

ED-HTB36



May 2025

# CITY OF LONDON TALL BUILDINGS POLICY

## Evidence Base Addendum



# Contents

Executive Summary	4
Background	6
Methodology	8
The Amendments: City Cluster	9
The Amendments: Broadgate	11
SVIA Addendum	16
Tower of London HIA Addendum	113
St Paul's Cathedral HIA Addendum	114
The Monument HIA Addendum	116
The Tall Building Topic Paper Addendum	117
Conclusion	118
Appendix	119

# 1. Executive Summary

## 1. Executive Summary

1.1 This Addendum has been prepared by the City Corporation to present and assess the visual effects of the proposed City Cluster contour line amendments and the proposed Broadgate Tall Building Site (collectively, 'the amendments'), both of which have emerged through the City Plan 2040 Regulation 19 Consultation and subsequent Statements of Common Ground with developers with respect to:

- 30 Fenchurch Street (SOCG16)
- 1-2 Minster Court (SOCG17)
- Broadwalk House (SOCG19)
- New London House (SOCG20)

1.2 The document is an Addendum to the following parts of the submitted City Plan 2040 Evidence Base: the Strategic Visual Impact Assessment (SVIA) (ED-HTB15-27), the Tower of London (ED-HTB28), St Paul's Cathedral (ED-HTB30) and Monument Heritage Impact Assessments (HIAs) (ED-HTB31) and the Tall building Topic Paper (ED-HTB1). All of which are available on the Corporation's examination website: City Plan 2040: Evidence Base - City of London

1.3 As an Addendum to the Evidence Base, this document aligns with and flows from its methodologies, assumptions and policy and

legislative basis.

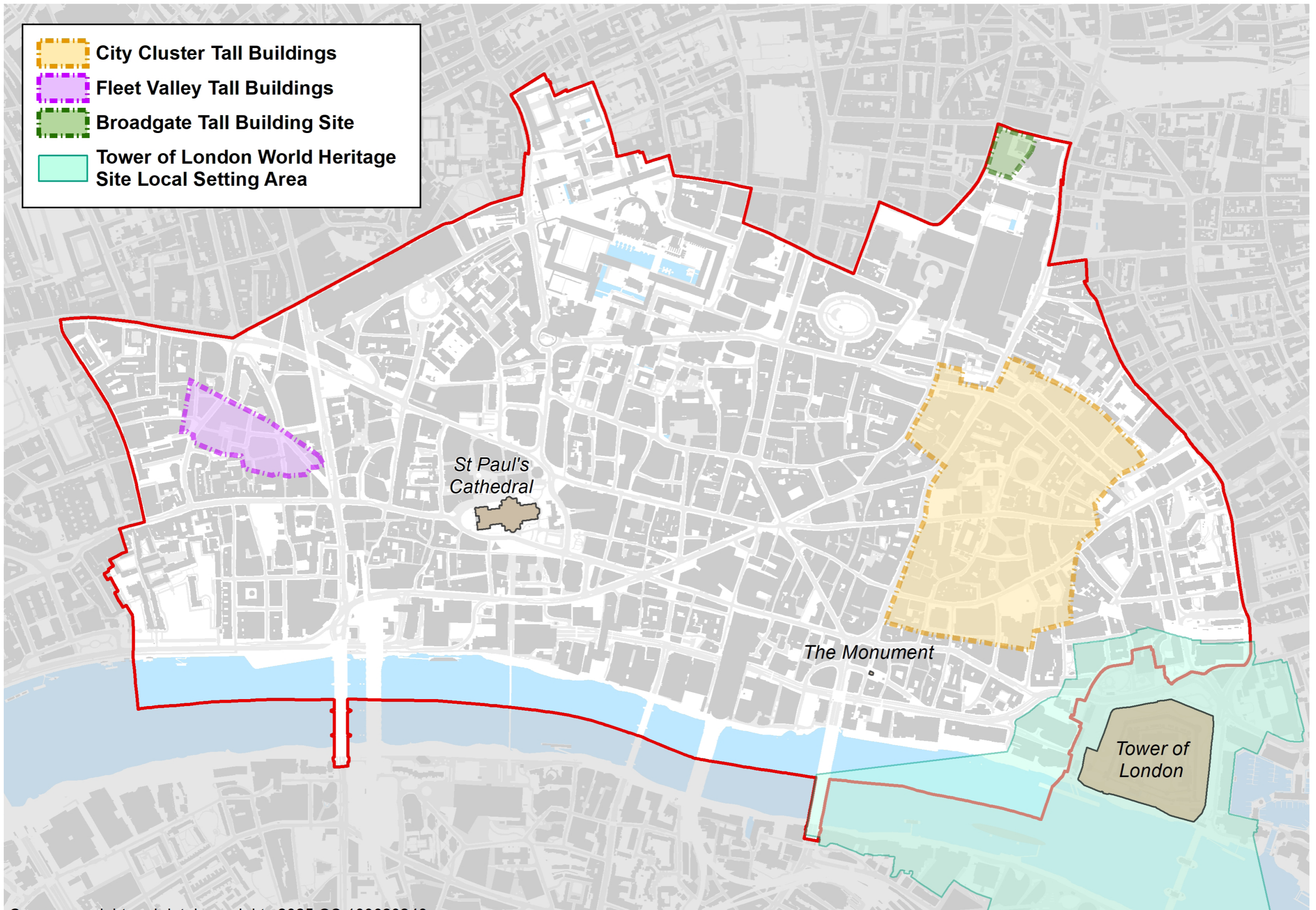
1.4 These amendments have arisen through discussions with the promoters of four specific sites in the City of London. The amendments to the City Cluster contour lines are all focused on sites within the south and south-eastern zone of the City Cluster, while the proposed Broadgate Tall Building Site is located in the north of the City on the boundary with LB Hackney.

1.5 The visual effects of the amendments have been assessed using the methodology established and set out in the R19 Evidence Base, with nuancing where required to account for the specifics of the amendments.

1.6 Overall, the Addendum concludes that the proposed amendments would meet the objectives of the contour line policy mechanism, which is to minimise the possibility of harm to the settings and OUV/significance of the three Strategic Landmarks: the Tower of London, St Paul's Cathedral and the Monument.

1.7 The proposed amendments are therefore considered acceptable to the City Corporation and are hereby presented for discussion at the Main Matter 7 Hearings.

**Map: City of London Tall Building Areas**



## 2. Background

### 2. Context

2.1 This note and the other evidence supporting Chapter 11 of the City Plan has been prepared in the context of the unique nationally and internationally significant context of the City of London as both the economic and the historic centre of London. Further detail of the context is set out below. This note has been prepared to assist in the consideration of some potential amendments to the tall buildings contours of the City Plan 2040 within the examination hearing sessions in June 2025.

2.2 The City of London, also referred to as the Square Mile, is unique. It is the historic and financial core of London. It boasts a wealth of historic buildings, including Roman walls, medieval churches, the City Corporation's Guildhall, Georgian places of worship, grand Livery halls, monumental civic and commercial buildings, warehouses, townhouses, and modernist marvels from the 20th century. With over 600 listed buildings, 48 Scheduled Ancient Monuments, five Historic Parks and Gardens, and 27 Conservation Areas, the City is a tapestry of history connected by thoroughfares, public spaces, parks, gardens, and hidden courts and alleyways.

2.3 As well as construction and creativity, the

City's built environment has been shaped by destructive forces. The Great Fire of London in 1666, commemorated at the Monument, led to the loss of large parts of the City. The rebuilding that followed saw the development of some of the City's most treasured buildings and churches, many of which were designed by Sir Christopher Wren. In a similar vein, the second half of the 20th Century saw substantial post-war reconstruction including the development of the Golden Lane and Barbican estates, both now widely recognised for their architecture and landscapes.

2.4 Commerce has been central to the City since its inception, establishing it as a hub of international trade and finance. The modern City is characterised by the juxtaposition of old and new, embraced and enjoyed by its inhabitants and those that come to the City. As a major business and financial hub, it generates over £97 billion annually in economic output, equivalent to 4% of the UK's GVA. Approximately 678,000 people work in the City, representing one in every 48 British workers, with a 25% increase in workers since 2019. Unlike most local authority areas, the predominant land use in the City is offices, which is complemented by a mix of residential, retail, religious, cultural, civic, transport and other uses.

2.5 The City is also home to around 8,600 residents. Residential Clusters have emerged, primarily in the four larger estates (Barbican, Golden Lane, Mansell Street and Middlesex Street), with smaller Clusters elsewhere (for example to the north of Fleet Street and around Smithfield) and various residential buildings dotted around the City. It offers a unique living experience with a blend of historic and modern architecture, proximity to workplaces, vibrant cultural attractions and green spaces, and unparalleled connections to other parts of London and beyond.

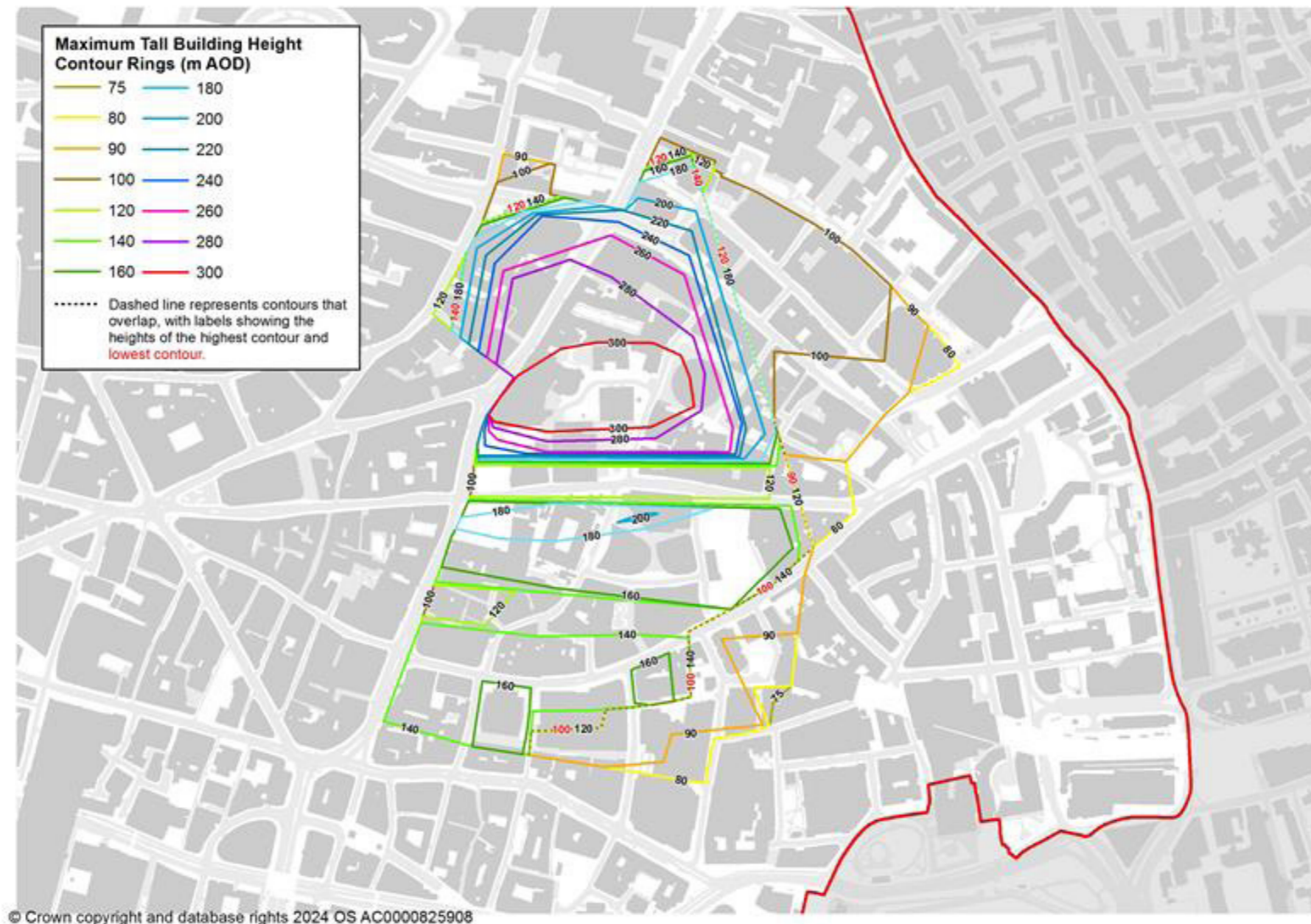
2.6 As a destination, the City attracts not only residents, students, and workers but also visitors who come to explore its heritage, enjoy cultural attractions, visit elevated public spaces, and experience the mix of old and new that the Square Mile offers. Historical landmarks such as St Paul's Cathedral draw tourists, visitors, and worshippers. Leadenhall Market, dating back to the 14th century, is now filled with restaurants and shops. The Barbican Centre offers world-class arts and entertainment, alongside other attractions like the Guildhall Art Gallery and its Roman amphitheatre, the City's numerous religious buildings, and (soon to be relocated) London Museum. The City also has a long affinity with height, from the 13th Century spire of old St Paul's and the purpose-built

