

## **Planning & Transportation Committee – 26<sup>th</sup> October 2021**

### **Addendum for Agenda item 4**

#### **Planning applications 20/00631/FULMAJ and 20/00632/LBC:**

- A. The following section should be added to the already published committee report to be inserted between existing paragraphs 511. and 512. This section was omitted in error from the published report and should form part of the overall consideration of the applications.

### **STRATEGIC VIEWS, PAN-LONDON AND LOCAL**

#### **London View Management Framework (LVMF) - Assessment Process**

1. The LVMF designated pan-London views deemed to contribute to the Capital's character, heritage and identity at a strategic level.
2. The LVMF Supplementary Planning Guidance (the SPG), paragraph 19/34, states that development which is inconsistent with LVMF London Plan Policy, the principles and guidance set out in the SPG, should be refused.
3. In accordance with Section 3 of the LVMF SPG Officers have followed the three-step approach to assessment of impact. In accordance with the SPG at Step 2, Description of the View, Officers have complemented and expanded upon the general description of the views contained in the SPG to include wider discussion of the view's composition, including the skyline and elements which contribute (or detract from) the View, providing confirmation of what is distinctive, aesthetically or culturally important and its benefit to London in the view. This includes constraints, opportunities to enhance the view and its setting.
4. In assessing the impact, Step 3, Officers have referred to scale, massing, appearance and materials and skyline and setting relationship, the visual relationship between the proposal and setting, night-time effects, shadowing, seasonal changes and the effect of distance between the viewer, the elements of the view and the proposal.
5. In summary, the assessment of impact follows the three-step approach whilst having consideration for the view management guidance in Section 4 of the SPG and the specific visual management guidance for the particular views, expanded upon by further elaboration of their respective characters.
6. Consistent with Paragraph 23, AVRs have been used in conjunction with 3D digital modelling which has complemented essential on-site assessment. It should be noted that the detailed design has changed since the application was submitted and the HTVIA has not been updated, nor has a new three-dimensional model been received.

7. The assessment considers that the viewer is not passive in appreciating the view, but active and focused, with the potential to isolate contributing features in the view, with the potential to then appreciate them as part of the whole. This experience is via the naked eye and/or could include the potential for magnification, for example a camera, in order to focus further on the view. It is considered that all impacts here are apparent with the naked eye, and indeed that is essential to understanding impact.

#### LVMF View 5A.2, London Panorama, Greenwich Park

8. This Viewing Location comprises two Assessment Points, of which 5A.2 is inclusive of a Protected Vista towards St Paul's Cathedral as the Strategically Important Landmark (SIL). The site is over sailed in part by the Landmark Viewing Corridor and the Wider Setting Consultation Area. The proposed roof extensions would fall well below the threshold plane of the Protected Vista and would otherwise not be visible in the View. There would be no impact.

#### LVMF View 4A.1, London Panorama, Primrose Hill

9. The Viewing Location comprises two Assessment Points, of which 4A.1 is inclusive of a Protected Vista towards St Paul's Cathedral as the SIL. The site is over sailed in part by the Wider Setting Consultation Area (Background). The proposed roof extensions would fall well below the threshold plane of the Protected Vista and would otherwise not be visible in the View. There would be no impact.

#### LVMF View 10A.1, River Prospect, Tower Bridge (Upstream, North Bastion)

10. Comprising a single Assessment Point, located on the north bastion of the Tower Bridge, looking upstream. It is an iconic London view allowing the viewer perhaps the best opportunity in the Capital to see a number of seminal historical and cultural landmarks and key feature elements in the same view, understanding the relationship between them. The Tower of London World Heritage Site and St Paul's are recognised as the Strategically Important Landmarks (SILs), whilst the Monument is identified as a landmark, amongst others.
11. It is identified as being centred on the Monument, here seen along the Monument Street axis in attractive unison with the London Custom House. The eye is naturally led along the North Bank from the foreground focus on the Tower of London (ToL) towards the Custom House, the Monument, Old Billingsgate, St Paul's and then beyond. The forms of exceptional historic grouping of strategic City and London heritage assets recognised and appreciated from the original 'gateway' to London from the sea in their only direct shared riparian setting from the historic Upper Pool. The broad river frontage of the principal arrival experience-defining architectural composition of the Custom House is prominent along the Quay and river wall, comprising the only surviving example of an intact 19th Century Quay in what was the head and heart of the historic Port of London, the centre of a global commercial empire.

