

The Monument, Heritage Impact Assessment

January 2024

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1.0 Introduction

- 1.1 This Heritage Impact Assessment (HIA) outlines the potential impact of two proposed tall building clusters, identified as the 'City Cluster' and 'Fleet Valley' upon the significance of The Monument, a Grade I listed building within the City of London, location shown in Figure 1. The Monument is located approximately 200 metres beyond the South Western boundary of the proposed City Cluster, and approximately 1.38 km from the proposed Fleet Valley Cluster.
- 1.2 The Monument has been identified as a Strategic Landmark by the City of London (CoL), and views to and from it are protected under the 'Protected Views' SPD (2012) and additionally within the 'Monument Views' SPD (2020). As a Grade I listed building, the Monument is a designated heritage asset with a high sensitivity, and this includes sensitivity to change within its setting.
- 1.3 Policy D9:B1 of the London Plan, requires Boroughs to, "determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan." This HIA has been prepared by the City of London Corporation, informing an evidence base in support of the emerging New City Plan Tall Buildings Policy. This assessment therefore seeks to identify the potential impact of the proposed tall building clusters upon the significance of the Monument. Specifically this assessment will outline the potential for change within this heritage asset's setting, identifying how this may impact the contribution of setting to significance. Using 3D modelling, an indicative visual envelope for the proposed clusters has been produced, enabling the potential visual impact of each cluster to be illustrated. This assessment is made in accordance with the tests outline in Chapter 16 of the NPPF as well as Historic England Good Practice Advice in Planning Note 3, and in line with the requirements of the CoL SPDS noted above. A full outline of the policy background is given in section 2 below.

Important Caveat

- 1.4 It should be noted that the visual envelopes assessed are indicative only. This assessment does not preclude the need for future tall buildings proposals which may affect the setting and significance of the Monument to undertake a full Heritage Assessment, in line with the provisions of Section 66 of the Planning (Listed Buildings & Conservation Areas) Act 1990 as well as National and Local Planning Policy.

The Monument, City of London

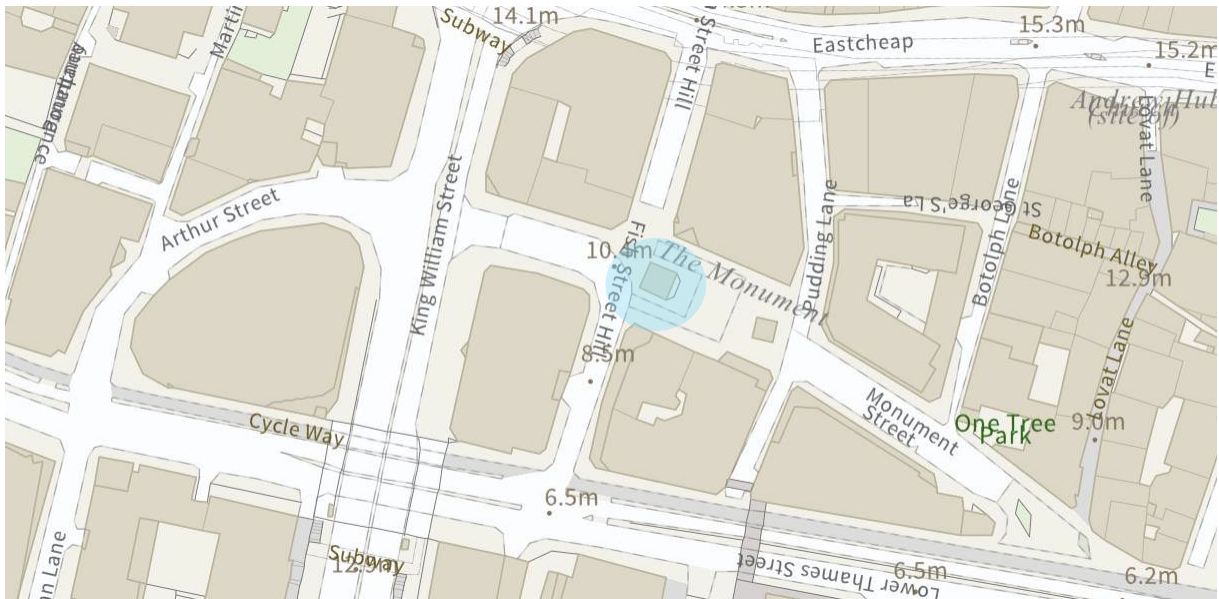


Figure 1. The Location of the Monument is indicated by the blue transparency. Source: Historic England.

