

4. Policy and Guidance

4.1 This chapter sets out the relevant national, regional and local planning policy and guidance. For the purposes of this assessment, it is those policies relating to townscape that are of most relevance.

Statutory duties

4.2 The legislation set out below is relevant to this assessment:

- The Planning and Compulsory Purchase Act 2004
- The Town and Country Planning Act 1990

Planning policy

National planning policy and guidance

The National Planning Policy Framework, 2023

4.3 The Government issued the latest version of the National Planning Policy Framework (NPPF) in December 2023. The NPPF sets out planning policies for England and how these should be applied.

4.4 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that *'at the heart of the Framework is a presumption in favour of sustainable development.'*

NPPF Section 12: Achieving well-designed and beautiful places

4.5 Section 12 of the NPPF deals with design. At paragraph 131, the NPPF states that *'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.'*

4.6 Paragraph 135 notes that *'Planning policies and decisions should ensure that developments:*

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

- 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.'*

4.7 Paragraph 137 states that: *'Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'*

4.8 Paragraph 139 states that *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*. It goes on to say that *'Conversely, significant weight should be given to:*

- development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*

Planning Policy Guidance

4.9 The national Planning Practice Guidance (PPG) was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. It is updated on an ongoing basis, and the parts cited below are current at the time of writing.

4.10 The PPG includes a section called 'Design: process and tools' which *'provides advice on the key points to take into account on design'*. This was issued on 1 October 2019; it replaces a previous section called 'Design'.

4.11 The PPG deals with the processes of the planning system with respect to design, and notes that guidance on good design is set out in the National Design Guide.



The National Design Guide

4.12 The National Design Guide (September 2019) ('NDG') states (paragraph 3) that it *'forms part of the Government's collection of planning practice guidance'*.

4.13 At paragraph 21 the NDG states that well-designed places are achieved by making the right choices at all levels, including:

- *'The layout (or masterplan)*
- *The form and scale of buildings*
- *Their appearance*
- *Landscape*
- *Materials; and*
- *Their detailing'*

4.14 At paragraph 35 the NDG sets out ten characteristics which contribute to the character of places, nurture and sustain a sense of community, and address issues affecting climate. These are described as follows:

- *'Context - enhances the surroundings.*
- *Identity - attractive and distinctive.*
- *Built form - a coherent pattern of development.*
- *Movement - accessible and easy to move around.*
- *Nature - enhanced and optimised.*
- *Public spaces - safe, social and inclusive.*
- *Uses - mixed and integrated.*
- *Homes and buildings - functional, healthy and sustainable.*
- *Resources - efficient and resilient.*
- *Lifespan - made to last.'*

Regional Planning Policy and Guidance

The London Plan, 2021

4.15 The London Plan 2021 was adopted in March 2021. It is the *'overall strategic plan for London' and sets out a 'framework for the development of London over the next 20-25 years'*.

4.16 The policies most relevant to townscape and visual impact are found in chapter 3, 'Design', and chapter 7, 'Heritage and Culture.'

4.17 Policy D1 on 'London's form, character and capacity for growth' highlights the necessity for Boroughs to identify an area's capacity for growth by undertaking an assessment of the *'characteristics, qualities and values of different places'*. This should include the consideration of urban form and structure, historical evolution and heritage assets, and views and landmarks.

4.18 Policy D3 on 'Optimising site capacity through the design-led approach' states that *'All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.'* The policy states that development proposals should *'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.'* Development should *'respond to the existing character of a place'*, and *'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.'* The policy further states that development design should *'be of high quality, with architecture that pays attention to detail,' and use 'attractive, robust materials which weather and mature well'.*

4.19 Policy D8 on 'Public realm' states that development plans and proposals should ensure that the public realm is *'[...] well-connected, related to the local and historic context [...]'*. It states that there should be *'a mutually supportive relationship between the space, surrounding buildings and their uses'* and that development should *'ensure that buildings are of a design that activated and defines the public realm, and provides natural surveillance.'*

4.20 Policy D9 on 'Tall buildings' notes that the height of what is considered a tall building should be defined in development plans and identified on maps, and that although this will vary in different parts of London, *'should not be less than 6 storeys or 18 metres'*. The policy also notes that *'tall buildings should only be developed in locations that are identified as suitable in Development Plans.'*

4.21 Policy D9 also notes that the views of buildings from different distances should be considered. This includes long-range views (developments should make a *'positive contribution to the existing and emerging skyline and not adversely affect local or strategic views'*), mid-range views (developments should a *'positive contribution to the local townscape in terms of legibility, proportions and materiality'*), and immediate views (developments should *'have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street'*). Proposals should *'take account of, and avoid harm to, the significance of London's heritage assets and their settings'* and should *'positively contribute to the character of the area.'* It goes on to note that the architectural quality and materials should be of an exemplary standard. Buildings that are situated in the setting of a World Heritage Site *'must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.'* Buildings near the River Thames should protect the open quality of the river, including views.

4.22 Policy HC3 on 'Strategic and Local Views' states that *'development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.'* The Mayor will identify Strategically-Important landmarks within designated views and will *'seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista'*. The Mayor will *'identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity and attributes.'*

4.23 Policy HC4 on the 'London View Management Framework' states that *'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.'* It notes that development should not be *'intrusive, unsightly or prominent to the detriment of the view'*, when it falls within the foreground, middle, or background of a designated view. With regard to protected vistas, development should protect and enhance, not harm, the viewer's ability to recognise and appreciate the strategically important landmark, and it should not harm the composition of the protected vista, whether it falls within the wider setting consultation area or not.

London View Management Framework

Supplementary Planning Guidance (March 2012)

4.24 In March 2012 the Mayor published the *'London View Management Framework Supplementary Planning Guidance'* ('LVMF') which is designed to provide further clarity and guidance on London Plan policies for the management of these views. The Proposed Clusters will be visible in many views defined within the LVMF, the visual management guidance will be referred to in the visual assessment in chapter 6.

