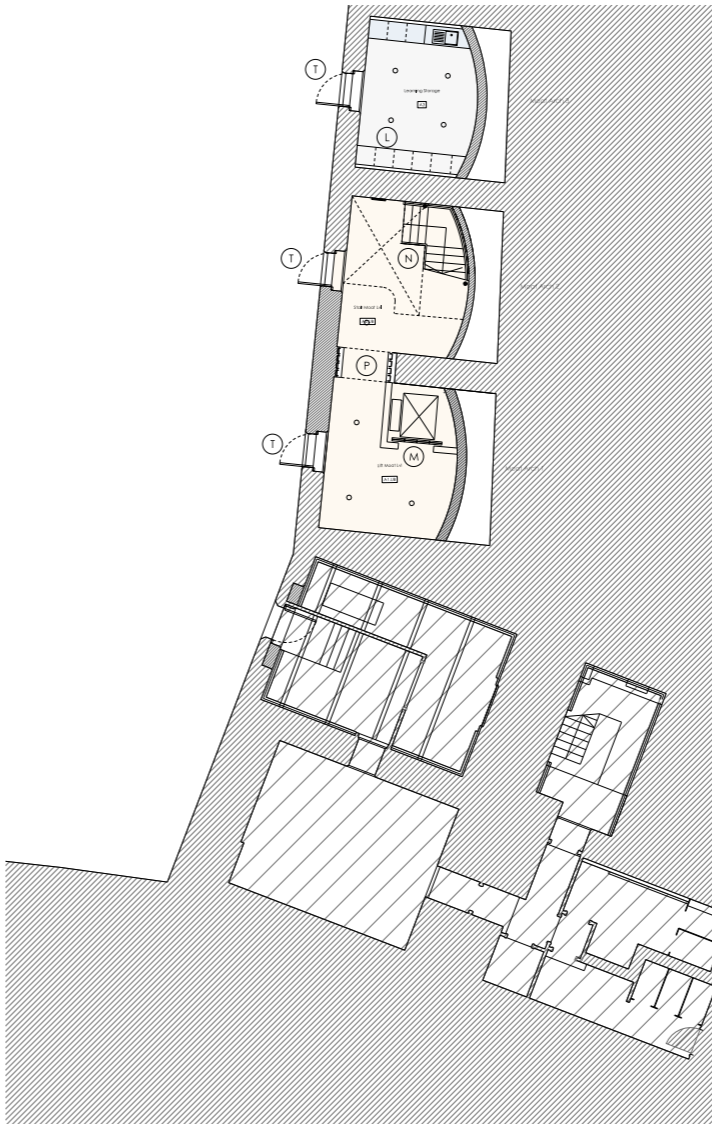
These removals, and ways of mitigating the heritage impact, have been carefully considered through the design development process.

In conclusion, it was felt that these localised removals are necessary to ensure functionality and achieve operational connections between the Moat and the new learning spaces, ensure compliant fire escape routes, and facilitate inclusive access through the provision of a new stair and lift.

Recent partitioning and false ceilings/ floors will also be removed, thereby reinstating the original double height volumes of these spaces and enhancing their historic, aesthetic and evidential value – whilst delivering public benefit by opening them up to the visiting public for the first time, as part of a new inclusive access visitor route.



Demolition within the arches at Basement (Moat level)



Proposed Basement Plan (Moat level)