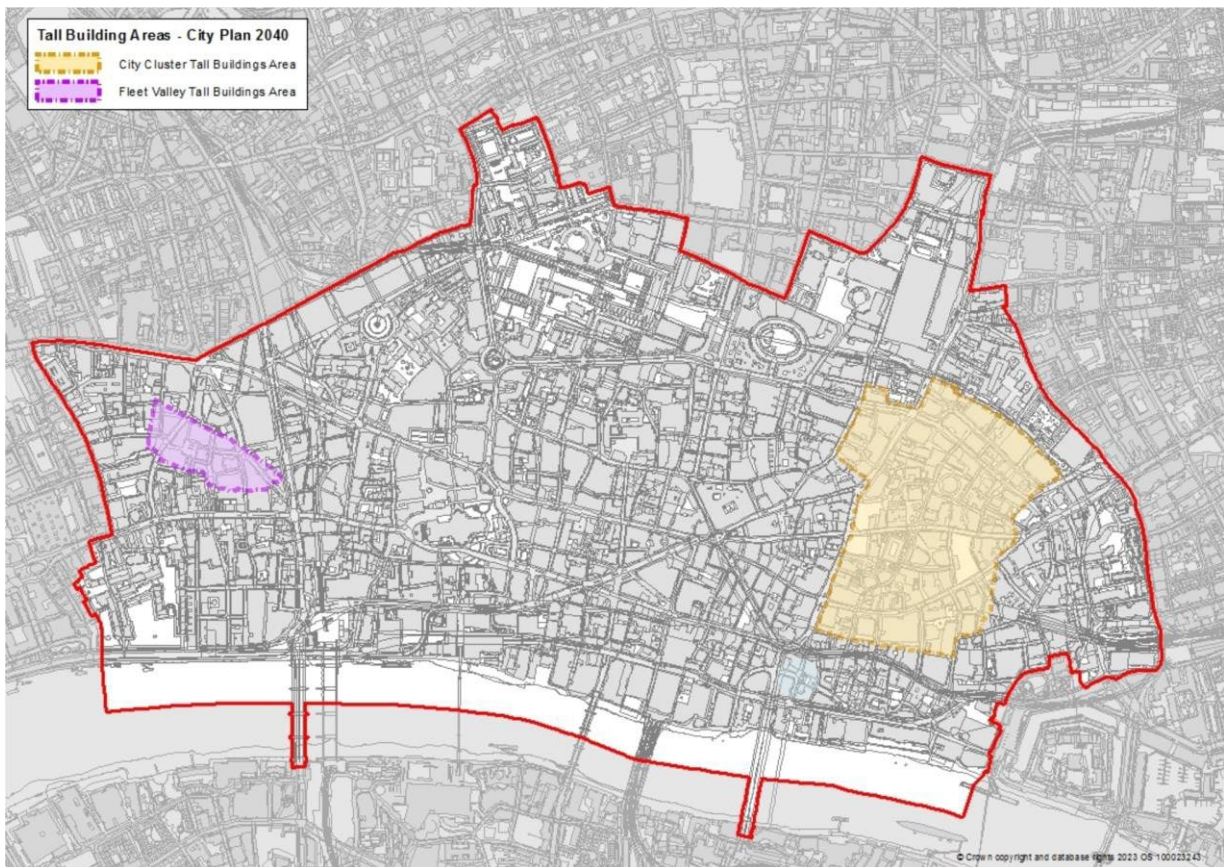


Figure 2. Map of proposed tall building areas. Location of the Monument highlighted in blue.

