

British Land

York House,
45 Seymour St,
London, W1H 7LX
+44 020 7486 4466
info@britishland.com
britishland.com

City Plan 2040 Examination in Public – City of London**Written Representations for Broadwalk House, London EC2A – Addendum to Matter Statement (MM7-R0167)****30 May 2025**

This addendum to our original Matter Statement (MM7-R0167) provides our comments on the additional Strategic Views Impact Assessment Addendum (ED-HTB36) and the revised policies maps (LD31) that have been published by the City Corporation.

This addendum has been prepared by Bluebutton Properties UK Ltd ('Bluebutton') which is a joint venture between British Land and GIC who jointly own Broadgate in the City of London.

Comments

Bluebutton Properties UK Ltd supports the further assessment that has been undertaken in the Strategic Views Impact Assessment Addendum by the City Corporation and is in agreement with the maximum heights identified on the revised policies map that result from this.

Following the submission of our original Matter Statement and SOCG (SOC19), where both parties agreed 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, Bluebutton has continued to engage in detailed discussions with both the City Corporation and Historic England regarding the identification of Broadwalk House and the adjacent Network Rail signal box as an area that would be appropriate for a tall building. The identification of the Broadgate tall building area within the new City Plan policy map ensures that the future development of a tall building on the site would comply with Policy S12 of the new City Plan and Policy D9 of the London Plan.

Bluebutton View Testing

The original massing envelope tested in our Reg 19 representation (R0167) identifies the potential for two distinct forms, reaching up to 173.3m AOD at its highest point and a smaller form rising to 137.8m AOD, with a valley between the two at 80.4m AOD. Based on this original modelling, we suggested that a single contour around the site set at 180m would be appropriate.

During our continued discussions with the City Corporation, amendments to the form of the massing envelope which supported our Reg 19 representations (R0167) have been made and have been subject to further verified view modelling undertaken by Miller Hare on behalf of the JV.

The amendments to the massing envelope principally relate to reductions to the two taller elements to ensure that the massing envelope would avoid any new or additional adverse effect on protected landmarks, namely St Paul's Cathedral and the Tower of London.



British Land

York House,
45 Seymour St,
London, W1H 7LX
+44 020 7486 4466
info@britishland.com
britishland.com

To ensure any future detailed planning application will avoid any additional adverse effects on the protected landmarks, and including viewpoint locations contributing to the kinetic experience of protected views, our further modelling identified that the indicative massing should be reduced to a maximum of 167.6m AOD at its highest point, the smaller form reduced to a maximum 120.2m (AOD), with the valley in the middle remaining at a maximum of 80.4m AOD.

The further views testing submitted with this addendum includes all the strategic protected views submitted in our Reg 19 representation (R0167) and updated with the revised indicative massing envelope, plus testing supporting positions and kinetic view sequences to these protected views. In particular, kinetic views sequences have been explored along Waterloo Bridge, Gabriel's Wharf and further along the Southbank to understand more fully any possible likely effects on St Paul's Cathedral with consideration to St Paul's Heights Policy Area. The further testing confirms our original findings that no new or additional adverse effects on the protected landmark would be created.

Our further testing of this amended massing envelope is provided at Appendix 1.

Revised Policies Map

A more refined and detailed approach to the proposed tall building contour for the site than the one originally suggested within our Reg 19 representation is now being jointly proposed by the City Corporation and Bluebutton following the further testing that has been undertaken.

The proposed contour identifies maximum heights of 160m and 120m for the two taller elements and a maximum height between 75-80m for the central valley. Although the maximum 160m contour is c.7.6m lower than the maximum height that our further modelling suggests could be accommodated on the site, we are happy to accept the City Corporation's suggested 160m maximum height contour for this part of the site.

The proposed contours are supported by detailed testing to remain below the embrasures of the White Tower of the Tower of London World Heritage Site from LVMF view 10A.1, and within the existing building silhouette of St Paul's from LVMF 8A.1. The further testing supports the principle of a taller building at this location and with greater clarity of the likely limited effects on strategic views and protected landmarks based on the indicative massing revisions now considered by the City Corporation for inclusion in the City Plan.