Photo of an existing arch



Photo of an existing arch

4.2 HERITAGE IMPACT ASSESSMENT

4.2.2 MOAT ARCHES

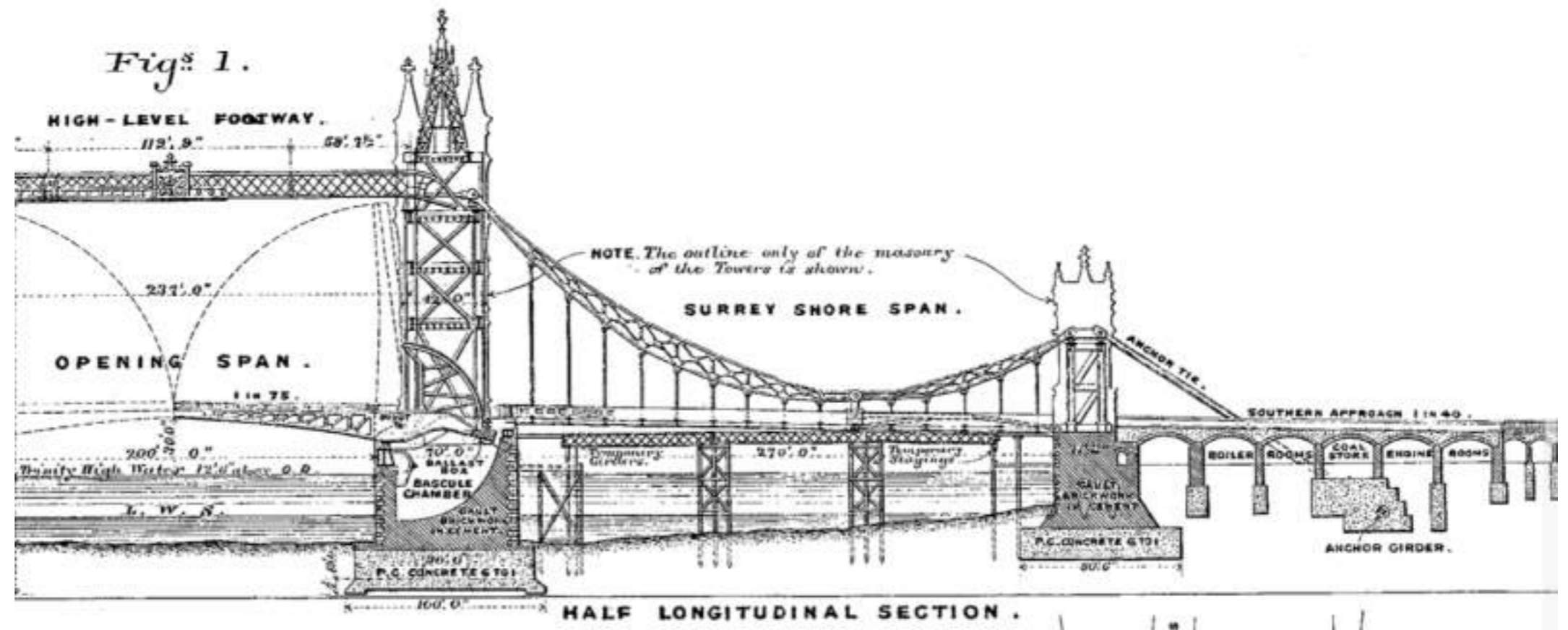
The diagrams on the following page illustrate the research we have done during design stages to date to understand the structural configuration of Tower Bridge, including the Tower Bridge Arches and the Moat Arches – based on assessment of historic record drawings.

Further work is needed in next design stages to undertake targeted opening-up investigations and record findings to build the body of knowledge about the existing Grade I listed fabric, and confirm the provenance of fabric, its condition and configuration, and the extent of 1884 survival.

The diagrams define, indicated in red, the presumed potential impact on the original historic fabric of the proposed new openings through the cross walls of the historic structure to form the connecting corridor between the proposed learning spaces. This impact is further explored on detail drawings by Jamie Fobert Architects, Hockley & Dawson Structural Engineers, and Purcell included within the Planning, Scheduled Monument Clearance, and Listed Building Consent application which this document accompanies.

Additionally, the diagram explores the potential impact the proposed lift pit might have, subject to further below ground investigations during next design stages.

The proposed position of the lift as developed during RIBA Stage 3 risks significant potential impact on, and necessary removal of, part of the concrete anchor footing assumed to be in this location based on the George Stephenson engineering drawings of the bridge and its cross section. To mitigate potential adverse impact on this footing as a significant part of the heritage fabric, and avoid the costly logistic issues that are likely to be associated with any concrete removal in this location, the proposed lift location has been resited in design to the north side of the relevant Moat Arch.