2.0 Legislation

- 2.1 While it is acknowledged the proposed clusters assessed in this report are not themselves development proposals, the following policy outlines the existing framework in which impacts to Heritage Assets, including listed buildings, are assessed.
- 2.2 The primary legislation relating to Listed Buildings is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 66(1) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

National Planning Policy Framework

- 2.3 The revised National Planning Policy Framework (NPPF) was published in September 2023, replacing the previous published 2012 framework. With regard to the historic environment the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that “our historic environments... can better be cherished if their spirit of place thrives, rather than withers.” The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.4 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a “manner appropriate to their significance”.
- 2.5 NPPF directs local planning authorities to require an applicant to “describe the significance of any heritage assets affected, including any contribution made by their setting” and the level of detailed assessment should be “proportionate to the assets’ importance”.
- 2.6 The NPPF states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, “to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”. This therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.
- 2.7 Paragraph 199 requires that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”
- 2.8 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “clear and convincing justification” (Paragraph 200). This paragraph outlines that substantial harm to grade II listed

heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

- 2.9 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 201 states the following:
- 2.10 "Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use."
- 2.11 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in "less than substantial harm", paragraph 202 provides the following:
- 2.12 "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use."
- 2.13 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.14 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

Planning Practice Guidance (PPG)

- 2.15 The Planning Practice Guidance (PPG) was published in June 2021 as a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance. The following guidance remains relevant.
- 2.16 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.

- 2.17 In particular, the PPG notes the following in relation to the evaluation of harm: "In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest." (Ref ID: 18a-018-20190723)
- 2.18 This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a "high test".

Historic England Conservation Principles: Policies and Guidance 2008.

- 2.19 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

"New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future".

Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

- 2.20 This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that "*The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting.*"

**Historic England Managing Significance in Decision Taking in the Historic Environment
Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)**

- 2.21 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: "*assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.*"

Historic England: Historic Environment Good Practice Advice in Planning Note 3 'The Setting of Heritage Assets' December 2017

2.22 This document sets out guidance on managing change within the settings of heritage assets which is identified as being separate from the concepts of curtilage, character and context. It clarifies that:

“The setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Extensive heritage assets, such as townscapes, can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. A Conservation Area will include the settings of listed buildings and have its own setting. The setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it. (page 2). “Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset (page 4). The numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations.... Sustainable development... can have important positive impacts on heritage and their settings. However, the economic and social viability of a heritage asset can be diminished if accessibility from or to its setting is reduced by badly designed or insensitively located development”.

2.23 The document advocates the following 5 step approach to assessing setting:

- Step 1: Identify which heritage assets and their settings are affected
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes

Local Policy

The London Plan (2021)

2.24 Key extracts from the London Plan are outlined below:

2.25 **Policy D1 London's form and characteristics:**

A. Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:

Form and layout

- 1) use land efficiently by optimising density, connectivity and land use patterns
- 2) 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

Quality and character

- 12) respond to the existing character of a place by identifying the special and valued features that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute to the local character
- 13) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

2.26 **Policy D1 London's form, character and capacity for growth:**

A) Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:

- 1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
- 2) housing types and tenure
- 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
- 4) existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity
- 5) air quality and noise levels

- 6) open space networks, green infrastructure, and water bodies
- 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character)
- 8) topography and hydrology
- 9) land availability
- 10) existing and emerging Development Plan designations
- 11) land uses
- 12) views and landmarks.

Planning for growth

B In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:

- 1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and
- 2) assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and
- 3) following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.

2.27 **Policy D9 Tall buildings:**

- A) Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

Locations

- B) 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

- 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
- 3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.
 - ...d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.
 - e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it
- 4) Cumulative impacts
 - a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

2.28 **Policy HC1 Heritage conservation and growth**

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

2.29 **London View Management Framework Supplementary Planning Guidance (March 2012)**

In March 2012 the Mayor published the 'London View Management Framework Supplementary Planning Guidance' ('LVMF') which is designed to provide further clarity and guidance on London Plan policies for the management of these views. The Proposed Clusters will be visible in many views defined within the LVMF, and this has informed the selection of views used to assess impact.

City of London Local Plan 2015

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

- 2.31 **Policy DM 10.1: New development** requires ‘all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:
- The bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
 - All development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
 - Appropriate, high quality and durable materials are used;
 - The design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
 - Development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City’s streets;
 - The design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- 2.32 **Policy DM 12.1: Managing change affecting all heritage assets and spaces** aims to: ‘To sustain and enhance heritage assets, their settings and significance. Development proposals...that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings. Proposals for sustainable development, including the incorporation of climate change adaption measures, must be sensitive to heritage assets.’
- 2.33 **Policy CS13: Protected Views** aims: ‘to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of the City’s landmarks, by: Implementing the Mayor’s London View Management SPG to manage designated views of strategically important landmarks (St. Paul’s Cathedral and the Tower of London), river prospects, townscape views and linear views. Protecting and enhancing: local views of St. Paul’s Cathedral, through the City’s “St. Paul’s Heights” code; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views of historic City landmarks and skyline features. Securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, which adjoins the City, so ensuring its Outstanding Universal Value, taking account of the Tower of London World Heritage Site Management Plan 2007.
- 2.34 **Policy CS14: Tall Buildings** aims ‘to allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by: Permitting tall buildings on suitable sites within the City’s Eastern Cluster. Refusing Planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Pau’s Heights area; St. Paul’s protected vista viewing corridors; and

Monument views and setting, as defined on the Policies Map. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features. Ensuring that tall buildings proposals do not adversely affect the operation of London's airports.'