viewing gallery atop the Monument to the modern skyscrapers of the 21st Century, often affectionately named (the Gherkin, the Walkie Talkie, the Cheesegrater) and which increasingly provide new attractions with publicly elevated spaces offering free views of the city skyline.

2.7 The City is also home to 376 green and open spaces totalling just under 35 hectares. They are scattered across the City but include spaces like Portman's Park, Finsbury Circus Gardens, St Dunstan's in the East Garden and the Guildhall Yard. These spaces offer a refreshing contrast to the bustling urban environment, providing places to rest and unwind and enjoy nature.

2.8 The transport infrastructure of the Square Mile is vital for supporting the City's many functions. With the opening of Crossrail, Liverpool Street Station is now the busiest in the country, and the many termini, the City's Underground stations, bus lanes and cycle routes all make the City one of the best connected places in the country, linking millions of people to workplaces that offer highly skilled job opportunities.

2.9 The City Plan will play a pivotal role in the next chapter of the Square Mile, helping to continue the pivotal role of the City in supporting economic growth for the country, and ensuring that – as the Square Mile continues to grow – it does so in sustainable ways that support and enrich the lives of the City’s workers, residents, and visitors for years to come.



Map: Published Contour Lines as at Reg 19

## 3. Methodology

### 3. Methodology

#### Development of the Amendments

- 3.1 These amendments have arisen primarily as a result of representations made by – and discussions with – the promoters of four sites in the City of London, listed below . The amendments to the City Cluster contour lines are all focused on sites within the south and south-eastern zone of the City Cluster, while the proposed Broadgate Tall Building Site is located in the north of the City on the boundary with LB Hackney.
- 3.2 In the first instance, following the end of the R19 consultation, the R19 submissions of each promoter were scrutinised by the City through testing in the digital modelling environment through which the original proposed Clusters were generated, using the same view positions assessed in the R19 SVIA.
- 3.3 Where necessary and appropriate, and through discussions with the individual promoters, the initial proposed amendments were amended and refined by the City, in an iterative process similar to that which underpinned the creation of the proposed Clusters, to meet the objectives of the contour lines, namely to minimise the possibility of harm to the settings and OUV/significance of the three strategic landmarks: the Tower

of London, St Paul's Cathedral and the Monument.

- 3.4 In all cases, the proposed amendments are evolutions and refinements of the promoters' initial submissions, and are considered by the City Corporation to meet the strategic goals of the City Plan 2040's proposed Clusters, which is to facilitate growth while minimising the possibility of harm to the three strategic landmarks arising from individual schemes coming forward in these areas over the life of the Plan.
- 3.5 In the case of the proposed Broadgate Tall Building Site, this is a new tall building site outside either R19 Proposed Cluster. As such, its evolution as a proposal involved the scrutiny of a number of new views , not included in the R19 SVIA. These are listed below. Otherwise, the evolution of this proposed amendment followed the established methodology of the Evidence Base.

#### Assessment of the Amendments

- 3.6 The methodology very largely remains as per the published SVIA; please refer to the relevant sections of that document.
- 3.7 As an Addendum, this document does not re-publish the baseline photography and future baseline imagery for each view,

because these remain as per the R19 SVIA for consistency. It is acknowledged that, since R22 submission, there have been subsequent consents (e.g. 60 Gracechurch Street, 1 Undershaft, 99 Bishopsgate) within the Cluster, but these are not in areas affected by the proposed line amendments and the City Corporation is consequently of the view that the R19 future baseline remains most appropriate for the purposes of this Addendum. For concision and clarity, this Addendum therefore presents the proposed R19 imagery alongside imagery showing the proposed line amendments.

- 3.8 To produce the imagery in this report, this assessment has re-run the computer generated modelled contours twice, version one is the previously published Reg-19 model, and version two is the amended model to incorporate the proposed changes. Since Reg-19 in June 2023 there have been updates to the base-model used by the programme, which results in minor differences to consented schemes appearing in the view, as well as minor rendering changes to hues and transparencies. For the avoidance of doubt, any rendering differences or changes in the base model between the visuals used in this report and those previously published are not material to the assessment within this report and the modelled contour data is as labelled.

3.9 As an Addendum, the document employs the language of the R19 SVIA and adopts the same approach in considering and describing the effects of the proposed amendments. The text presented alongside the imagery is that from the R19 SVIA, modified with commentary on the proposed amendments. This means that in some of the imagery where the proposed amendments are less or scarcely visible, the accompanying text is simply that of the R19 SVIA (so small-scale is the effect of the amendments on such views).

- 3.10 For clarity, the conclusions for each view relate to the effect of the proposed City Cluster as a whole, including the proposed line amendments, and/or the effect of the proposed Broadgate Tall Building Site.
- 3.11 The localised nature of the Cluster contour line amendments means that they are not visible in all the views assessed in the SVIA; consequently this Addendum assesses fewer views – those relevant views where the line amendments are visible.

#### A note on terminology

- 3.12 Throughout this document, the published Regulation 19 Cluster contour lines are referred to as the 'R19 contours'.