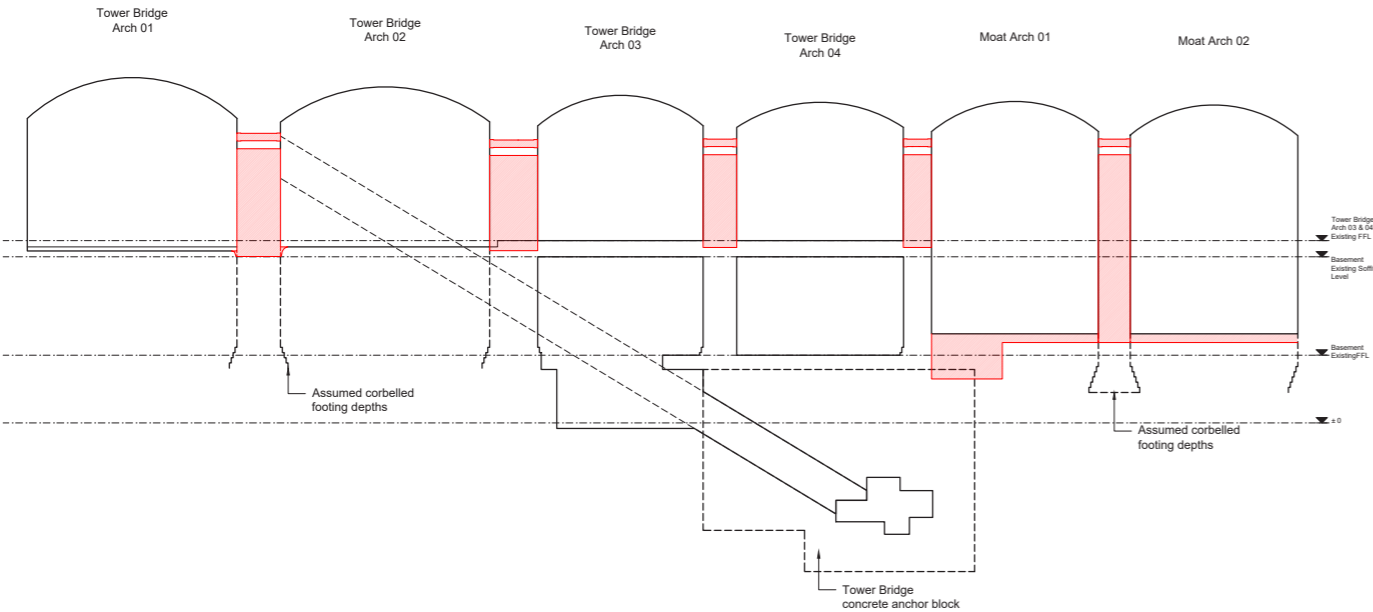


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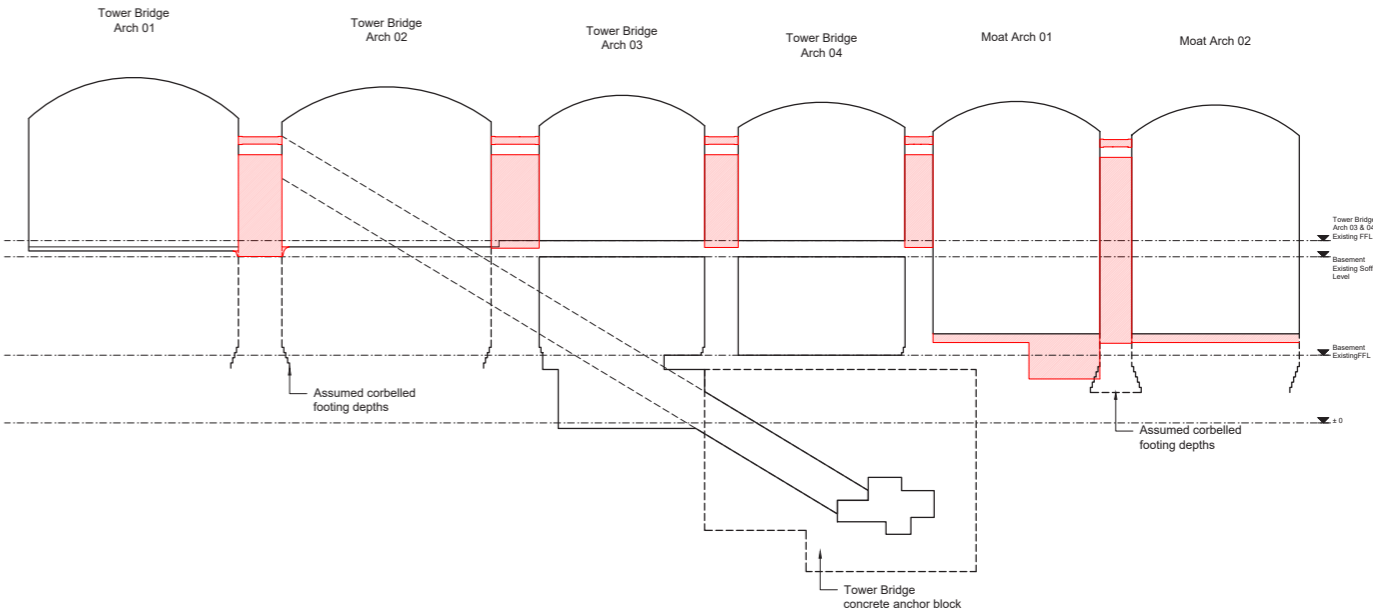
HERITAGE IMPACT ASSESSMENT

