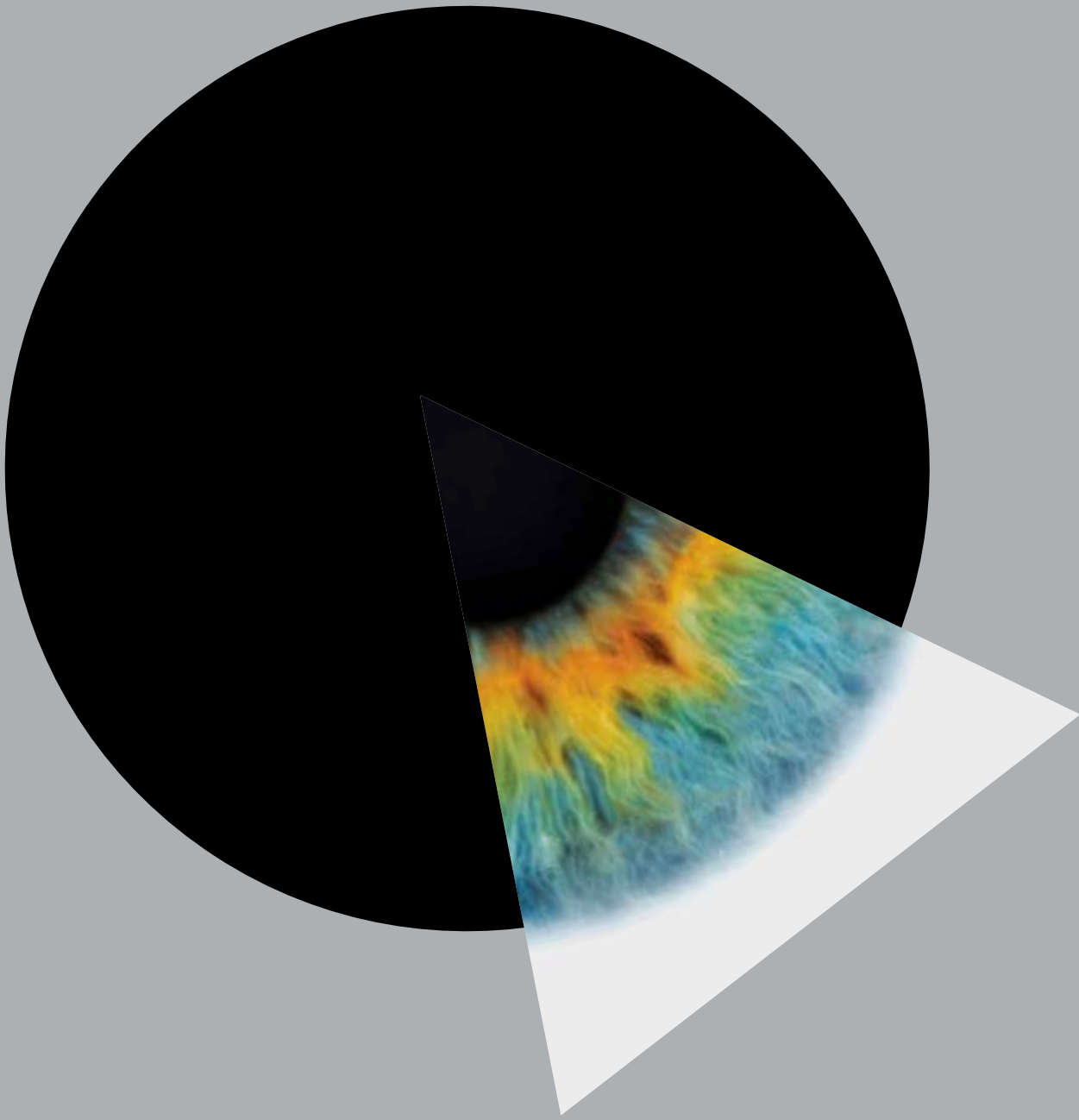


New City Court, St Thomas Street
Environmental Statement Part 3: TVIBHA - Cumulative Assessment Addendum

June 2020



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New City Court, St Thomas Street

Environmental Statement Part 3: TVIBHA - Cumulative Assessment Addendum

June 2020

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1 Introduction

1.1 In December 2018, GPE (St Thomas Street) Limited submitted a planning application for a new development ('the Development') at New City Court, including nos. 4-8, 12-16, 20 and 24-26 St Thomas Street, London, SE1, ('the Site'). Part 3 of the Environmental Statement (ES) submitted in support of the planning application (planning reference no. 18/AP/4039) comprised a Townscape, Visual Impact and Built Heritage Assessment (the 'December 2018 TVIBHA'), prepared by Peter Stewart Consultancy.

1.2 This Addendum to the December 2018 TVIBHA has been prepared by Peter Stewart Consultancy in response to a request from Southwark Council to include additional schemes in the cumulative assessment, following a review of the ES by its consultants. The Addendum considers the cumulative effects of the Development with significant recently submitted and permitted developments or developments that are on the point of submission at the time of writing. These additional cumulative developments have been identified by Southwark Council.

1.3 Whilst minor changes to the Development may be made in response to consultation or local authority requirements during the course of determination, no material changes have been made to date or are currently anticipated that would impact on our assessment. We will keep this under review in the event of any further changes.

1.4 This Addendum forms part of the December 2018 Environmental Statement for the Development and should be read in conjunction with the December 2018 TVIBHA.

Methodology

1.5 The methodology for the assessment is as set out in the December 2018 TVIBHA. As set out in paragraph 3.47 of that assessment, the approach to cumulative assessment is to focus on the additional effects of the Development on top of the cumulative 'future baseline' formed by consented/submitted schemes (i.e. as if the schemes were in place).

1.6 The Guidelines for Landscape and Visual Impact Assessment' (GLVIA) acknowledge this as one of two main assessment approaches which are acceptable. It is considered that this approach is best suited to an urban environment, in which the cumulative effects between the Development and other schemes can be complex (including situations in which the effect of the Development could be lessened or removed entirely by cumulative schemes) and because, as also acknowledged in the GLVIA, it may not be considered reasonable to assess the effect of many complex schemes other than the Development in the manner required by the alternative approach, known as the 'combined effects' approach.

1.7 The 'future baseline' considered in this Addendum comprises those cumulative schemes assessed in the December 2018 TVIBHA and the following additional cumulative schemes:

Scheme	Description	Status
Capital House, 42-46 Weston Street (18/AP/0900 Submitted:16 March 2018 Validated:18 April 2018 Approved: 14 May 2019)	Demolition of Capital House and the erection of a 39-storey building	Approved
2-4 Melior Place (18/AP/3229 Submitted: 25 September 2018 Validated: 4 October 2018).	Development of 6 storeys	Submitted
40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowfields (19/AP/0404 Submitted: 6 February 2019 Validated: 8 March 2019).	Development of up to 18 storeys	Submitted
Vinegar Yard (18/AP/4171 Submitted: 21 December 2018 Validated: 15 April 2019).	Development of up to 21 storeys	Submitted
Becket House, 60 St Thomas Street (18/AP/4136)	Scoping submitted for a 24-storey building	Pre-planning

Table 1-1: New cumulative schemes

Visual Impact Assessment

1.8 The December 2018 TVIBHA included an assessment of the visual impact of the Development from 67 viewpoints. This Addendum considers the effect of the Development under the revised cumulative condition on a subset of those viewpoints. Professional judgment has been used to determine this set, taking into account the visibility (or lack thereof) of the Development and the new cumulative schemes from the viewpoints identified in the December 2018 TVIBHA.

1.9 Where it was clear from inspection that the Development would be concealed from view in the 'as proposed' and 'as proposed with cumulative' views as previously submitted, or

that the new cumulative schemes would be out of shot in a given view, or where those schemes would be concealed from view by other buildings in the photo, it was determined that those views would not be included in the subset. Exceptions were made in the case of viewpoint locations of particular sensitivity, such as Montague Close.

1.10 This led to the selection of 43 viewpoints from which the visual impact of the Development would be assessed under the revised cumulative condition. These are identified in Table 1-2 below.

View	Description	View type
1	LVMF 1A.1 Alexandra Palace: the viewing terrace – south-western section	Wireline
2	LVMF 1A.2 Alexandra Palace: the viewing terrace – approaching from the north-eastern car park	Wireline
3	LVMF 2A.1 Parliament Hill: the summit – looking toward St Paul's Cathedral	Render
4	LVMF 2B.1 Parliament Hill: east of the summit – at the prominent oak tree	Render
5	LVMF 3A.1 Kenwood: the viewing gazebo – in front of the orientation board	Render
6	LVMF 4A.1 Primrose Hill: the summit – looking towards St Paul's Cathedral	Wireline
7	LVMF 5A.2 Greenwich Park: the General Wolfe statue – north-east of the statue	Wireline
8	LVMF 6A.1 Blackheath Point – near the orientation board	Wireline
9	LBS Borough View 1 North facing view from One Tree Hill	Wireline
10	LBS Borough View 2 St Paul's Cathedral from Nunhead Cemetery	Wireline
12	LVMF 10A.1 Tower Bridge: Upstream – The North Bastion	Render
13	St Katharine's Dock, at Girl with a Dolphin Fountain	Wireline
14	LVMF 12B.1 Southwark Bridge: downstream – close to the City of London bank	Wireline
15	Millennium Bridge (centre)	Wireline
18	LVMF 17B.1 Golden Jubilee/Hungerford Footbridges: downstream – crossing the Westminster bank	Wireline
19	LVMF 17B.2 Golden Jubilee/Hungerford Footbridges: downstream – close to the Westminster bank	Wireline
22	Victoria Embankment, opposite Temple Gardens	Wireline
24	London Bridge: upstream – at the City of London bank	Render
25	Old Billingsgate Walk	Render
26	Tower of London: Inner Curtain Wall Walkway	Render
27	Tower of London: Inner Ward, north of the White Tower	Render
29	Tower of London Local Setting Study View 8: The Royal Mint	Render
31	Tower Bridge Road / Queen Elizabeth Street	Wireline
32	Saint Mary Magdalen Churchyard	Wireline
33	Leathermarket Gardens	Wireline
34	Weston Street / Guy Street	Render
35	Tabard Gardens	Wireline

View	Description	View type
37	Southwark Bridge Road outside no.92	Wireline
38	Red Cross Garden (middle)	Wireline
41	Southwark Street / Southwark Bridge Road	Wireline
52	St Thomas Street, outside St. Thomas' Church	Render
53	Bedale Street / Borough Market	Render
54	Borough High Street / Bedale Street	Render
55	Cathedral Street / Winchester Walk	Wireline
56.2	Southwark Cathedral I north-west corner 1	Render
56.3	Southwark Cathedral I north-west corner 2	Render
56.6	Southwark Cathedral: Millennium Courtyard I Panorama	Render
57	London Bridge, outside Glazier's Hall	Render
58	Islington Local View 4: Farringdon Lane, near Ray Street Bridge	Render
59	Ray Street Bridge, corner with Farringdon Lane	Render
60	Islington Local View 3: Vine Street Bridge	Render
61	Islington Local View 1: Clerkenwell Road, bridge across Farringdon	Render
62	Trinity Church Square, south-west corner	Wireline

Table 1-2: The Views

- 1.11 For each viewpoint, the following views have been provided:
1. **View ‘as existing’**, showing the baseline conditions;

2. **View ‘as proposed’**, showing the Development in the image; and

3. **View ‘as proposed with updated cumulatives’**, showing the Development in the context of the updated cumulative condition, i.e. including the new cumulative schemes listed in Table 1-1.
- 1.12 Where the Development is shown in wireline form in the AVRs, it can be identified by the blue outline. Cumulative schemes assessed in the December 2018 TVIBHA are represented by an orange wireline outline. The new cumulative schemes under consideration are represented in wireline outline (dotted where obscured by intervening buildings) in different colours as follows:
- Capital House, 42-46 Weston Street – purple wireline

• 2-4 Melior Place – green wireline

• 40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowfields – magenta wireline

• Vinegar Yard – turquoise wireline

• Becket House, 60 St Thomas Street – yellow wireline
- 1.13 Technical details for the production of these verified view images can be found in Appendix A6 of this Addendum, which is provided by the project visualiser, Millerhare.

Townscape Assessment

- 1.14 The assessment of effect on the Townscape Character Areas (‘TCAs’) identified in the December 2018 TVIBHA (see page 5 and page 200 of this Addendum) is informed by the updated cumulative views provided in this Addendum.

Built Heritage Assessment

- 1.15 The assessment of effect on the Built Heritage Assets identified in the December 2018 TVIBHA is informed by the updated cumulative views provided in this Addendum.

Legislation and Planning Policy

- 1.16 Since submission of the December 2018 TVIBHA, there have been updates to legislation, policy and guidance of relevance to townscape, visual, and built heritage. These are set out below. This assessment takes these updates into account.

Statutory duties

Town and Country Planning and Infrastructure Planning (EIA) (Amendment) Regulations 2018

- 1.17 The 2018 Regulations are an amendment to the 2017 Regulations which make minor changes to correct drafting errors in the 2017 Regulations that were referenced in the December 2018 TVIBHA. These amending regulations have no bearing on this assessment.

National Planning Policy and Guidance

The National Planning Policy Framework (2019) (“NPPF”)

- 1.18 The Government issued the latest version of the NPPF in February 2019. The NPPF sets out planning policies for England and how these are expected to be applied by all users of the planning system.
- 1.19 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three dimensions; economic, social and environmental. The NPPF states, at paragraph 10, that *‘at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development.’*
- 1.20 Section 12 of the NPPF deals with design. At paragraph 124, 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.’*
- 1.21 Paragraph 127 notes that ‘Planning policies and decisions should ensure that developments:

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

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

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

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

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

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.’
- 1.22 Paragraph 130 states that *‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions,’ and goes on to say ‘Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.’*
- 1.23 Paragraph 131 states that *‘In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in the area, so long as they fit in with the overall form and layout of their surroundings.’*
- NPPF Section 16: Conserving and enhancing the historic environment
- 1.24 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 1.25 Heritage assets are defined in Annex 2 of the NPPF as a *‘building, monument, site, place, area or landscape identified as having a degree of significance meriting*

consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).’

- 1.26 The NPPF notes, at paragraph 184, that heritage assets *‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*
- 1.27 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 189). It goes on to say that *‘the level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’*
- 1.28 The NPPF identifies three key factors local authorities should take into account in determining applications (para.192):

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

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

c)*The desirability of new development making a positive contribution to local character and distinctiveness.’*

1.29 Paragraph 193 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that *‘this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’*

1.30 The setting of a heritage asset is defined in Annex 2 as *‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.’*

1.31 The NPPF states, at paragraph 195, that where a proposed development would lead to *‘substantial harm’* or total loss of heritage significance of a designated heritage asset, consent should be refused, *‘...unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss’, or all of a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.*
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1.32	Where a development proposal will lead to <i>‘less than substantial’</i> harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 196).				
1.33	Paragraph 197 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.				
1.34	The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and World Heritage Sites (WHSs) and within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 200 goes on to say <i>‘Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably’</i> .	1.41	The PPG notes that setting is defined in the NPPF and that <i>‘all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset’s curtilage may not have the same extent’</i> (18a-013-20190723). It goes on to say, <i>‘the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each’</i> (18a-013-20190723).	1.46	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: <ul style="list-style-type: none"> • <i>‘The layout (or masterplan)</i> • <i>The form and scale of buildings</i> • <i>Their appearance</i> • <i>Landscape</i> • <i>Materials; and</i> • <i>Their detailing’</i>
1.35	Paragraph 201 states <i>‘Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance.’</i>				
	<i>Planning Practice Guidance</i>				
1.36	The national Planning Practice Guidance (PPG) was launched by the Government on the 6 March 2014 and provides a frequently updated web-based resource in support of the NPPF.	1.42	The PPG contains guidance on WHSs, including particular guidance on setting which notes that buffer zones may be identified around a WHS in some cases, and that it may be appropriate to protect the setting of a WHS in other ways <i>‘... for example by the protection of specific views and viewpoints.’</i> (18a-033-20190723). The PPG goes on to state that developments potentially affecting a WHS <i>‘...need to submit sufficient information with their applications to enable assessment of impact on Outstanding Universal Value’</i> (18a-035-20190723).		
1.37	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’.			1.47	Historic England issued Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets in October 2019. The note covers the NPPF requirement that heritage significance is described in order to help local authorities make decisions on the impact of proposals for change to heritage assets. It states, in paragraph 2 of the introduction, that <i>‘the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance’</i> . It describes a statement of heritage significance as <i>‘an objective analysis of significance, an opportunity to describe what matters and why’</i> .
1.38	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 (see below).	1.43	With regard to non-designated HAs, the PPG notes that <i>‘there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.’</i> It states <i>‘it is important that all non-designated heritage assets are clearly identified as such’</i> noting it is <i>‘helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies’</i> (18a-040-20190723).	1.48	The advice note states that a staged approach to decision making, where the significance is assessed before the design of the proposal commences, is the best approach. It states in paragraph 29, under <i>‘proportionality’</i> , that while <i>‘analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance’</i> .
1.39	The PPG includes a section called ‘Historic environment’ which was updated on 23 July 2019. It explains which bodies are responsible for the designation of Heritage Assets (“HAs”) and provides information on heritage consent processes.				
1.40	The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that <i>‘HAs may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals...’</i> (18a-007-20190723). It goes on to say <i>‘understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm’</i> (18a-008-20190723). It states that in				
			<i>The National Design Guide (2019)</i>		
		1.44	The National Design Guide (September 2019) (‘NDG’) states (paragraph 3) that it <i>‘forms part of the Government’s collection of planning practice guidance’</i> .		
		1.45	At paragraph 21 the NDG states that well-designed places are achieved by making the right choices at all levels, including:		
					Historic England Advice Note 4 – Tall Buildings – Second edition consultation draft (2020)
					1.49 This draft updated version of the advice note issued in 2015 had been issued for public consultation at the time of writing, with comments invited until 28 May 2020. The guidance within the draft Advice Note is not significantly different to that in the existing document, and the updates are primarily designed to reflect changes to the policy and guidance, including the NPPF and the National Design Guide, to take account of changing technology for visualising proposed tall buildings, and to give greater focus to plan-led approaches to tall buildings.
					Regional Planning Policy and Guidance
					<i>The Draft New London Plan – Intend to publish (December 2019)</i>
					1.50 In December 2019, the Mayor of London issued a draft ‘Intend to Publish’ version of the new London Plan, which shows all of the Mayor’s suggested changes to earlier drafts, following the Examination in Public (EiP) and publication of the Panel of Inspectors report, including panel recommendations. While it is not yet adopted, the draft London Plan carries a good deal of weight as a material consideration, having been through examination. Its aim is to <i>‘provide a vision for how London should sustainably grow and develop in the future’</i> . When adopted, it will replace the current London Plan.
					1.51 Whilst it was anticipated that the draft plan would be finally published in the period post Mayoral election, in early summer 2020, the Mayor of London received a letter from the Secretary of State on 13 March 2020 directing him to make specified changes to the plan prior to adoption. The timescales for adoption are now less clear. The Mayor of London indicated, in a letter of 24 April, that he is seeking to enter into discussions with the Secretary of State regarding the changes that he has been directed to make. The Secretary of State’s letter does not make reference to the draft policies noted below.
					1.52 Chapter 2 ‘Spatial Development Patterns’ includes policies on Opportunity Areas. Policy SD1 on ‘Opportunity Areas’ states that boroughs should, inter alia, <i>‘support development which creates employment opportunities and housing choice for Londoners’</i> .
					1.53 The policies most relevant to townscape, visual impact and the historic environment are contained in Chapter 3, ‘Design’, and Chapter 7, ‘Heritage and Culture’. These chapters contain draft policies that are broadly similar to those in Chapter 7, ‘London’s Living Places and Spaces’, in the current London Plan. These draft policies are as follows:
					1.54 Policy D1 on <i>‘London’s form, character and capacity for growth’</i> states that the form and layout of a place should

enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, which have clearly defined public and private environments. They should *'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.'* Policy D1 also 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 proposals should *'be of high quality, with architecture that pays attention to detail,' and uses 'attractive, robust materials which weather and mature well'.*

1.55 Policy D2 on *'delivering good design'* highlights the necessity to allow master plans and design codes to help bring forward development to ensure it delivers high quality design, optimising site capacity. It also notes that at least one design review should be carried out if the development proposes *'a building defined as a tall building by the borough (see Policy D9 Tall Buildings), or that is more than 30m in height where there is no local definition of a tall building'*.