4.25 Paragraph 57 of the visual management guidance states: *'While it is neither desirable nor necessary to preserve in stasis every aspect of a Designated View, changes to them should be managed in a way that does not harm the composition of the view or key elements of its character. New development that will be visible in a Designated View should be of appropriate height and incorporate excellent architectural design quality. It should safeguard the setting of landmarks (including Strategically Important Landmarks and World Heritage Sites) and, where tall, should ideally contribute to the development or consolidation of clusters of tall buildings that contribute positively to the cityscape. New development should not harm a viewer's ability to appreciate the Outstanding Universal Value of a World Heritage Site.'*

Local Policy and Guidance
City of London Local Plan 2015

4.26 The City of London Local Plan was adopted in January 2015. The Local Plan sets out the spatial vision for shaping the City until 2026 and how this will be achieved. The Local Plan provides a spatial framework that brings together a range of strategies prepared by the City Corporation, its partners and other agencies and authorities.

4.27 Policy DM 10.1: New development requires 'all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- appropriate, high quality and durable materials are used;
- the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

- servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design
- there is provision of amenity space, where appropriate;
- there is the highest standard of accessible and inclusive design.'

4.28 Policy DM 10.4 Environmental Enhancement states that 'The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- the predominant use of the space, surrounding buildings and adjacent spaces;
- connections between spaces and the provision of pleasant walking routes;
- the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

- the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- the use of high quality street furniture to enhance and delineate the public realm;
- lighting which should be sensitively co-ordinated with the design of the scheme.'

4.29 Policy CS13: Protected Views aims: 'to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks, by:

- Implementing the Mayor's London View Management SPG to manage designated views of strategically important landmarks (St Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views.
- Protecting and enhancing: local views of St Paul's Cathedral, through the City's "St Paul's Heights" code; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views of historic City landmarks and skyline features.
- Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, which adjoins the City, so ensuring its Outstanding Universal Value, taking account of the Tower of London World Heritage Site Management Plan (2007).'

4.30 Policy CS14: Tall Buildings aims 'to allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:

- Permitting tall buildings on suitable sites within the City's Eastern Cluster.

- Refusing Planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St Paul's Heights area; St Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
- Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.
- Ensuring that tall buildings proposals do not adversely affect the operation of London's airports.'

City of London Protected Views Supplementary Planning Document (SPD), January 2012

4.31 The Protected Views SPD was adopted on 31st January 2012. It provides further guidance to the public and developers on the operation of the view protection policies outlined in the documents noted above. The SPD includes sections on St Paul's Cathedral, The Monument, the Tower of London, the LVMF and other historic landmarks and skyline features within the City of London. The site does not fall within the St Paul's Heights policy area or the Monument Views policy area. Potentially relevant views identified towards the Tower of London and St Paul's Cathedral, which are also identified in the LVMF, are considered in chapter 6 of this assessment.



Emerging Local Plan

City of London, Draft City Plan 2036. Proposed Submission version, March 2021

- 4.32 The City of London is currently consulting on a new Local Plan, 'City Plan 2040' (previously referred to as 'City Plan 2036'). The latest (third) stage of consultation took place between 19 March-10 May 2021 on the Proposed Submission Draft (Regulation 19 consultation). The Draft City Plan process was paused to address issues raised by the Mayor of London with respect to tall buildings and other factors, including the impact of the Covid-19 pandemic.
- 4.33 As of April 2023, a revised timetable has been published by the City of London with an anticipated adoption date of June/July 2025. Once adopted, the new Local Plan will replace the City of London Local Plan, 2015.
- 4.34 The Plan sets out the City Corporation's vision, strategy and objectives for planning the square mile. It identifies 'Key Areas of Change' within the City and provides area-based policies and proposals relating to these. These are provided in section 7, which notes (at 7.1.1) '*The Key Areas of Change have been identified as they are likely to experience significant change over the Plan period and present particular opportunities or challenges that warrant a specific policy focus*'. The site lies within the 'City Cluster' Key Areas of Change.
- 4.35 The other draft policies of most relevance to this assessment are found in section 6: '*Shape outstanding environments*'. Those policies are:

- S8: Design;
- DE2: New Development;
- DE3: Public Realm;
- DE5: Terraces and Viewing Galleries;
- S12: Tall Buildings; and
- S13: Protected Views.

Draft Character Areas Study, CoL

- 4.36 The CoLC is currently undertaking a study into the characteristics of the City of London. The City is split into 9 character areas.
- 4.37 The draft chapters have been used to inform the baseline information for assessments in this document.

Tower of London Local Setting Study, August 2010

- 4.38 The Tower of London 'Local Setting Study' was published in August 2010 by the Tower of London World Heritage Site Consultative Committee. The Study describes the current character and condition of the Tower's local setting and sets out aims and objectives for conserving, promoting and enhancing appreciation of the OUV of the Tower. Chapter 7 of the Study identifies a series of views to and from the Tower. Views of relevance are as follows:

- View 1: Tower Green, Inner Ward, which 'Illustrates the Tower's significance as the setting for key historical events in European history. It also illustrates the relationship and scale of the individually outstanding palace buildings of the Inner Ward.'
- View 2: Inner Curtain Wall (North) "Illustrates the Tower's landmark siting, particularly its relationship to the City."
- View 4: Inner Curtain Wall (South) "Illustrates the outstanding example of concentric castle design, the prominence of the White Tower, and the Tower's relationship to the Thames to the south".
- View 5: Tower of London, Byward Tower Entrance which "Illustrates the Tower's relationship to the Thames and the City..."
- View 9: Tower Bridge (LVMF Viewing Location 10A.1) which "Illustrates the Tower's aesthetic value as a recognisable landmark and symbol of national identity."

- View 10: The Queen's Walk (LVMF Viewing Location 25A.1) which "Illustrates the Tower's aesthetic value as a recognisable landmark and symbol of national identity."
- View 11: London Bridge (LVMF Viewing Location 11B.2) which "reinforce(s) the landmark siting of the Tower on the Thames as a symbol of Norman power."

Westminster Metropolitan Views (2007)

- 4.39 Westminster sets out metropolitan Views which include both views from Westminster to other parts of London, and views from other parts of London into Westminster, such as views along and across the River Thames. They also include views within and across Westminster, particularly views of landmark buildings of metropolitan importance.
- 4.40 The views from this document that are assessed in this report are:

- V17 - Victoria Embankment towards the Palace of Westminster Clock Tower; and
- V34 - Horse Guards and Whitehall Court from St James's Park.