4.2.2

MOAT ARCHES



Lift pit as initially proposed in RIBA Stage 3 design development – which would have an adverse impact on the significant concrete footing anchor block that receives the base of the tension cable for Tower Bridge



Position of lift pit as now proposed to mitigate impact on subterranean cable anchor block

Key

Not in Scope

New fabric to Jamie Fobert Architect's design

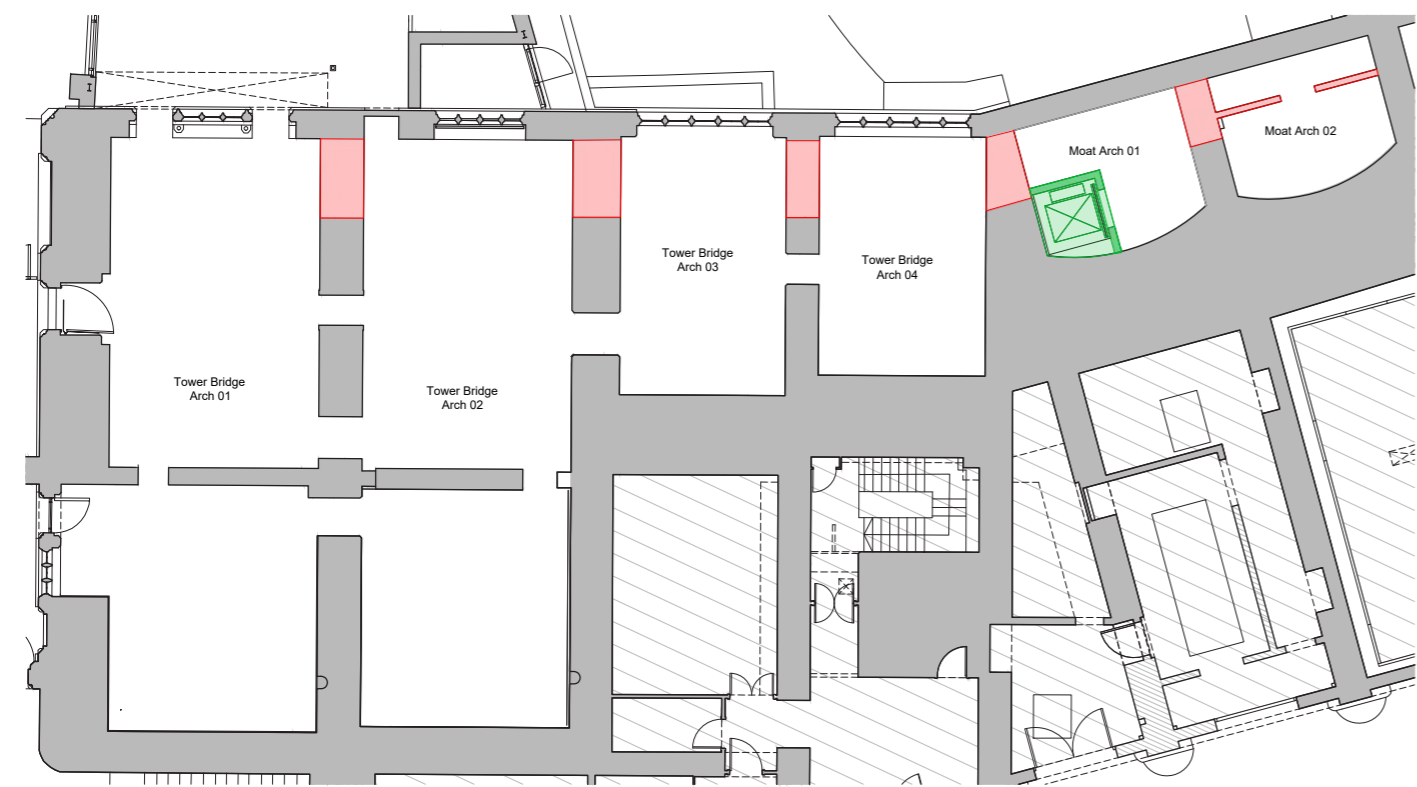
Strip-out/Demolition

4.2

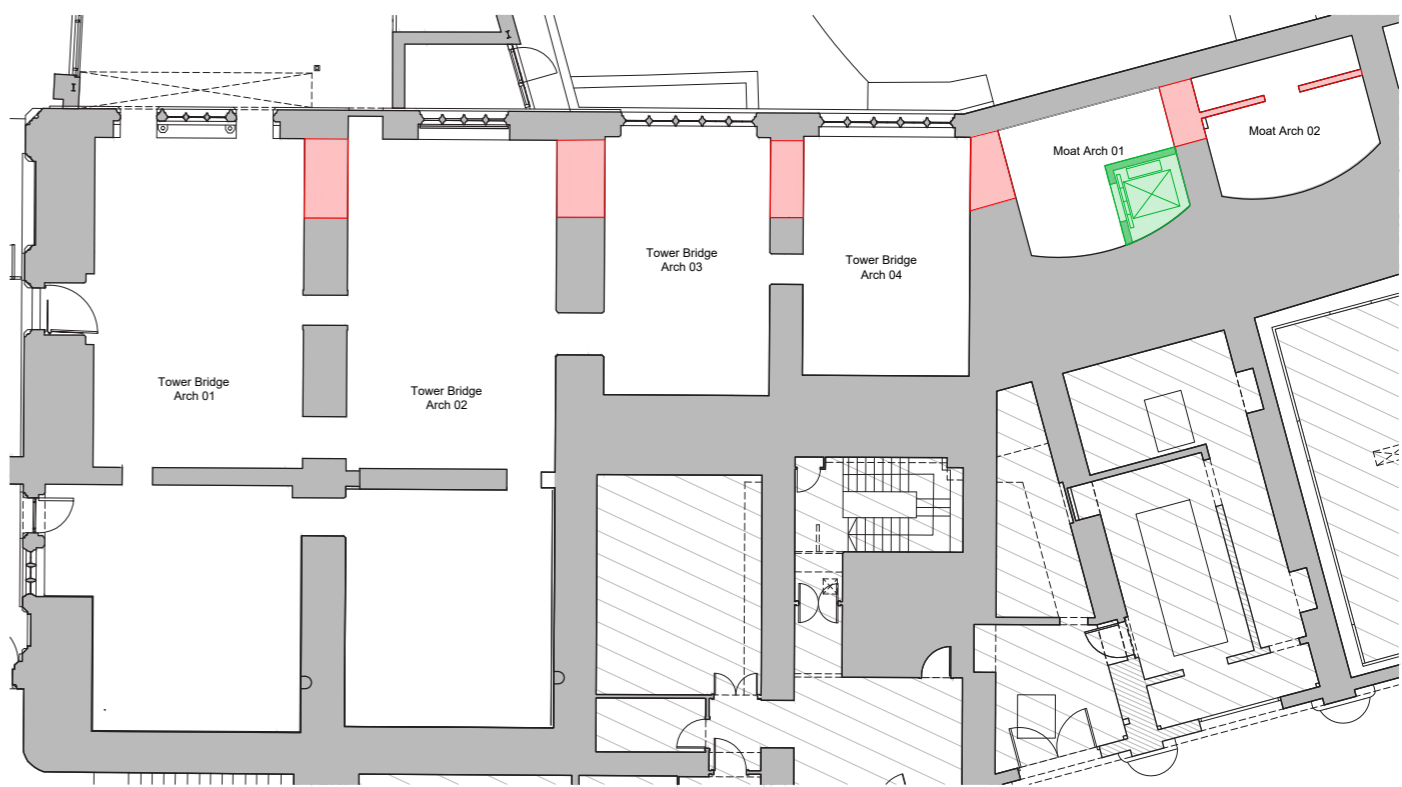
HERITAGE IMPACT ASSESSMENT

4.2.2

MOAT ARCHES



Lift pit as initially proposed in RIBA Stage 3 design development – which would have an adverse impact on the significant concrete footing anchor block that receives the base of the tension cable for Tower Bridge



Position of lift pit as now proposed to mitigate impact on subterranean cable anchor block

Key

Not in Scope

New fabric to Jamie Fobert Architect's design

Strip-out/Demolition

4.2 HERITAGE IMPACT ASSESSMENT

4.2.3 REVELLER BUILDING

Heritage Significance of Existing Condition:

Reveller Building – **Low**

Proposed Alterations to Reveller Building:

The proposed alterations to the Reveller building within the scheme for which Planning, Listed Building Consent and Scheduled Monument Clearance is sought comprise:

- Refurbishment of the former Perkin Reveller building to become a new Learning & Community Centre at the Tower of London.

Heritage Impact Assessment:

Medium Beneficial

The alterations enhance to a clearly discernible extent the heritage asset or the ability to appreciate its significance.