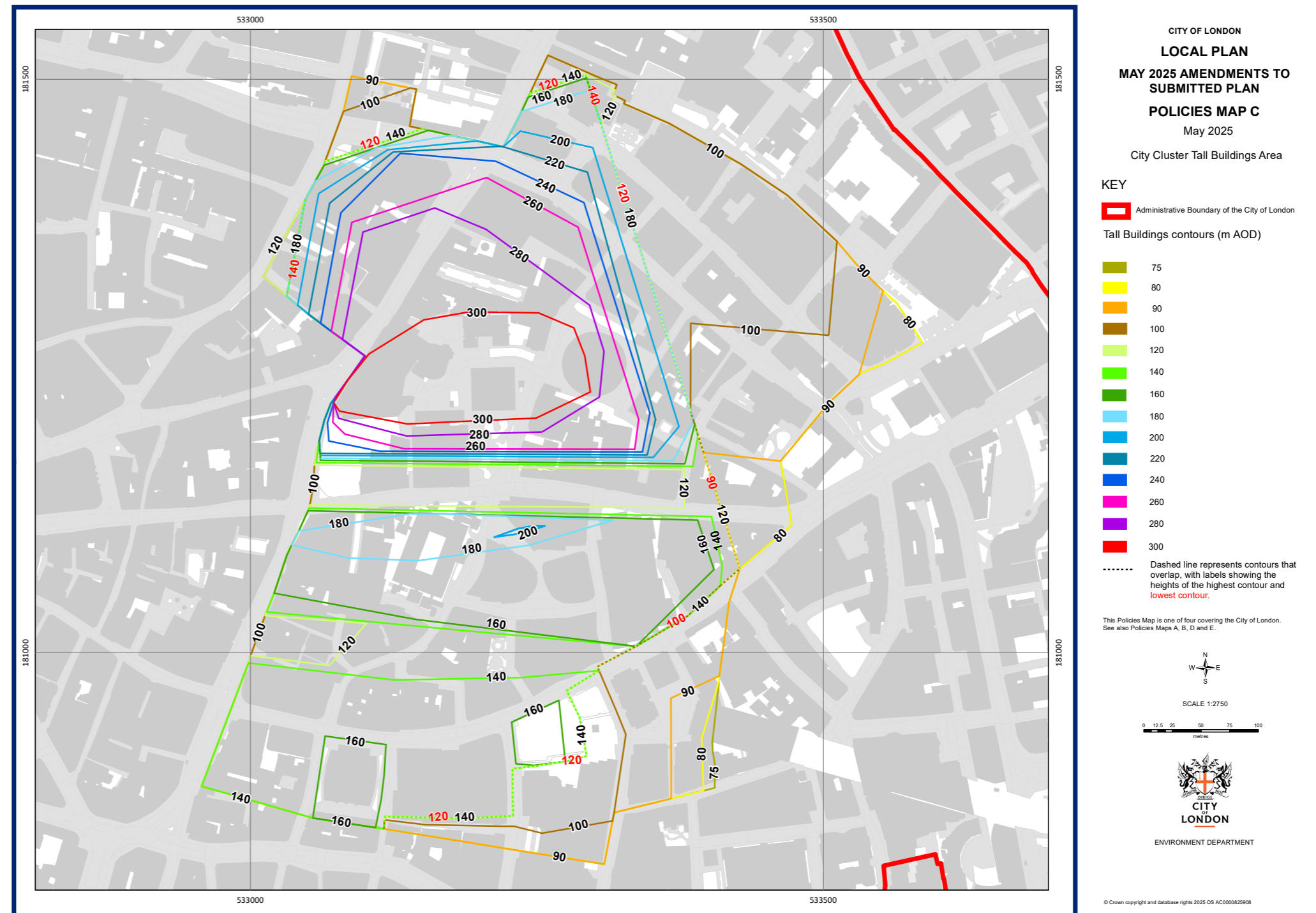
## 4. The Amendments: City Cluster

### 4. Proposed City Cluster Contour Line Amendments

- 4.1 The proposed line amendments are located within the south and south-east zone of the Cluster and relate to three sites. In response to the R19 consultation, the promoters of these sites have tabled line amendments to allow for more capacity and these amendments have since been discussed through the Statement of Common Ground process.
- 4.2 The proposed line amendments are located within the south and south-east zone of the Cluster and relate to three sites. In response to the R19 consultation, the promoters of these sites have tabled line amendments to allow for more capacity and these amendments have since been discussed through the Statement of Common Ground process.
- 4.3 The line amendments follow the same methodology for devising the R19 contour lines as set out in the R19 Tall Building Topic Paper (ED-HTB1) and SVIA; namely that they have been shaped to respond and minimise the possibility of harm to the settings and significance/OUV of the three strategic landmarks (being the Tower, the Cathedral and the Monument). However, these amendments build on this methodology by also accounting for, at this individual site level, the positions of cores of the existing buildings on these sites to maximise the possibility of alignment with the sustainability objectives of the City Plan.
- 4.4 A summary of the three sites and the associated line changes is given below. They would diminish in scale and magnitude from west to east, conforming to the overall, original modelling of these areas of the Cluster.
- 30 Fenchurch Street (SoCG 16)
- 4.5 The R19 contours would have allowed for this site to mediate between three groups of contour lines: 90m to 100m in the south, 120m to 140m in part of the middle, and 140m to 160m to the north. As illustrated in the R19 SVIA, this would have seen the southern edge of the Cluster in this location step backwards from the boundary between the existing and implemented forms of 20 and 50 Fenchurch Street.
- 4.6 The proposed contour line amendments would allow for most of the site to mediate between 140m and 160m AOD by bringing forward the 120m and 140m lines almost to the edge of the site to the south; a small sliver of the site beyond would remain to mediate between the 100m and 120m lines. As illustrated in this addendum, the effect would be that the southern edge of the Cluster in this location would assume a more sheer profile, though crucially set back and angled inwards from the Cluster boundary and perceptibly lower in height than the crests of 20 and 50 Fenchurch Street.
- 4.7 As such, the line amendments proposed over this site would stay true to the overall articulation of the Cluster skyline along the southern edge.
- Minster Court (SoCG 17)
- 4.8 The R19 contours would have allowed for this site to mediate between two groups of contour lines: 80m to 90m in the southern part and 90 to 100m in the northern part. As illustrated in the R19 SVIA, this would have seen the south-eastern corner of the Cluster in this location step clearly and differentially downwards as part of a series of lower foothills towards the World Heritage Site.
- 4.9 The proposed contour line amendments would allow for this site to mediate, in two parts as before, between the next higher groups of contour lines: 90m to 100m in the southern part and 100 to 120 in the northern part. As illustrated in this addendum, this would maintain, albeit at a slightly increased scale, the same clear and differential stepping downwards in height as part of a series of lower foothills towards the World Heritage Site.
- 4.10 As such, the line amendments proposed over this site would stay true to the overall articulation of the Cluster ‘foothills’ along the south-eastern edge.
- New London House (SoCG 20)
- 4.11 The R19 contours would have included this site only partly within the Cluster, with an allowance for that part included to mediate between 75m and 80m. As illustrated in the R19 SVIA, this would have seen the south-eastern corner of the Cluster tail off irregularly to the lowest of the contour height ranges as part of the series of lower, differential ‘foothills’ closest to the World Heritage Site.
- 4.12 The proposed contour line amendments would bring this site fully within the contour lines and allow it to mediate between two groups of contour lines: 80m to 90m across the majority of the site and 75m to 80m at the eastern edge of the site. As illustrated in this addendum, this would maintain the effect of this area of the Cluster as the lowest termination point of the ‘foothills’ in this area of the Cluster.
- Cumulatively
- 4.13 Taken together, the line changes would maintain the essential characteristics of the contour lines in this location of the Cluster

– which can be summarised as a series of lower heights around the crests of 20 and 50 Fenchurch Street descending to lower foothills in the south-east corner of the Cluster. They would provide for increases in capacity over the R19 contours, but these increases are relatively modest and would, as set out in the following section, not alter the fundamental conclusions reached in the R19 SVIA and HIAs.

Map: Proposed Contour Line Amendments



## 5. The Amendments: Broadgate

### 5. Proposed Broadgate Tall Building Site (SoCG ref 19)

#### Location

5.1 The site is located in the north-easternmost extent of the City, adjacent to the City's border with LB Hackney. It comprises the sites of two existing buildings – Broadwalk House and the NR Signal Box immediately adjacent.

#### Consultation responses relevant to this site

5.2 The City Corporation undertook two rounds of Regulation 19 consultation on the City Plan. The first took place in March to May 2021 and then in April to June 2024. In between these dates an additional round of informal engagement took place. British Land submitted representations at both formal stages, as set out below.

5.3 First Regulation 20 response was received on 10/05/2021. Respondent number 146:

*LD5-Appendix-6-Proposed-Submission-City-Plan-2036-Consultation-Reps.xlsx.*

5.4 This set out the following matters:

- Liverpool Street Gateway- amendments to the supporting text in relation to public realm and pedestrian prioritisation

- Vehicular transport and servicing comments
- Walking, cycling and healthy streets
- Liverpool Street Key Area of Change-proposed amendment to the policy working around public realm, and remodelling of the area through the Broadgate and other developments

5.5 Second Regulation 20 response (17 June 2024) outlined in table overleaf:

*<https://www.cityoflondon.gov.uk/assets/Services-Environment/R0167-British-Land.pdf>*

5.6 This concluded that Broadwalk House and the adjacent Network Rail Signal Box site should be identified as a location for a future tall building with a building height of up to 180m AOD. The representations were underpinned by substantial evidence advanced by the promoter in view of the site's location in the Liverpool Street and Broadgate Character Area, which was deemed very sensitive to tall building development and 'sieved out' of that process as described in the City Corporation's Tall Buildings Topic Paper (ED-HTB1).

5.7 The City Plan seeks to facilitate sustainable development. The Square Mile has a dynamic land market, with development

decisions often occurring at pace in response to economic factors, growth projections and market indicators. While this site only emerged at Regulation 19 stage, and does not form part of the tall building areas identified in the submitted City Plan, the City Corporation considers it appropriate for the Examination in Public to explore the potential for identifying this site, as a means of potentially supporting the delivery of office floorspace capacity to meet objectively identified need. This was particularly the case given the information submitted at Regulation 19 stage by the site promoters, which demonstrated that it was likely that a tall building on the site may be achievable without having a significant impact on the strategic landmarks.

Final Response ID	City Corporation summary	City Corporation Response
R0167/C0002	British Land would like exceptions for tall buildings on sites within defined parts of the Liverpool Street and Broadgate Character Area. On Figure 13 – Tall Buildings distribution, British Land would recommend that the status of 2 Finsbury Avenue is updated from 'Permitted Not Commenced' to 'Under Construction' for a tall building of 170m+.	Noted. The City has undertaken an exhaustive assessment of the sensitivity of the Square Mile to tall building development and, as a result, has ruled out all of it except for the City Cluster and Fleet Valley areas as being 'very sensitive' to tall building development. The Evidence Base is clear on this; however, following detailed considerations of the range of representations received in relation to tall buildings outside the Clusters, the City Corporation is open to further discussion on these matters during the course of the examination. It has produced a Heritage and Tall Buildings Explanatory note for further clarification. No change proposed.
R0167/C0006	There are further opportunities for tall buildings to come forward within the northern part of the Liverpool Street and Broadgate Character area. As a result of the modelling work undertaken and the assessment by the Townscape Consultancy, Broadwalk House and the adjacent Network Rail Signal Box should be identified as a future tall building site.	Noted. The City has undertaken an exhaustive assessment of the sensitivity of the Square Mile to tall building development and, as a result, has ruled out all of it except for the City Cluster and Fleet Valley areas as being 'very sensitive' to tall building development. The Evidence Base is clear on this; however, following detailed considerations of the range of representations received in relation to tall buildings outside the Clusters, the City Corporation is open to further discussion on these matters during the course of the examination. It has produced a Heritage and Tall Buildings Explanatory note for further clarification. No change proposed.
R0167/C0007	The aims of S25 are aligned with the initiatives in the Broadgate Vision. A number of key objectives must be realised for the full potential of the public realm around Liverpool Street station to be realised.	Noted. No change proposed.
R0167/C0011	Representation on behalf of British Land, owners of Broadgate. In process of preparing a vision underpinned by placemaking masterplan.	Noted. No change proposed.
R0167/C0012	Further townscape and heritage evidence to support Broadwalk House as a site for a tall building.	Noted. No change proposed.

## 5.8 City Corporation Response at Regulation 19

5.9 The City Corporation considered the representations before submission with a response within Annex 9 of the Consultation Statement. Table 1 above is an extract from this annex, including the summary and responses relevant to this site.

5.10 The City Corporation then proceeded to Regulation 22 Submission stage in August 2024 as it considered that the City Plan is sound. However as indicated in the initial response above, and to assist in the future examination hearings, further discussions took place with a small number of developers in particular locations to more fully understand their positions. This resulted in the four Statements of Common Ground dated November 2024, including for Broadwalk House (SOCG19). This set out:

*4.2 Both parties agree that the majority of the Liverpool Street and Broadgate Character Area is very sensitive to tall buildings, but Broadwalk House is an exception in relation to the degree of sensitivity. This is demonstrated by the verified view modelling that has been undertaken which shows that a taller building on the site would continue to preserve the setting of St Paul's Cathedral and other protected strategic land-*

*marks, the Tower of London (WHS) and the Monument, in the River Prospect views.*

*The modelling also shows that in all other relevant LVMF views a taller building would either be entirely occluded or does not sit in close proximity to the westerly sky setting of St Paul's Cathedral or the setting of other protected strategic landmarks. This is particularly the case when taking into account the commencement and pending completion of development at 2 Finsbury Avenue in 2027, which is located in the foreground (compared to Broadwalk House) of the relevant key strategic views.*

*4.3. Both parties agree that the evidence submitted in the British Land R19 representation demonstrates potential for a tall building at Broadwalk House, when considered on the basis of the strategic landmarks and alongside the evidence underpinning the City Plan. To reflect this, changes to the Policies Map and Figure 14 of the City Plan to include a new tall building on this site may be acceptable, subject to further discussion of how these changes can best be achieved. Both parties agree that any tall building proposals on the site would be required to demonstrate compliance with the relevant development plan policies.*

*4.4. Both parties agree that the site at Broadwalk House has potential to deliver new office floorspace to contribute to the strategic objectives of the City Plan 2040.*

## 5.11 Detailed evidence

5.12 The site is not within a conservation area or host to any other designated heritage assets. It is partially crossed by the Background Wider Setting Consultation Area of LVMF 8A.1 Westminster Pier. It is located within an informal Cluster of tall buildings that has developed over the last few decades which straddles the borough boundaries: 2-3 Finsbury Avenue (City), the Broadgate Tower (City), One Crown Place (LB Hackney), Principal Place (LB Hackney) and a few others.