12. It is considered that the Custom House is aesthetically and culturally important to the view, in of itself given its architectural and historical resonance to the Upper Pool as a key feature in the View. The group value of the historic middle ground grouping is an important characteristic of the View, accentuated by the apparent integrity and authenticity of the Custom House. This also enhances the juxtaposition between it and the Monument at the centre of the View, and the juxtaposition between Custom House and the River Thames, where the completed classical composition of pre-eminent Centre Block and subservient wings can be read, allowing an understanding of that architectural and historic relationship with the operational river in the foreground.
13. The Northern and Shell building opposite Old Billingsgate and, on renewed focus, the incidental later accretions atop the West Block, detract from the View.
14. The proposal would not obscure the Monument in the foreground in accordance with paragraph 185 of the visual management guidance in the SPG. The proposed height, scale and discordant appearance of the proposed roof extension, exacerbated on renewed focus by the associated terraces and visual clutter, would be apparent, during the day and in particular after dark, irrespective of seasonal change. The height and scale of the West Block roof extension and associative terrace would challenge the pre-eminence of the Centre Block, essential to an understanding of that architectural and historic relationship with the River, whilst upending that sense of integrity and authenticity of the London Custom House, drawing undue attention. Contrary to paragraph 71 of the visual management guidance, this intervention into built fabric would fail to preserve or enhance the juxtaposition between the Monument, as an important landmark element, and the London Custom House as a key feature element. It would also undermine the juxtaposition between the important principal architectural composition of the Custom House, and that aesthetic and cultural relationship its shares which the River.
15. The undermining of the London Custom House would harm that exceptional middle ground grouping of strategic City and London heritage assets comprising the Custom House, the Monument, Old Billingsgate and St Paul's Cathedral in this unique and rare shared riparian setting from the Upper Pool, a central characteristic of the View.
16. Given the intrusive foreground nature of the roof extension proposed, it would dilute the integrity and authenticity of that direct visual relationship between the Custom House and the Monument at the centre of the field of view. Whilst it would not obscure the Monument, it would distract from that strong group value which is a central characteristic of contribution made by this important landmark element, undermining that contribution.
17. Given the siting and scale of the proposal, the viewers ability to recognise St Paul's as a SIL would be unharmed – it would not be obscured, or its sky silhouette encroached upon. Whilst the proposal would undermine the historic

grouping in which it is appreciated, it would not harm an appreciation of St Paul's in isolation.

18. The natural loss of the redundant railings on the Quay would result in a more minor enhancement to the contribution made by the Custom House and the central historic grouping to the view overall. These are non-prominent and subservient to the line of mature London Plane Trees, however, on renewed focus, their removal would slightly enhance the clarity of relationship between the Custom House and its river frontage. That said, some form of railing will remain necessary, whilst it is a moot point as to whether the Applicant's proposals for unrestricted year-round temporary events on the Quay would diminish that clarity. The historic integrity of the relationship would also change, albeit would be difficult to perceive from here. In all, whilst there is potential for slight enhancement, it is considered the effect overall on the riverfront would be broadly neutral.
19. Given the intervening distance and the scale of the proposed extensions, they would not compromise a viewer's ability to recognise and appreciate the Outstanding Universal Value (OUV) of the World Heritage Site. The ToL would not be dominated, development would not breach the skyline of the White Tower and would leave unaffected the visual separation of the ToL from the City of London, in accordance with the visual management guidance at paragraphs 183-187 in the LVMF SPG.
20. Overall, it is considered that the proposals would harm and fail to make a positive contribution to the characteristics of the View, being intrusive and of an inappropriate height and architectural design, undermining the important contribution of a key feature element of the aesthetic and cultural character of the view, the London Custom House, whilst undermining the contribution of the Monument as an important landmark element. It is contrary to London Plan Policy HC4, Local Plan Policy CS13, City Plan Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD.