1.56 Policy D8 on *'public realm'* states that opportunities to create a new public realm should be encouraged and that development plans and proposals should consider a number of things, including that the public realm is well-designed, incorporates materials that are *'of good quality, fit-for-purpose, durable and sustainable,'* and that it relates to the local and historic context. It states that buildings should be *'of a design that activates and defines the public realm,'* and that there should be *'a mutually supportive relationship between the space, surrounding buildings and their uses'.*

1.57 Policy D9 on ‘*tall buildings*’ highlights that ‘*tall buildings should only be developed in locations that are identified in Development Plans.*’ Development Plans should provide a definition of a tall building (*‘the height of which will vary between and within different parts of London’*) and should identify in maps where tall buildings may be appropriate.

1.58 Policy D9 also notes that the views of buildings from different distances should be considered. This includes long-range views (buildings must make a *'positive contribution to the existing and emerging skyline and not adversely affect local or strategic views'*), mid-range views (buildings must make a positive contribution to the local townscape and particular attention should be paid to its form, proportions and materiality), and immediate views (buildings 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'*. It notes that the architectural quality and materials should be of an exemplary standard and buildings should *'positively contribute to the*

character of the area.' Buildings that are situated in a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site.

1.59 Policy HC1 on 'Heritage Conservation and Growth' aims to highlight the importance of London's historic environment when proposing new development. This policy emphasises that *'development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings'*.

1.60 Policy HC2 on 'World Heritage Sites' states that development proposals in World Heritage Sites and their settings, including any buffer zones, should '*conserve, promote and enhance their Outstanding Universal Value.*'

1.61 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 seek to *‘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 of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site’.* Boroughs should clearly identify local views in their Local Plans and strategies.

1.62 Policy HC4 on the 'London View Management Framework' highlights 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.'* They should also *'preserve and where possible enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.'* Development in the foreground, middle ground and background of a designated view *'should not be intrusive, unsightly or prominent to the detriment of the view'.*

1.63 Development in the background of a Protected Vista that is inside or outside of the Wider Setting Consultation area *‘should not harm the composition of the Protected Vistas’*. It should make a positive contribution and *‘where possible enhance the viewer’s ability to recognise Strategically-Important Landmarks’*. Where existing buildings currently detract from or block the view, *‘this should not be used as justification for new development to likewise exceed the threshold height of the Landmark Viewing Corridor’*. It also notes that opportunities to reinstate Landmark Viewing Corridors arising as a result of redevelopment and demolition of existing buildings that exceed Landmark Viewing Corridor threshold height *‘should be taken whenever possible’*.

1.64 The composition of the view as a whole should not be harmed and instead, development proposals should give context to landmarks. In particular, *'townscape and linear views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.'* Similarly, London panoramas and River Prospects views must be managed and the composition of the view as a whole must be not be harmed.

Local Planning Policy and Guidance

LBS New Southwark Plan 2019 to 2034 - Submission version
(2020)

1.65 The submission version of the New Southwark Plan document was submitted for Examination in January 2020, following two rounds of Regulation 19 (pre-submission) consultation. It reflects responses made between December 2017 and February 2018 on the Proposed Submission version issued in December 2017. As the Plan is yet to undergo Examination Hearings, it currently carries only a moderate weight as a material consideration in the decision making process, which will increase on an ongoing basis as policy are tested throughout Examination. The following draft policies are of relevance to this assessment.

1.66 Draft Policy P12 relates to the design of places. It notes that development must:

'1. Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and

2. Better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment; and

3. Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; and

4. Ensure buildings, public spaces and routes are positioned according to their function, importance and use; and

5. Ensure a high quality public realm that encourages walking and cycling and is safe, legible, and attractive, and eases the movement of pedestrians, cyclists, push-chairs, wheelchairs and mobility scooters and vehicular traffic. Street clutter should be avoided; and

6. Provide landscaping which is appropriate to the context, including the provision and retention of street trees; and

7. Provide the use of green infrastructure through the principles of water sensitive urban design, including quiet green spaces, tree pit rain gardens in addition to green grid spaces for people and surface runoff; and

8. Provide accessible and inclusive design for all ages and people with disabilities; and

9. Provide opportunities for formal and informal play;
and

10. Provide adequate outdoor seating for residents and visitors'.

1.67 Draft Policy P13 relates to the design quality. It notes that development must provide:

'1. High standards of design with fabric, function and composition; and

2. Innovative design solutions that are specific to the site's historic context, topography and constraints; and

3. Adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing neighbouring occupiers residents; and

4. Respond positively to the context using durable, quality materials; and

5. Buildings and spaces which are constructed and designed sustainably; and

6. Buildings and spaces that utilise active design principles that are fitting to the location, context, scale and type of development; and

7. Active frontages and entrances that promote activity and successfully engage with the public realm in appropriate locations; and

8. Adequate servicing within the footprint of the building and site for each land use; and

9. Accessible and inclusive design for all; and

10. A positive pedestrian experience; and

11. Basements that do not have adverse archaeological, amenity or environmental impacts'.

1.68 Draft Policy P16, Tall buildings, provides a map of areas where tall buildings are expected to be set out and they are typically within Southwark's Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Tall buildings are defined as being *'being significantly higher*

	than surrounding buildings or their emerging context.’ New tall buildings must:		<i>‘Tall buildings are above 30m except where they are 25m in the Thames Special Policy Area, and also where they are significantly higher than surrounding buildings or their emerging context. A point of landmark significance is where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions’.</i>		development must ‘conserve and enhance the significance’ of the following heritage assets and their settings:		<i>‘View 1: The London panorama of St Paul’s Cathedral from One Tree Hill</i>		
	<div>‘1. Be located at a point of landmark significance; and</div> <div>2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and</div> <div>3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and</div> <div>4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and</div> <div>5. Respond positively to local character and townscape; and</div> <div>6. Provide a functional public space that is appropriate to the height and size of the proposed building; and</div> <div>7. Provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.</div>	1.71	Draft Policy P18, on ‘Listed buildings and structures’, states that development relating to Listed Buildings and structures will only be permitted where it conserves and enhances the special significance of listed buildings and structures and their settings by conserving and enhancing: <div>‘1. The historic fabric, architectural style and features, curtilage, site layout, plan form and readability, and land use; and</div> <div>2. The contribution of the building to its setting or its place within a group; and</div> <div>3. Views that contribute positively to the significance of the building or structure or their setting; and</div> <div>4. The viable use of listed buildings and structures that is consistent with their on-going and long term conservation’.</div>		<div>i. Scheduled monuments; and</div> <div>ii. Sites of archaeological interest; and</div> <div>iii. Protected London squares; and</div> <div>iv. Registered parks and gardens; and</div> <div>v. Trees within the curtilage of a listed building; and</div> <div>vi. Trees that contribute to the historic character or appearance of conservation areas; and</div> <div>vii. Trees that are subject to a Tree Preservation Order (TPO); and</div> <div>viii. Ancient hedgerows; and</div> <div>ix. Buildings and land with Article 4 (1) directions inside and outside conservation areas; and</div> <div>x. Unlisted buildings of townscape merit; and</div> <div>xi. Undesignated heritage assets including Second World War Stretcher Fences; and</div> <div>xii. Foreshore and river structures’</div>		<div>1. Maintain the view of St Paul’s Cathedral from the viewing place on One Tree Hill and not exceed the threshold height of the view’s Landmark Viewing Corridor; and</div> <div>2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer’s ability to recognise and appreciate St Paul’s Cathedral and its setting is maintained. A canyon effect of the view of St Paul’s Cathedral must be avoided;</div> <div>View 2: The linear view of St Paul’s Cathedral from Nunhead Cemetery</div> <div>1. Maintain the view of St Paul’s Cathedral from the viewing place within Nunhead Cemetery and not exceed the threshold height of the view’s Landmark Viewing Corridor; and</div> <div>2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer’s ability to recognise and appreciate St Paul’s Cathedral and its setting is maintained. A canyon effect of the view of St Paul’s Cathedral must be avoided;</div>		
1.69	The draft policy goes on to state that the design of tall buildings will be required to:			1.72	It also states that any harm to the significance of the Listed Building or structure that results from a proposed development ‘ must be robustly justified ’.	1.76	The policy states that new development must also do the following: <div>‘2 Enable the viable use of the heritage asset that is consistent with its on-going and long-term conservation; and</div> <div>‘3 Provide robust justification for any harm to the significance of the heritage asset that result from the development.’</div>	1.79	Annex 1 sets out the viewing locations and view geometry that relates to the Borough Views.
	<div>‘1. Be of exemplary architectural design and residential quality; and</div> <div>2. Conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and</div> <div>3. Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and</div> <div>4. Maximise energy efficiency and prioritise the use of sustainable materials; and</div> <div>5. Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and provide widened footways and routes to accommodate increased footfall’.</div>	1.73	Draft Policy P19, on ‘Conservation areas’, states that development relating to conservation areas will only be granted where: <div>‘1. The development conserves and enhances the significance of conservation areas, taking into account their local character, appearance and positive characteristics published in Conservation Area Appraisals and Conservation Area Management Plans; and</div> <div>2. The development conserves and enhances the significance of a conservation area’s setting, including views to and from the conservation area’.</div>			1.77	Draft Policy P21 on Borough Views, states that development must: <div>1. Preserve and where possible enhance the borough views of significant landmarks and townscape; and</div> <div>2. Ensure the viewing locations for each view are accessible and well managed; and</div> <div>3. Enhance the composition of the panorama across the borough and central London as a whole.</div>	1.81	The section of the draft plan on Site Allocations (page 94 onwards) notes under Allocation NSP50, which includes the site, that: <div>• ‘Site is directly adjacent to Grade II listed London Bridge Station and Grade II listed Railway Arches. Proposals for the site should sustain and enhance the setting of these assets and integrate St Thomas Street Boulevard.</div> <div>• Proposals for the site should be sensitive to the surrounding context, and sustain and enhance the setting of the Bermondsey Street conservation area to the east.’</div>
1.70	It is noted in the ‘Fact Box’ that follows the text above that			1.74	It continues, ‘2. The demolition of buildings or structures that make a positive contribution to the historic character and appearance of a conservation area will not be generally permitted. Any replacement buildings or structures must conserve and enhance the conservation area’s historic character and distinctiveness ’.			1.82	Draft Policy P25: ‘Local List’ states that ‘ Development must take into account locally listed buildings and structures that positively contribute to local character and amenity ’.
				1.75	Draft Policy P20, is titled ‘Conservation of the historic environment and natural heritage’. It identifies several types of heritage asset, both designated and non-designated, not all of which are of relevance to this assessment. It states that	1.78	Policy P21 goes on to identify Borough Views and sets out requirements for developments in a given view. Those noted below are of relevance to this assessment:		

1.83 Chapter 4 of the draft plan presents the local planning authority's area visions. Vision AV.11 covers the London Bridge area, which includes the site. It notes that development in London Bridge should, inter alia:

- *Attract global commerce with headquarter and local offices and build on its reputation for arts and crafts, food and trade while serving local needs through its town centre role;*
- *Support the creation of a distinctive and inspiring world class environment through a mix of inspiring new architecture, restored and reactivated warehouses and other heritage revealed with 'placemarks', public art and quality public realm that provides openness, connectivity and a 'green grid'. Greenery and innovations in environmental resilience should be incorporated into buildings;*
- *Build on the fabric of local alleyways and yards to create quiet, green routes with clean air;*
- *Strengthen the cultural offer of the area and diversify activities and shops;*
- *Make sure the new standard of London Bridge Station is upheld and the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark;*
- *Improve local accessibility and interchange at the station with enhanced walking, cycling, tube, bus and boat routes;*
- *Contribute towards the development of the Low Line, a new public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail;*
- *Support the development of vibrant new high streets on St Thomas Street, Crucifix Lane and Tooley Street, complementing the distinct character of nearby Bermondsey Street'.*

1.84 Vision AV.11 presents the London Bridge Area Vision Map on page 40. This indicates the site allocations lying within this area. St Thomas Street is the focus of three allocated sites – NSP49 (the focus of which is Guy's Hospital) just to the east of the the Site; NSP50 (which includes Capital House and Becket House); and NSP50 (which includes Vinegar Yard).

1.85 The section of the draft plan on Site Allocations (page 94 onwards) notes that *'Site Allocations are planning policies which apply to key potential development sites of strategic importance'.*

Liberty of The Mint Conservation Area Appraisal (2018)

1.86 The Liberty of The Mint Conservation Area Appraisal was published by Southwark Council in November 2018. After detailing the historic background of the area and its development, the document considers the character of the conservation area and its setting. It notes that the conservation area *'contains a varied section of Southwark townscape broadly dating from the later 19th century. This consists of a mix of industrial, residential, educational, transport and historic, mixed-use buildings fronting onto Borough High Street'.*

Baseline Conditions

1.87 The baseline conditions for the assessment have not altered and remain as set out in the December 2018 TVIBHA.

2 Potential Effects

Cumulative Effects during the Works

Views

2.1 Taking into account the additional cumulative schemes, if demolition and construction of the cumulative schemes were to occur simultaneously with that of the Development, the significance of the effect on views would be the same as that set out in the December 2018 TVIBHA. The magnitude of change during the Works would range from **‘insignificant’** to **‘major’**. Taking into account the sensitivity of the views as set out under ‘Views and Visual Impact Assessment’ in the December 2018 TVIBHA (ranging from ‘low’ sensitivity to ‘high’ sensitivity), the significance of effect would range from **‘no effect’** to **‘major’** (the latter in the case of views close to the Site and from Montague Close). The effect would be **‘adverse’** or **‘neutral’**, and **‘short to medium term’** in all cases.

Townscape

2.2 Taking into account the additional cumulative schemes, if demolition and construction of the cumulative schemes were to occur simultaneously with that of the Development, the significance of the effect on townscape would be the same as that set out in the December 2018 TVIBHA. The magnitude of change during the Works would be **‘moderate to major’** for TCA 1, and no more than **‘minor to moderate’** for all other TCAs. Taking into account the sensitivity of the TCAs as set out in the baseline section of the December 2018 TVIBHA (ranging from ‘low to medium’ to ‘high’ sensitivity overall), the significance of effect would be **‘moderate to major’** for TCA 1, **‘moderate’** for TCA 5, and no more than **‘minor’** for all other TCAs. The effect would be **‘adverse’** or **‘neutral’**, and **‘short to medium term’** in all cases.

Built Heritage

2.3 In terms of built heritage, taking into account the additional cumulative schemes, the effects during the Works would remain as set out in the December 2018 TVIBHA. There will be adverse effects (both direct and indirect) but these will be temporary and necessary to deliver the scheme.

Cumulative Effects Once the Development is Complete and Occupied

Views

2.4 As noted in the previous chapter, the December 2018 TVIBHA included an assessment of the visual impact of the Development from 62 viewpoints. This Addendum considers the effect of the Development under the revised cumulative condition on a subset of those viewpoints. The effect on these views is illustrated on the following pages. This presents each view ‘as existing’ and ‘as proposed’, followed by the revised cumulative condition.

2.5 The new cumulative schemes under consideration are represented in wireline outline (dotted where obscured by intervening buildings) in different colours as follows:

- Capital House, 42-46 Weston Street – purple wireline
- 2-4 Melior Place – green wireline
- 40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowsfields – magenta wireline
- Vinegar Yard – turquoise wireline
- Becket House, 60 St Thomas Street – yellow wireline

2.6 The assessment of effect on these views under the revised cumulative condition follows the views images (see page 200 of this Addendum).