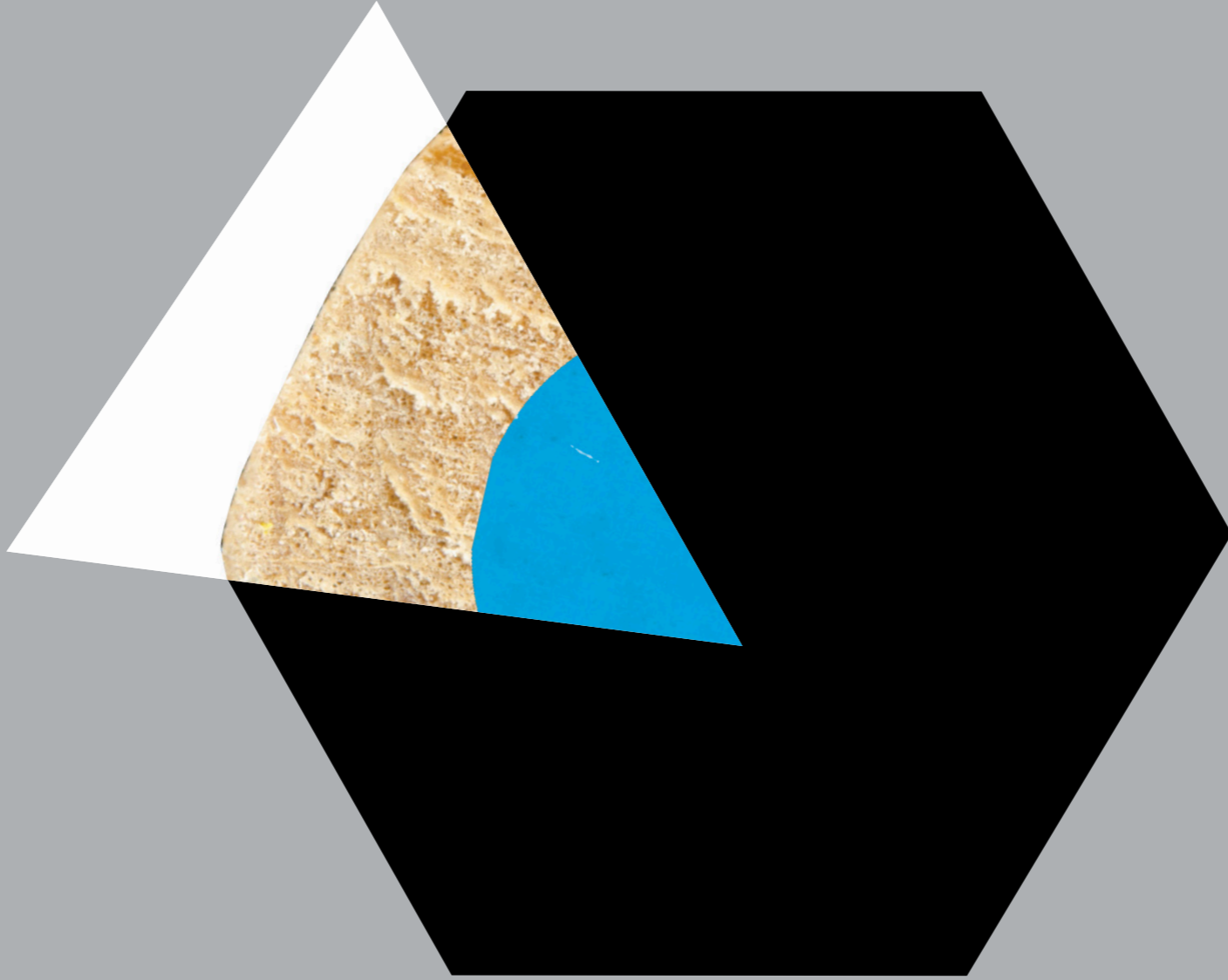


APPENDIX 1

MILLER HARE FURTHER VIEWS TESTING

Broadwalk House
SoCG Views Study

May 2025



Broadwalk House SoCG Views Study

May 2025

Contents

1	SoCG Views Study	2
	Indicative Massing	2
2	Townscape Views	3
	10A.1 LVMF 10A.1 Tower Bridge: upstream - the north bastion	6
	8A.1 LVMF 8A.1 Westminster Pier - the orientation plaque	7
	8A.1 LVMF 8A.1 Westminster Pier - the orientation plaque	8
	8A.1 LVMF 8A.1 Westminster Pier - the orientation plaque	9
	A Waterloo Bridge: LVMF 15B.2	10
	B Waterloo Bridge: east of LVMF 15B.2	12
	C Waterloo Bridge: north of the Lambeth bank	14
	D Waterloo Bridge: above the Lambeth Bank	16
	E Waterloo Bridge: opposite the National Theatre	18
	F Southbank: below Waterloo Bridge	20
	G Southbank: opposite the National Theatre	22
	H Southbank: opposite 76 Upper Ground	24
	I Southbank: opposite 72 Upper Ground	26
	J Southbank: LVMF 16B.1	28
	K Southbank: LVMF 16B.2	30
	L Southbank: south of LVMF 16B viewing place	32
	M Southbank: north of 56 Upper Ground	34
	N Southbank: north of Bernie Spain Gardens	36
	O Southbank: west of Oxo Tower Wharf	38
	P Southbank: Oxo Tower Wharf	40
	Q Southbank: Sea Container's House	42
	R Bankside: east of the Founder's Arms	44