#### LVMF View 25.A. 1-3, Townscape View, Queen's Walk

21. Considered the most iconic view of the ToL, the White Tower benefits from a dynamic sky-backed Protected Silhouette between the three Assessment Points in what is a kinetic experience. The ToL is the sole SIL, whilst the Monument and Tower Bridge are identified as landmarks, alongside the Custom House and former PLA building (actually identified as a landmark element at paragraph 411) as also in the View.
22. The description of the view identifies a central characteristic the juxtaposition between the ToL WHS and the modern city, including that juxtaposition of a rich array of built and landmark elements from a variety of eras (para 411/413).
23. Officers consider one such townscape key built element of contributing to this central characteristic of the View is the London Custom House, given its fundamental architectural and historic relationship the River in the foreground, as an integral part of the Upper Pool, at the head and heart of the Port of

London and the centre of commercial empire as part of the 'gateway' to London from the sea. The whole broad extent of the principal river composition of the Custom House is visible, in association with the rare surviving example of 19th Century Quay and river wall make it stand out as prominent.

24. Officers consider another important characteristic is the ability to read in broad composition, perhaps better than in any other location, those strategic London riparian heritage assets, including Custom House, Old Billingsgate, the former PLA HQ, the ToL and Tower Bridge, which together tell a story of London's relationship to its River, accentuated by the clear integrity and authenticity of that historic foreground/middle ground setting and these built elements.
25. The North and Shell building opposite Old Billingsgate and the later, albeit rather incidental accretions on the roof of the Custom House detract, but otherwise seasonal or atmospheric change would not have a significant effect on an assessment of impact.
26. In sweeping away the later incidental clutter on the roof of the Custom House, it would be replaced by two prominent and disproportionate roof extensions, rising to the height of (and higher) than the integral datum set by the definitive ridge of the Centre Block, whilst their height/bulk would overwhelm and blur the surviving historic roofscape, forming an awkward relationship with the more recessive hipped long-span of the Long Room roof, diminishing it. The whole effect would be exacerbated by the associated terraces and their visual clutter which, alongside the detailed design of the extensions, would further undermine the symmetrical composition of the whole, whilst undermining its proportions. The terraces and associated clutter would exacerbate this discordant impact. This impact would be potentially greater at dusk and in the evening.
27. It is not clear where the Applicant's views are taken from in the THVIA within the Viewing Platform or at which Assessment Point. It might be at one point the proposed fenestration of the penultimate floor of the East Block would be visible, undermining the historic roofscape and symmetry of the whole.
28. The proposed additions at roof level of the Custom House would be intrusive, of an inappropriate height and architectural design, undermining the apparent integrity and authenticity of Custom House, diminishing the contribution to the View of this important built townscape element, diminishing also its contribution to the central characteristics of a rich variety of important built elements from a variety of era and to that strategic compositional grouping of important riparian features.
29. On renewed focus, the removal of the railings on the quayside would result in a more minor enhancement, removing now redundant clutter and better revealing the principal composition. This benefit would be nullified by the combination of new necessary railings, the proposed river terrace which would result in the loss and part obscuration of the principal river composition and the potential for unfettered events and associated clutter on the whole Quay year round. The insertion of the first-floor terrace would also alter and

undermine the integrity of the principal composition, albeit would be difficult to perceive, especially when the trees are in leaf.

30. There would be no breach of the Protected Vista or the Protected Silhouette, and the development, as a result of its diminutive scale in the view as a whole and distance from the ToL, would not dominate the ToL, which would maintain its relationship with the River and would preserve the ability to recognise and appreciate the ToL as the SIL, set away from the City and not lost in it, in accordance with the visual management guidance in the LVMF SPG at Paragraphs 414-421.
31. Overall, it is considered that the proposals would harm and fail to make a positive contribution to the characteristics of the View, being intrusive and of an inappropriate height and architectural design, undermining the important contribution of a key feature/townscape element of aesthetic and cultural contribution to the View, the London Custom House. It is contrary to London Plan Policy HC4, Local Plan Policy CS13, City Plan Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD.