The Views



1 | LVMF 1A.1 | Alexandra Palace: the viewing terrace - south-western section



2 | LVMF 1A.2 | Alexandra Palace: the viewing terrace - approaching from the north-eastern car park



3 | LVMF 2A.1 | Parliament Hill: the summit - looking toward St Paul's Cathedral



3.1 | LVMF 2A.1 | Parliament Hill: the summit - looking toward St Paul's Cathedral | Telephoto



4 | LVMF 2B.1 | Parliament Hill: east of the summit - at the prominent oak tree



5 | LVMF 3A.1 | Kenwood: the viewing gazebo - in front of the orientation board



5.1 | LVMF 3A.1 | Kenwood: the viewing gazebo - in front of the orientation board | Telephoto



6 | LVMF 4A.1 | Primrose Hill: the summit - looking towards St Paul's Cathedral



7 | LVMF 5A.2 | Greenwich Park: the General Wolfe statue - north-east of the statue



8 | LVMF 6A.1 | Blackheath Point - near the orientation board



9 | LBS Borough View 1 | North facing view from One Tree Hill



9.1 | LBS Borough View 1 | North facing view from One Tree Hill | Telephoto



10 | LBS Borough View 2 | St Paul's Cathedral from Nunhead Cemetery



10.1 | LBS Borough View 2 | St Paul's Cathedral from Nunhead Cemetery | Telephoto



12 | LVMF 10A.1 | Tower Bridge: Upstream - The North Bastion



13 | St Katharine's Dock, at Girl with a Dolphin Fountain



14 | LVMF 12B.1 | Southwark Bridge: downstream - close to the City of London bank



15 | Millennium Bridge (centre)



18 | LVMF 17B.1 | Golden Jubilee/Hungerford Footbridges: downstream - crossing the Westminster bank



19 | LVMF 17B.2 | Golden Jubilee/Hungerford Footbridges: downstream - close to the Westminster bank



22 | Victoria Embankment, opposite Temple Gardens



24 | London Bridge: upstream - at the City of London bank



25 | Old Billingsgate Walk



26 | Tower of London: Inner Curtain Wall Walkway



27 | Tower of London: Inner Ward, north of the White Tower



29 | Tower of London Local Setting Study View 8: The Royal Mint



31 | Tower Bridge Road / Queen Elizabeth Street



32 | Saint Mary Magdalen Churchyard



33 | Leathermarket Gardens



34 | Weston Street / Guy Street



35 | Tabard Gardens



37 | Southwark Bridge Road outside no.92



38 | Red Cross Garden (middle)



41 | Southwark Street / Southwark Bridge Road



52 | St Thomas Street, outside St. Thomas' Church



53 | Bedale Street / Borough Market



54 | Borough High Street / Bedale Street



55 | Cathedral Street / Winchester Walk



56.2 | Southwark Cathedral | north-west corner 1



56.3 | Southwark Cathedral | north-west corner 2



56.6 | Southwark Cathedral: Millennium Courtyard | Panorama



57 | London Bridge, outside Glazier's Hall



58 | Islington Local View 4: Farringdon Lane, near Ray Street Bridge



59 | Ray Street Bridge, corner with Farringdon Lane



60 | Islington Local View 3: Vine Street Bridge



61 | Islington Local View 1: Clerkenwell Road, bridge across Farringdon



62 | Trinity Church Square, south-west corner

View	Description	MH Reference	Type	Method	Camera Location			Camera	Lens	HFOV		Photo date/time	Bearing	distance (km)
					Eastings	Northing	Height			Photo	Image			
1	LVMF 1A.1 Alexandra Palace: the viewing terrace – south-western section	3090	AVR1	Verified	529611.2	189963.7	94.61	Canon EOS 5D Mark III DSLR	40mm	48.8	48.8	26/04/2018 18:15	162.4	10.3
2	LVMF 1A.2 Alexandra Palace: the viewing terrace – approaching from the north-eastern car park	0690	AVR1	Verified	529702.5	190064.6	94.00	Canon EOS 5D Mark III DSLR	35mm	54.4	54.4	02/03/2015 17:20	163.1	10.4
3	LVMF 2A.1 Parliament Hill: the summit – looking toward St Paul's Cathedral	3010	AVR3	Verified	527665.4	186131.5	98.10	Canon EOS 5D Mark II DSLR	40mm	48.6	48.6	22/06/2018 17:16	139.8	7.8
3.1	LVMF 2A.1 Parliament Hill: the summit – looking toward St Paul's Cathedral Telephoto	3020	AVR3	Verified	527665.4	186131.5	98.10	Canon EOS 5D Mark II DSLR	300mm	6.9	6.9	22/06/2018 17:25	139.8	7.8
4	LVMF 2B.1 Parliament Hill: east of the summit – at the prominent oak tree	3240	AVR3	Verified	528043.1	186154.5	71.61	Canon EOS 5D Mark II DSLR	40mm	48.6	48.6	06/08/2018 17:32	142.1	7.6
5	LVMF 3A.1 Kenwood: the viewing gazebo – in front of the orientation board	3300	AVR3	Verified	527270.1	187486.2	114.15	Canon EOS 5D Mark II DSLR	40mm	48.8	48.8	06/08/2018 18:35	143.4	9.1
5.1	LVMF 3A.1 Kenwood: the viewing gazebo – in front of the orientation board Telephoto	3310	AVR3	Verified	527270.1	187486.2	114.15	Canon EOS 5D Mark II DSLR	300mm	6.9	6.9	06/08/2018 18:39	143.4	9.1
6	LVMF 4A.1 Primrose Hill: the summit – looking towards St Paul's Cathedral	3000	AVR1	Verified	527657.3	183893.0	68.29	Canon EOS 5D Mark II DSLR	40mm	48.6	48.6	25/01/2018 15:43	126.5	6.3
7	LVMF 5A.2 Greenwich Park: the General Wolfe statue – north-east of the statue	0720	AVR1	Verified	538936.1	177334.5	48.80	Canon EOS 5D Mark III DSLR	35mm	54.3	54.3	24/02/2017 09:42	294.3	6.8
8	LVMF 6A.1 Blackheath Point – near the orientation board	4000	AVR1	Verified	538238.2	176823.1	47.61	Canon EOS 5D Mark II DSLR	70mm	28.0	28.0	13/06/2018 11:38	301.1	6.4
9	LBS Borough View 1 North facing view from One Tree Hill	3030	AVR1	Verified	535430.0	174189.3	91.88	Canon EOS 5D Mark II DSLR	24mm	73.7	73.1	16/01/2018 13:16	335.6	6.5
9.1	LBS Borough View 1 North facing view from One Tree Hill Telephoto	3040	AVR1	Verified	535430.1	174189.4	91.88	Canon EOS 5D Mark II DSLR	300mm	6.9	6.9	16/01/2018 13:08	335.6	6.5
10	LBS Borough View 2 St Paul's Cathedral from Nunhead Cemetery	3050	AVR1	Verified	535367.0	175378.2	60.99	na	na	73.5	73.2	na	331.0	5.5
10.1	LBS Borough View 2 St Paul's Cathedral from Nunhead Cemetery Telephoto	3060	AVR1	Verified	535367.1	175378.1	60.99	Canon EOS 5D Mark II DSLR	300mm	7.0	7.0	16/01/2018 10:27	331.0	5.5
12	LVMF 10A.1 Tower Bridge: Upstream – The North Bastion	0460	AVR3	Verified	533665.0	180311.4	14.82	Canon EOS 5D Mark III DSLR	24mm	74.2	73.2	06/04/2017 09:44	260.0	1.0
13	St Katharine's Dock, at Girl with a Dolphin Fountain	8800	AVR1	Verified	533790.0	180355.1	6.74	Canon EOS 5D Mark II DSLR	24mm	74.1	73.5	22/09/2017 09:16	258.9	1.1
14	LVMF 12B.1 Southwark Bridge: downstream – close to the City of London bank	0470	AVR1	Verified	532386.3	180647.1	13.93	Canon EOS 5D Mark III DSLR	24mm	74.3	73.2	03/04/2017 17:40	146.1	0.6
15	Millennium Bridge (centre)	2810	AVR1	Verified	532052.5	180687.5	15.32	Canon EOS 5D Mark II DSLR	24mm	74.2	73.2	28/11/2017 14:12	128.9	0.9
18	LVMF 17B.1 Golden Jubilee/Hungerford Footbridges: downstream – crossing the Westminster bank	0760	AVR1	Verified	530470.6	180325.7	13.58	Canon EOS 5D Mark III DSLR	24mm	74.3	73.1	07/03/2017 14:45	94.6	2.3
19	LVMF 17B.2 Golden Jubilee/Hungerford Footbridges: downstream – close to the Westminster bank	0770	AVR1	Verified	530521.7	180301.9	13.64	Canon EOS 5D Mark III DSLR	24mm	74.3	73.1	07/03/2017 15:12	94.0	2.2
22	Victoria Embankment, opposite Temple Gardens	0910	AVR1	Verified	531201.9	180798.4	6.26	Canon EOS 5D Mark II DSLR	24mm	73.2	73.2	10/08/2017 16:50	113.2	1.7
24	London Bridge: upstream – at the City of London bank	2600	AVR3	Verified	532815.3	180630.5	15.55	Canon EOS 5D Mark II DSLR	24mm	74.4	73.3	22/09/2017 08:24	190.8	0.5
25	Old Billingsgate Walk	1500	AVR3	Verified	533086.6	180586.9	7.16	Canon EOS 5D Mark II DSLR	24mm	74.1	73.4	22/09/2017 08:53	219.5	0.6
26	Tower of London: Inner Curtain Wall Walkway	3400	AVR3	Verified	533624.9	180474.1	13.59	Canon EOS 5D Mark II DSLR	24mm	73.6	73.3	07/08/2018 08:49	250.0	1.0
27	Tower of London: Inner Ward, north of the White Tower	3080	AVR3	Verified	533616.8	180591.8	13.32	Canon EOS 5D Mark II DSLR	24mm	73.4	73.1	12/12/2017 09:42	243.5	1.0
29	Tower of London Local Setting Study View 8: The Royal Mint	0930	AVR3	Verified	533794.8	180690.1	13.65	Canon EOS 5D Mark II DSLR	24mm	73.7	73.1	29/04/2017 08:02	243.1	1.2
31	Tower Bridge Road / Queen Elizabeth Street	5000	AVR1	Verified	533565.6	179960.8	7.52	Canon EOS 5D Mark II DSLR	24mm	74.3	73.3	22/09/2017 10:06	282.4	0.9
32	Saint Mary Magdalen Churchyard	5100	AVR1	Verified	533376.6	179401.8	6.46	Canon EOS 5D Mark II DSLR	24mm	74.3	73.8	22/09/2017 10:19	318.7	1.0
33	Leathermarket Gardens	1440	AVR1	Verified	533123.9	179691.5	4.72	Canon EOS 5D Mark II DSLR	24mm	73.9	73.4	22/09/2017 10:35	318.6	0.6
34	Weston Street / Guy Street	5300	AVR3	Verified	532967.2	179777.1	4.92	Canon EOS 5D Mark II DSLR	24mm	74.3	73.1	22/09/2017 10:58	326.5	0.4
35	Tabard Gardens	1420	AVR1	Verified	532675.1	179507.1	5.64	Canon EOS 5D Mark II DSLR	24mm	74.0	73.5	22/09/2017 11:21	4.3	0.6
37	Southwark Bridge Road outside no.92	2820	AVR1	Verified	532171.1	179917.9	5.81	Canon EOS 5D Mark II DSLR	24mm	74.1	73.1	28/11/2017 13:32	67.5	0.6
38	Red Cross Garden (middle)	2830	AVR1	Verified	532339.5	179952.2	5.93	Canon EOS 5D Mark II DSLR	24mm	74.2	73.2	28/11/2017 13:06	63.2	0.4
41	Southwark Street / Southwark Bridge Road	2100	AVR1	Verified	532253.7	180156.7	5.48	Canon EOS 5D Mark II DSLR	24mm	73.8	73.1	24/09/2017 15:38	91.3	0.5
52	St Thomas Street, outside St. Thomas' Church	2400	AVR3	Verified	532755.2	180177.4	6.28	Canon EOS 5D Mark II DSLR	24mm	73.7	73.0	03/10/2017 09:07	225.7	0.0
53	Bedale Street / Borough Market	1900	AVR3	Verified	532674.1	180218.1	7.29	Canon EOS 5D Mark II DSLR	24mm	53.4	52.6	24/09/2017 16:02	145.8	0.1
54	Borough High Street / Bedale Street	2000	AVR3	Verified	532689.4	180212.9	7.14	Canon EOS 5D Mark II DSLR	24mm	75.1	73.3	24/09/2017 16:09	153.3	0.1
55	Cathedral Street / Winchester Walk	2500	AVR1	Verified	532629.3	180310.1	6.33	Canon EOS 5D Mark II DSLR	24mm	73.6	73.2	28/09/2017 16:42	150.3	0.2
56.2	Southwark Cathedral north-west corner 1	2520	AVR3	Verified	532656.5	180371.3	6.09	Canon EOS 5D Mark II DSLR	24mm	73.4	73.0	28/09/2017 16:54	163.6	0.2
56.3	Southwark Cathedral north-west corner 2	2530	AVR3	Verified	532662.2	180376.0	6.23	Canon EOS 5D Mark II DSLR	24mm	73.4	73.1	28/09/2017 17:24	165.2	0.2
56.6	Southwark Cathedral: Millennium Courtyard Panorama	3600	AVR3	Estimated	532687.4	180351.8	6.29	na	na	65.0	65.0	na	170.2	0.2
57	London Bridge, outside Glazier's Hall	2700	AVR3	Verified	532766.0	180376.0	14.01	Canon EOS 5D Mark II DSLR	24mm	73.7	73.1	22/09/2017 08:15	190.6	0.2
58	Islington Local View 4: Farringdon Lane, near Ray Street Bridge	1360	AVR3	Verified	531366.6	182194.2	14.77	Canon EOS 5D Mark II DSLR	24mm	73.3	72.6	06/10/2017 16:22	146.5	2.5
59	Ray Street Bridge, corner with Farringdon Lane	1340	AVR3	Verified	531386.0	182169.6	13.99	Canon EOS 5D Mark II DSLR	24mm	73.3	73.0	06/10/2017 16:15	146.5	2.4
60	Islington Local View 3: Vine Street Bridge	1320	AVR3	Verified	531436.8	182093.3	15.00	Canon EOS 5D Mark II DSLR	24mm	73.6	72.9	06/10/2017 16:37	146.6	2.3
61	Islington Local View 1: Clerkenwell Road, bridge across Farringdon	1300	AVR3	Verified	531451.4	182072.7	15.54	Canon EOS 5D Mark II DSLR	24mm	73.5	73.0	06/10/2017 16:00	146.6	2.3
62	Trinity Church Square, south-west corner	5340	AVR3	Verified	532356.8	179453.8	6.07	Canon EOS 5D Mark II DSLR	24mm	74.1	73.2	20/02/2018 14:34	27.9	0.8





[View location map](#)



Existing

3462_3091





Proposed

3462_3095



LVMF 1A.1 | Alexandra Palace: the viewing terrace - south-western section

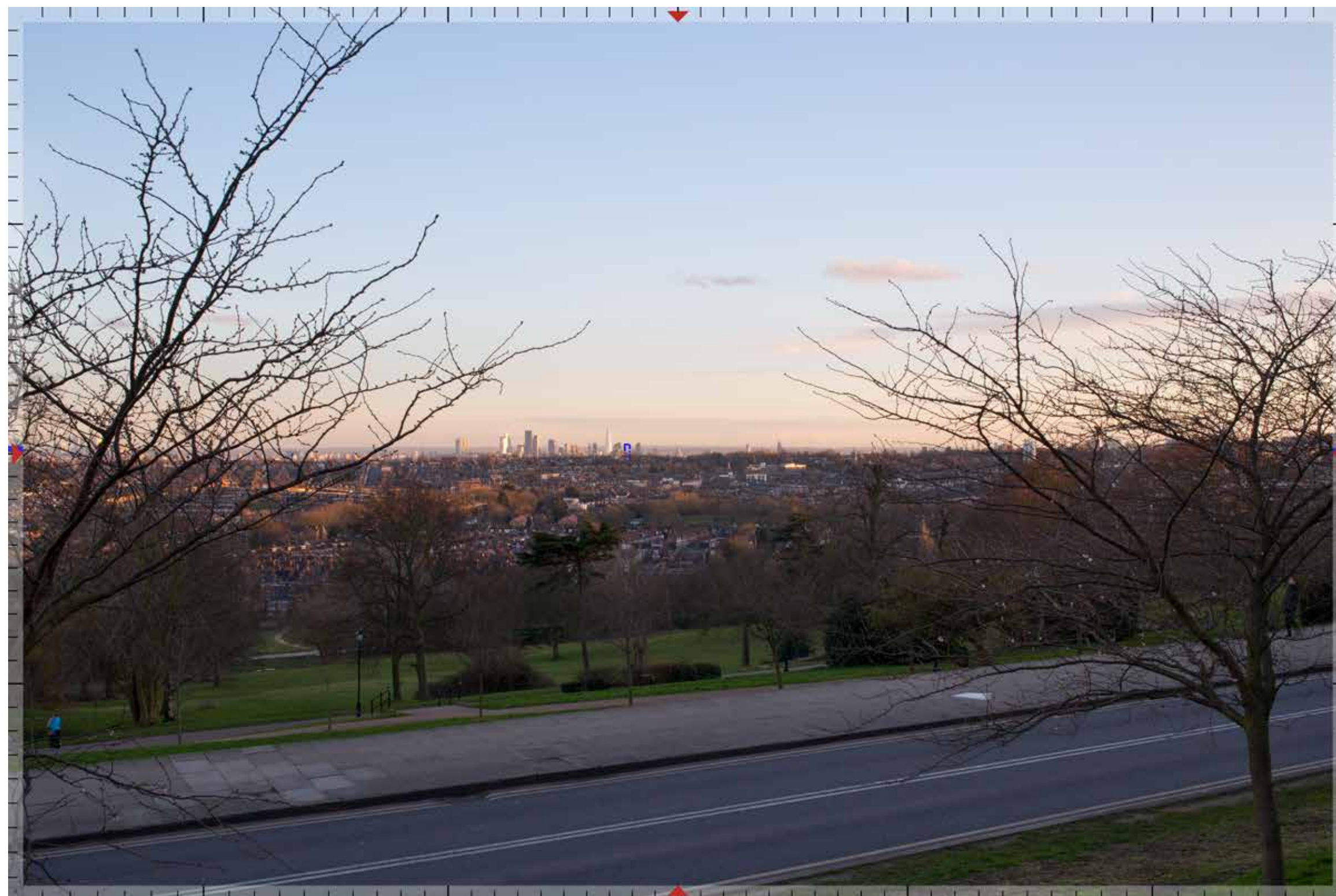


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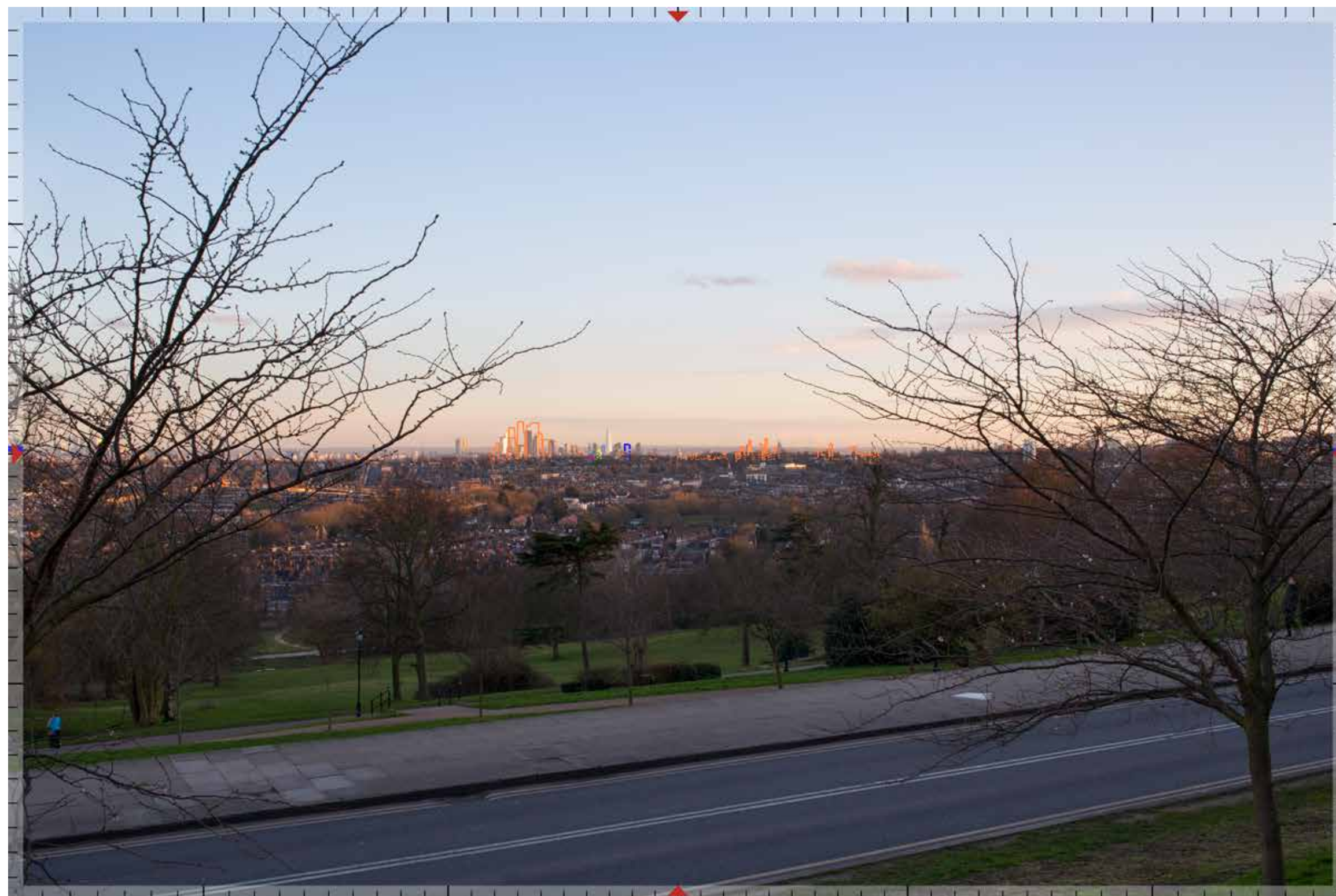
3462_3096