5.13 The site is within the Liverpool Street & Broadgate Character Area which was assessed in the R19 Topic Paper for its sensitivity to tall building development as part of the Character Areas exercise. The Topic Paper 'sieves out' this area from the tall building strategy in the City Plan, deeming it 'very sensitive' to tall buildings, with the skyline setting of St Paul's Cathedral as the primary reason.

5.14 As the Topic Paper notes at 3.20.43, 'Tall buildings in the Character Area have the potential to significantly affect views of St Paul's Cathedral from the west. The existing Broadgate Tower is already very close to the Cathedral in key River Prospects and other westerly views. Further tall building

development is likely to lead to direct conflict with the skyline features of the Cathedral, contrary to the SPG guidance, as well as further infilling the skyline to the west of the Cathedral...'

5.15 It further notes at 3.20.61 that 'further tall building development within the Character Area could overwhelm the westerly sky setting of St Paul's Cathedral in the [relevant] River Prospects, merge detrimentally with the existing tall buildings in the Barbican and Golden Lane Character Area and even directly clash with the Cathedral's sky silhouette'.

5.16 Drawing upon the clear parameters established by these statements, the City scrutinised the proposed amendment as originally tabled to determine whether it would:

- i. result in the loss of further clear sky near, around or behind the Cathedral
- ii. draw this informal Cluster closer to the Cathedral in the relevant views to risk a canyoning effect
- iii. make fresh contact with the Cathedral's silhouette in any of the relevant views
- iv. lead to a 'merging' of the informal Cluster with the existing tall buildings in the Barbican and Golden Lane Character Area.

5.18 Fortuitously, the site of the proposed amendment is located such that, in all the relevant views assessed, the proposed tall building site envelope would appear at the heart of the informal Cluster of tall buildings in this area; its effect in relation to the aforementioned parameters would be as follows:

- i. it would be framed by extant tall buildings either side and above, such that it would not consume any more clear sky around the Cathedral .
- ii. being at the heart of the informal Cluster, it would not draw it closer to the Cathedral
- iii. as per (i), it would not lead to fresh encroachment on the Cathedral's silhouette at any point
- iv. per (ii), it would not lead to a 'merging' of the informal Cluster with tall buildings in the adjacent Character Area.

5.19 As such, the proposed amendment was considered acceptable in principle. Despite the verdict of the Topic Paper on the Character Area in question, the proposed amendment would satisfactorily minimise the possibility of harm to the setting and significance of the Cathedral when tested against the parameters drawn from the verdicts of the Topic Paper.

5.20 With the principle of this amendment

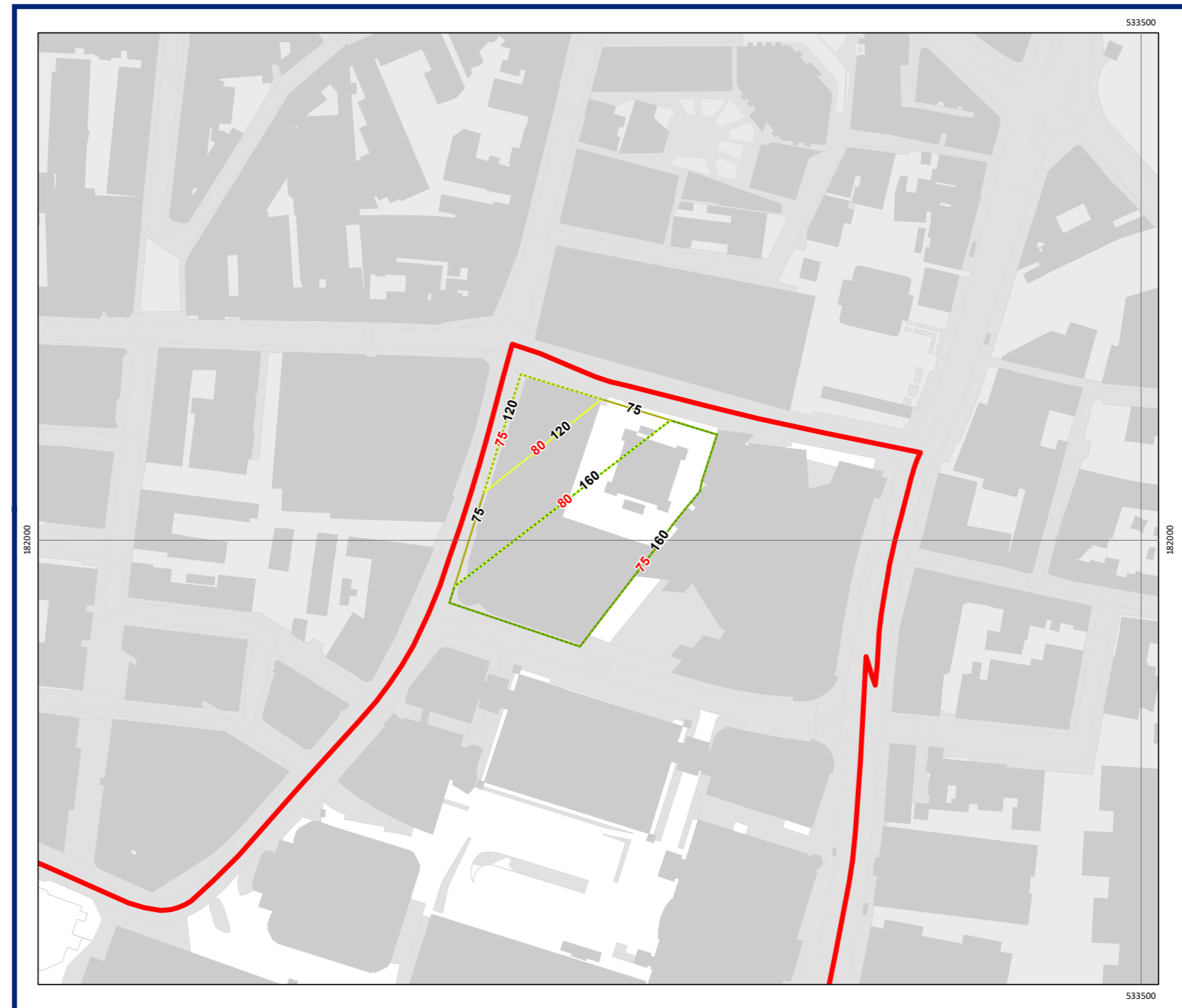
accepted, the City continued negotiations with the site promoter to arrive at contour line forms and heights that would maintain the amendment's acceptability in view of the parameters above and which would build in tolerances to the relevant views.

5.21 The proposed Broadgate Tall Building Site would take the form of 75m-160m main block across the south-eastern half of the site and a 75m-120m 'spur' block on the north-western half of the site, with the two blocks separated by a narrow channel set to between 75m-80m. The maximum 160m height of the main block would ensure it sits well below and within the informal Cluster and well below the embrasures of the silhouette of the White Tower, which occludes it in 10A.1; the maximum 120m height of the spur block would conceal it in the River Prospects, ensuring that the informal Cluster isn't seen to start to expand to the west; the maximum 75m-80m height of the valley would ensure that it sits well below the line of the Cathedral's south transept in 8A.1, the amendment being entirely occluded in this view by the Cathedral drum and the Shell Centre.

5.22 In all the relevant re-assessed views from the R19 SVIA, and the relevant new views included in this Addendum, the proposed amendment would conform to the overall

objectives of the contour line mechanism, which is to minimise the possibility of harm to the settings and significance of the three Strategic Landmarks, the most relevant in this case being St Paul's Cathedral.

Proposed Broadgate Tall Building Site



CITY OF LONDON  
**LOCAL PLAN**  
**MAY 2025 AMENDMENTS TO**  
**SUBMITTED PLAN**  
**POLICIES MAP E**  
 May 2025  
 Broadgate Tall Building Site

KEY

Administrative Boundary of the City of London

Tall Buildings contours (m AOD)

- 75
- 80
- 90
- 100
- 120
- 140
- 160

Dashed line represents contours that overlap, with labels showing the heights of the highest contour and lowest contour.

This Policies Map is one of five covering the City of London. See also Policies Maps A, B, C and D.



SCALE 1:1500



ENVIRONMENT DEPARTMENT

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## 6. SVIA Addendum

### 6. SVIA Addendum

6.1 As per the R19 SVIA, this chapter focuses on the visual effects of the Proposed Clusters on visual amenity and the surrounding townscape.

6.2 The following set of views are re-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: Tate Modern [LVMF 13B.]
- View 5: Gabriel's Wharf [LVMF 16B.2]
- View 6: Waterloo Bridge [LVMF 15B.1]
- View 7: Waterloo Bridge [LVMF 15B.2]
- View 8: Hungerford Bridge [LVMF 17B.1]
- View 9: Hungerford Bridge [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 25.1]

#### LVMF (London Panoramas)

- 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: Greenwich [LVMF 5A.2]
- View 22: Blackheath [LVMF 6A.1]

#### HRP Views (Tower of London Local Setting Study)

- View 23: AR 14 - Tower Bridge
- View 24: AR 12 - Commodity Quay
- View 25: AR 12 - Commodity Quay
- View 26: R 5 - East Smithfield
- View 27: RV 8 - The Royal Mint
- View 28: AR 4 - Great Tower St
- View 30: RV 5 - ToL Entrance
- View 31: RV 1 - Tower Green, Inner Ward
- View 32: RV 1 - Tower Green, Inner Ward
- View 33: RV 1 - Tower Green, Inner Ward
- View 34: RV 1 - Tower Green, Inner Ward
- View 35: RV 1 - Tower Green, Inner Ward
- View 36: RV 1 - Tower, Green, Inner Ward
- View 37: RV 2 - Inner Curtain Wall N
- View 40: RV 4 - Inner Curtain Wall S
- View 41: RV 4 - inner Curtain Wall S

#### New Addendum View (Broadgate Tall Building Site)

- New View 1 Westminster Pier [LVMF 8A.1]
- New View 2: King Henry's Mound [LVMF 9A.1]
- New View 3: South end of Waterloo Bridge (south of LVMF 15B.2)