#### LVMF View 11B.1-2, River Prospect, London Bridge (Downstream)

32. The Viewing Place is on the east side of London Bridge, looking downstream, where a kinetic viewing experience is designated between Assessment Points 11B.1 and 11B.2. The ToL is the sole identified SIL, whilst Tower Bridge and HMS Belfast are identified as landmarks alongside Old Billingsgate and the Custom House as other features in the view.
33. The visual management guidance in the SPG, paragraph 200, considers the grouping of Old Billingsgate and the Custom House add formality to the foreground riverside setting. The London Custom House is considered a key feature contributing to the View, and that prominent foreground/middle ground setting compromising the Custom House and Old Billingsgate, with the backdrop features of the Church of All Hallows and the tower of the former PLA HQ, form a good historic grouping, forming a central characteristic of the View.
34. The Custom House is prominent, the full monumental breadth and formal symmetrical composition of the Neo-Classical edifice is well appreciated, including the important aesthetic and cultural relationship inherent in the integral composition of pre-eminent Centre Block and subservient wings off the central clock axis, and that essential relationship and juxtaposition with the historic Upper Pool and the operational River Thames amplifying it's contribution as a key feature in the View. This is added to by the clear integrity and authenticity of the roofscape of Old Billingsgate and Custom House. The importance of the View to the strategic character and identity of the Capital is imbued by the location on its original London Bridge, forming the arrival experience of millions at the Capital every year.
35. The Northern and Shell building and the rather more incidental later accretions to the Custom House roofscape are detracting elements. It is not considered

that seasonal or weather changes would so much affect the assessment of impact, but it is considered that the impact would still be apparent after dark.

36. From throughout the kinetic experience the proposals would remain prominent and intrusive. They would undermine the strict and scholarly complete Neo-Classical composition, replacing incidental detracting clutter with over-scaled and alien roof extensions which undermine the visual pre-eminence of the Centre Block and its integral aesthetic and cultural relationship with the operational River. This impact would be exacerbated by the associated terraces and visual clutter, undermining the overarching symmetry and even challenging and breaching the primacy of the Central Block main roof ridge. The roof level proposals would blur and detract from the integrity and authenticity of the Custom House roofscape and, where these intervene, from that of Old Billingsgate. That impact could be accentuated at dusk and after dark.
37. Contrary to paragraph 204 of the visual management guidance in the SPG, the proposal would fail to contribute positively to the historic riverside buildings. They would be prominent and intrusive in the middle ground, of an inappropriate height and architectural design, undermining the integrity and authenticity of the Custom House and diluting its contribution to the view as a key element of the Views, whilst undermining that grouping of key historical features which form an important characteristic of the View. The undermining of the principal river composition would diminish that aesthetic and cultural relationship and juxtaposition with the operation River and Upper Pool of London, in which is it a defining architectural and historic feature.
38. The loss of the redundant railings would result in a more minor enhancement in the integrity of the Custom House ensemble, an enhancement mitigated somewhat by the fact that some form of railings would by necessity need to remain, whilst the obscuring/cluttering influence of the ground and first floor river terraces and the potential for unrestricted year-round events and associated clutter on the Quay would dilute any benefit gleaned here to an extent where the outcome would be broadly neutral.
39. Given the siting and size of the proposals, at significant intervening distance from the ToL, the WHS would not be detracted from, and the viewers ability to recognise and appreciate would be unharmed. Tower Bridge would remain the dominant structure, while the viewers ability to easily recognise its outer profile would not be compromised, in accordance with paragraph 202 of the SPG. The ability to read the characteristics and composition of the identified landmark elements would go unharmed.
40. Overall, it is considered that the proposals would harm and fail to make a positive contribution to the characteristics of the View, being intrusive and of an inappropriate height and architectural design, undermining the important contribution of a key feature/element of aesthetic and cultural contribution to the View, the London Custom House. It is contrary to London Plan Policy HC4, Local Plan Policy CS13, City Plan Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD.