5. Proposed Clusters - Indicative Massing

5.1 The CoLC have undertaken a detailed scoping and testing exercise to establish the indicative massing of the Proposed Clusters. This included a wide range of views to account for various hard and qualitative constraints as set out below. A refined set of views has been used in this SVIA to assess the indicative massing of the Proposed Clusters to achieve an overview of the potential significant effects to the most strategic views.

5.2 A summary of the indicative massing of the Proposed Clusters is set out below.

Hard Constraints

5.3 The final shaping of the Proposed Clusters was informed by a 'Select Criteria' identified by CoLC – these are established, adopted macro-level strategic view and heritage constraints.

5.4 These Comprise:

- The Tower of London World Heritage Site, and associated policy and guidance;
- St Paul's Cathedral, and associated policy and guidance;
- The London View Management Framework (LVMF), and associated policy and guidance;

- City Landmarks and Skyline Features, and associated policy and guidance and;
- The Monument to the Great Fire, and associated policy and guidance.

5.5 The hard constraints were modelled, i.e protected vistas, silhouettes, and St Paul's Heights, as parameters in which the indicative massing would work within.

Qualitative constraints

5.6 The qualitative constraints that further shaped the indicative massing comprise:

- Local heritage assets and their setting;
- Local townscape character; and
- The future baseline of consented schemes.

5.7 In addition to the hard constraints, the qualitative constraints further shaped the indicative massing. This includes more qualitative parts of the LVMF visual management guidance which seeks to allow for the potential of new development to be visible in a Designated View. Noting it should be of appropriate height and incorporate excellent architectural design quality and should safeguard the setting of landmarks.

5.8 This was achieved through a series of model-testing studies from a large set of viewpoints undertaken by CoLC.

5.9 The indicative forms resulting from the above testing by the CoLC is assessed in this SVIA.

Proposed City Cluster Skyline

5.10 The overall qualitative feature of the Proposed City Cluster is its achievement of a coherent urban form on the skyline. This considered, sculpted form is considered to enhance the legibility and identity of the Cluster as a composition. This considered form adds to legibility and identity through its three-dimensional considerations in its relationship to its context.

5.11 The Proposed City Cluster has a primary crest and two smaller crests in combination with foothills and edges. Each of these components of the overall form are a result of responding to the constraints as described above.

5.12 Together, these create a recognisable form based on a series of individual parts that would that would reinforce and enhance the Cluster's identity as a composition on the City skyline.

Height and massing

5.13 The height and massing of the Proposed City Cluster is largely informed by the scale of existing and emerging developments already within the City Cluster area.

5.14 The Proposed City Cluster subsumes the future baseline and offers a continuation and completion of an entire form by stepping down towards the Tower of London, creating a western edge condition in response to views of St Paul's, and identifying how the existing and emerging crests can relate to each other through foothills.

5.15 The Proposed City Cluster would further consolidate the established cluster of tall buildings in this location and is considered to minimise the possibility of adverse visual effects or of harm arising to the setting and significance of the three strategic heritage assets (ToL WHS, St Paul's Cathedral, and the Monument to the Great Fire), and/or conflict with related policy and guidance, from future individual tall building proposals.



Urban design

- 5.16 The urban design will be established through the relationship of the individual forms as part of the Proposed City Cluster. This relates both to the ground condition and experience on the street, as well as the perception of legibility, wayfinding, and identity as experienced from further away, throughout London.
- 5.17 This will need to be assessed through individual applications for sites within the Proposed City Cluster as they come forward.

Proposed Holborn and Fleet Valley Cluster Skyline

- 5.18 The overall qualitative feature of the Proposed Holborn and Fleet Valley Cluster is its achievement of consolidation of the future baseline into a dynamic new skyline presence.
- 5.19 The Proposed Holborn and Fleet Valley Cluster envelope relates to the heights of existing and emerging schemes within the area. It would take the form of a singular, gentle crest stretching east to west. This subtle form, much lower in height than the City Cluster, to the east, would respond to the constraints described above, in particular the Temples area to the south and the local views of St Paul's Cathedral.
- 5.20 While the Proposed Holborn and Fleet Valley Cluster envelope takes a simple, linear form, it is envisaged that individual schemes within this Cluster would be required to achieve a graceful, architectural termination at roof level, in order to create a compelling new skyline presence, avoiding the impression of a linear 'wall' of development.

Height and massing

- 5.21 The height and massing of the Proposed Holborn and Fleet Valley Cluster is largely informed by the scale of existing and emerging developments already within the area.
- 5.22 The Proposed Holborn and Fleet Valley Cluster would consolidate the future baseline with new schemes that would create a compelling new mid-rise, north-west corner of the City.
- 5.23 The proposed heights within the Proposed Holborn and Fleet Valley Cluster would be managed through extrapolation of suitable relationships between the individual buildings of the future baseline and the potential for future sites. This has been achieved by testing heights options on sites with prospective extrusions and extensive testing in views carried out by CoLC.
- 5.24 The Proposed Holborn and Fleet Valley Cluster would consolidate the existing nucleus of tall buildings in this location and would, on balance, minimise the possibility of adverse visual effects or of harm arising to the setting and significance of the three strategic heritage assets, and/or conflict with related policy and guidance, from future individual tall building proposals.

Urban design

- 5.25 The urban design will be established through the relationship of the individual forms as part of the Proposed Holborn and Fleet Valley Cluster, this relates both to the ground condition and experience on the street as well as the perception of legibility, wayfinding, and identity as experienced from further away, particularly from the south side of the Thames.
- 5.26 This will need to be assessed through individual applications for sites within the Proposed Holborn and Fleet Valley Cluster as they come forward.

6. Strategic Visual Assessment

6.1 This chapter focuses on the visual effects of the Proposed Clusters on visual amenity and the surrounding townscape. In order to assess the visual effects, viewpoints from 50 locations, including five kinetic sequences, have been selected in consultation with CoLC planning officers based on the methodology set out in chapter 2.

6.2 The views assessed in the following pages are not the only views which are likely to be affected by the Proposed Clusters. They represent a general spread of views which illustrate the urban relationships likely to arise between the Proposed Clusters and the surrounding townscape from strategic locations.