Heritage Impact Assessment on OUV and contribution to the WHS:

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.

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

Contribution to the Tower of London as an international famous monument and part of the relationship of the Tower of London to the River and the Wharf (OUV Attribute 1, and key component 4 & 5)

The enhancements to the Reveller building increase the level of glazing for visual permeability, as well as physical permeability through new door openings. Overall these interventions have a very minor effect which does not change the architectural language of the existing building or impact on the attribute. The scheme proposals for its refurbishment 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 since the building will become a Schools & Communities Welcome Centre as part of the education facilities which convey the rich history of the Moat and the Tower of London to a broad range of audiences.

Public and Heritage Benefits achieved through the Proposed Interventions:

Public benefits:

- Refurbishment of the former Perkin Reveller restaurant will facilitate the beneficial use of this currently underused building (a Low significance heritage asset in the context of the Tower of London), supporting its long-term continued maintenance and according with Conservation Policies defined within Historic Royal Palaces Tower of London World Heritage Site Management Plan.
- Sensitive refurbishment will ensure the building is safe, inclusive, sustainable and compliant with modern Building Regulations, whilst retaining the architectural characteristics which contribute to its heritage value.
- Sensitive rehabilitation of the building will not affect its overall appearance, so has no impact on significant views or the Outstanding Universal Value of the World Heritage Site.
- The 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 provision of Air Source Heat Pumps will bring reduced energy demand from non-renewable energy sources and will maintain comfortable temperature levels within the building. The siting of these units has been well considered and is discreet, and also allows for the creation of new views out from the Reveller building while having minimal impact on the building's overall appearance.



Jamie Fobert Architects' visualisation of proposed new Learning Centre

Heritage benefits:

- Minor alterations to the north and south facades of the Reveller building increase the amount of glazing to better engage the proposed new Learning Centre with its context and views into the Moat, without adverse impact on protected views referenced in the GLA London Plan and WHS Management Plan.
- The contemporary element and glazed lantern in the roof of the Reveller building presently has an awkward interface to the historic façade of Tower Bridge. The scheme proposal adjusts this by increasing the amount of glazing, enhancing the visual separation between the Reveller and Tower Bridge, and better articulating the monumentality of iconic Tower Bridge in views of the Bridge from the Wharf and River.