## Summary of LVMF Impacts

41. By reason of their siting, height, size and appearance, the proposed roof extensions and associated alterations and terraces, and to a lesser extent wider proposals at ground and first floor level, would harm and fail to make a positive contribution to the characteristics of the relevant Strategic Views, namely the River Prospects from Tower Bridge (10A.1) and London Bridge (11A.1-2) and the Townscape View from The Queen's Walk at City Hall (25A.1-3). The proposal would comprise intrusive development as a result of inappropriate height and architectural design, undermining the contribution made by the Custom House as a key element of the Views characters, harming its contribution to central characteristics and where relevant the juxtaposition between it and the River Thames and identified landmark elements.
42. This is contrary to London Plan Policy HC 4, Local Plan Policy CS 13, City Plan Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD.

## Other Strategic Views (Local)

### The Monument to the Great Fire

43. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City.

### Views from the Monument

44. The proposal would be visible in View 1 from the Monument Viewing Gallery, as identified in the Protected Views SPD.

### *View 1: South East to the Tower of London, Tower Bridge, the River Thames and HMS Belfast*

45. Local Plan Policy CS13(2) seeks to protect and enhance significant local views of and from the Monument.
46. The Protected Views SPD Paragraphs 4.2 and 4.3 state that inappropriate bulk/massing should not detract from the general prospect/panorama and contributing key features and familiar skyline landmarks are described where they are important to the view. In View 1, the Custom House is considered a contributor to the view and general prospect, described in the guidance as demarcating the northern bank of the Upper Pool of the River Thames, it is identified as a 'notable' building in the foreground visual axis along Monument Street, alongside Old Billingsgate Market, leading the eye towards a focus on Tower Bridge (Paragraph 4.5/4.6), which is identified as a Key Feature.
47. The River Thames is also an identified Key Feature and the guidance in the SPD is clear, at 4.4, that views of the River Thames should be maintained.



This has been the subject of long-term curation by the Corporation, and 'maintained' is deemed to mean, no further encroachment/screening between the viewer and the River.

48. These views from the Gallery provide strategic pan-London views from one of its most famous and esteemed landmarks. The view offers the observer a significant understanding and appreciation of the cultural topography of London, to which the Custom House is intrinsic and seminal to the development of London and its growth as the world's largest trading port and later business centre. The view offers fantastic mid-level views over the Upper Pool of London, to which Custom House is a significant contributor.
49. It is apparent that the proposed roof extension on the West Block (and associated terracing) would cause a slight encroachment/screening of the visible river edge of the Upper Pool, where it meets the authentic roof of the Custom House. This is an encroachment on a Key Feature, the River Thames, and is contrary to the specific long-term curatorial guidance at 4.4 of the Protected Views SPD.
50. From here the whole architectural hierarchy and legible composition of the Custom House roof can be appreciated, including the pre-eminent Centre Block, whose roof comprises the then innovative and grand span of the Long Room roof, the central weathervane stack alerting Long Room clerks/merchants to the prevailing wind conditions, Smirke's northern Long Room lightwell and the original West Block simple pitched roofs surrounding the central sole-surviving courtyard atrium. Albeit altered, including the loss of the East Block, the historic roofscape survives with a good degree of integrity and remains pre-eminent, standing out along Old Billingsgate as a rare authentic historic roofscape, with the potential to enhance in accordance with the Protected Views SPD (paragraph 4.4).
51. The proposal would substantially alter and undermine the surviving original hierarchy and composition. The double height pavilions would overwhelm the remaining surviving historic roof, obscuring and detracting from it. The extensions in tandem would challenge the grand span of Smirk's Long Room roof, the matching patinated copper finish bleeding/blurring with it, rather than distinguishing from it, whilst diminishing that symbolic architectural and historical relationship between the Upper Pool and the Centre Block containing the Long Room and Queen's Warehouse, in what is a strategic topographical view which allows the observer to understand the Custom House in its wider setting of the Upper Pool from above. The infilling of the Long Room lightwell and the associated terracing would 'crowd' and clutter the historic roof, whilst the sole-surviving West Block courtyard would significantly undermine the legibility of the original design and function.
52. The associated clutter of the terraces would be at odds with the simple Neo-Classical edifice, detracting from those surviving historic features such as the weathervane, whilst overall substantially reducing the legibility, hierarchy and plan form of the original building.