6.3 TTC have assessed the visual effects of the Proposed Clusters on the local environment, making use of quantitative and the qualitative material provided by CoLC as well as the computer model imagery provided by CoLC, produced using Vu.City software, presented in this chapter. The written assessments, found in the following pages, include both objective and subjective commentary based on professional judgement and the text has been finalised to reflect the agreement and position of CoLC planning officers.

6.4 Each of the views includes an 'existing view' illustrated by a photograph, illustrating the current condition. These photographs have been provided by Cityscape Digital. The assessment is then presented through computer model images comparing a 'future baseline view', which includes all relevant consented schemes, with a 'proposed view', which includes the Proposed Clusters set within the future baseline condition. The views are shown and assessed in a winter scenario, to illustrate maximum visibility. For completeness and to understand the impacts of tree coverage, summer views are included in Appendix 3. The methodology used by CoLC to produce the Vu.City images is included at Appendix 1 of this report.

6.5 All schemes included in the future baseline are considered committed schemes, with the exception of 55 Bishopsgate, which has resolution to grant, but is awaiting decision. This scheme is included in the visualisations for additional information; it is not considered material for assessment.

6.6 The following set of views are assessed:

LVMF (River Prospects)

- View 1: Tower Bridge: upstream [LVMF-10a.1]
- View 2a: London Bridge: downstream [LVMF-11b.1]
- View 2b: London Bridge: downstream [LVMF-11b.2]
- View 3: Southwark Bridge: downstream [LVMF-12b.1]
- View 4: Thames side at Tate Modern [LVMF-13b.1]
- View 5: The South Bank: Gabriel's Wharf viewing platform [LVMF-16b.2]
- View 6: Waterloo Bridge: downstream [LVMF-15b.1]
- View 7: Waterloo Bridge: downstream [LVMF-15b.2]
- View 8: Golden Jubilee/Hungerford Footbridges: downstream [LVMF-17b.1]
- View 9: Golden Jubilee/Hungerford Footbridges: downstream [LVMF-17b.2]

LVMF (Townscape Views)

- View 10a: The Queen's Walk at City Hall [LVMF-25a.3]
- View 10b: The Queen's Walk at City Hall [LVMF-25a.2]
- View 10c: The Queen's Walk at City Hall [LVMF-25a.1]
- View 11: The Queen's Walk at City Hall [LVMF-25a.3]
- View 12: The Queen's Walk at City Hall [LVMF-25a.2]
- View 13: The Queen's Walk at City Hall [LVMF-25a.1]
- View 14: St James's Park Bridge [LVMF-26a.1]
- View 15: St James's Park Bridge [WCC-mv34b]
- View 16: St James's Park Bridge [WCC-mv34a]



LVMF - Long Distance views

- View 17: Alexandra Palace [LVMF 1A.1]
- View 18: Parliament Hill [LVMF 2A.1]
- View 19: Kenwood [LVMF 3A.1]
- View 20: Primrose Hill [LVMF 4a.1]
- View 21: General Wolfe Statue, Greenwich [LVMF5A.2]
- View 22: Blackheath Point [LVMF 6A.1]

HRP Views (Tower of London Local Settings Study)

- View 23: Approach route 14 Tower Bridge (kinetic sequence representative view 2)
- View 24: Approach route 12 Commodity Quay (kinetic sequence representative view 2)
- View 25: Approach route 12 Commodity Quay (kinetic sequence new selected view)
- View 26: Local Setting Route 5: pedestrian subway to East Smithfield south of Tower Gardens
- View 27: Representative Viewpoint 8 The Royal Mint (panned north to include cluster)
- View 28: Approach route 4 Great Tower Street (new selected view)
- View 29: Approach route 4 Great Tower Street (new selected view)
- View 30: Representative Viewpoint 5 Main entrance of the Tower (looking away from TOL)
- View 31: Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
- View 32: Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
- View 33: Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
- View 34: Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
- View 35: Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
- View 36: Representative Viewpoint 1 Tower Green, Inner Ward (new selected viewpoint)
- View 37: Representative Viewpoint 2 Inner Curtain Wall North (new selected viewpoint -panned west)
- View 38: Representative Viewpoint 2 Inner Tower Ward North

- View 39: Representative Viewpoint 2 Tower Green, Inner Ward (new selected viewpoint -panned east)
- View 40: Representative Viewpoint 4 Inner Curtain Wall South (new selected viewpoint -panned west West)
- View 41: Representative Viewpoint 4 Inner Curtain Wall South (new selected viewpoint - moved east)

CoL views – Processional Way and Cannon Street

- View 42a: CoL Protected Views, St Paul's Views, Identified view from Fleet Street
- View 42b: CoL Protected Views, St Paul's Views, Identified view from Fleet Street
- View 42c: CoL Protected Views, St Paul's Views, Identified view from Fleet Street
- View 42d: CoL Protected Views, St Paul's Views, Identified view from Fleet Street
- View 43a: Cannon Street at Laurence Pountney Hill [COL-cs1]
- View 43b: Cannon Street at Bush Lane [COL-cs2]
- View 43c: Cannon Street at Dowgate Hill [COL-cs3]
- View 43d: Cannon Street at College Hill [COL-cs4]
- View 43e: Cannon Street at Queen Street [COL-cs5]
- View 43f: Cannon Street at Garlick Hill [COL-cs6]

WCC views

- View 44: Somerset House Terrace [WCC-mv17b]
- View 45a: The Strand west, at Burleigh Street [WCC-mv18n]
- View 45b: The Strand west, at Burleigh Street [WCC-mv18c]
- View 45c: The Strand west, at Burleigh Street [WCC-mv18s]

Holborn and Fleet Valley Views

- View 46: London Bridge: upstream [LVMF-11a.1]
- View 47: The South Bank: Gabriel's Wharf viewing platform [LVMF-16b.1]
- View 48: The Queen's Walk at the Royal National Theatre [LVMF-16a.1]
- View 49: Westminster Bridge Downstream [LVMF-18b.1]
- View 50: The Monument looking north-west [CoL M05]