Client

British Land

Planning Consultant

DP9

Townscape Consultant

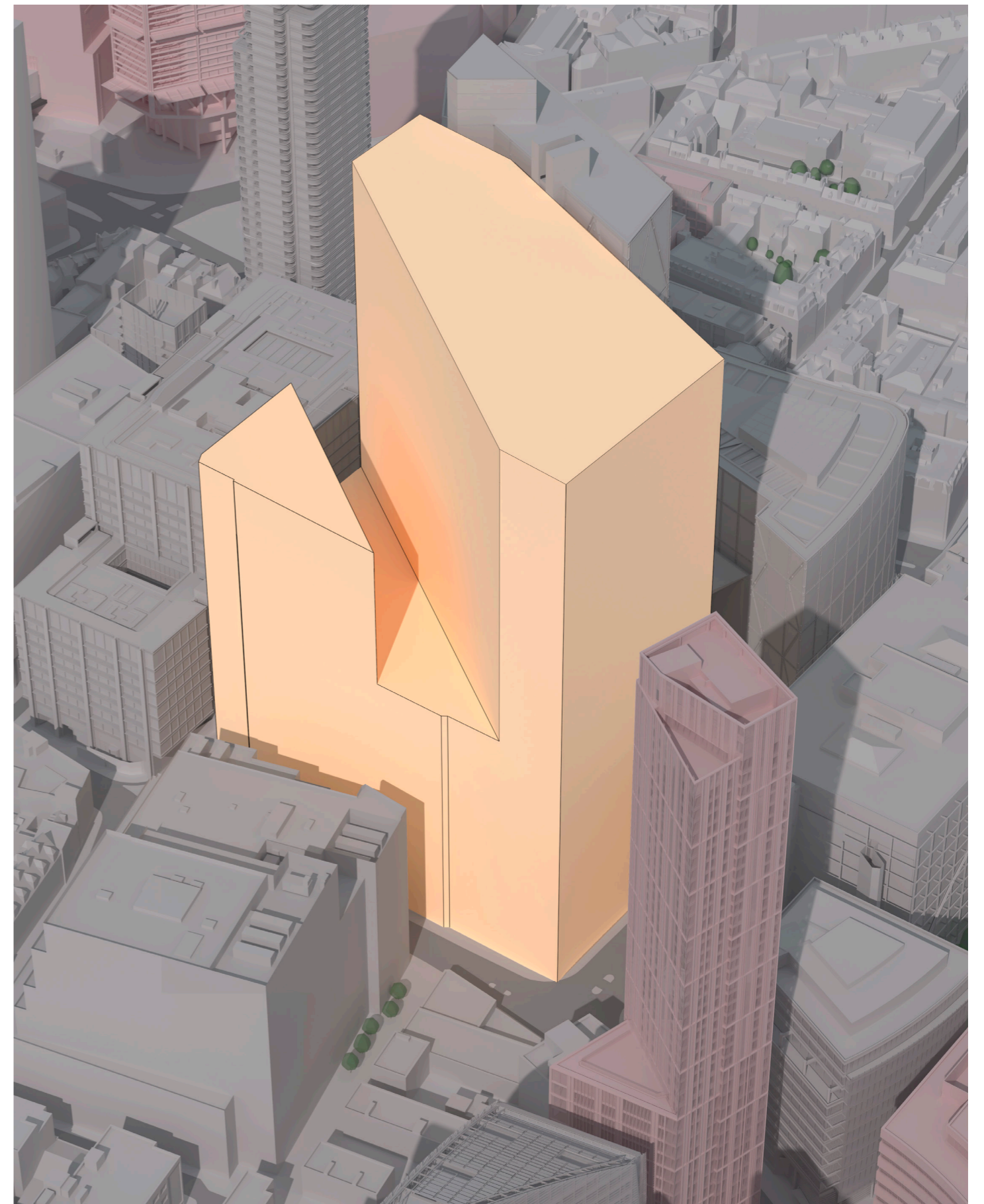
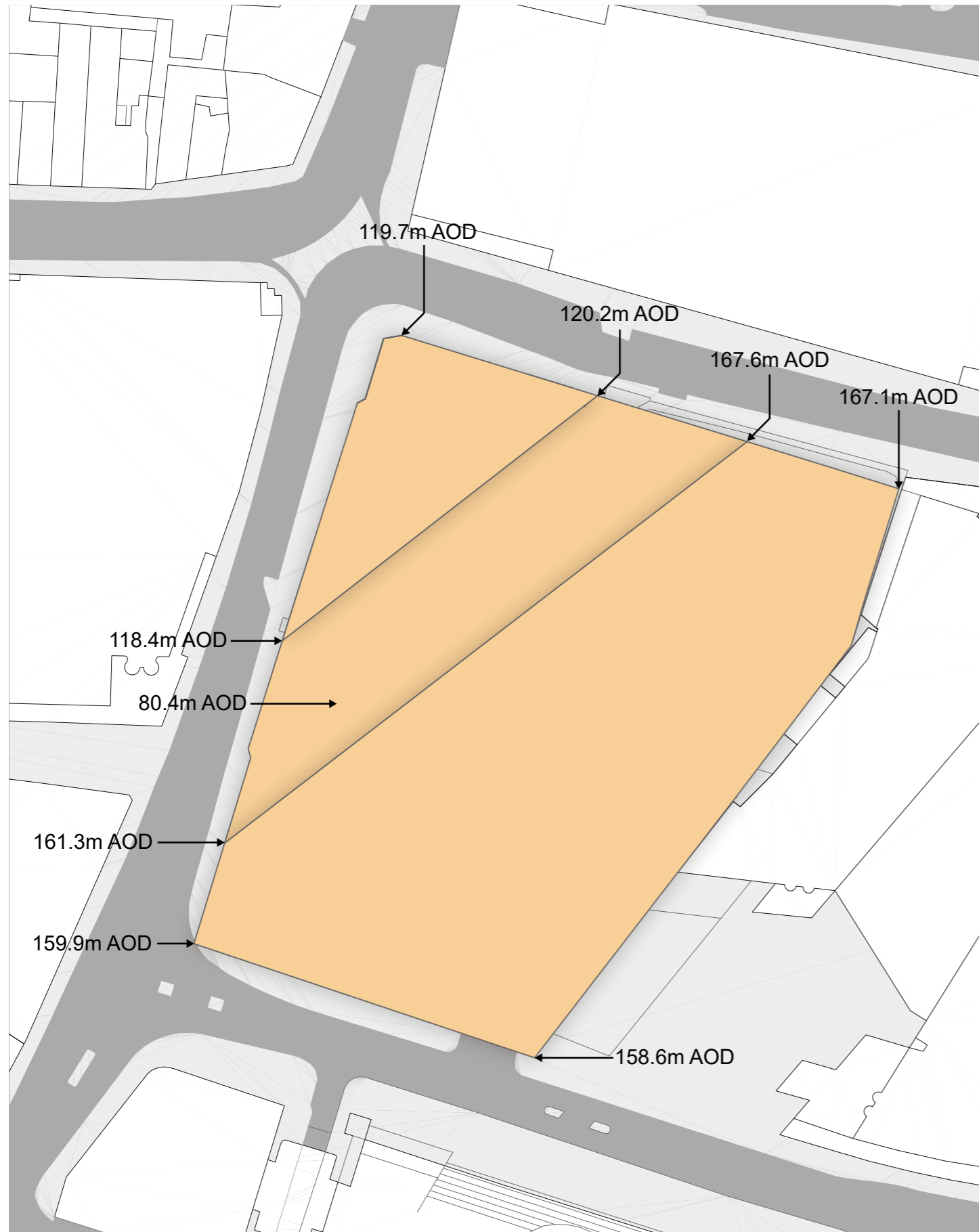
The Townscape Consultancy