#### Appendix

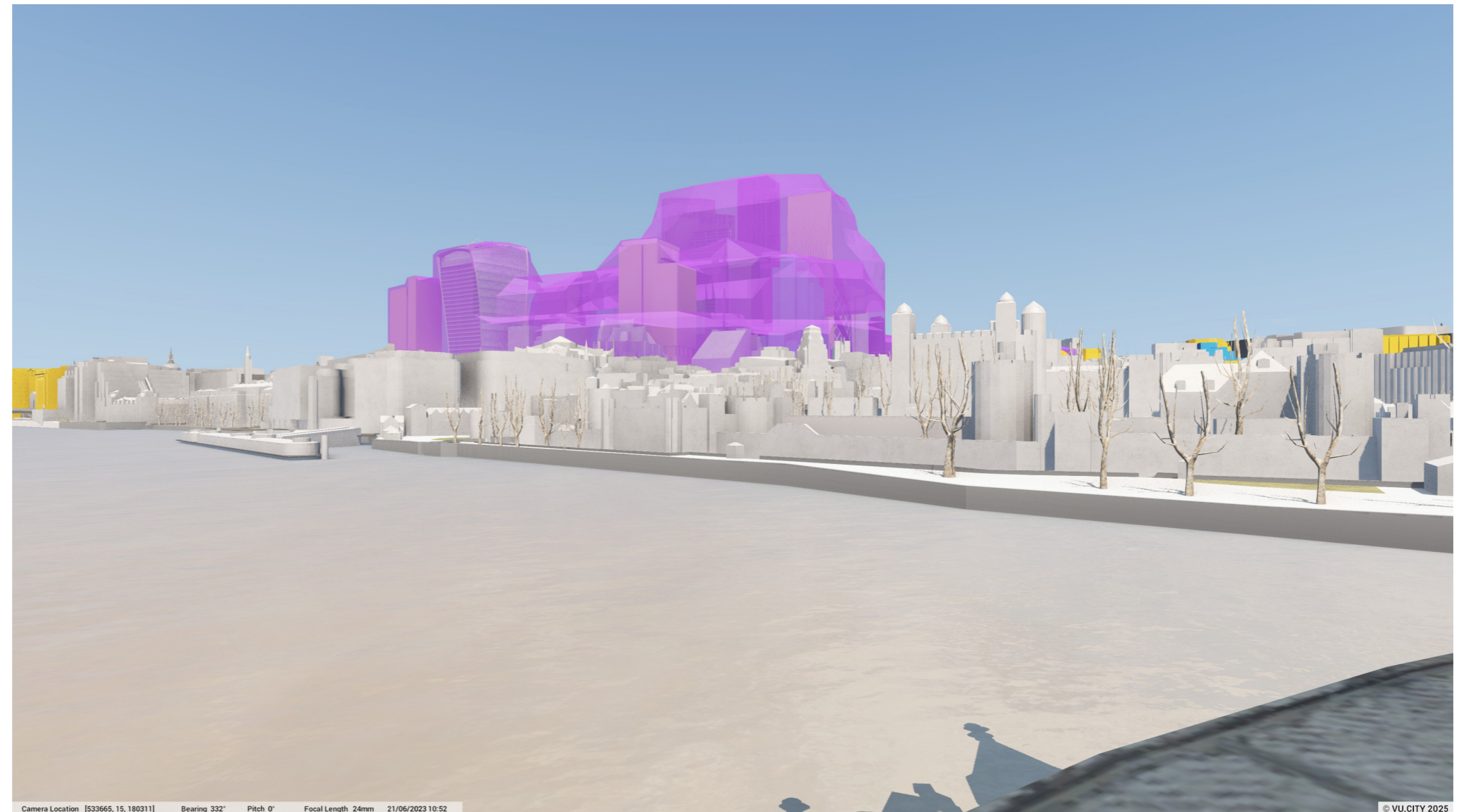
- Appendix View 1 South end of LVMF 15B Waterloo Bridge Additional model shot removing vegetation.
- Appendix view 2 9A.1 King Henry's Mound additional model shot removing vegetation.

## View 1: Tower Bridge: Upstream [LVMF 10A.1] - R19 Submission

6.3 The Proposed City Cluster is seen as the blue form, encompassing the existing and emerging tall buildings.

6.4 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 to the south and south-east to create lower foothills of the Proposed City Cluster, in order to successfully mediate between it, the river and the WHS.

6.5 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 (LVMF SPG para 186), 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.



- 6.6 The LVMF SPF 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.
- 6.7 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.
- 6.8 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. of lower heights between and before the secondary crests at 20 Fenchurch Street and 50 Fenchurch Street. The proposed line amendments would remain clearly lower than these crests.

## View 1: Tower Bridge: Upstream [LVMF 10A.1] - Proposed

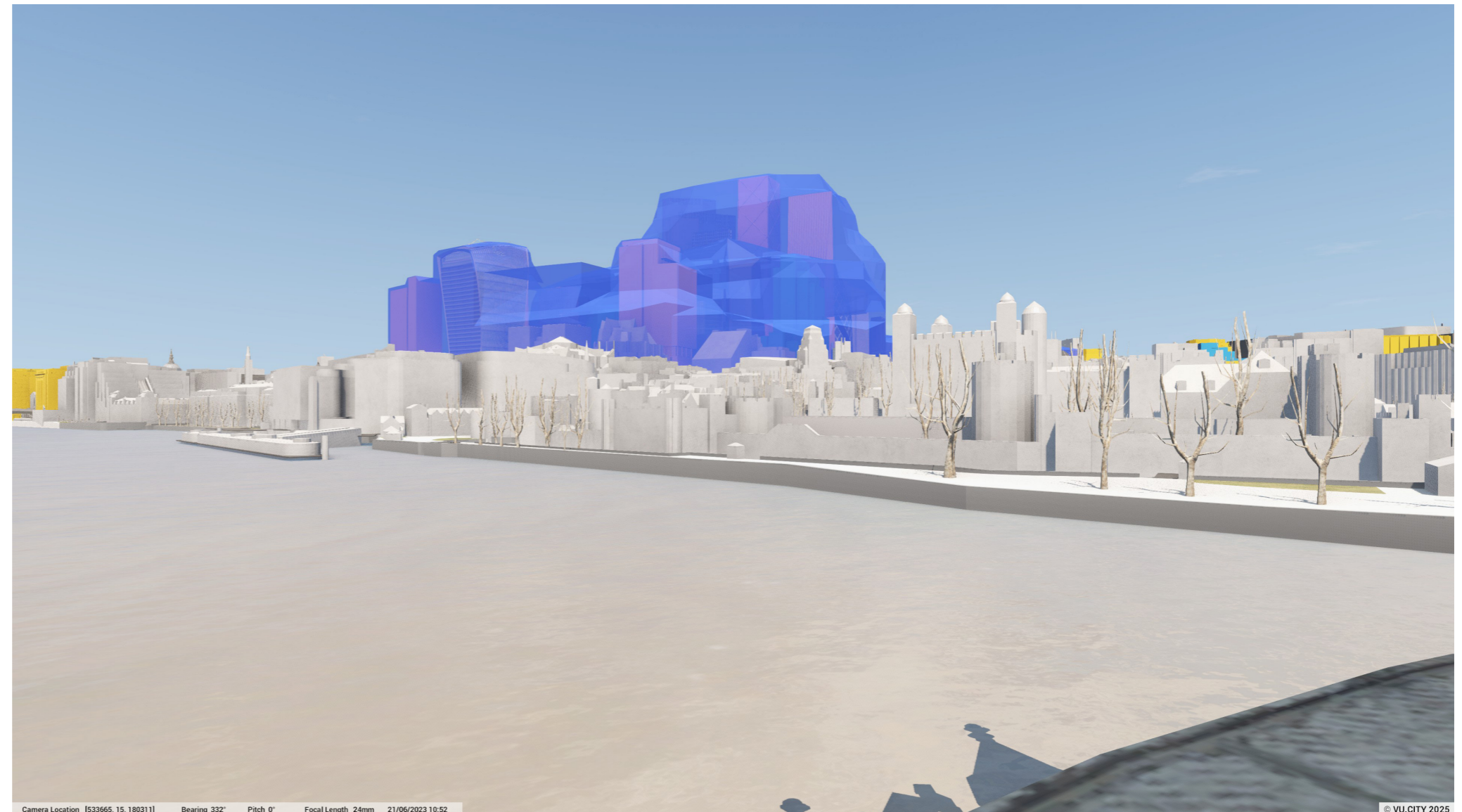
### Proposed Contour Line amendments

6.9 Compared with the published Proposed Cluster, the proposed line amendments would result in increased heights in the south and south-eastern zone of the Cluster, but would, in this view, still read as an articulated skyline

### Proposed Broadgate Tall Building Site

6.10 The proposed additional Tall Building Site would be entirely occluded by the existing form of the White Tower.

6.11 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 this will need to be rigorously scrutinised for individual schemes.



## View 2a: London Bridge: downstream [LVMF 11b.1] - R19 Submission

6.12 Only the very edge of the Proposed City Cluster, shown in blue, would be seen to the far left of this view.

### Proposed Contour Line amendments

6.13 The increase in scale over 30 Fenchurch Street would just be perceived at the outermost field of view, but would remain within the existing silhouette of 50 Fenchurch Street and would not alter the overall form of the Cluster when seen from here

### Proposed Broadgate Tall Building Site

6.14 This would be invisible in this view.

6.15 Overall, there would be no effect.



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



## View 2b: London Bridge: downstream [LVMF 11b.2] - R19 Submission

6.16 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.

6.17 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.



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

### Proposed Contour Line amendments

6.18 These would result in a perceptible increase in the scale of the Cluster at its southern edge, particularly that over 30 Fenchurch Street which would appear before 50 Fenchurch Street; and that over Minster Court, which would slightly raise the scale of the Cluster's edge. However, the essential form and shape of the Cluster in this location would remain, stepping down to a series of lower foothills towards the WHS.

### Proposed Broadgate Tall Building Site

6.19 This would be invisible in the view.

6.20 There would be 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] - R19 Submission

6.21 The Proposed City Cluster is seen to the left of this view, shown in blue. Only the southern extent is visible. The form of the Proposed City Cluster would draw the schemes on Gracechurch and Fenchurch Streets into a consolidated form, to the benefit of the Cluster as a composition maintaining the reading of the riverside townscape in this view.



Camera Location [532386, 14, 180647] Bearing 98° Pitch 0° Focal Length 24mm 21/06/2023 10:52

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

### Proposed Contour Line amendments

6.22 These would be glimpsed but largely occluded by buildings in the field of view.

### Proposed Broadgate Tall Building Site

6.23 This would be invisible in the view.

6.24 The effect would be neutral.



## View 4: Tate Modern: [LVMF 13b.1] - R19 Submission

6.25 The Proposed City Cluster, shown in purple, follows quite tightly the emerging form to the south side around 20 Fenchurch Street and Gracechurch Street. To the north, the Cluster rises to its tallest crest. The northern context is less sensitive, and this is acknowledged through the more generous form of the crest to the north. The peak of this is established by 22 Bishopsgate and One Undershaft. 6.48 A consolidated form would leave the main characteristics and composition of the view unaffected, which is the principal vista of St Paul's and the riverside. This approach to growth in the Cluster does not interfere with the strategic approach of the St Paul's Height limitations. The Proposed City Cluster is at a substantial distance away and would not crowd St Paul's and its immediate setting. The further consolidation of the Proposed City Cluster as a singular skyline form would assist the viewers' reading of the characteristics and composition of the view as a whole. This would be a beneficial effect.