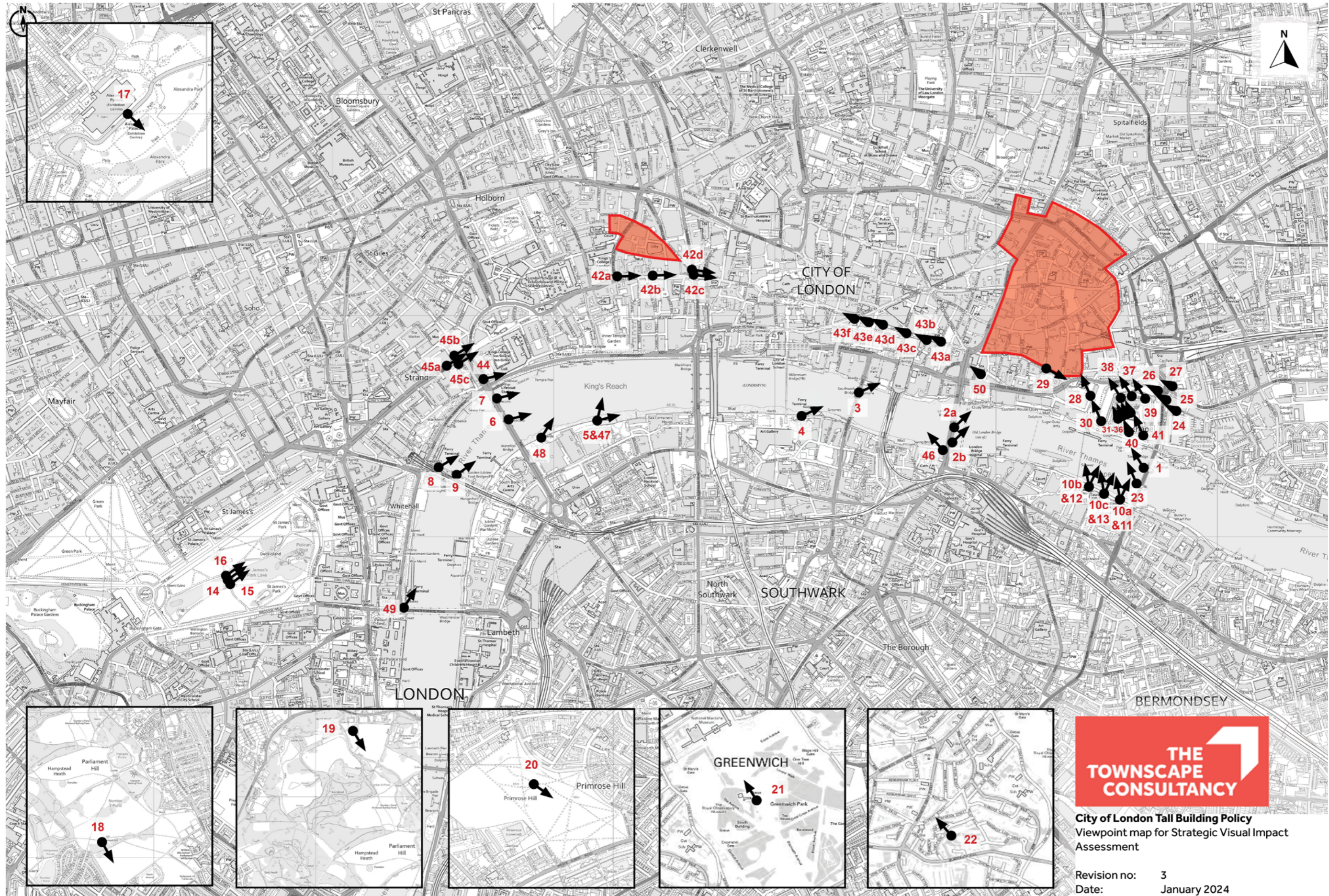


Figure 6.1: Viewpoint map, proposed tall buildings areas marked in red for indicative purposes only.



View 1: Tower Bridge: upstream [LVMF-10a.1] - Existing

Existing

- 6.7 This view is taken from Tower Bridge, and it looks north-west across the river from the northern bastion. The Tower of London, a World Heritage Site, is on the right. Its walls have a relationship with the river and create a frontage. The White Tower creates a strong silhouette except for the 1980s One America Square visible above the castellations.
- 6.8 To the left, modern mid-rise developments continue the river frontage with the tall buildings of the city scattered behind as a backdrop. The Monument and the lantern and upper dome of St Paul's Cathedral can be seen to the far left.
- 6.9 The LVMF SPG gives the following description of the view: *'The character of the upstream views is derived from the significant depth and width of the view, which includes important buildings and public spaces in the foreground on both sides of the river. Groups of trees along the northern embankment, especially around the Tower of London, form important elements in the view.'*
- 6.10 *The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued. The middle ground includes the varied elements of the City, rising behind the Tower. These include prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches.'*
- 6.11 Since the published in 2012, more tall buildings have been constructed in the City, including 20 Fenchurch Street, The Leadenhall Building, 52 Lime Street 22 Bishopsgate, and several more are under construction.



View 1: Tower Bridge: upstream [LVMF-10a.1] - Future Baseline

Future baseline

- 6.12 The emerging City Cluster can be seen in this view. The consented schemes are seen as the yellow forms in the view, with buildings currently under construction in blue. The emerging Cluster lies to the left of the ToL, without disturbing its skyline.
- 6.13 In the City Cluster, the consented 55 and 85 Gracechurch Street schemes are seen either side of 20 Fenchurch Street with One Leadenhall Street to the right of 85 Gracechurch Street and bridging the gap between 20 Fenchurch Street, and the centre of the Cluster. One Undershaft forms the peak of the Cluster, and 100 Leadenhall Street steps down from the tallest point to the right. In the foreground of the Cluster are consented schemes at 130 and 50 Fenchurch Street which expands the reading of the emerging Cluster to the south. The emerging Cluster is seen against clear sky.