Visualisation

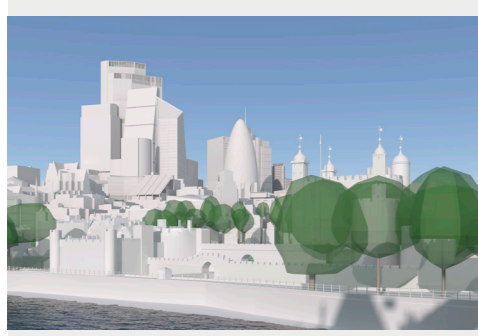
Millerhare

1 SoCG Views Study

Indicative Massing



2 Townscape Views



10A.1 | LVMF 10A.1 | Tower Bridge: upstream - the north bastion



8A.1 | LVMF 8A.1 | Westminster Pier - the orientation plaque



A | Waterloo Bridge: LVMF 15B.2



A | Waterloo Bridge: LVMF 15B.2 | Telephoto



B | Waterloo Bridge: east of LVMF 15B.2



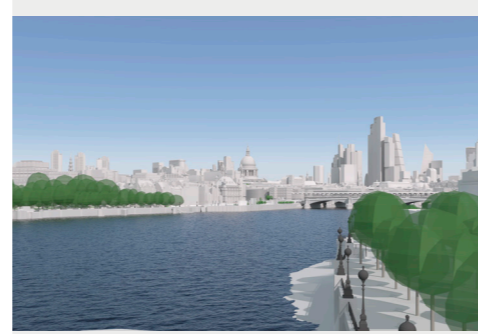
B | Waterloo Bridge: east of LVMF 15B.2 | Telephoto