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

4.0 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)
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	N/A - not affected by scheme proposals.	Refer p73. The project proposals have no impact on the protected view or the silhouette of the Tower in this view.								Neutral - no impact
		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	N/A - not affected by the scheme proposals	The enhancements to the Reveller building make minor alterations to the elevations and roofscape adjacent to Tower Bridge, but have no visual impact on this component of the attribute as they continue to respect and not disturb the primacy of the Tower's concentric layout around the White Tower.								Neutral - no impact
		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	N/A - not affected by the scheme proposals	The enhancements to the Reveller building make minor alterations to the elevations towards the Wharf, but have no impact on this component of the attribute as they do not affect the Tower's current close relationship with the Thames.								Neutral - no impact
		5. The Wharf and the historically-famous Water (or Traitor's) Gate, known world-wide from its depiction in literature and pictorial representations	Proposed alterations to the Reveller building elevations towards the Wharf	The enhancements to the Reveller building increase the level of glazing for visual permeability, as well as physical permeability through new door openings. Overall these interventions have a very minor effect which does not change the architectural language of the existing building or impact on the attribute. The proposed interventions are intended to aid use as a welcome facility for Schools & Communities, enhancing the ability for the Tower of London to tell the rich histories of the Wharf and the Tower.	Once	Long-term	Irreversible	Irreversible	Permanent	Negligible	Positive	Minor positive impact
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 sitting on a bend to enhance its visibility both upstream and downstream	N/A - not affected by the scheme proposals	The enhancements to the Reveller building make minor alterations to the elevations towards the Wharf, but have no impact on this component of the attribute as they do not affect the Tower's current close relationship with the Thames.								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

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)
		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. The Wharf / River wall	Proposed alterations to the Reveller building elevations towards the Wharf	The enhancements to the Reveller building increase the level of glazing for visual permeability, as well as physical permeability through new door openings. Overall these interventions have a very minor effect which does not change the architectural language of the existing building or impact on the attribute. The proposed interventions are intended to aid use as a welcome facility for Schools & Communities, enhancing the ability for the Tower of London to tell the rich histories of the Wharf and the Tower.	Once	Long-term	Irreversible	Irreversible	Permanent	Negligible	Positive	Minor positive impact
		5. Key views of the Tower up, down, across and from the river	N/A - not affected by the scheme proposals	The enhancements to the Reveller building make minor alterations to the elevations and roofscape adjacent to Tower Bridge, but have no visual impact on this component of the attribute as they continue to respect and not disturb the primacy of the Tower in these key views.								Neutral - no impact
		6. The Tower's skyline (silhouette) as seen from the river and from across the river	N/A - not affected by scheme proposals.	The project proposals have no impact on the protected view or the silhouette of the Tower in views from the river and from across the river.								Neutral - no impact
		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
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 alterations to the Reveller building elevations towards the Wharf	The enhancements to the Reveller building make minor alterations to the elevations and roofscape, but have negligible impact on this component of the attribute as they are so slight in their changes to a secondary architectural component, and have no effect on the plan form of the Tower overall.	Once	Long-term	Irreversible	Irreversible	Permanent	Negligible	n/a (Neutral)	Neutral - no impact
		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

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)
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
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 alterations and repairs to the East wall of the Moat	The proposals make minor interventions to the East wall of the Moat, to repair existing door and window openings into the Arches and facilitate their uses as spaces for Schools & Communities visiting the Tower of London. The proposals have a positive impact through undertaking conservation repair, ensuring the fabric is in good order, and making these underutilised spaces beneficially useful for the visiting public to better tell the rich histories of the Tower to a broad range of audiences.	Once	Long-term	Irreversible	Irreversible	Permanent	Negligible	Positive	Minor positive impact
		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	N/A - not affected by the scheme proposals	The project proposals have no impact on buried archaeological remains								Neutral - no impact
		4. Presence of the wall-walks and their visual linkage with the surrounding cityscape and river, which demonstrate use and function	N/A - not affected by the scheme proposals	The project proposals have no impact on the wall-walks								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)
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	N/A - not affected by the scheme proposals	The project proposals have no impact on this component of the attribute								Neutral - no impact
		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	Change in use to spaces within Tower Bridge which had previously been used to house prisoners within Tower of London curtilage	The proposals make minor interventions to spaces within Tower Bridge to facilitate their uses as spaces for Schools & Communities visiting the Tower of London. The proposals have a positive impact through undertaking conservation repair, ensuring the fabric is in good order, and making these underutilised spaces beneficially useful for the visiting public to better tell the rich histories of the Tower and Tower Bridge to a broad range of audiences.	Once	Long-term	Irreversible	Irreversible	Long-term	Some change	Positive	Minor positive 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