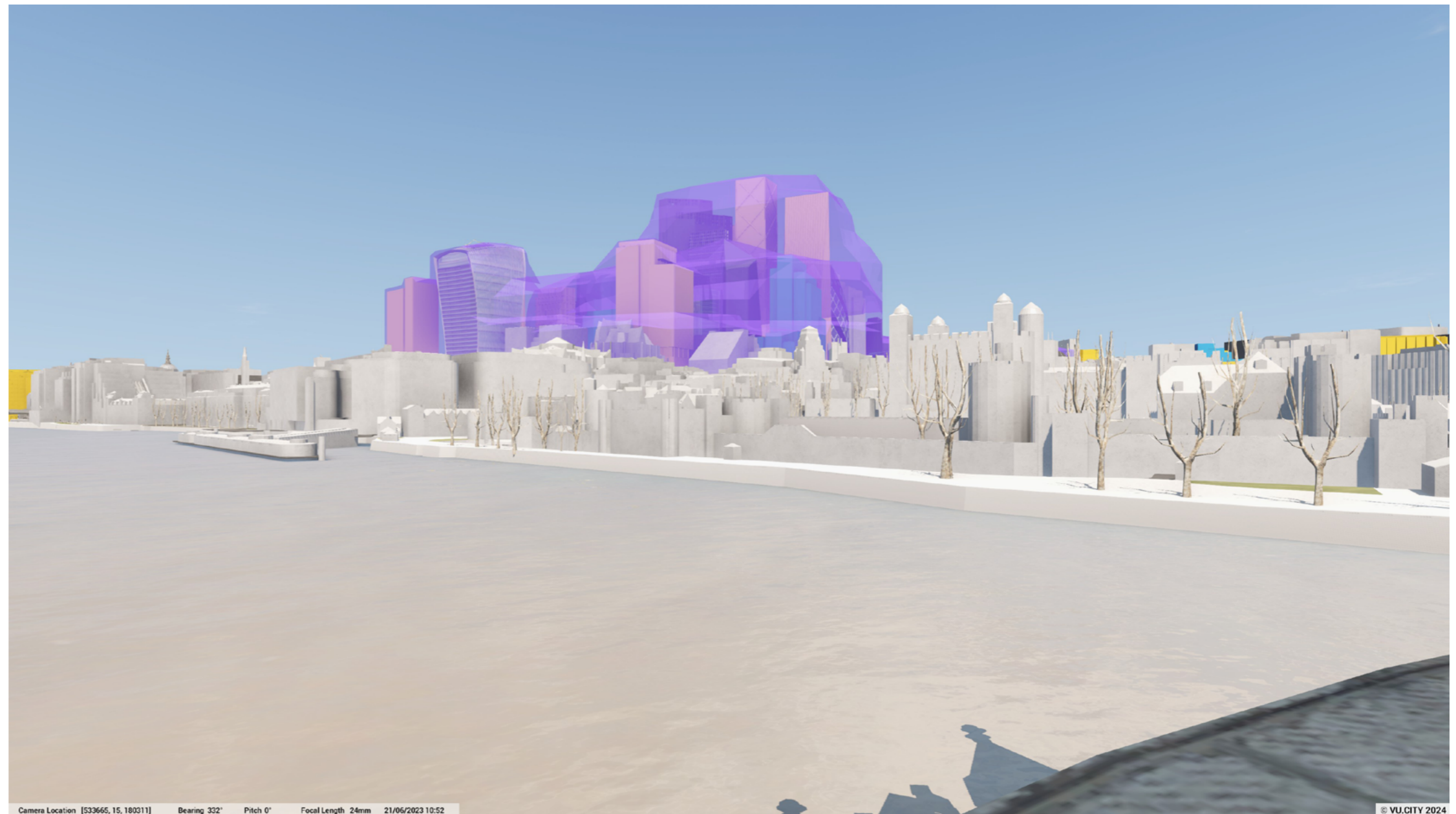




View 1: Tower Bridge: upstream [LVMF-10a.1] - Proposed Clusters

Proposed

- 6.14 The Proposed City Cluster is seen as the purple form, encompassing the existing and emerging tall buildings.
- 6.15 The overall form comprises the primary crest centred around One Undershaft, and two secondary crests around 20 Fenchurch Street and the grouping between 50 Fenchurch Street and 52 Lime Street. From these crests the contour heights descend towards the south and south-east to create significantly lower foothills of the Proposed City Cluster, in order to mediate successfully between it, the river, and the WHS.
- 6.16 The eastern edge of the Proposed City Cluster has been carefully modelled to respond to the context of the ToL WHS and to accord with the LVMF SPG. It would leave a clear sky space gap between the Cluster's eastern edge and the silhouette of the White Tower to maintain visual separation between the two (LVMF SPG para 186). It would minimise as far as possible the possibility of development appearing to 'dominate' the White Tower (para 183), but it is acknowledged that, in this scenario, individual schemes coming forward on sites at the Proposed City Cluster's edge in this location could have the potential to conflict with the guidance in this particular respect. Nevertheless, it is considered that the form and modelling of the Cluster at this point strikes, overall, an appropriate balance in respect of the LVMF SPG and the consolidation of the City Cluster form.



View 1: Tower Bridge: upstream [LVMF-10a.1] - Proposed Clusters

- 6.17 The LVMF SPG notes that the Proposed City Cluster could add considerably to the character and stature of the view, and that further tall buildings must take account of existing skyline features (para 187). Further tall buildings should carefully consider the delicate dynamic between the form of the Cluster and the ToL.
- 6.18 The architectural character, materials, and colour palette of individual proposals coming forward within the Proposed City Cluster will need to provide an appropriate context to the setting of the ToL, to further preserve its prominence in this view.
- 6.19 To the west, the Proposed Cluster form would be tightly wrapped around the silhouette of 55 Gracechurch Street, leaving a considerable sky gap between the Cluster, the Monument and St Paul's Cathedral.
- 6.20 Overall, the visual effect in respect of the Cluster form is considered to be **beneficial**, through the enhancement of its form and sharper definition of its edges. However, it is acknowledged that there is some low potential for adverse effects, particularly at the eastern edge next to the WHS, and these will need to be rigorously scrutinised at for individual schemes.