C | Waterloo Bridge: north of the Lambeth bank



C | Waterloo Bridge: north of the Lambeth bank | Telephoto



D | Waterloo Bridge: above the Lambeth Bank



D | Waterloo Bridge: above the Lambeth Bank | Telephoto



E | Waterloo Bridge: opposite the National Theatre



E | Waterloo Bridge: opposite the National Theatre | Telephoto



F | Southbank: below Waterloo Bridge



F | Southbank: below Waterloo Bridge | Telephoto



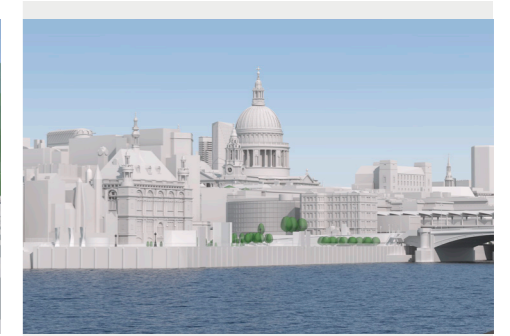
G | Southbank: opposite the National Theatre



G | Southbank: opposite the National Theatre | Telephoto



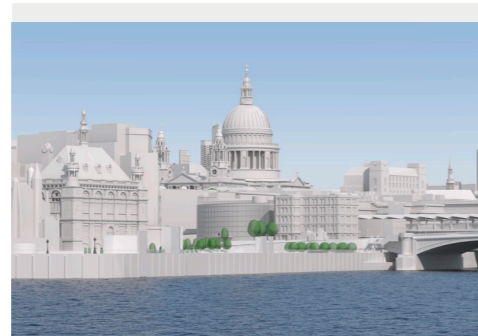
H | Southbank: opposite 76 Upper Ground



H | Southbank: opposite 76 Upper Ground | Telephoto



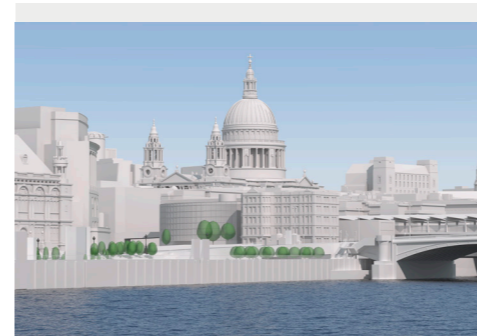
I | Southbank: opposite 72 Upper Ground



I | Southbank: opposite 72 Upper Ground | Telephoto



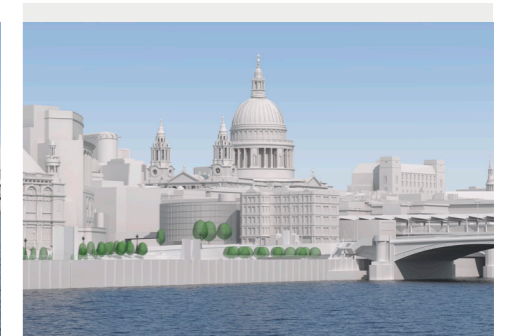
J | Southbank: LVMF 16B.1



J | Southbank: LVMF 16B.1 | Telephoto



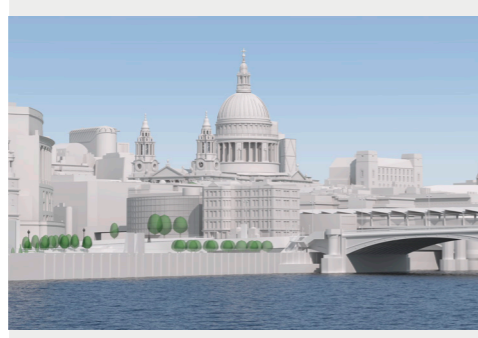
K | Southbank: LVMF 16B.2



K | Southbank: LVMF 16B.2 | Telephoto



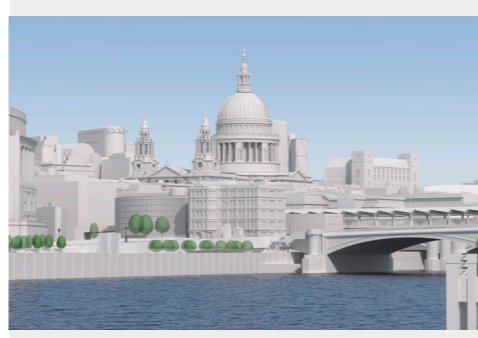
L | Southbank: south of LVMF 16B viewing place