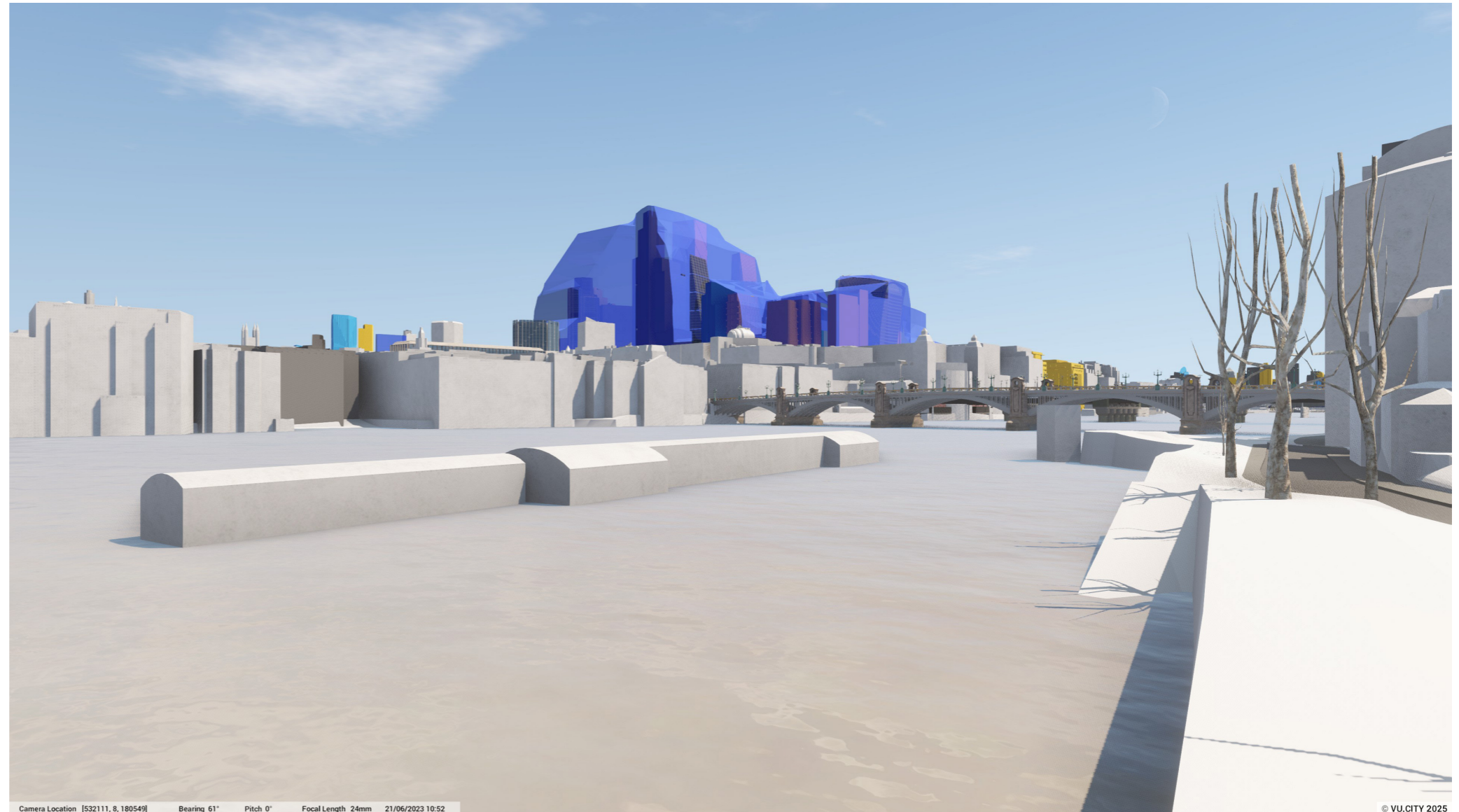
## View 4: Tate Modern [LVMF 13b.1] - Proposed

### Proposed Contour Line Amendments

6.26 There would be a very slight isolated change in the eastern edge of the proposed City Cluster, introducing a new lower step from where the southern elevation of 20 Fenchurch Street meets the towers of Canon Street Station, creating a more gradual edge to the Cluster form. While this will result in an visible increase to the Cluster, which will partially extend eastwards, this change is not considered to impact either the visibility of the Cathedral (out of shot to the west) or London Bridge. The overall effect is considered to be neutral.

### Proposed Broadgate Tall Building Site

6.27 The proposed tall building site will be visible to the west in this view, seen adjacent to a small group of existing and consented buildings at 9 Appold Street. While visible, the proposals are not considered to fundamentally alter the character of the view, nor will the Broadgate conjoin with the City Cluster. The overall hierarchies appreciable within this view will therefore remain the same, with no interaction or diminishment of the landmark quality of the Cathedral of London Bridge. The overall effect is considered to be neutral.



## View 5: Gabriel's Wharf: [LVMF 16b.2] - R19 Submission

6.28 The landmark form of St Paul's Cathedral would continue to be appreciated and understood. The Proposed Clusters lie outside of the St Paul's Heights policy area. The dominance of St Paul's Cathedral and the visibility of its principal features are further safeguarded by these limitations. The Proposed Clusters would preserve the ability to recognise and appreciate St Paul's Cathedral and the other landmarks and historic buildings identified in the guidance, including the relationship between the Inner Temple Gardens and the Victoria Embankment. The overall form of the Proposed City Cluster ensures the retention of the prominence of St Paul's Cathedral by avoiding visually crowding or dominating the landmark in this view. The Cluster is some distance from the Cathedral in this view, with height clearly and commodiously stepped away from the Cathedral, starting with a small sky gap retained between the Cluster and Angel Court. The Proposed City Cluster forms the skyline to the east as a dynamic counterpoint to the more historic and green areas of the Temples and Victoria Embankment to the west. There is more of a sense of intricacy, fine grain, and a layered townscape in the western half of the view contrasting with the higher density, height, and modern geometries of the eastern half of the view, in which the City Cluster stands. The relationship between the Cathedral and the City Cluster can be appreciated through this juxtaposition in this view.



6.30 To the south, the proposed City Cluster would step down dramatically in scale to significantly lower foothills, terminating just short of the Monument. As such, there would be a degree of encroachment into the clear sky setting of the Monument and therefore very minor potential for adverse effects on its presence in this view, which should be interrogated at individual scheme stage. The form of the Holborn and Fleet Valley Cluster, though largely concealed by trees, would create a subtle crest in the skyline. The extent of height does not interfere with the silhouette of St Bride's Church in this view. The emerging developments within the Holborn and Fleet Valley Cluster are of a finer grain which relates to the character of the Temples in the foreground. Further tall buildings within the Proposed Clusters have the potential to reinforce the dynamic qualities of contrasts and further define the modern skyline in this view, to the overall benefit of the dramatic contrast with the Cathedral. The LVMF SPG notes that proposals for new tall buildings should contribute to the existing Cluster and that new tall buildings should not reduce the prominence of the Cathedral when moving between the LVMF Assessment Points 16.B.1 and 16B.2. The architectural character, materials, and colour palette of individual proposals coming forward within the Proposed Clusters would need to provide an appropriate context to the landmark of St Paul's Cathedral, to further preserve its legibility in the skyline.

## View 5: Gabriel's Wharf: [LVMF 16b.2] - Proposed

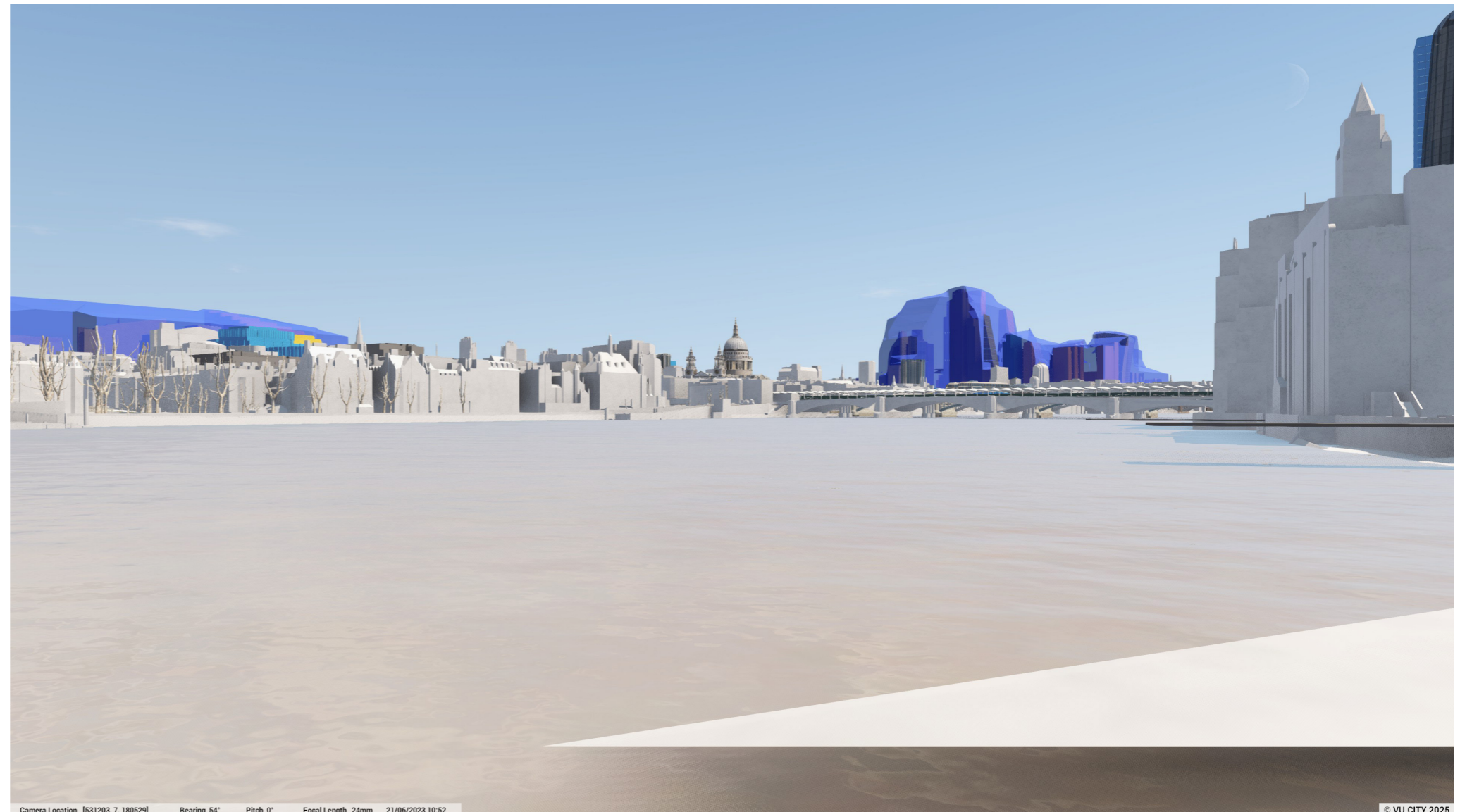
### Proposed Contour Line Amendments

6.31 The proposed amendments will adjust the slope of the City Cluster as seen to the east, creating a more gradual termination to the east. This includes an additional step the east of 20 Fenchurch Street. The Cluster will reach the same termination point to the east, stopping short of the Monument but finishing slightly higher on the sky line. The definition of the Monument on the skyline will remain. The overall effect of the proposed changes is considered to be neutral.