Existing



Proposed



Updated cumulative

3462_0696



Existing



3462_3011



Proposed



3/62_3016

Updated cumulative



Existing



Proposed

3/62_3025



3.1

LVMF 2A.1 | Parliament Hill: the summit - looking toward St Paul's Cathedral | Telephoto



Updated cumulative

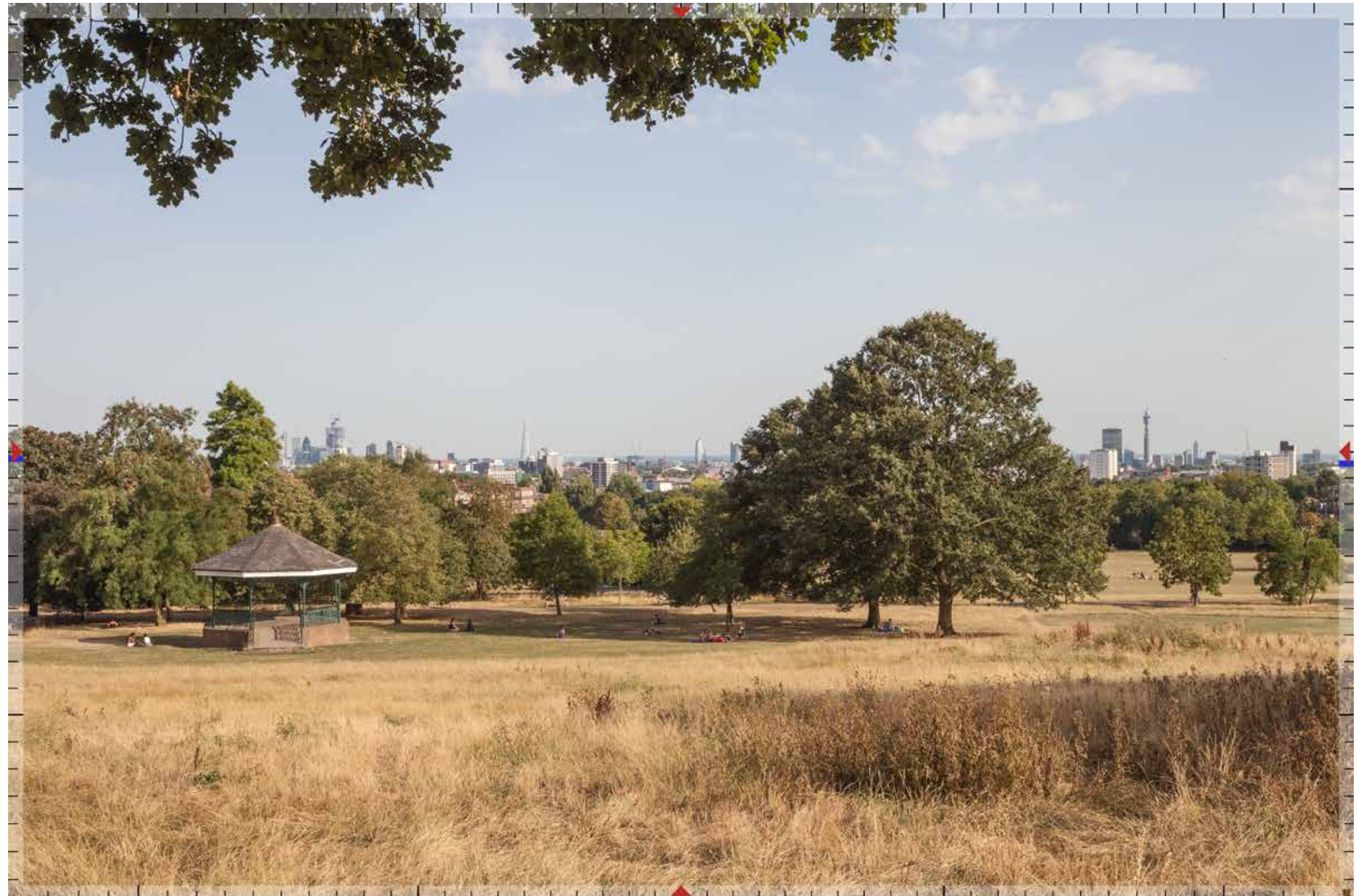
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Existing



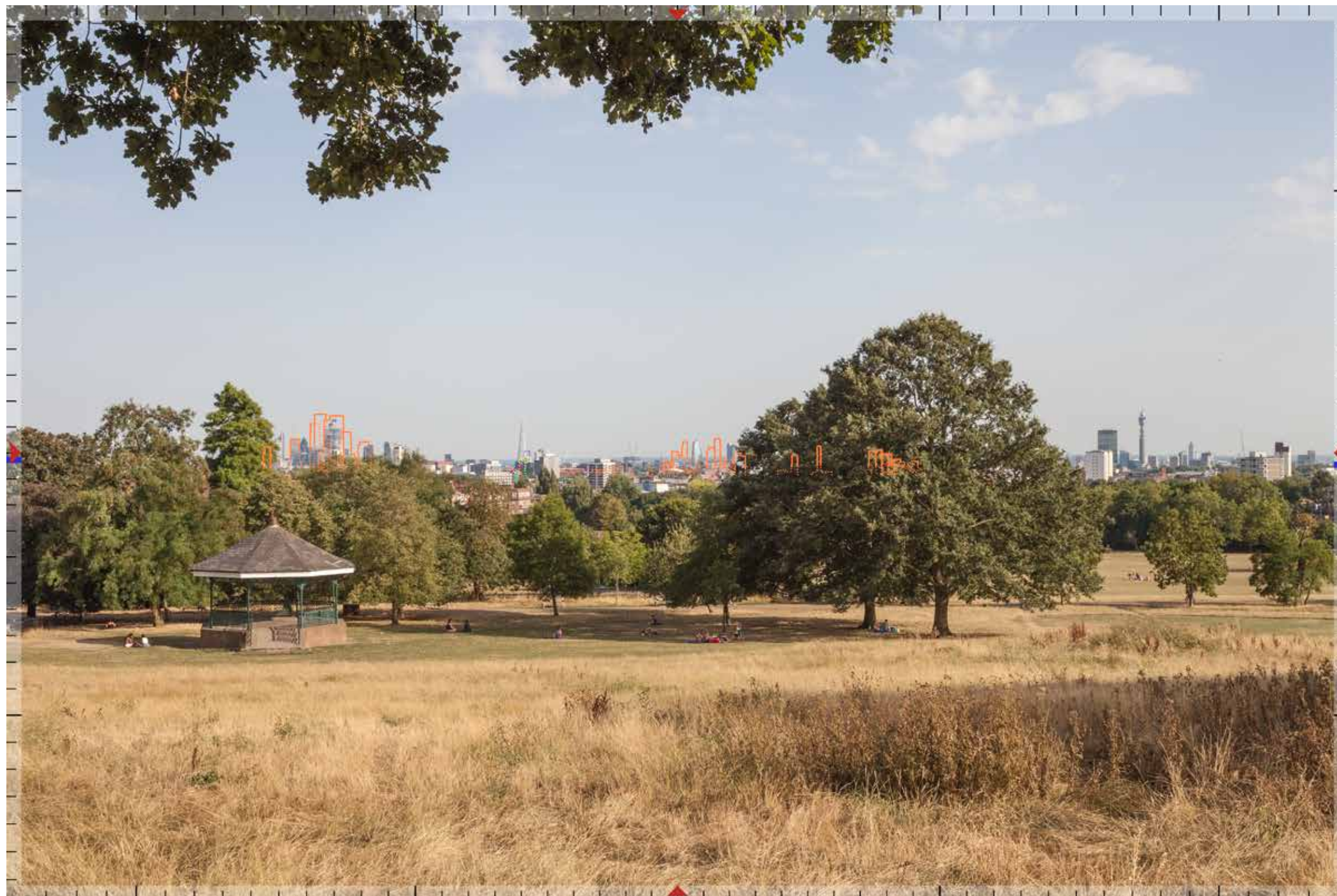
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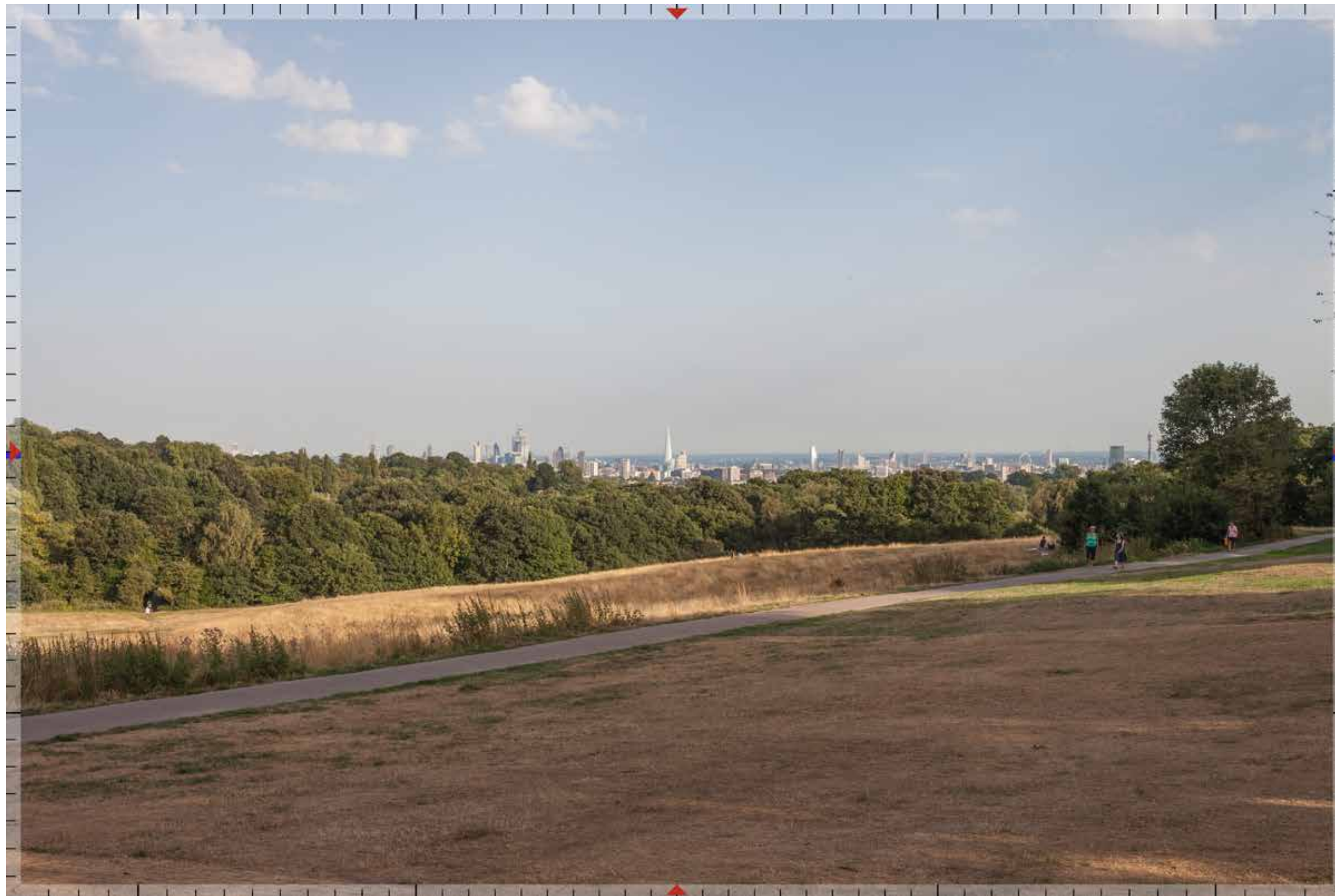
Proposed



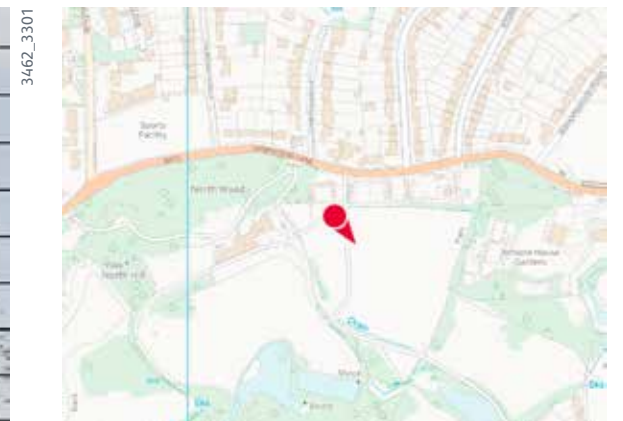
LVMF 2B.1 | Parliament Hill: east of the summit - at the prominent oak tree



Updated cumulative



Existing



3462_3301



Proposed

3462_3305



Updated cumulative

3462_3306



Existing



3462_3311



Proposed

3/62_3315



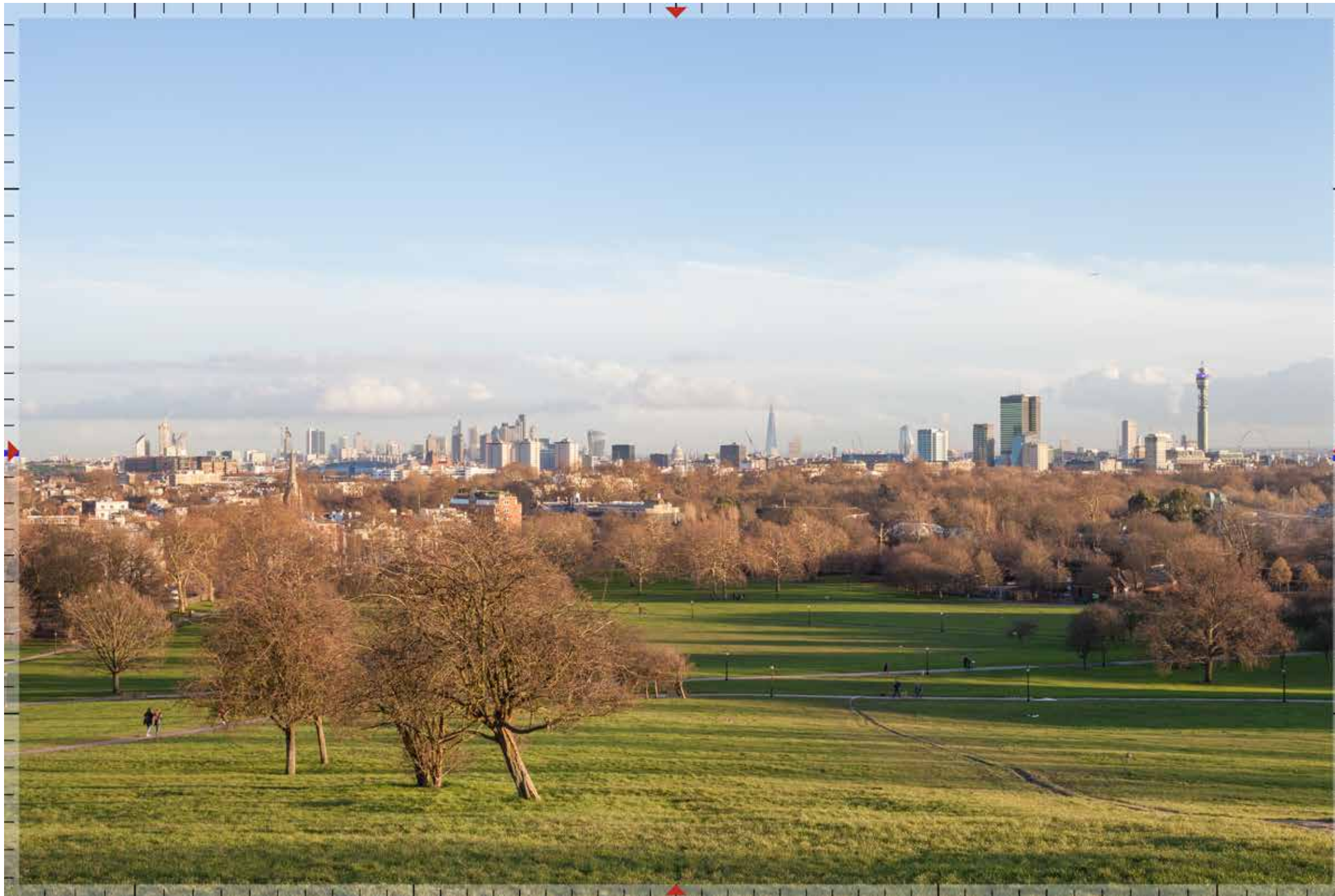
5.1

LVMF 3A.1 | Kenwood: the viewing gazebo - in front of the orientation board | Telephoto