53. The proposal would be a significant visual detracting influence when the eye of the observer is drawn up Monument Street and towards the Tower Bridge, a Key Feature, via the authentic foreground ensemble of Old Billingsgate and the Custom House, which imbues the appreciation of the whole general prospect. Whilst it wouldn't obscure/screen the Tower Bridge, in the same way it does the River edge, in terms of recognising Tower Bridge, it is considered it would distract from it, thus visually intruding on it as a Key Feature.
54. Overall, the proposal would be intrusive as a result of inappropriate bulk/mass and alteration, detracting from the Custom House as an important contributor to the general prospect whilst encroaching on the River Thames and visually intruding on an appreciation of Tower Bridge as a Key Feature, whilst failing to enhance that foreground roofscape. It would not protect and enhance significant City and London views of important buildings, townscape and skylines which make a substantial contribution to protecting the overall heritage of the City, by failing to protect local views from the Monument, in conflict with Local Plan Policy CS13(2), City Plan Policy S13 and guidance contained in the Protected Views SPD.

#### Views of and Approaches to the Monument:

55. The proposal would not be in the designated 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be in its immediate and wider setting.

#### *Monument Street and Tower Bridge Views*

56. The effect here is both local, from Monument Street itself, and wider, from Tower Bridge.
57. The Protected Views SPD, Paragraph 4.22, identifies strategic views of the Monument along the Monument Street axis, seen from Tower Bridge, from where the SPD identifies the Monument as rising above the roofscape of the Custom House from LVMF 10A.1.
58. As identified in the LVMF section, it is considered that the proposal would undermine the relationship between the Custom House and the Monument, detracting from an appreciation of the Monument.
59. The result is a slight diminishment in the viewers appreciation of the Monument as a strategic landmark as identified in the Protected Views SPD, in this strategic view of the Monument in its wider City and pan-London context.
60. Views from Monument Street itself are also material in accordance with Local Plan Policy CS 13(2) and guidance contained in the Protected Views SPD, which seeks to protect significant local views of the Monument. The proposal would be visible in association with the Monument from the west side of the western approach from King William Street. Here it would in part slightly impinge on the springing point of the sky silhouette of the plinth of the

Monument, the eye led both up and south towards the wider complementary historic setting of the Custom House its historic hinterland comprising in part the Eastcheap Conservation Area, in what is considered the best appreciation of the Monument in this immediate setting. A distracting and incongruous addition to that complementary backdrop, the proposals would further detract from the integrity and authenticity of the Custom House roof and the glimpsed view of the top of Tower Bridge, resulting in a very slight diminishment of the view of the Monument as a whole.

61. Overall, the proposal would diminish the Monument and would not protect or enhance significant local views of and from the Monument, in conflict with Local Plan Policy CS13(2), City Plan Policy S13 and guidance contained in the Protected Views SPD.

#### St Paul's Cathedral – Views to and From:

62. The proposal is not in the St Paul's Heights Policy Area and would not have an impact on those local views of St Paul's subject to the guidance contained in the Protected Views SPD, including from the Processional Route.
63. The proposal would not be visible from either the Stone or Golden Galleries of St Paul's and so would accord with the guidance in the Protected Views SPD.
64. Local views of St Paul's would be preserved in accordance with Local Plan Policy CS 13 and City Plan Policy S13.