View 2a: London Bridge: downstream [LVMF-11b.1] - Existing

Existing

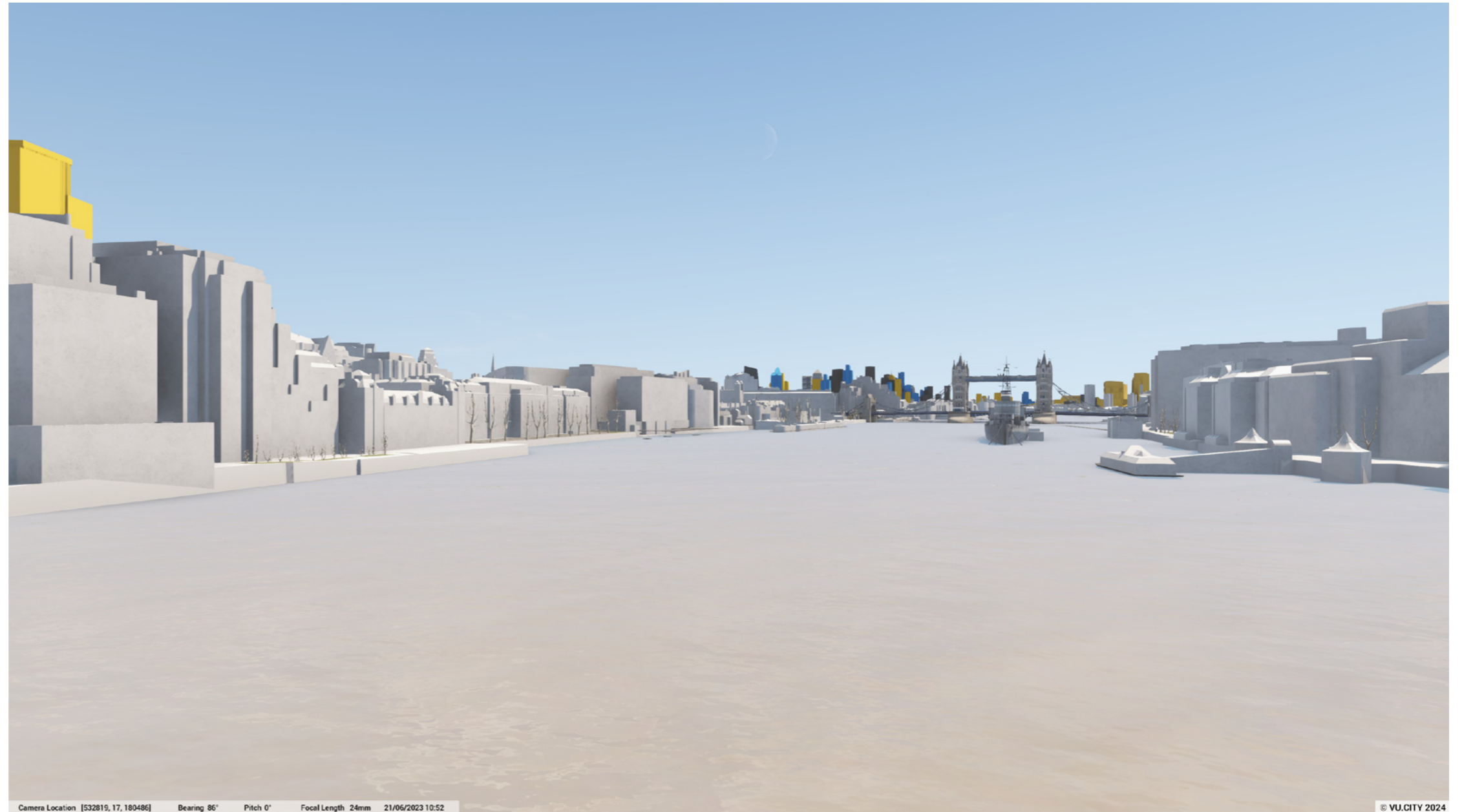
- 6.21 This view is taken from London Bridge and it looks downstream, towards the Tower of London and Tower Bridge.
- 6.22 The LVMF SPG describes the view as follows: *'The downstream pavement provides views to the Tower of London World Heritage Site, Tower Bridge, and beyond, to the rising ground at Greenwich and the cluster of towers at Canary Wharf.'*
- 6.23 *The river dominates the foreground and middle ground. Trees along the northern embankment are an important element in the view. The focus of the view is Tower Bridge, dominant over the Tower of London. The City, to the left of the view, expresses variety in its grain and character. Adelaide House, the former Billingsgate fish market and the Custom House, all listed, add formality to the foreground. The Southwark riverside buildings direct the view to the profile of Tower Bridge. HMS Belfast adds considerable interest to the view.*
- 6.24 *The tall buildings at Canary Wharf mark the path of the river as it continues further east. The best view of the Tower of London is from close to the Southwark bank.'*
- 6.25 Since the LVMF SPG was published in 2012, more tall buildings in Canary Wharf appear in the background of this view.



View 2a: London Bridge: downstream [LVMF-11b.1] - Future Baseline

Future baseline

- 6.26 The corner of 50 Fenchurch Street is just visible to the far left, if the viewer were to pan around, more of the Cluster would be seen.
- 6.27 In the distance emerging schemes can be seen in the Canary Wharf and Canada Water areas.



View 2a: London Bridge: downstream [LVMF-11b.1] - Proposed Clusters

Proposed

6.28 Only the very edge of the Proposed City Cluster, shown in purple, would be seen to the far left of this view. The important element in this view is Tower Bridge which is unaffected by the Proposed Clusters. There is **no effect**.



View 2b: London Bridge: downstream [LVMF-11b.2] - Existing

Existing

6.29 This view is in close proximity to view 2a (LVMF 11b.1), it is at the southern side of the bridge and allows for more visibility of the Tower of London.

6.30 The LVMF SPG expands on this: *'From the south side of London Bridge there is a clear backdrop of sky to the White Tower's four turrets and castellations. Development should not cause adverse impact to the World Heritage Site and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage by unacceptably imposing on the Tower, or have a negative impact on a person's ability to recognise and appreciate this Strategically Important Landmark.'*

6.31 Since the LVMF SPG was published in 2012, more development has emerged in Canary Wharf, which appears in this view behind Tower Bridge. In the foreground, on the left, 1 Water Lane, which is on the northern bank of the river, has been redeveloped since 2012, though it has not increased dramatically in scale. The neighbouring development towards the Tower of London, at Three Quays Walk, is of a similar scale and was also built post-2012.