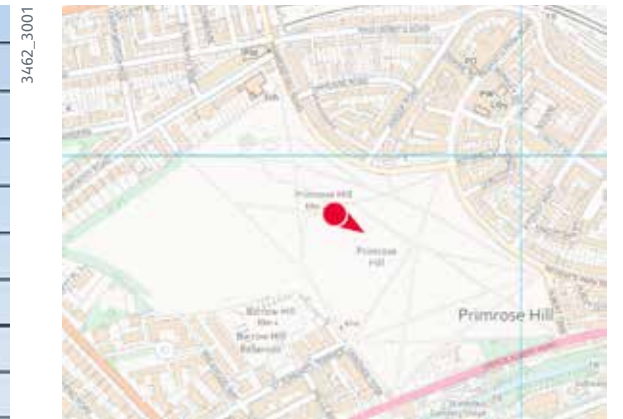


Updated cumulative

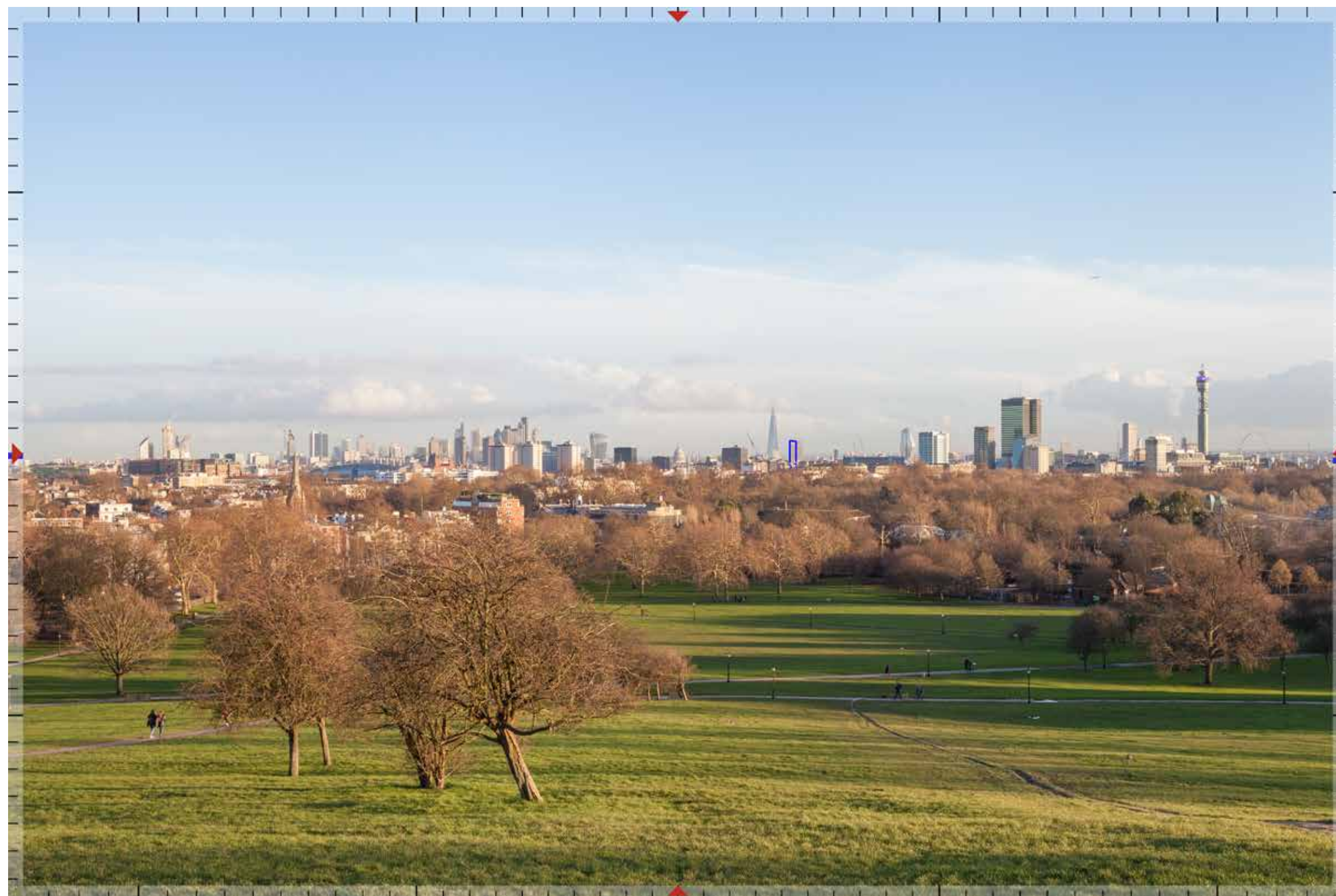
3/62_3316



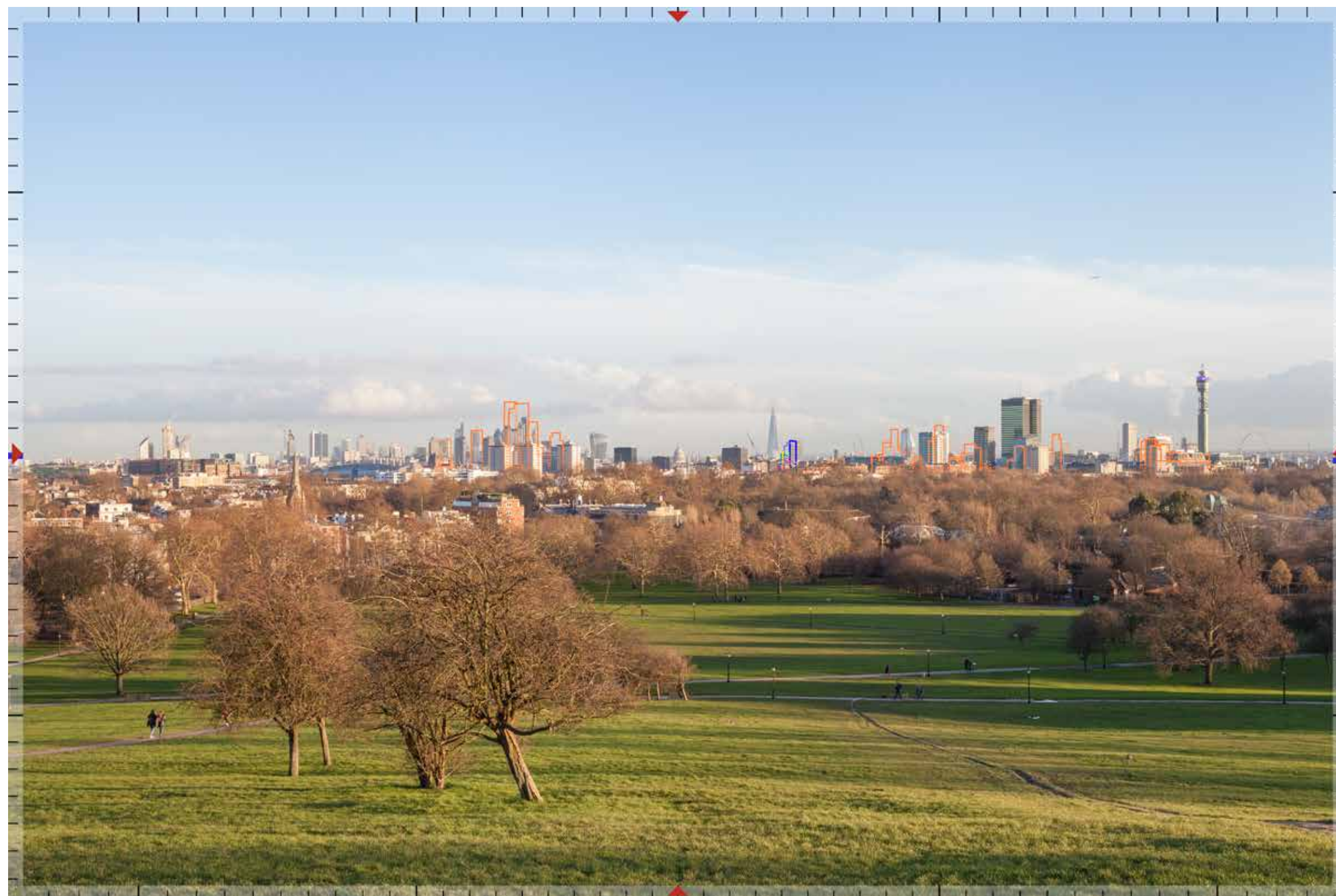
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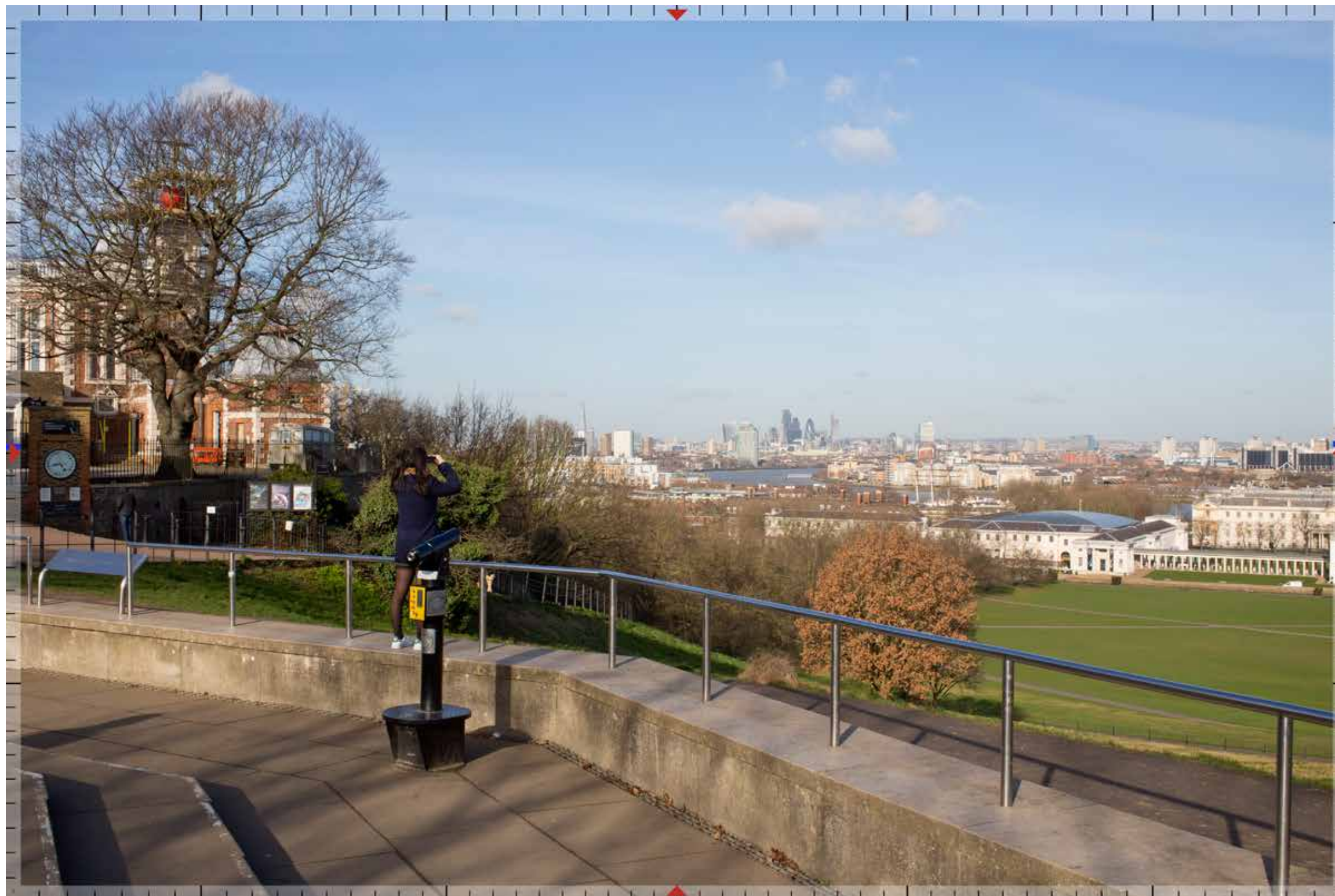
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Proposed