L | Southbank: south of LVMF 16B viewing place | Telephoto



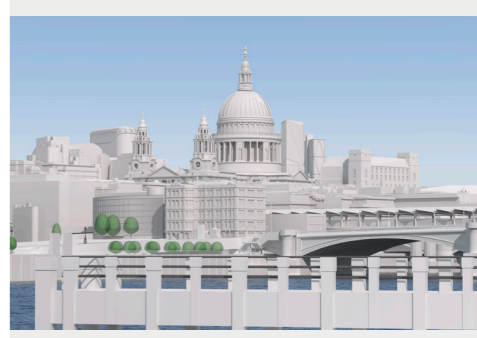
M | Southbank: north of 56 Upper Ground



M | Southbank: north of 56 Upper Ground | Telephoto



N | Southbank: north of Bernie Spain Gardens



N | Southbank: north of Bernie Spain Gardens | Telephoto



O | Southbank: west of Oxo Tower Wharf



O | Southbank: west of Oxo Tower Wharf | Telephoto



P | Southbank: Oxo Tower Wharf



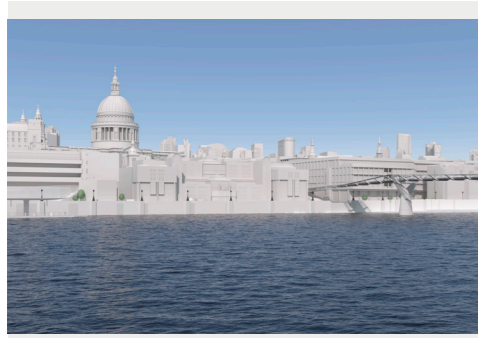
P | Southbank: Oxo Tower Wharf | Telephoto



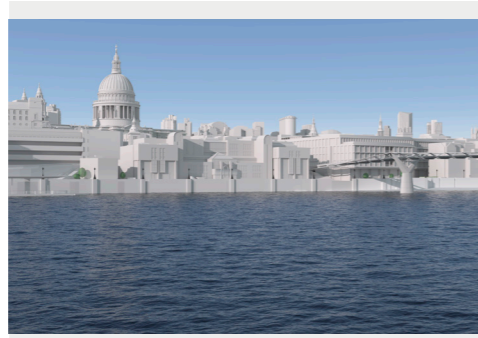
Q | Southbank: Sea Container's House



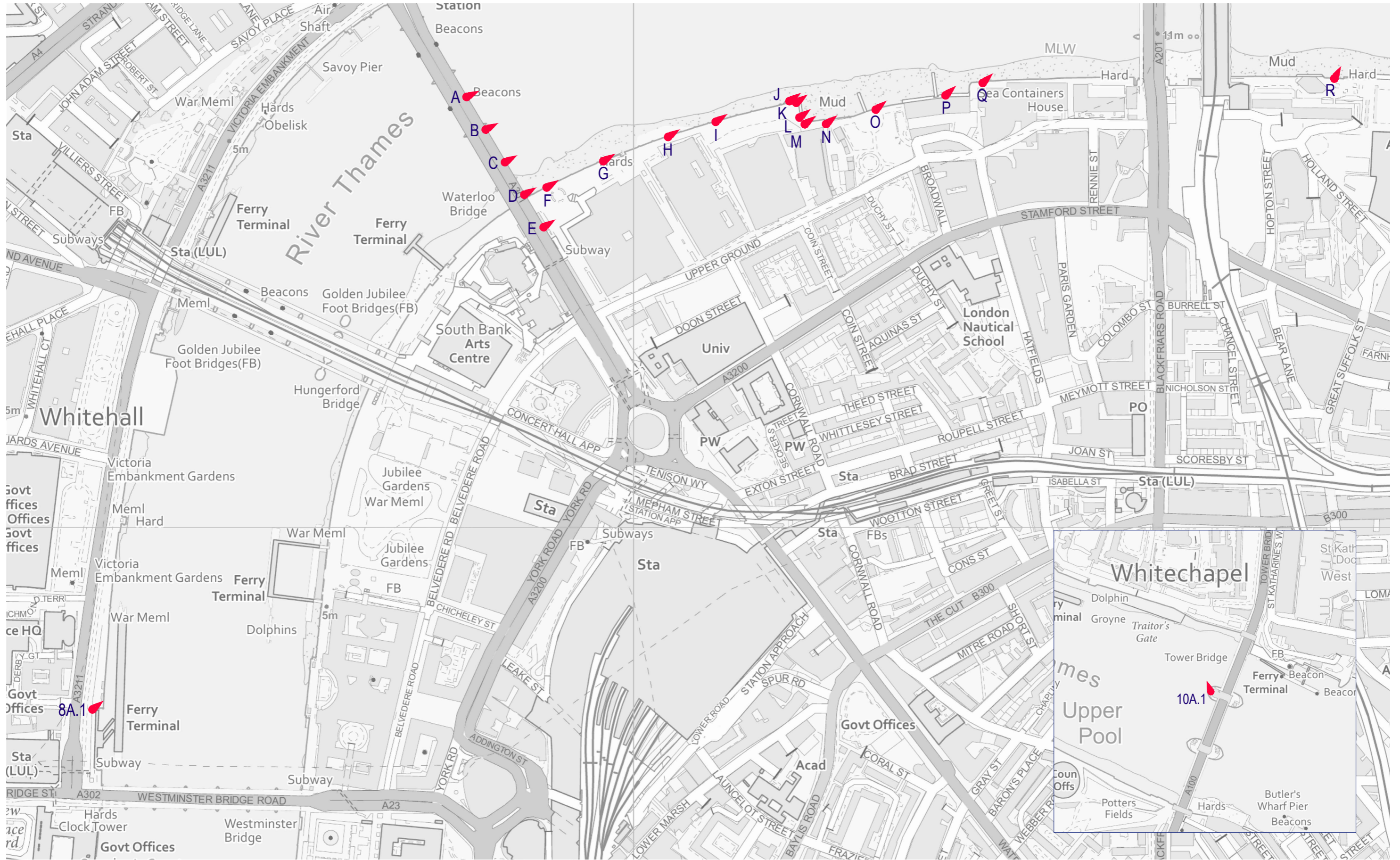
Q | Southbank: Sea Container's House | Telephoto