#### City Landmarks and Skyline Features:

65. Local Plan Policy CS 13(2) (Protected Views) seek to protect and enhance views of City Landmarks and skyline features. The Protected Views SPD, paragraph 6.2, states that the effect of development proposals on the setting of these will be assessed in accordance with this policy. It identified those 'City Landmarks (Figure 10) and 'City Churches with a Skyline Presence' (Figure 11). This includes All Hallows by the Tower Church and St Dunstan in the East.
66. As discussed earlier in this report it is considered the proposals at roof level would detract from the skyline presence of All Hallows from London Bridge (north end), potentially obscuring it and forming an incongruous intervening foreground feature diminishing an attractive historic group comprising the steeple seen alongside the Custom House and Old Billingsgate.
67. It is considered that the proposals at roof level would detract from the skyline presence of St Dunstan in the East, the result of potential obscuring of it from the River, whilst forming a prominent and incongruous intervention in the immediate foreground diminishing the integrity of that historic relationship with the Custom House when viewed from the Queen's Walk, with which it shares a strong architectural and historic relationship.

68. It is considered that the proposed West Block roof extension would obscure a brief townscape 'moment' from the junction of King William Street and Monument Street (east and west side) where the picturesque sky-silhouette 'crown' of Tower Bridge (north tower) is seen. However small, this would diminish a localised glimpsed view of one of the five identified City Landmarks located outside the City in the Protected Views SPD (Figure 10). The incongruous/distracting nature of the roof would draw attention, making any residual visible silhouette of Tower Bridge truly incidental, detracting further from what would remain, undermining that brief architectural and historic relationship between two of the defining monuments of the historic Port of London.
69. Overall, the proposal is considered to conflict with Local Plan Policy CS 13(2) as it would not protect and enhance views of a City Landmark and Skyline Features, detracting from Tower Bridge, All Hallow by the Tower and St Dunstan in the East.

### **Conclusion: Strategic London and Local Views Impact**

70. The proposal would diminish the significant contribution the London Custom House makes to strategic pan-London River Prospects and a Townscape View from around the Upper Pool of London at 10A.1 (Tower Bridge), 25A.1-3 (Queen's Walk at City Hall) and 11B1-2 (London Bridge), in particular the latter two. Whilst in relative terms to broad riparian townscape prospects the proposals may be considered small, it is common ground amongst Officer's and all heritage stakeholders that the proposed roof extensions and alterations are intrusive. They would undermine an appreciation of the principal River façade composition and thus that significant architectural and historic it makes as a defining London building enclosing a significant part of the Upper Pool of the Thames in the fore/middle ground of these strategic views.
71. The long-term management of these views, to which the CoL makes a significant contribution, has been essential to the plan-led approach to accommodating significant growth which has resulted in substantial change to these strategic London views. The success of this approach has always been the meticulous and careful stewardship of those contributing historical monuments, in particular their intrinsic authenticity and integrity, as well as their juxtaposition with wider historical monuments and the River Thames. This proposal would undermine this approach.
72. Overall, the proposal would result in harm to the characteristics of those strategic views, undermining the character and composition of a contributing landmark element, the result of development in the fore/middle ground which is intrusive and which would dilute an appreciation of this landmark river frontage in its wider London context, its juxtaposition with the River Thames and its skyline contribution. The LVMF SPG, at paragraphs 19 and 71, is clear that harmful, intrusive development should be refused and the proposals would run contrary to Local Plan Policy CS 13(1), London Plan Policy HC 4 and guidance contained in the LVMF SPG.

73. Overall, the proposal would be intrusive as a result of inappropriate bulk/mass, detracting from the Custom House as a key contributor to locally strategic View 1 from the Monument Viewing Gallery. Further conflict would result from the proposals intrusiveness at roof level, and how this would detract from and diminish an appreciation of the Monument in identified strategic view from Tower Bridge. The proposals would also result in the diminishment of the skyline setting of Tower Bridge, All Hallows by the Tower and St Dunstan in the East, identified as a City Landmark and City Churches with a Skyline Presence, in conflict with Local Plan Policy CS 13(2) and associated guidance in the Protected Views SPD.
74. Considered together the proposals are considered contrary to Local Plan Policy CS13, City Plan Policy S13 and guidance contained in the Protected Views SPD with respect to the strategic local setting of the Monument.