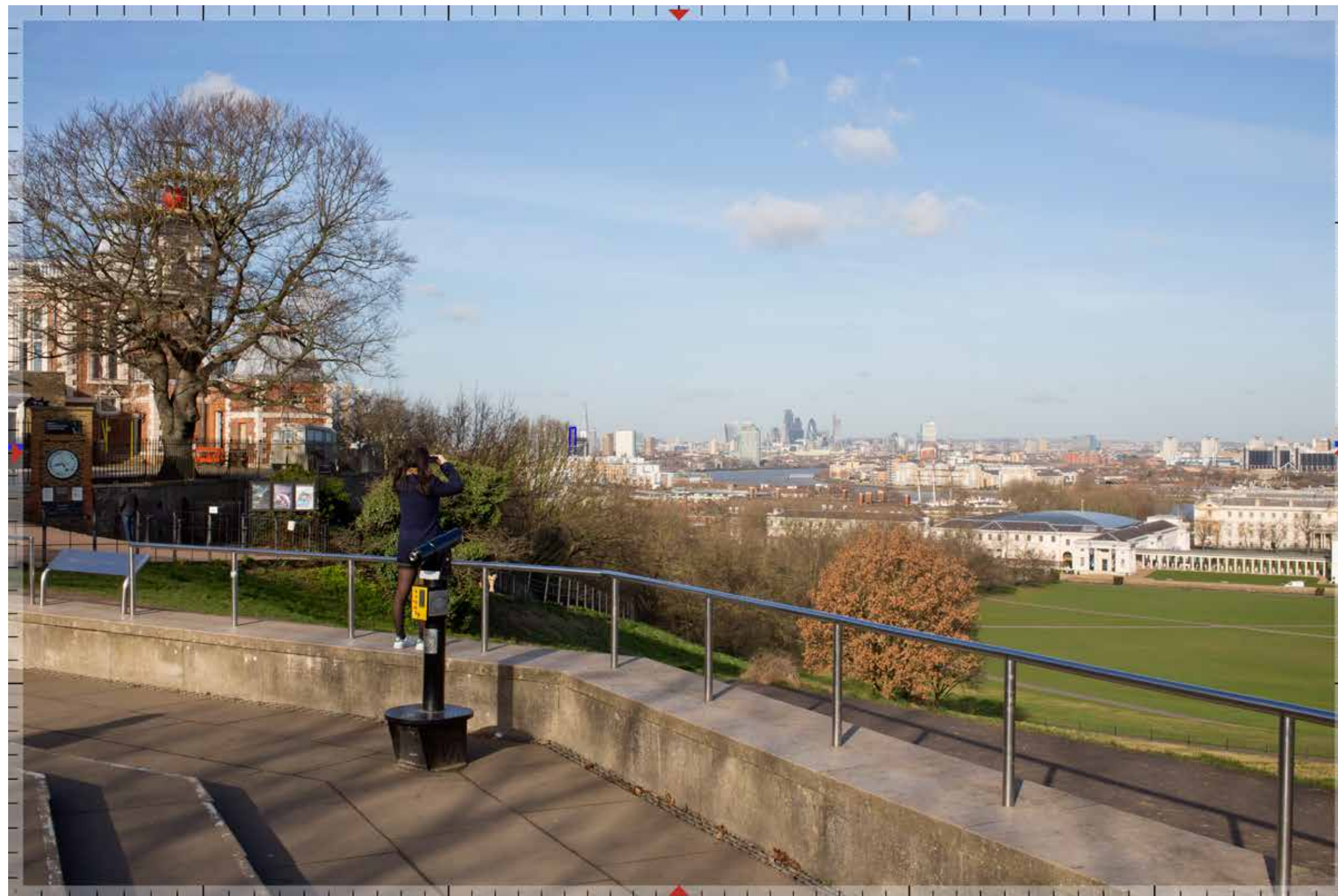
Updated cumulative



Existing

3462_0721





Proposed



LVMF 5A.2 | Greenwich Park: the General Wolfe statue - north-east of the statue

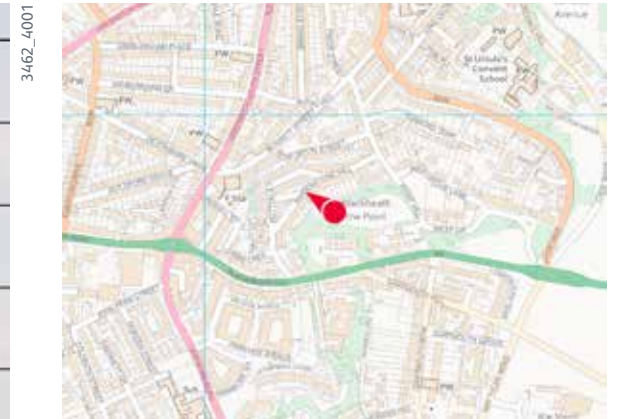


Updated cumulative

3462_0726



Existing



3462_4001



Proposed



LVMF 6A.1 | Blackheath Point - near the orientation board



Updated cumulative



Existing



3462_3031



Proposed

3/62_3035

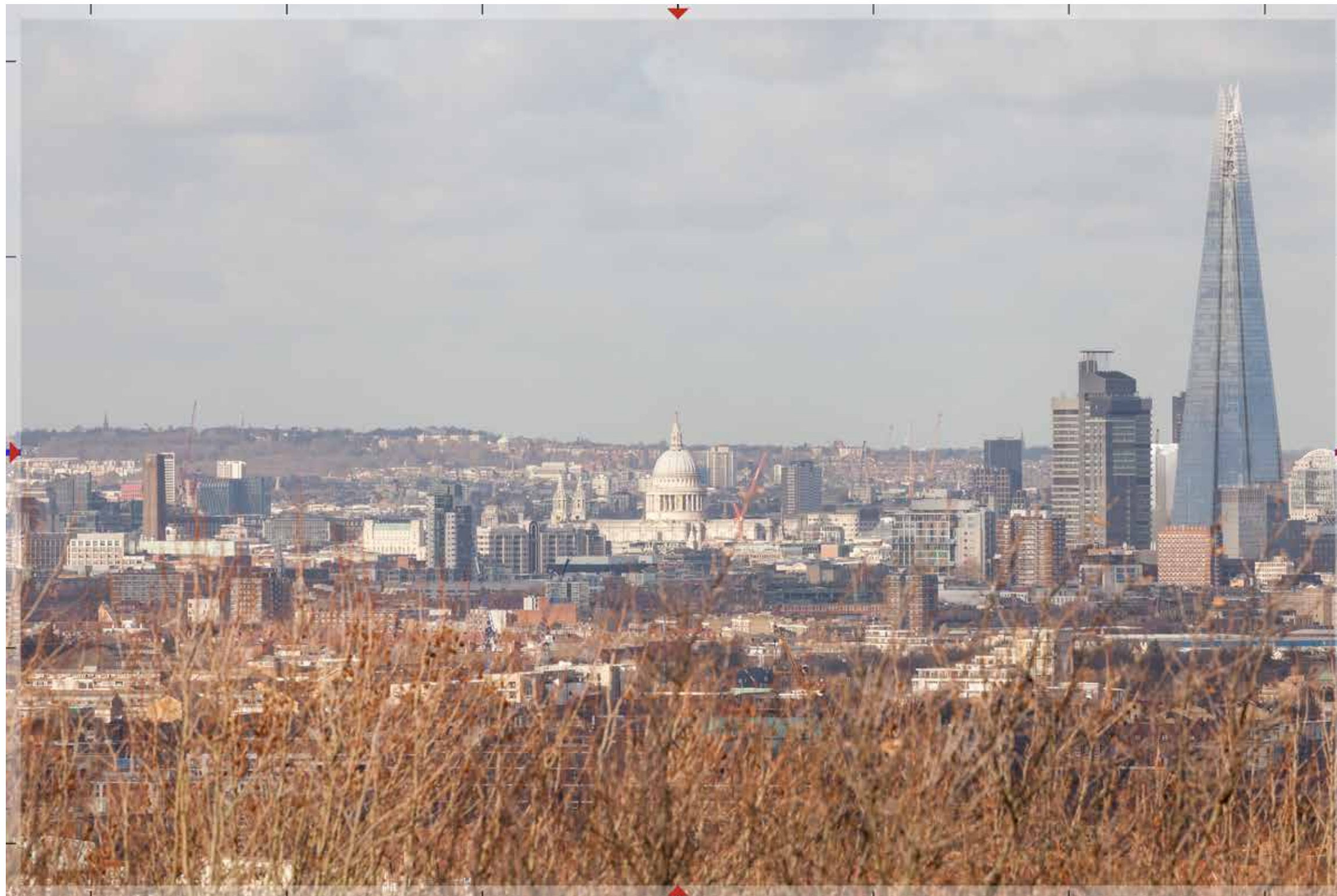


LBS Borough View 1 | North facing view from One Tree Hill



Updated cumulative

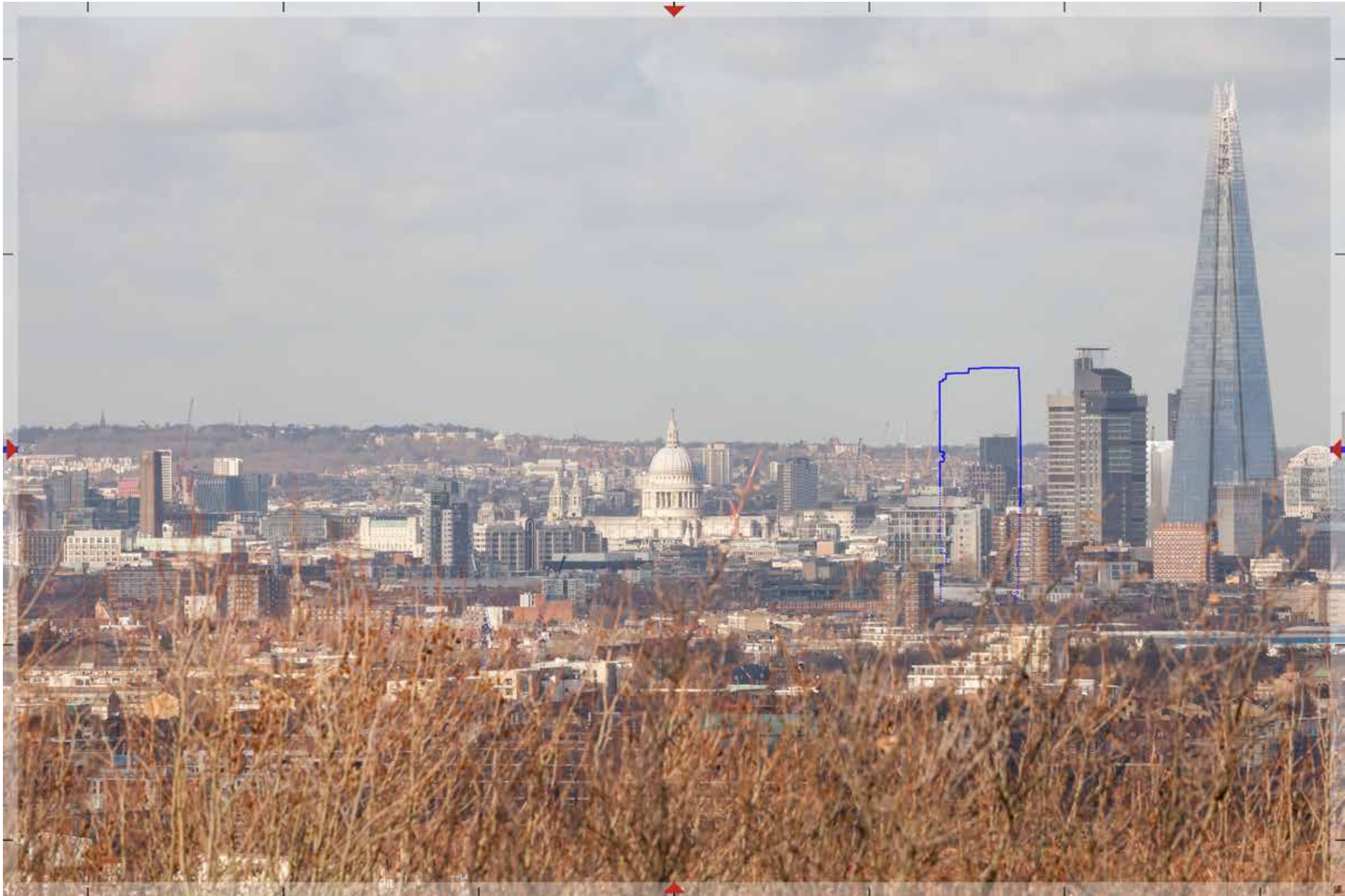
3462_3036



Existing



3462_3041



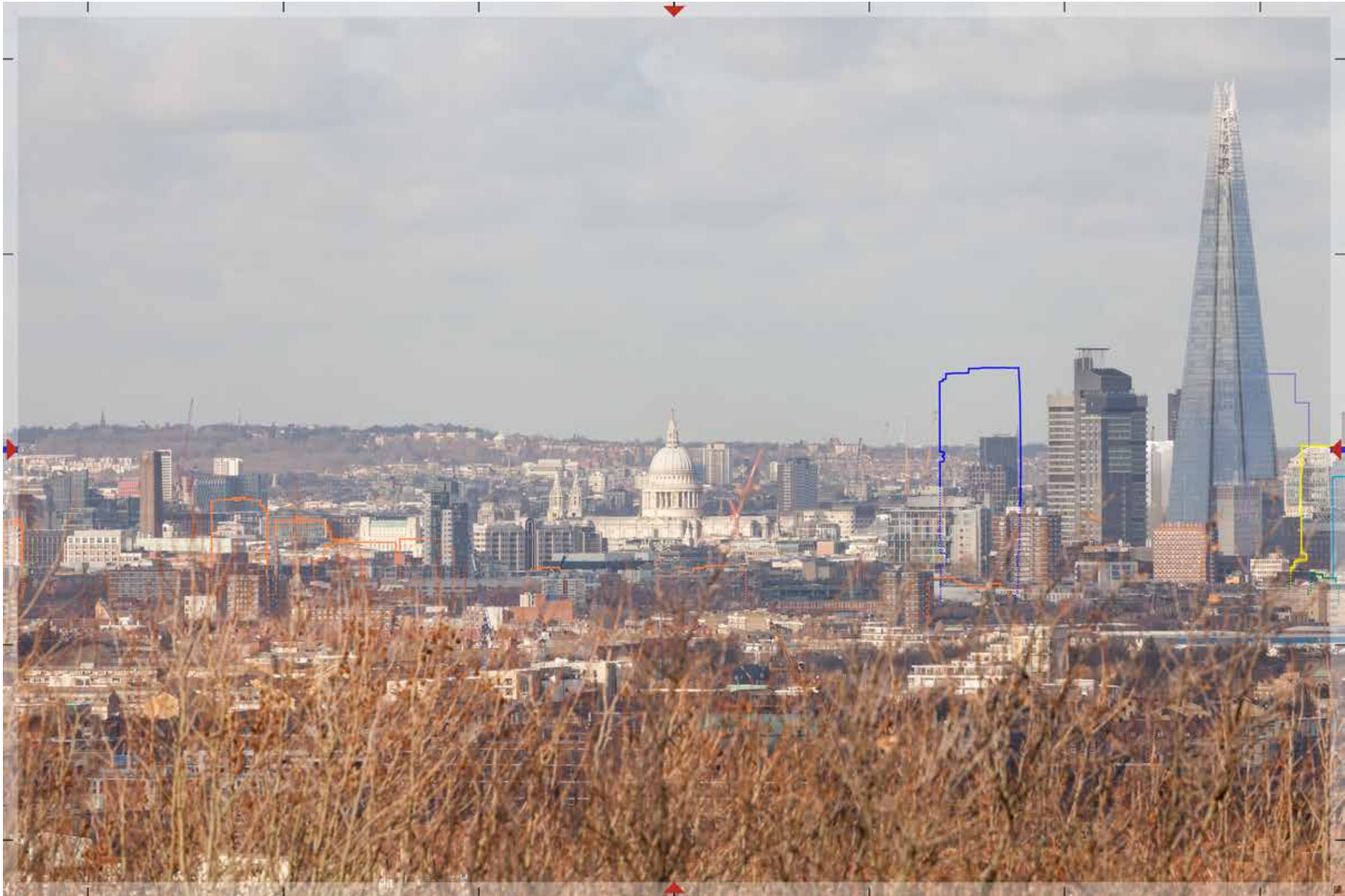
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Proposed



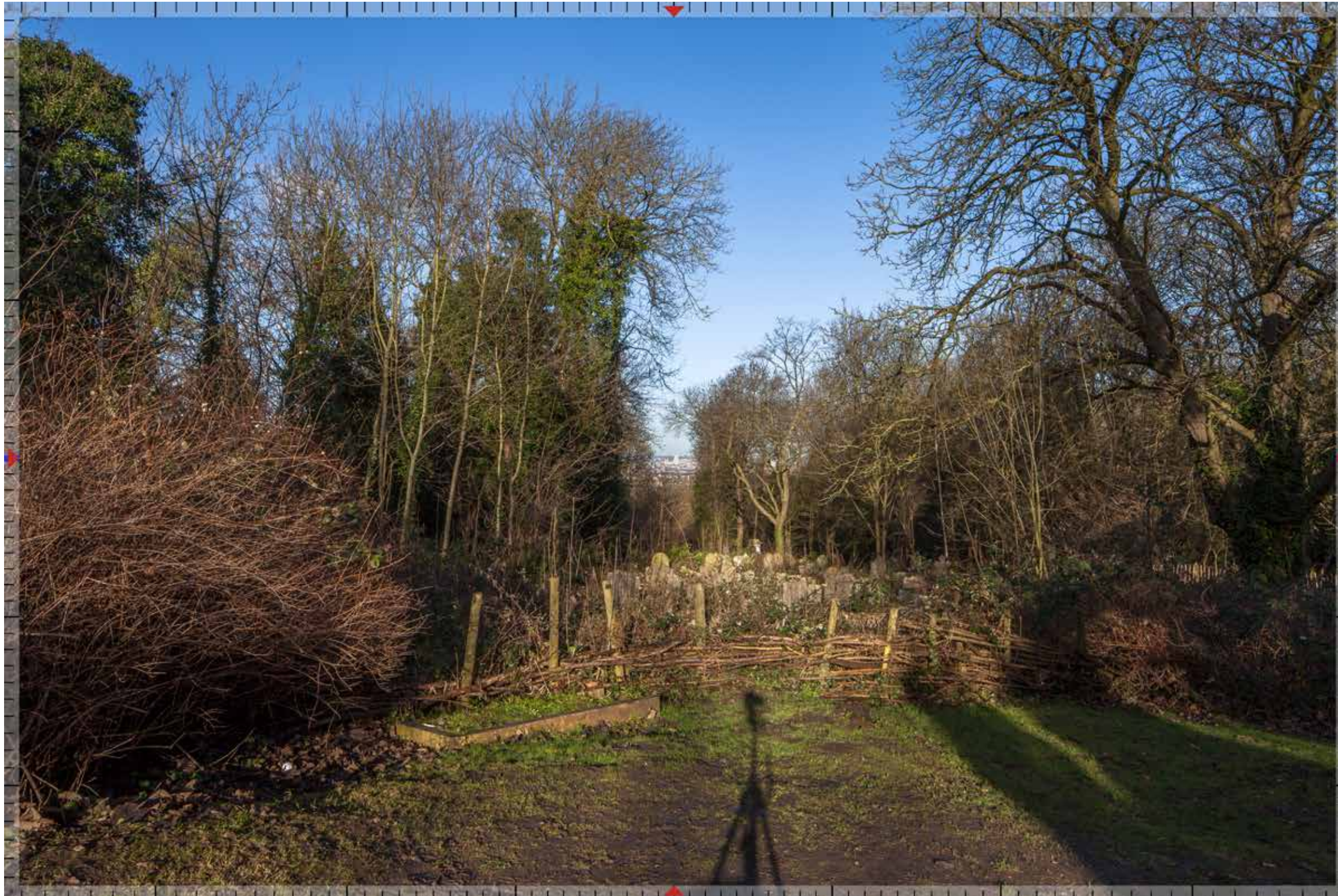
9.1

LBS Borough View 1 | North facing view from One Tree Hill | Telephoto



Updated cumulative

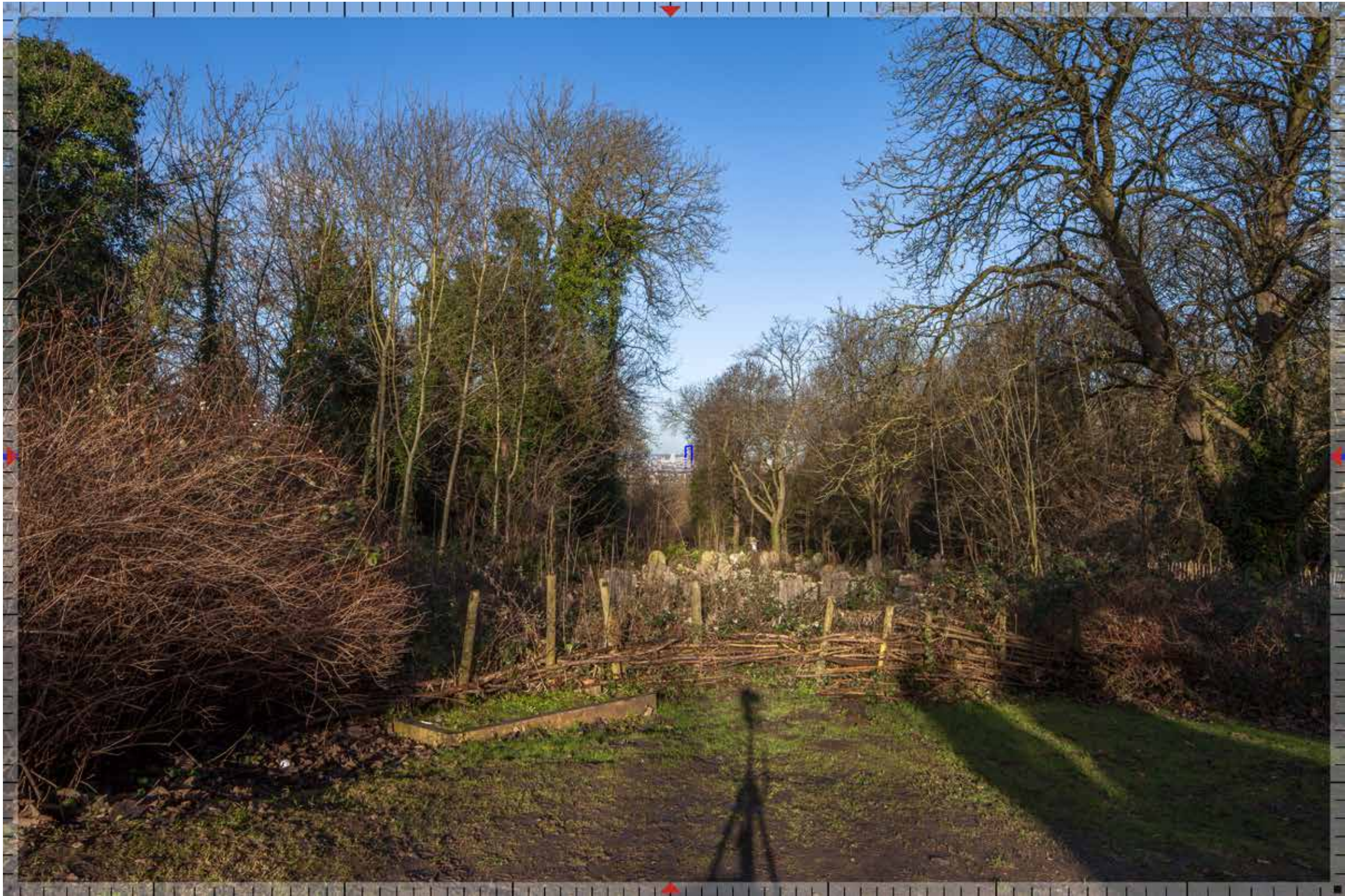
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3462_3051