### Proposed Broadgate Tall Building Site

6.32 The proposed Broadgate site will not be visible.

6.33 Overall, the visual effect is considered to be beneficial owing to the reinforcement of the character of the Proposed Clusters into cohesive forms, which will continue to develop a recognised identity over time, although it is acknowledged that there could be some potential for adverse effects upon the setting of the Monument, and these will have to be very carefully scrutinised at individual scheme stage.





## View 6: Waterloo Bridge: [LVMF 15b.1] - R19 Submission

6.34 The Proposed City Cluster would be consolidated, preserving the overall composition of the view, but covering further sky space closer to the east of the Cathedral. While the Cathedral would retain a clear sky setting around its silhouette, the drawing of the Proposed City Cluster form closer to the Cathedral in the view could create the potential for conflict with the guidance in the LVMG SPG, which requires development to maintain the Cathedral's visual prominence and not dominate any element of the Cathedral's silhouette in the background of the view. 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.

6.35 Nevertheless, it is considered that the form and modelling of the Proposed City Cluster at this point strikes, overall, an appropriate balance in respect of the SPG and the consolidation of the City Cluster form.



## View 6: Waterloo Bridge: [LVMF 15b.1] - Proposed

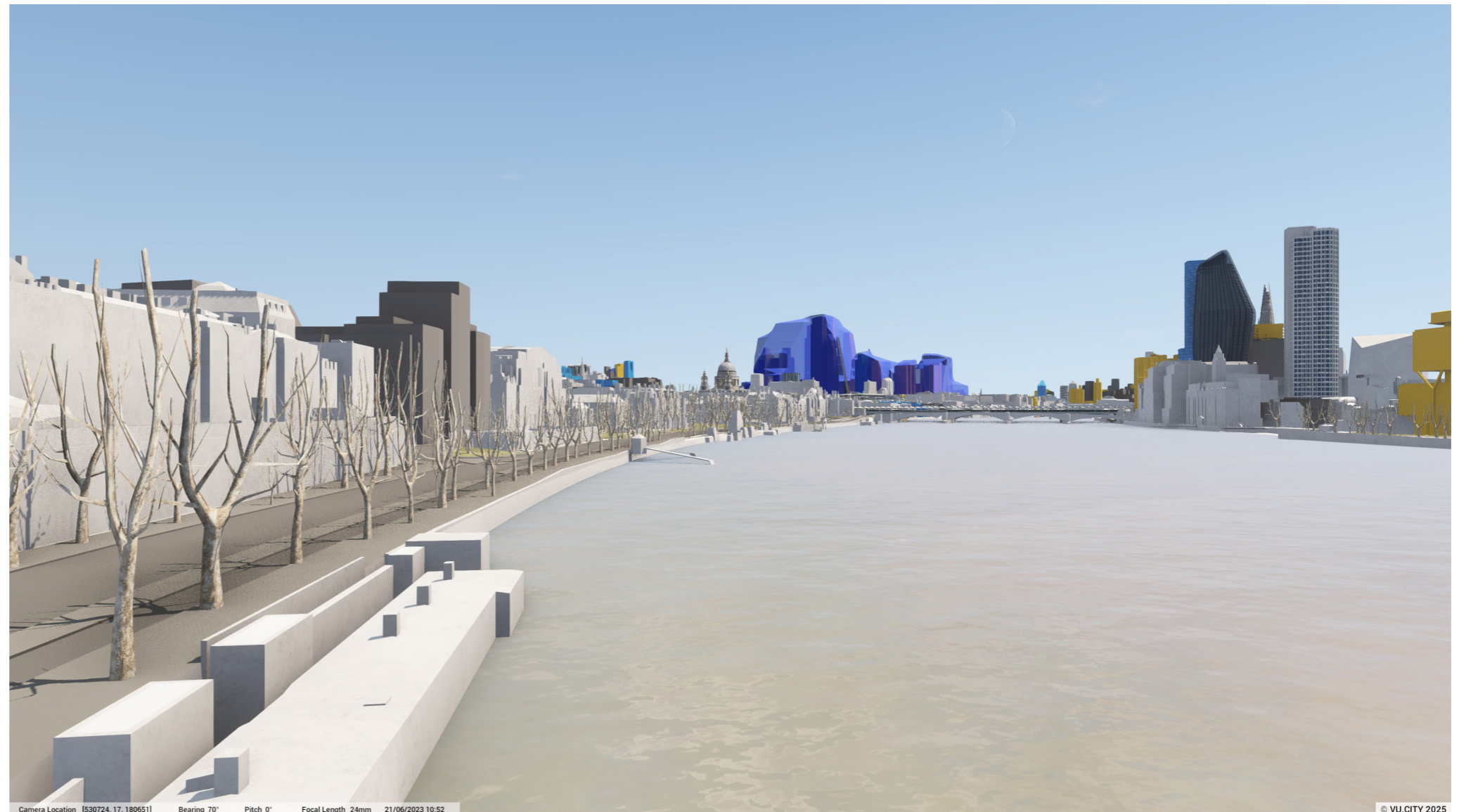
### Proposed Contour Line Amendments

6.36 The proposed amendments will adjust the slope of the City Cluster as seen to the east, creating a more gradual termination. This includes an additional step the east of 20 Fenchurch Street. The Cluster will reach the same termination point to the east, albeit with a final step created at the eastern edge. The height of this cliff edge nature of this step much reduced when compared to the un amended contour line which drops sharply at the eastern limit of 20 Fenchurch Street. The overall effect of the proposed changes is considered to be neutral.

### Proposed Broadgate Tall Building Site

6.37 The proposed Broadgate Tall Building Site, will be just visible, infilling a small gap between an existing group of consented tall buildings at a distance to the west of the City Cluster. This alteration will not extent the overall height or width that this group occupies on the skyline, instead creating a slightly more layered visible mass within its existing limits. This change is not considered to alter the overall character of this view or detract from the prominence of dominance of the landmarks within it, such as St Paul's Cathedral. The overall effect of this change is considered to be neutral.

6.38 Overall, the visual effect in respect of the Proposed City Cluster form alone is considered



to be beneficial, through the enhancement of its form and sharper definition of its edges. However, it is acknowledged that there is some low potential for adverse effects, particularly at the north-western corner closest to the Cathedral, and these will need to be scrutinised at individual scheme stage.



## View 7: Waterloo Bridge: [LVMF 15B.2] - R19 Submission

6.39 The Proposed Holborn and Fleet Valley Cluster would be seen to the left of this view. The eastern edge of it is defined by 120 Fleet Street, with the gentle curve of the Proposed Holborn and Fleet Valley Cluster reaching to the west to allow for similarly scaled developments to consolidate the existing nucleus of tall buildings into a compelling modern skyline. The Proposed City Cluster form would follow the shape of the emerging schemes to the south. The primary crest peaks around One Undershaft. The northern part of the Proposed City Cluster would establish an opportunity for future development, creating a coherent crest between 100 Leadenhall Street and the Heron Tower, while preserving the Cathedral's clear sky setting. The southern part of the Cluster would consolidate around 20 Fenchurch Street and drop down significantly in scale towards the Monument, the clear sky setting of which would be preserved in the view.



## View 7: Waterloo Bridge: [LVMF 15B.2] - Proposed

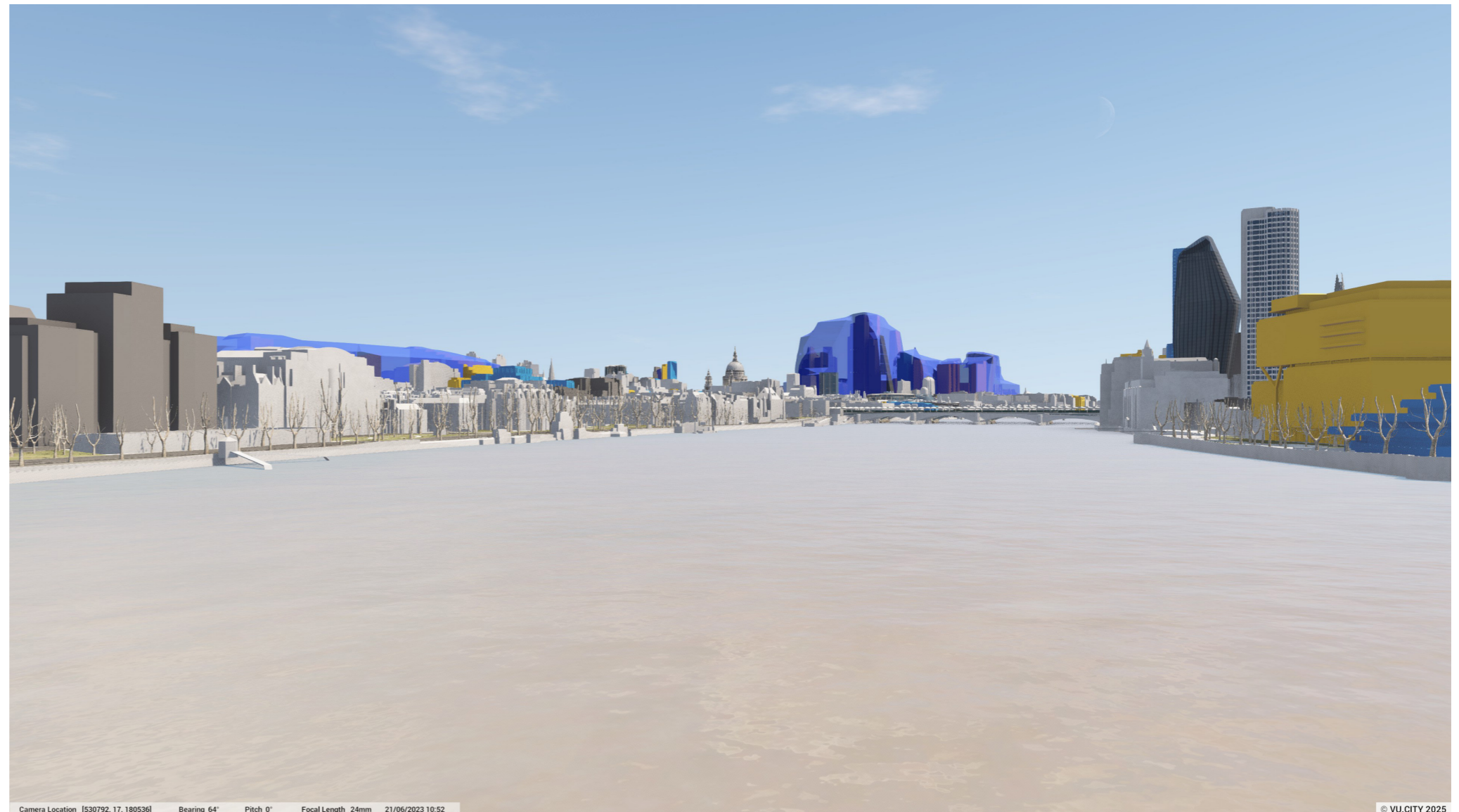
### Proposed Contour Line Amendments

6.40 As above, the proposed amendments will adjust the slope of the City Cluster as seen to the east, creating a more gradual termination. This includes an additional step the east of 20 Fenchurch Street. The Cluster will however reach the same termination point to the east, incurring no increase in the horizontal extent of the Cluster on the skyline. The overall effect of the proposed changes is considered to be neutral.