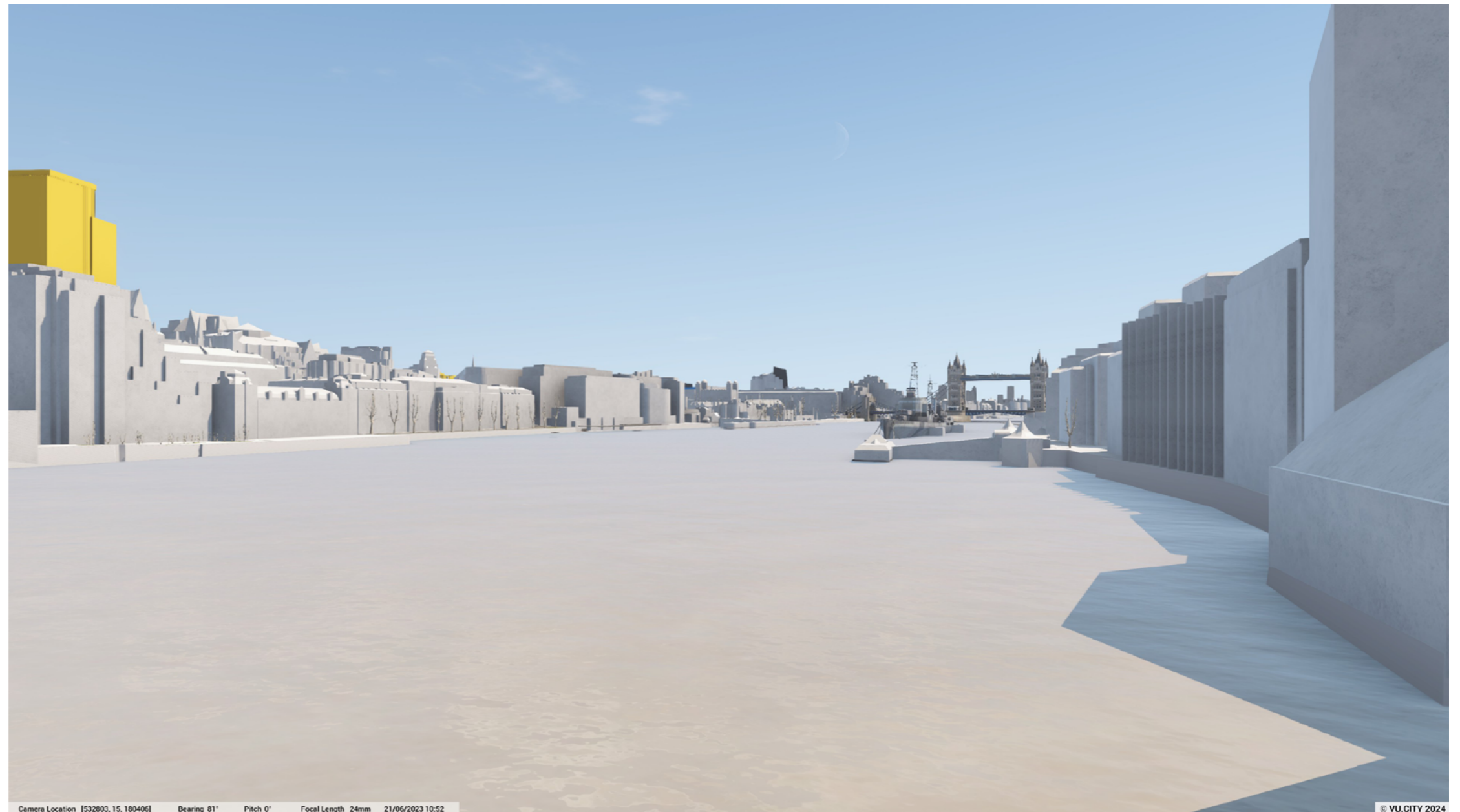




View 2b: London Bridge: downstream [LVMF-11b.2] - Future Baseline

Future baseline

6.32 Consented schemes are shown in yellow and schemes under construction in blue. The upper floors of the Butterfly scheme are seen to the right of the Old London Port Authority building. A small amount of the Royal Mint Court scheme is seen to the left of the White Tower. Several taller schemes are emerging in the distance in Canary wharf.



View 2b: London Bridge: downstream [LVMF-11b.2] - Proposed Clusters

Proposed

- 6.33 The eastern corner of the Proposed City Cluster would be visible to the left of this view forming a backdrop to the Minster Building and the spire of St Dunstan in the East.
- 6.34 Further tall buildings at the eastern edge of the Cluster could have implications for the setting of the buildings along the riverside in the foreground of this view. The seminal group of maritime buildings remain dominant in the view and the generally open quality of this part of the City's riverside leading down to the WHS is preserved. The clear backdrop of sky to the White Tower's four turrets and castellations is unaffected.
- 6.35 There would be a **neutral effect** in this view, through the form of the Proposed City Cluster largely stepping down to meet the more sensitive context around the riverside and WHS.



View 3: Southwark Bridge: downstream [LVMF-12b.1] - Existing

Existing

- 6.36 This view is taken from Southwark Bridge, looking downstream.
- 6.37 The LVMF SPG describes the view as follows: *'Views from the downstream pavement are limited, owing to the Cannon Street railway bridge, which dominates the near foreground. Seen, above the bridge, there is a limited prospect of Tower Bridge. Part of the cluster of tall buildings close to Canary Wharf can also be seen, indicating the breadth of London.'*
- 6.38 The most dramatic addition to this view is the construction of 20 Fenchurch Street since 2012. 1 Angel Lane has also been completed since 2012, appear beyond the Victorian station of Canon Street.



View 3: Southwark Bridge: downstream [LVMF-12b.1] -Future Baseline

Future baseline

6.39 The consented schemes are shown in yellow in this view, with those under construction in blue. 55 and 70 Gracechurch Street are seen in the foreground of 20 Fenchurch Street, with others further north. In the distance, taller schemes are emerging around Canary Wharf and Canada Water. The 22 storey Colechurch House is seen on the south side of the river to the right of the view.