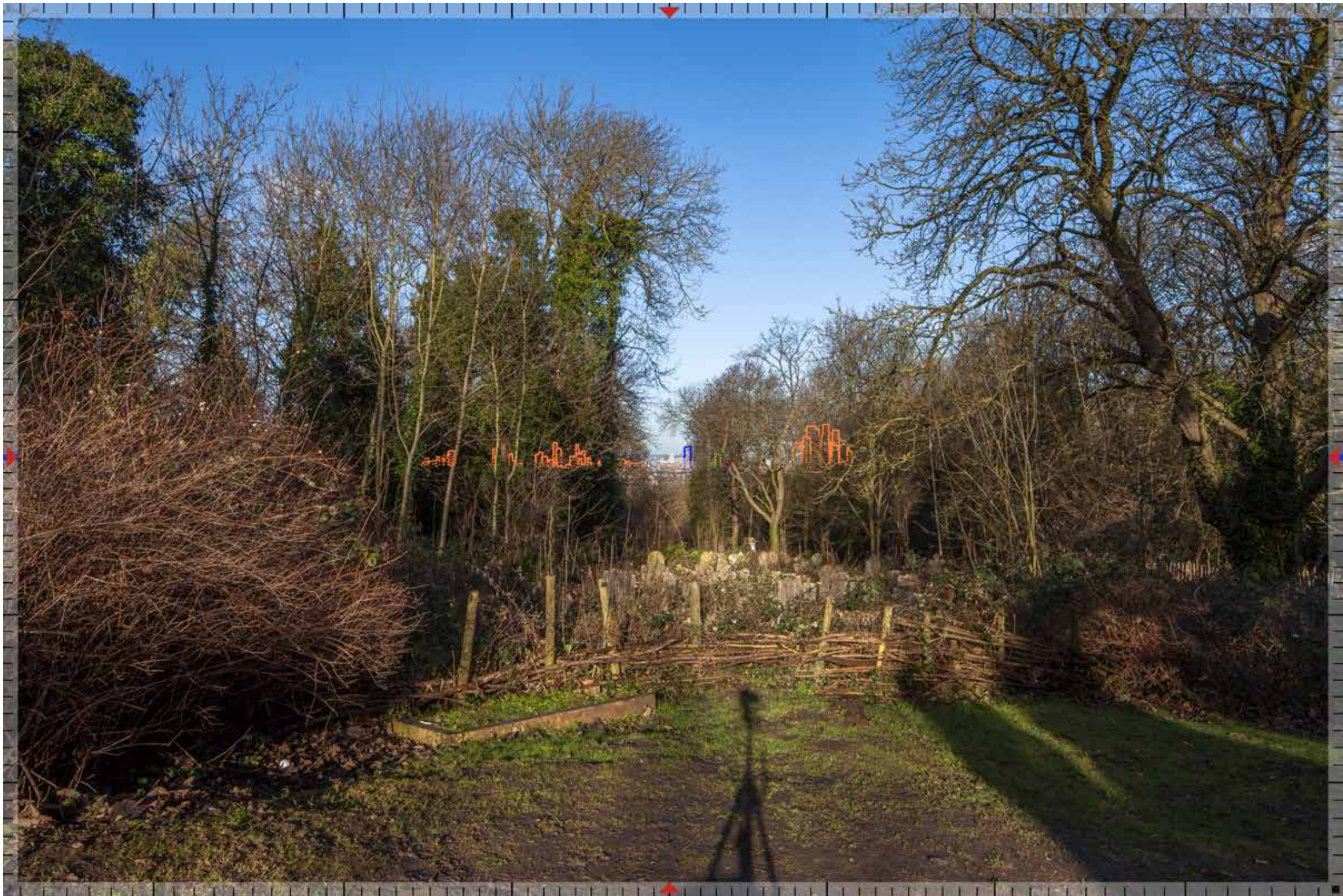


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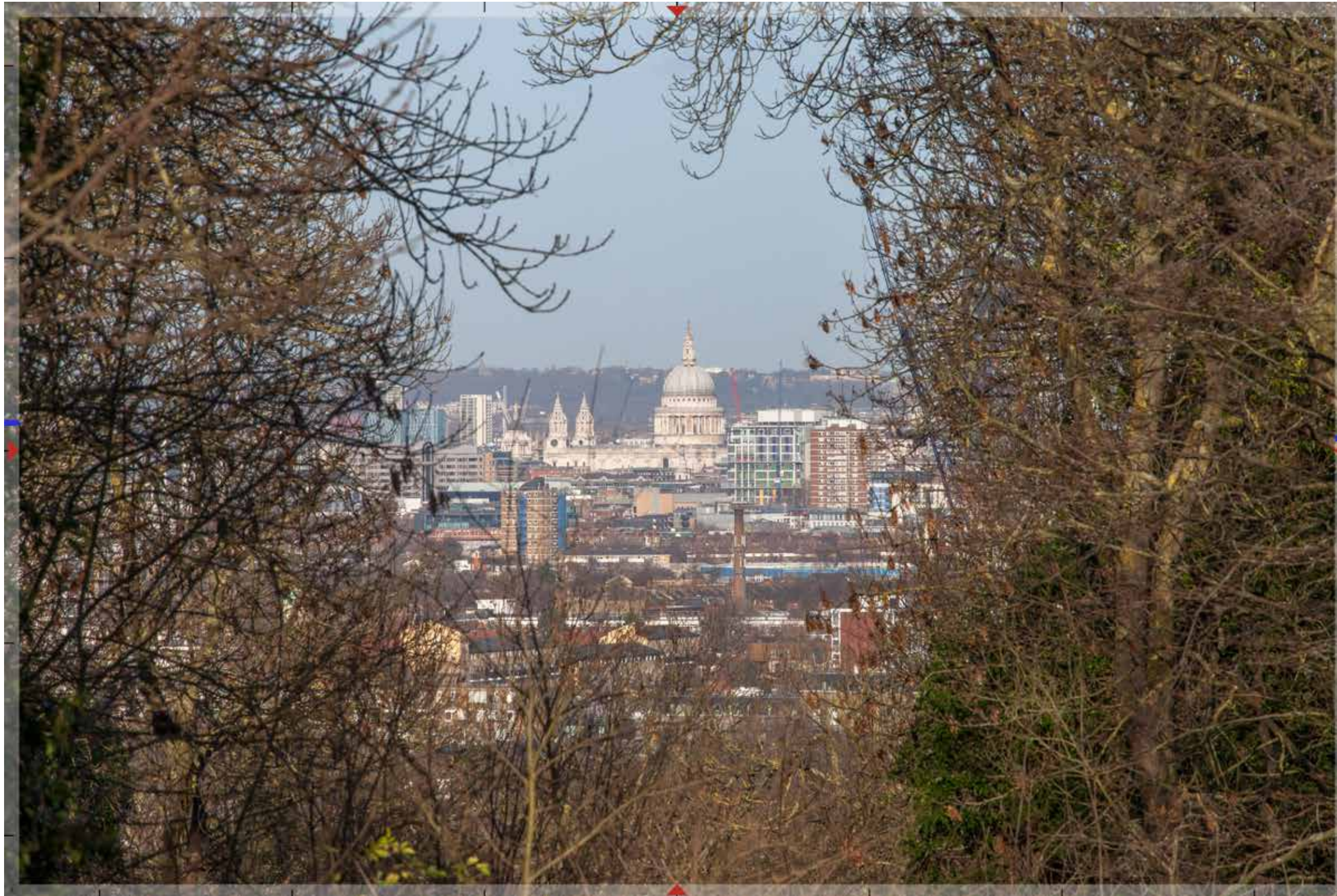
Proposed

3462_3055

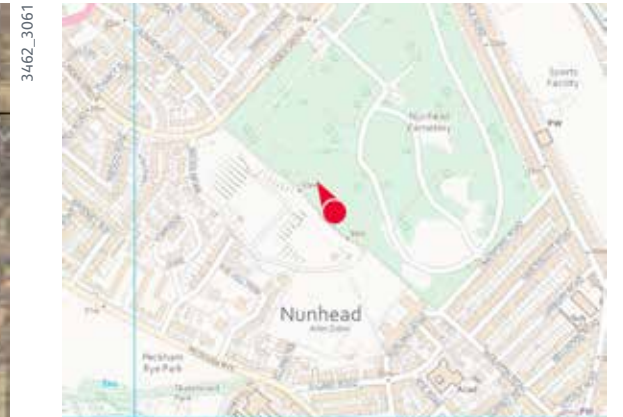


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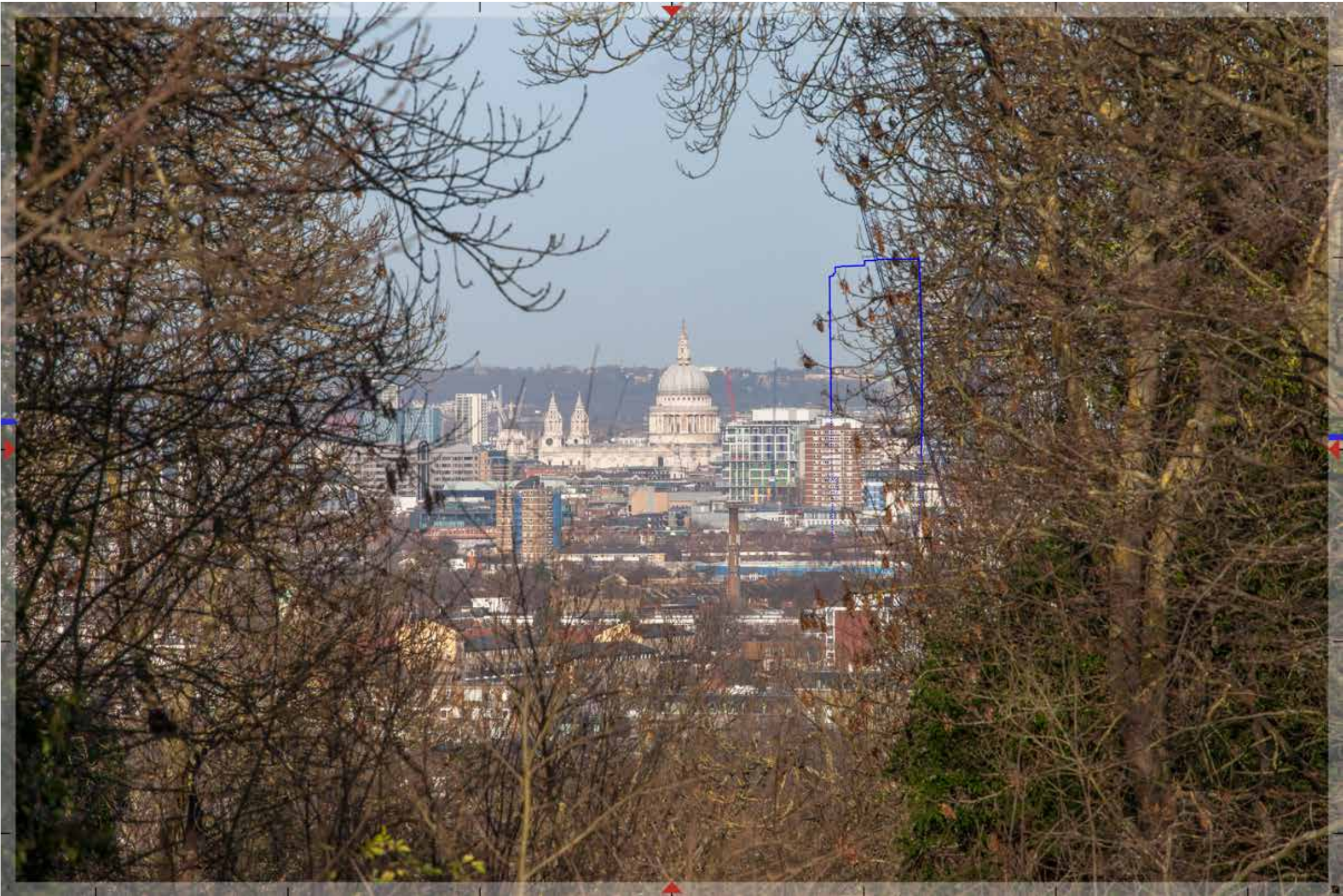
3/462_3056