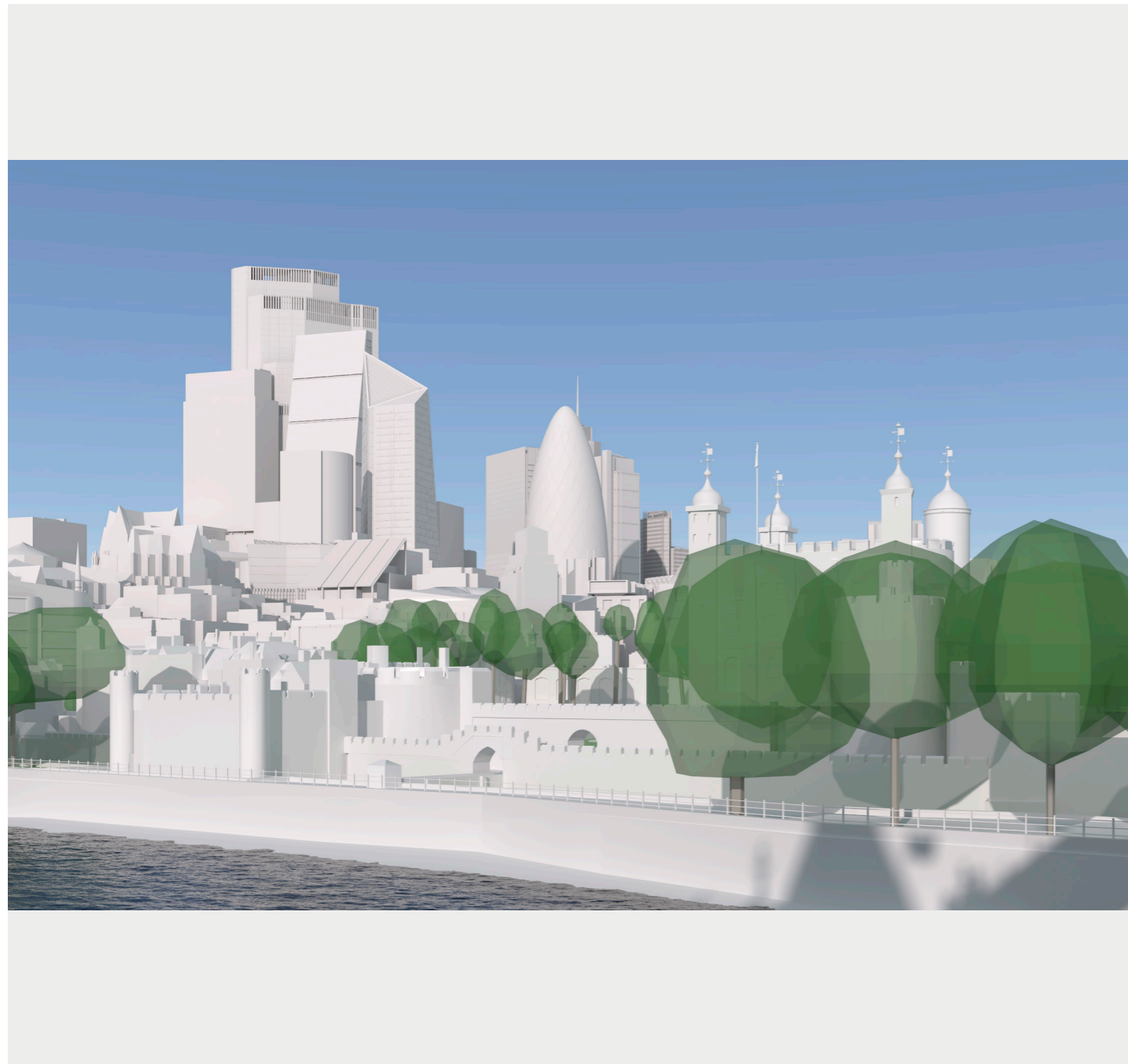
R | Bankside: east of the Founder's Arms