### Proposed Broadgate Tall Building Site

6.41 As above, the proposed Broadgate Tall Building Site, will be just visible, infilling a small gap between an existing group of consented tall buildings at a distance to the west of the City Cluster. This alteration will not extend the overall height or width that this group occupies on the skyline, instead creating a slightly more layered visible mass within its existing limits. This change is not considered to alter the overall character of this view or detract from the prominence of dominance of the landmarks within it, such as St Paul's Cathedral. The overall effect of this change is considered to be neutral.

6.42 Overall, the effect would be beneficial in respect of the enhancement of the Cluster forms themselves, and neutral in respect of the overall qualities of the view.



## View 8: Hungerford Bridge: [LVMF 17B.1] - R19 Submission

6.43 Both Proposed Clusters are seen in this view, shown in purple. The Proposed Holborn and Fleet Valley Cluster would appear as a comparatively modest consolidation of the existing nucleus of tall buildings here into a compelling new skyline. The Proposed City Cluster presents a similar dynamic to that in the Waterloo Bridge views; here it is seen to the east of the Cathedral and is a prominent feature of the view. The consolidation of the existing and emerging buildings to create the overall form of the Proposed City Cluster would preserve the view of St Paul's, which would retain clear sky space behind and around. The Proposed Clusters would build upon and consolidate the existing groups of tall buildings in these locations, preserving the overall qualities of the view.



## View 8: Hungerford Bridge: [LVMF 17B.1] - Proposed

### Proposed Contour Line Amendments

6.44 The proposed amendments are not discernible in this view. The overall effect of this change is therefore neutral.

### Proposed Broadgate Tall Building Site

6.45 The proposed Broadgate Tall Building Site, will be just visible, backdropped by an existing group of consented tall buildings at a distance to the west of the City Cluster. As above, this alteration will not extent the overall height or width that this group occupies on the skyline, instead creating a slightly more layered visible mass within its existing limits. This change is not considered to alter the overall character of this view or detract from the prominence of the landmarks within it, such as St Paul's Cathedral. The overall effect of this change is considered to be neutral.

6.46 There would be a beneficial effect on the forms of the Clusters themselves, and a neutral effect on the view overall.



## View 9: Hungerford Bridge: [LVMF 17B.2] - R19 Submission

6.47 The effect in this view is similar to that to the north of the bridge. Both Proposed Clusters are seen, shown in purple. The Proposed Holborn and Fleet Valley Cluster provides a low backdrop in the context of the riverside buildings. The Proposed City Cluster presents a similar dynamic as seen further north along the bridge, here it is seen to the east of the Cathedral and is a prominent feature of the view. The consolidation of the existing and emerging buildings to create the overall form of the Proposed City Cluster would preserve the view of St Paul's, which would retain clear sky space behind and around its silhouette from this point further south on the bridge. The southernmost part of the Cluster would be obscured by the merging South Bank context. The composition between the Cathedral and the City Cluster would be strengthened through its consolidation; this is a beneficial effect.



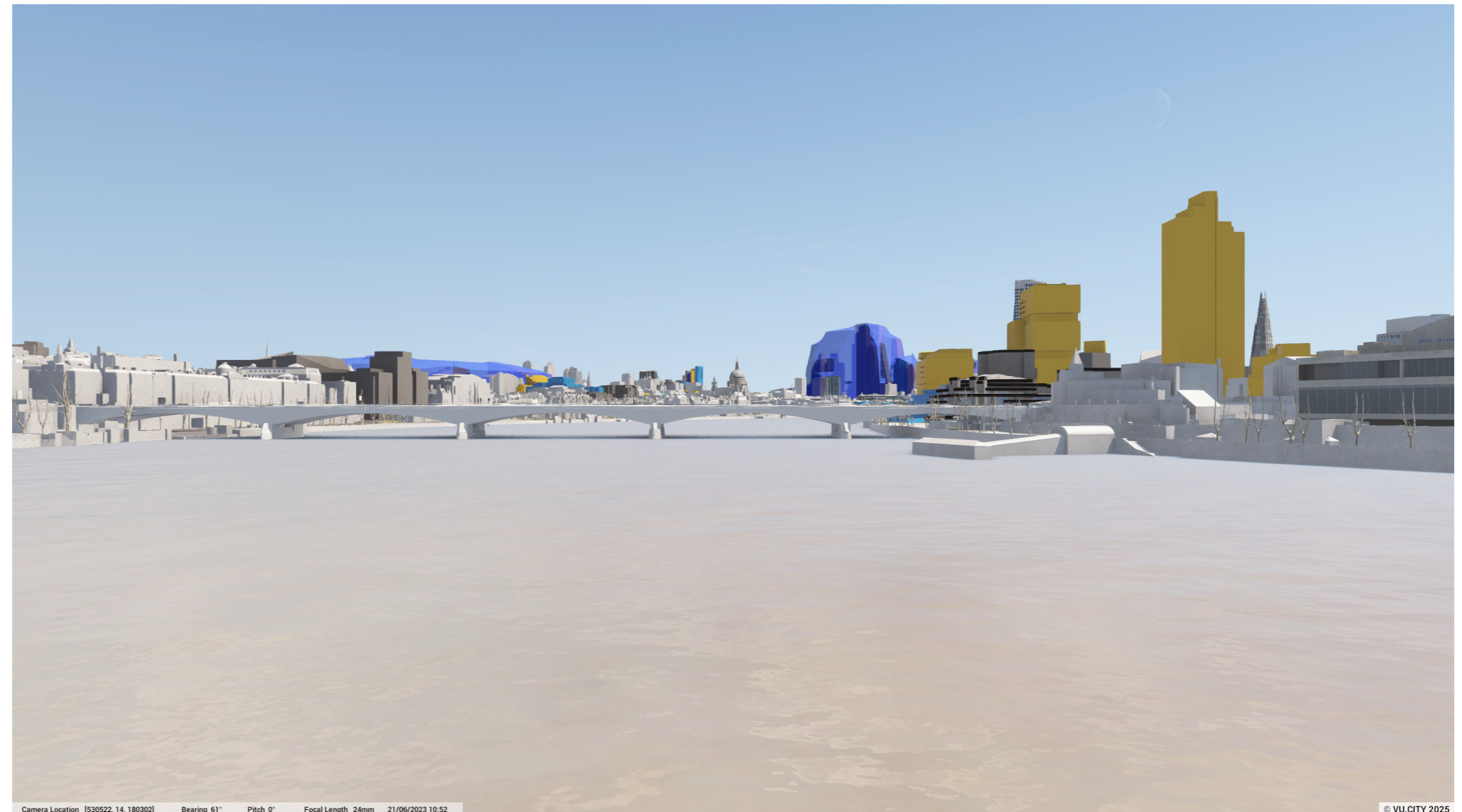
## View 9: Hungerford Bridge: [LVMF 17B.2] - Proposed

### Proposed Contour Line Amendments

6.48 The proposed amendments are not discernible in this view. The overall effect of this change is therefore neutral.

### Proposed Broadgate Tall Building Site

6.49 The proposed Broadgate Tall Building Site, will be just visible, backdropped by an existing group of consented tall buildings at a distance to the west of the City Cluster. As above, this alteration will not extent the overall height or width that this group occupies on the skyline, instead creating a slightly more layered visible mass within its existing limits. This change is not considered to alter the overall character of this view or detract from the prominence of the landmarks within it, such as St Paul's Cathedral. The overall effect of this change is considered to be neutral



## View 10a: The Queen's Walk at City Hall: [LVMF 25A.3] - R19 Submission

6.50 The proposed City Cluster would appear as an enveloping and consolidation of the future baseline, framed by the edge of the silhouette of 55 Gracechurch Street to the west, some way back from the Monument, seen against sky, and with its eastern flank cascading to a low foothill terminating at One America Square. To the south and south-east, the form would step down substantially to a series of low foothills, following the descending topography towards the river. The apex of the proposed City Cluster would be at 1 Undershaft, with a secondary crest at 20 Fenchurch Street. The proposed City Cluster would appear some way to the west of the WHS and would not affect the Protected Silhouette of the White Tower. Only at its lowest eastern extent would it be perceptible above the western curtain wall of the WHS.

6.51 It is considered that the Proposed City Cluster would have an appropriate presence in this view. It would maintain the central characteristic of the view as a striking juxtaposition between the WHS and the modern City. It would respect the setting of the ToL and not dominate it, in line with the LVMF SPG (para 415); it would be tightly reined in at its eastern extent to keep tall buildings some distance from the WHS, while stepping down substantively to the south to yield to the Tower's presence in riverine views; it would therefore allow the WHS to continue to dominate its surroundings para (419) and



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would not come near to breaching the Protected Silhouette. It would not contradict the townscape ensemble of the WHS (para 421). It would leave sufficient clear sky space around the Monument.

## View 10a: The Queen's Walk at City Hall: [LVMF 25A.3] - Proposed

### Proposed Contour Line amendments

6.52 These would be clearly perceptible but would themselves be backdropped by the rest of the Proposed Cluster, meaning that the change to the overall silhouette and form of the Cluster when seen from here would be minimal; the effect would be that the lower foothills in the south and south-east would increase slightly in scale, but not in a way which departs from the overall profile and arrangement of the City Cluster.

### Proposed Broadgate Tall Building Site

6.53 Not Visible

6.54 The proposed consolidation would have a beneficial effect on the City Cluster form and a neutral effect on the view overall.





## View 10b: The Queen's Walk at City Hall: [LVMF 25A.2] - R19 Submission

6.55 The proposed City Cluster would appear as an enveloping and consolidation of the future baseline, framed by the edge of the silhouette of 55 Gracechurch Street to the west, some way back from the Monument, seen against clear sky, and with its eastern flank cascading more pronouncedly and differentially in the direction of the WHS to a low foothill terminating at the former Port of London Authority building. To the south and south-east, the form would step down substantially to a series of low foothills, following the descending topography towards the river. The apex of the Proposed City Cluster would be at 1 Undershaft, with a secondary crest at 20 Fenchurch Street. It would appear some way to the west of the WHS and would not affect the Protected Silhouette of the White Tower. Only at its lowest eastern extent would it be perceptible above the western curtain wall of the WHS.

6.56 It is considered that the Proposed City Cluster would have an appropriate presence in this view. It would maintain the central characteristic of the view as a striking juxtaposition between the WHS and the modern City. It would respect the setting of the ToL and not dominate it, in line with the LVMF SPG (para 415); it would be tightly reined in at its eastern extent to keep tall buildings some distance from the WHS, while stepping down substantively to the south to yield to the Tower's presence in riverine views; it would therefore allow the WHS to



continue to dominate its surroundings (para 418) and would not come near to breaching the Protected Silhouette. It would not contradict the townscape ensemble of the WHS (para 421). It would leave sufficient sky space around the Monument.