Existing



3462_3061



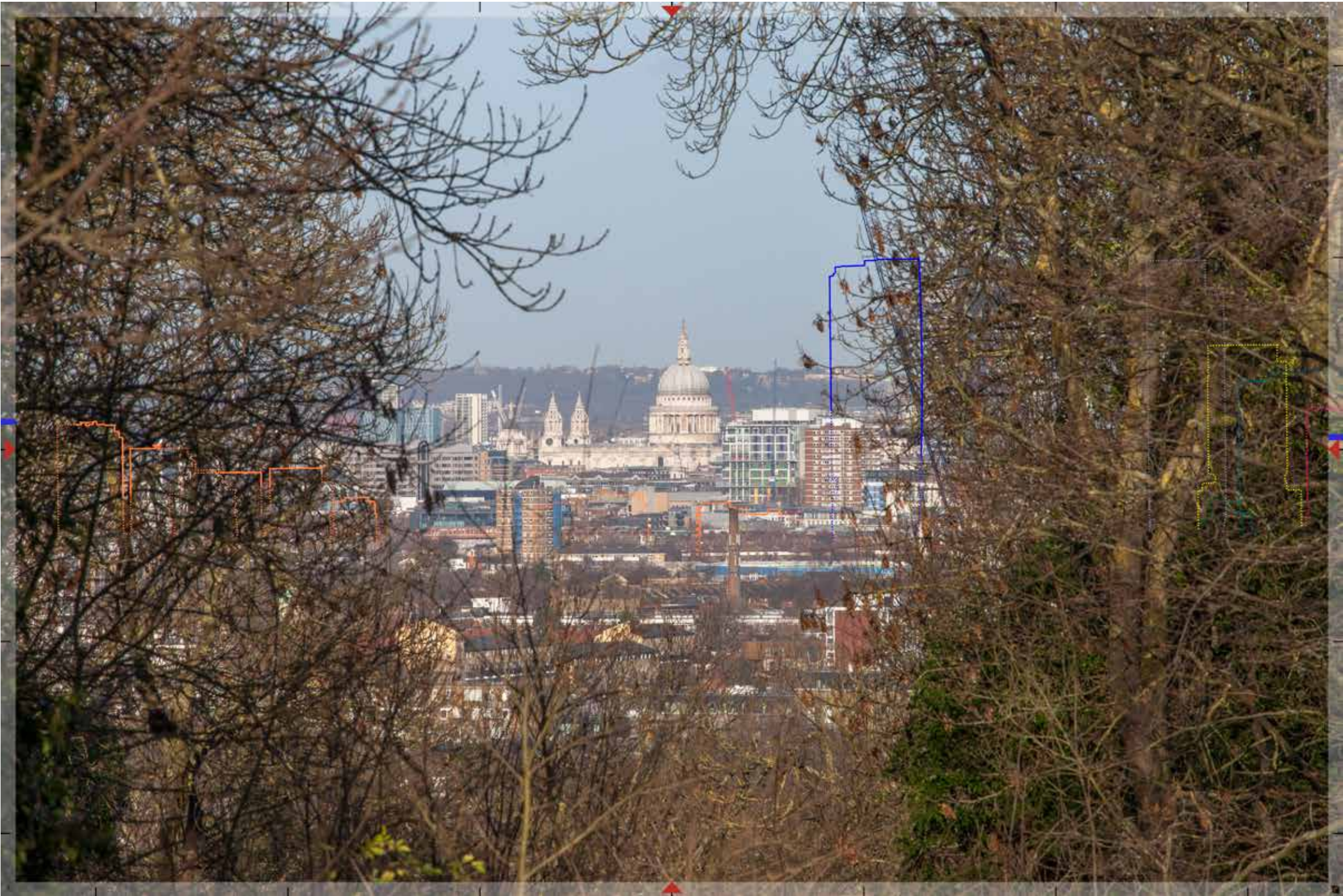
Proposed

3462_3065



10.1

LBS Borough View 2 | St Paul's Cathedral from Nunhead Cemetery | Telephoto



3462_3066

Updated cumulative



Existing



3462_0461



3462_0465

Proposed



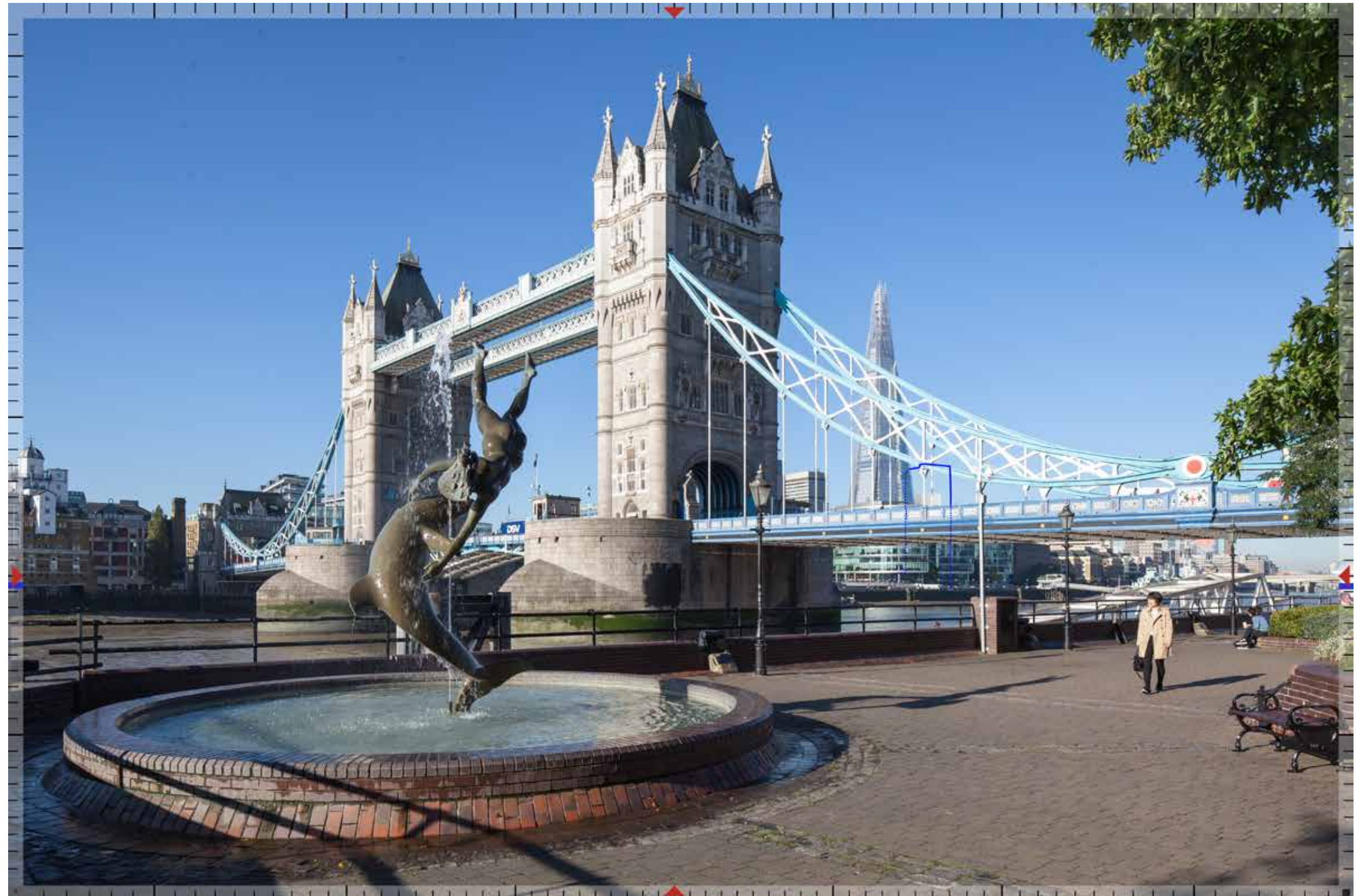
Updated cumulative

3462_0466



Existing





Proposed



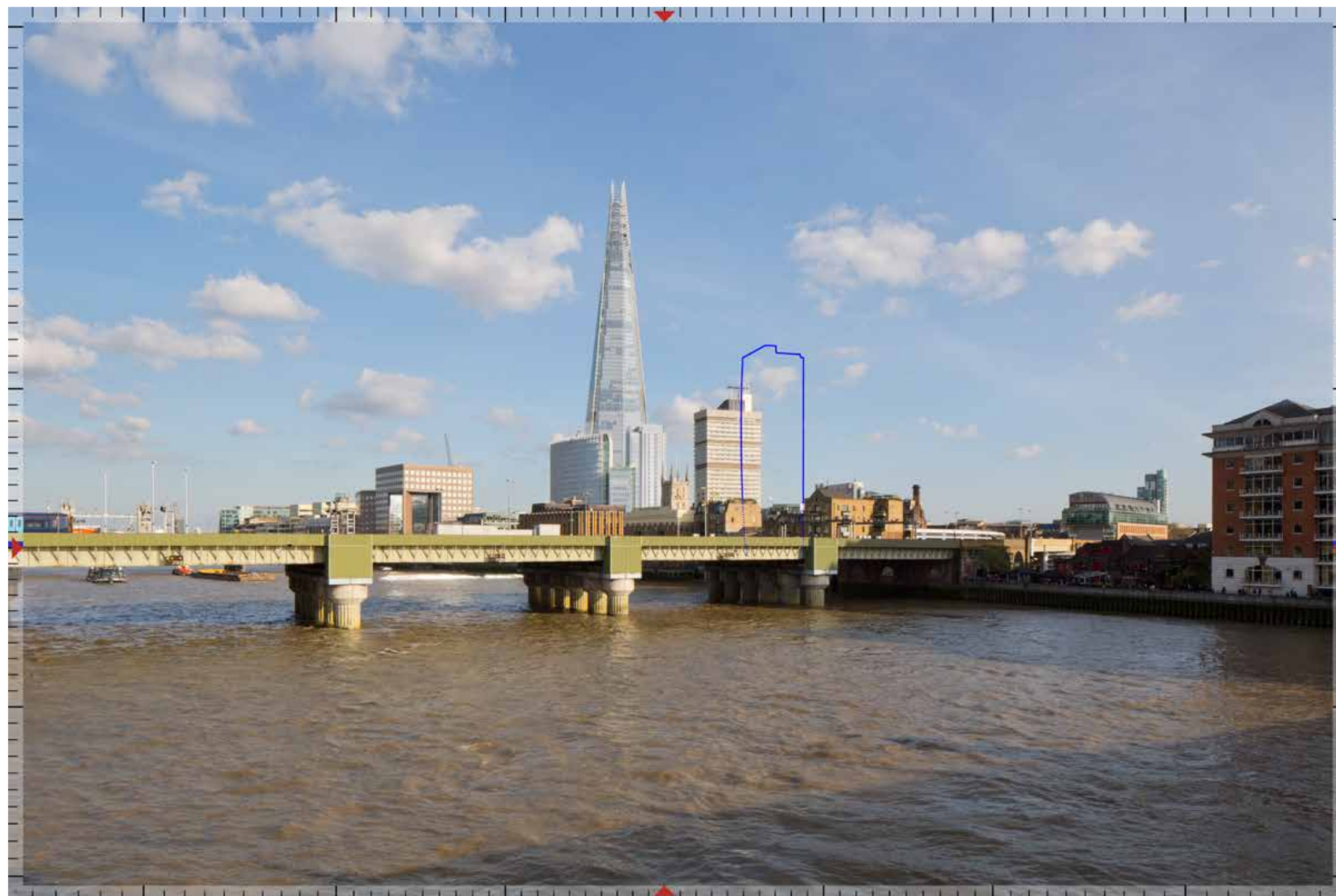
Updated cumulative



Existing

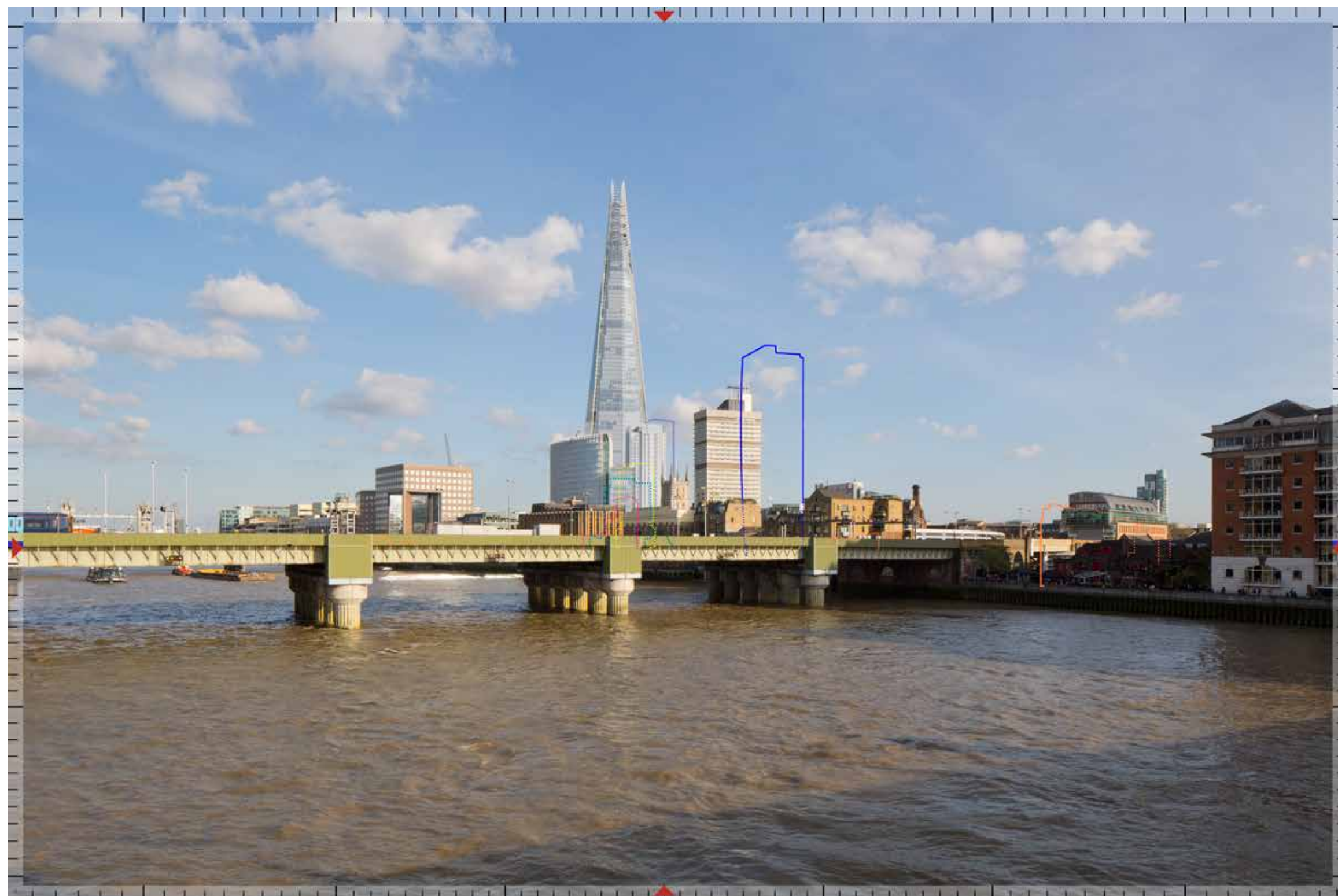


3462_0471



Proposed

3462_0475



Updated cumulative

3462_0476



Existing





Proposed



Millennium Bridge (centre)



Updated cumulative

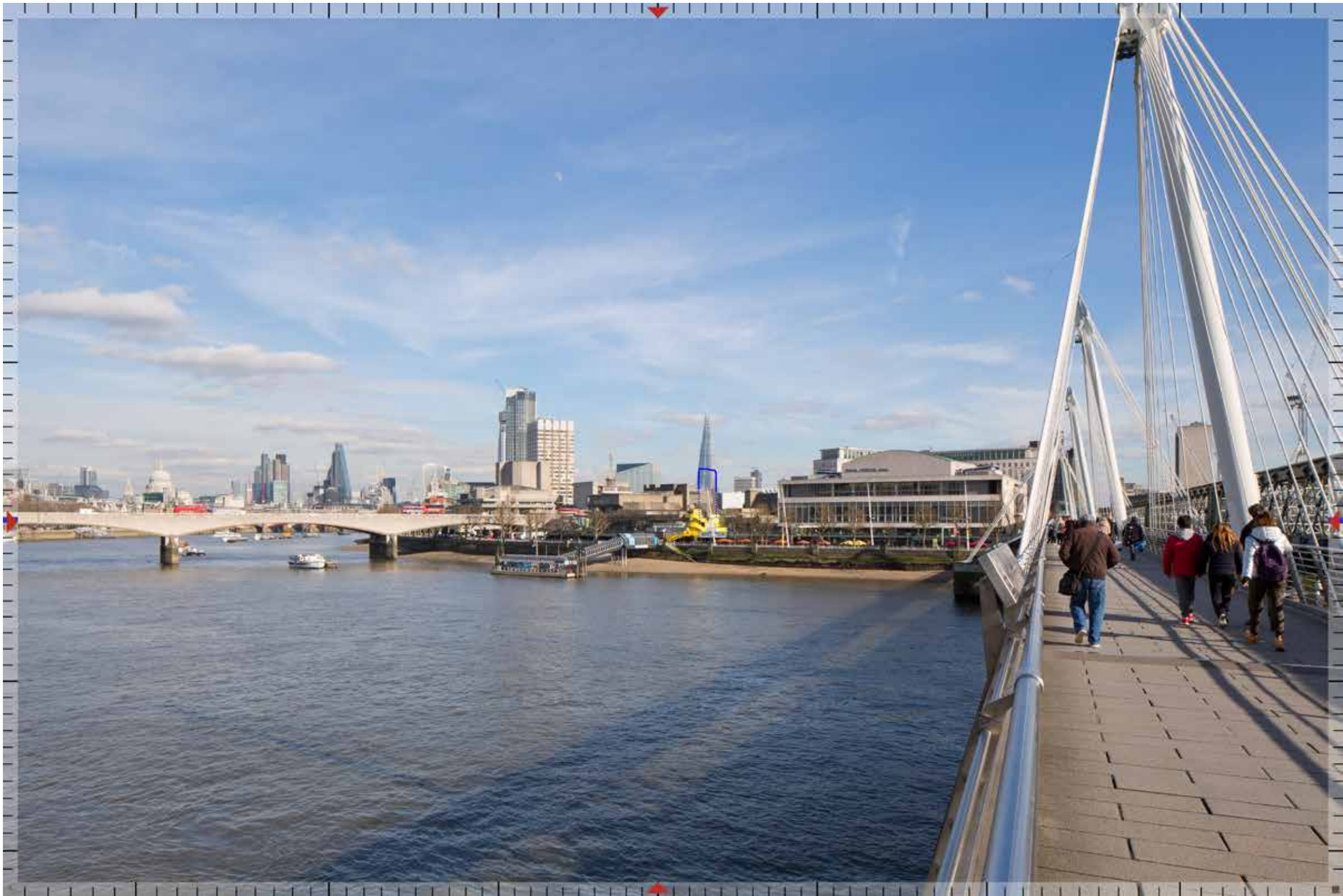
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Existing



3462_0761



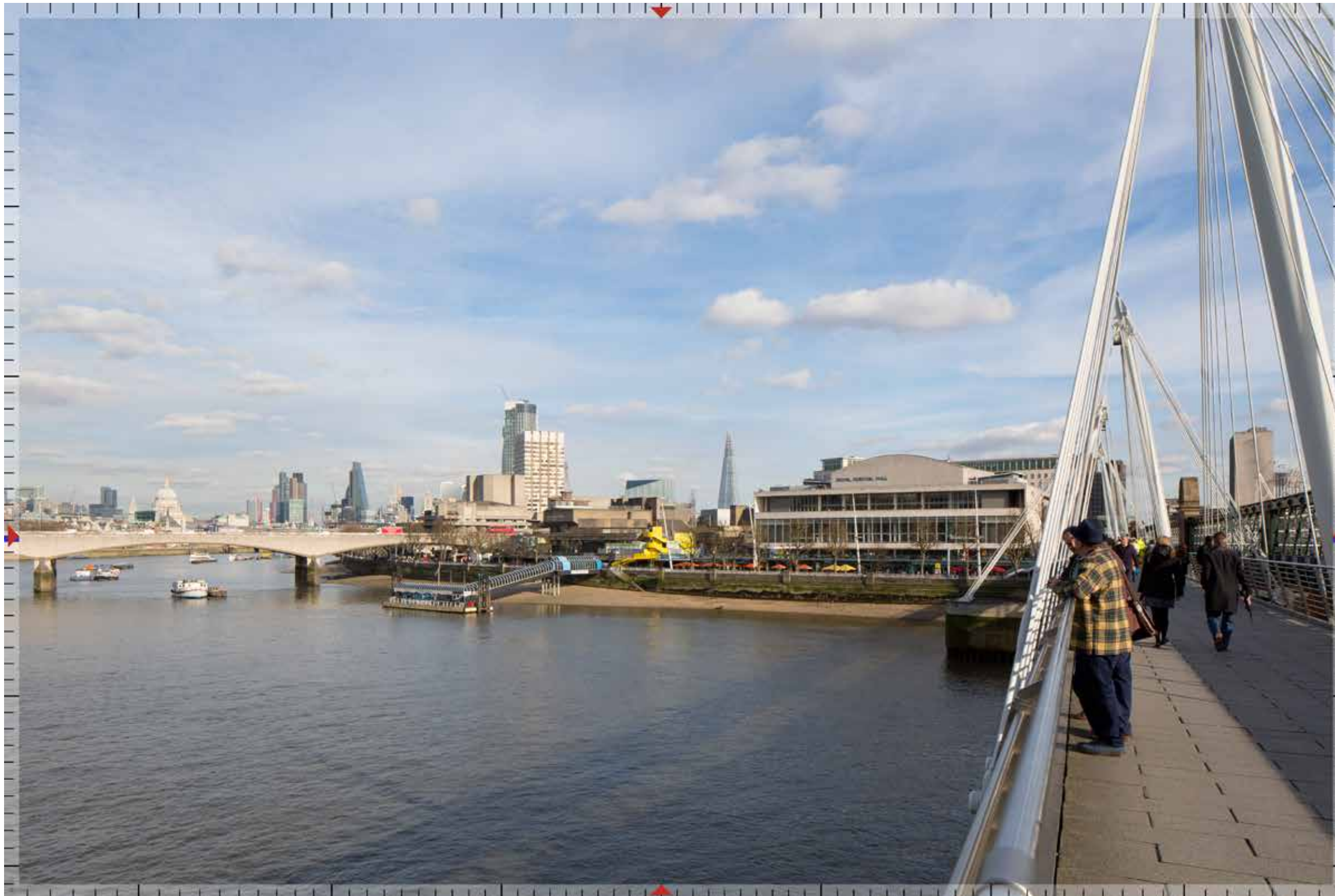
Proposed

3462_0765



Updated cumulative

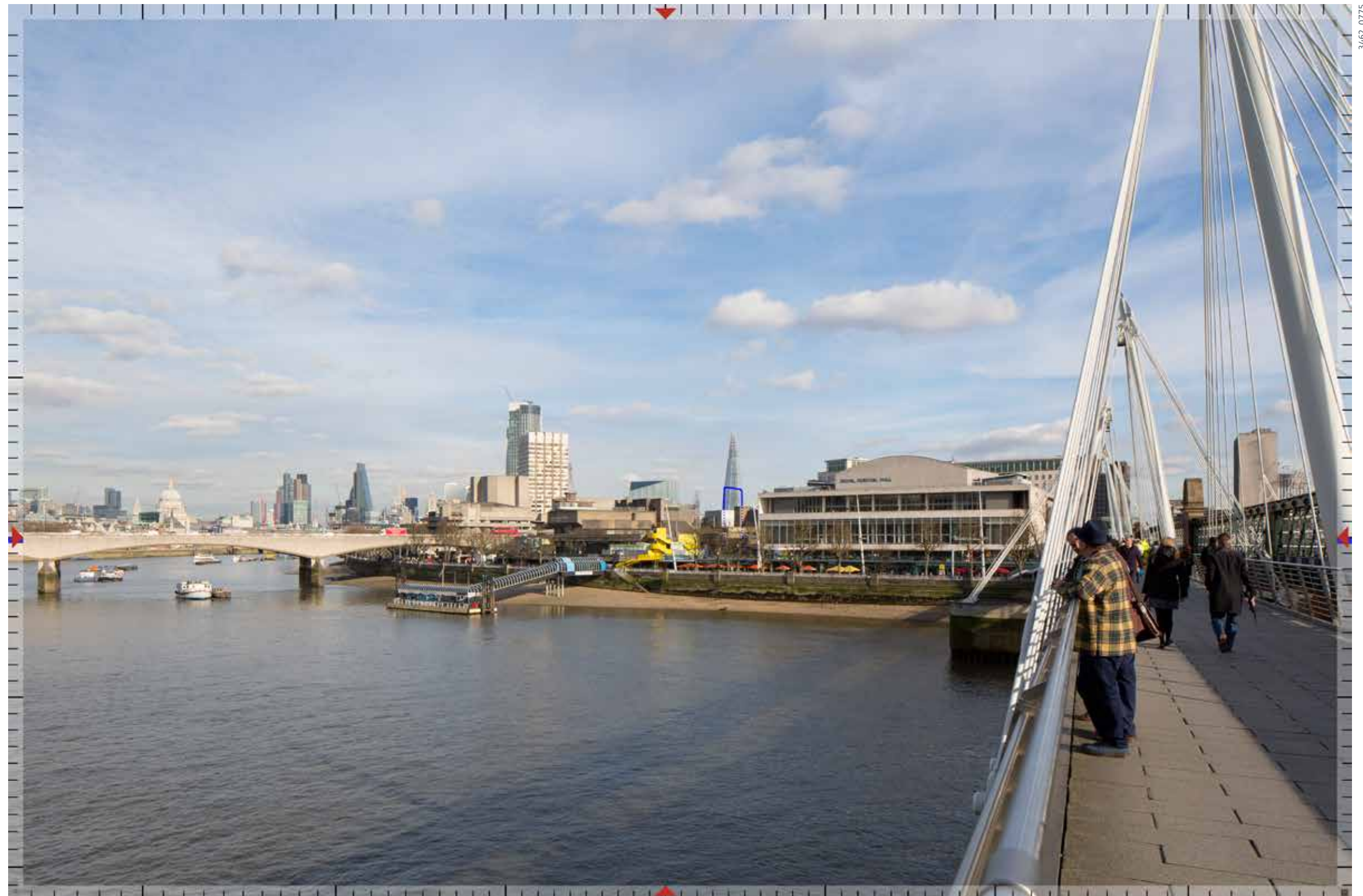
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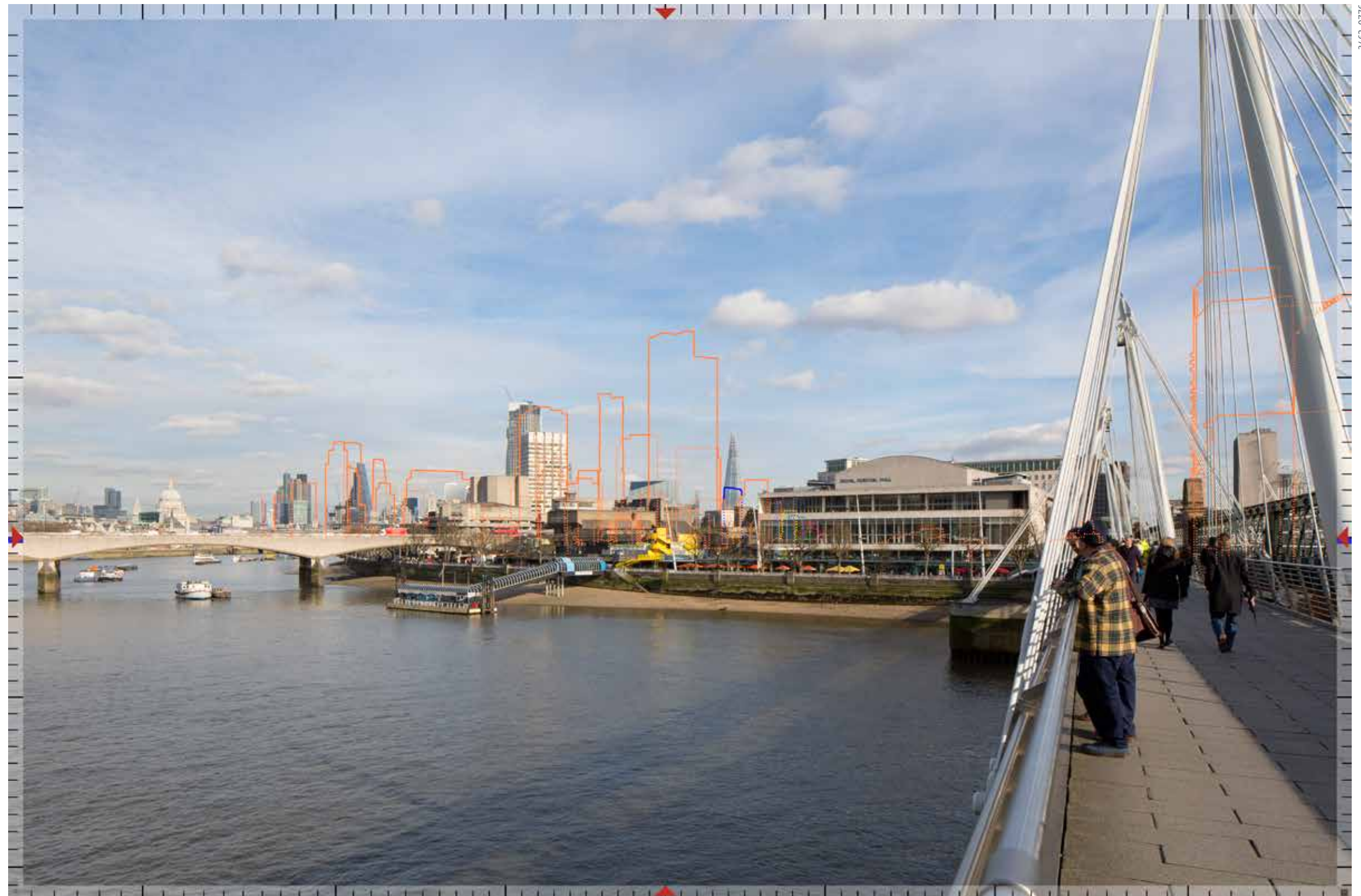


3462_0771



Proposed

3462_0775



Updated cumulative



Existing



3462_0911



Proposed

3462_0915