R | Bankside: east of the Founder's Arms | Telephoto



View location map

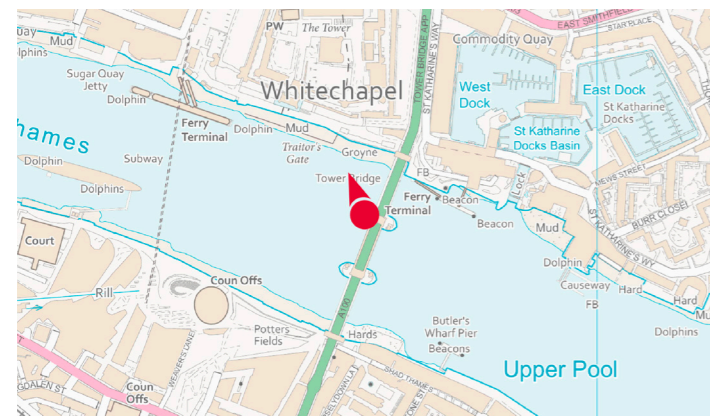


7414_0302



7414_0305

Existing

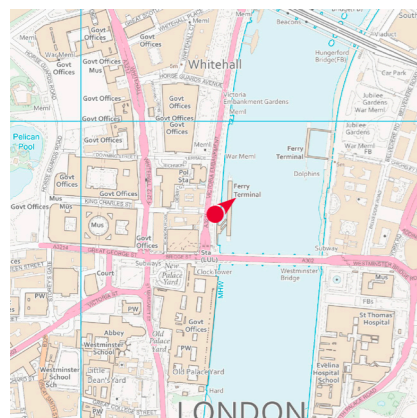


Camera Location
 National Grid Reference 533665.0E 180311.4N [Estimated]
 Camera height 14.82m AOD
 Looking at Centre of Site
 Bearing 339.0°, distance 1.7km

Photography Details
 Height of camera 1.60m above ground
 Date of photograph 18/01/2024
 Time of photograph 13:08
 Canon EOS 5D Mark IV DSLR
 Lens 50mm

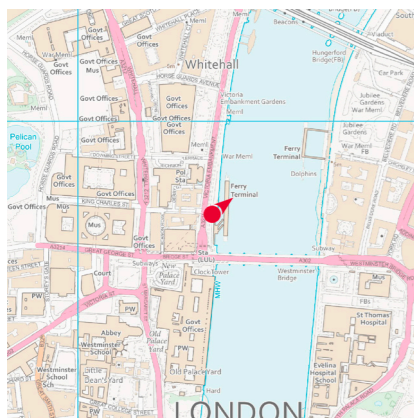
Indicative Massing

Camera Location
 National Grid Reference 530326.9E 179773.9N
 [Estimated]
 Camera height 8.40m AOD
 Looking at Centre of Site
 Bearing 51.7°, distance 3.6km



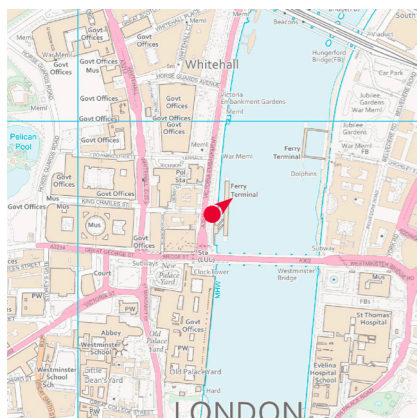
Existing

Camera Location
 National Grid Reference 530326.9E 179773.9N
 [Estimated]
 Camera height 8.40m AOD
 Looking at Centre of Site
 Bearing 51.7°, distance 3.6km



Analysis of Existing Buildings in the view

Camera Location
 National Grid Reference 530326.9E 179773.9N
 [Estimated]
 Camera height 8.40m AOD
 Looking at Centre of Site
 Bearing 51.7°, distance 3.6km



Indicative Massing