- 2.35 **City of London Protected Views Supplementary Planning Document (SPD), January 2012**
The Protected Views SPD was adopted on 31st January 2012. It provides further guidance to the public and developers on the operation of the view protection policies outlined in the documents noted above. The SPD includes sections on St Paul's Cathedral, The Monument, the Tower of London, the LVMF and other historic landmarks and skyline features within the City of London.

Views from The Monument

- 2.36 With regards to the Monument, protected views from the gallery of the Monument are shown on Proposals Map. The views are protected by policy CS13 of the LDF Core Strategy 2011. The policy describes specific views to establish the essential features of each view from the Monument as at August 2011. Nearby familiar skyline landmarks are also described as important features in the general panorama to be seen from the public viewing gallery.
- 2.37 In considering proposals which are likely to affect views from the Monument, the City Corporation will be concerned to ensure that development neither obstructs them due to its height or position nor detracts from the general prospect by inappropriate bulk or massing. The effect on the specific views from the gallery of the Monument protected by Core Strategy Policy CS13 (2) will be a consideration when proposals are made for the redevelopment or alteration of buildings within the views, or which fall within the 'shadow' of buildings which obstruct these views.

Views of The Monument

- 2.38 The policy states that, the Monument is prominent in the City townscape by virtue of its height and architectural form. Development within its surroundings should respect its setting and proposals which could dominate the Monument visually will not be appropriate.
- 2.39 Although views of the Monument from ground level are restricted by the scale of surrounding development, some good views along street axes are identified, notably from King William Street, Monument Street and Gracechurch Street, and from viewpoints in Southwark including the Queen's Walk (western end). These views are described as of 'great value' and should be protected and enhanced in accordance with Core Strategy policy CS13.

Monument Views Study SPD 2020

- 2.40 This guidance states, 'In considering proposals which are likely to affect views from the Monument, the City Corporation will be concerned to ensure that development neither obstructs them due to its height or position nor detracts from the general prospect by inappropriate bulk or massing. The effect on the specific views from the gallery of the Monument protected by Local Plan 2015 Core Strategic Policy CS13: Protected Views and draft City Plan 2036 Strategic Policy S13: Protected Views will be a consideration when proposals are made for the redevelopment or alteration of buildings within the views, or which fall within the 'shadow' of buildings which obstruct these views.

- 2.41 There is potential to improve the foreground roofscape in views from the Monument. Height and massing should not visually intrude into the key features of the views as described and views of the River Thames should be maintained.'
- 2.42 Specifically with regard to identified 'View 5 North West to St Paul's Cathedral' the Cathedral is identified as a 'Key Feature', with the Dome, Peristyle and Drum of the Cathedral visible, seen within a panorama of the western part of the City and beyond. The south-west tower of the cathedral is also visible, but located just outside of the policy area. Other features to consider within this view include:
- The spires of St Bride's Church (Listed Grade I)
 - St Mary le Bow (Listed Grade I)
 - The top of the Old Bailey cupola (Listed Grade II*)
 - The BT Tower (Listed Grade II) and
 - The tower of St Mary Aldermary (Listed Grade I).
- 2.43 It should be noted however that the Monument Views policy does not protect the background of this view.
- 2.44 With regards to Northern views, the guidance states, "Although specific views to the north have not been identified on the Policies Map, they collectively form a spectacular panorama of diverse City buildings. The principal axial views are provided by King William Street and Gracechurch Street / Bishopsgate, leading the eye into the Bank Conservation Area and the fringe of the City Cluster of tall buildings to the north. Any proposed increases in the height of buildings near the Monument will be assessed in terms of their impact on views to and from the Monument."
- 2.45 This document also defines an immediate setting for the monument, comprising the four street blocks adjacent to the site of the Monument.

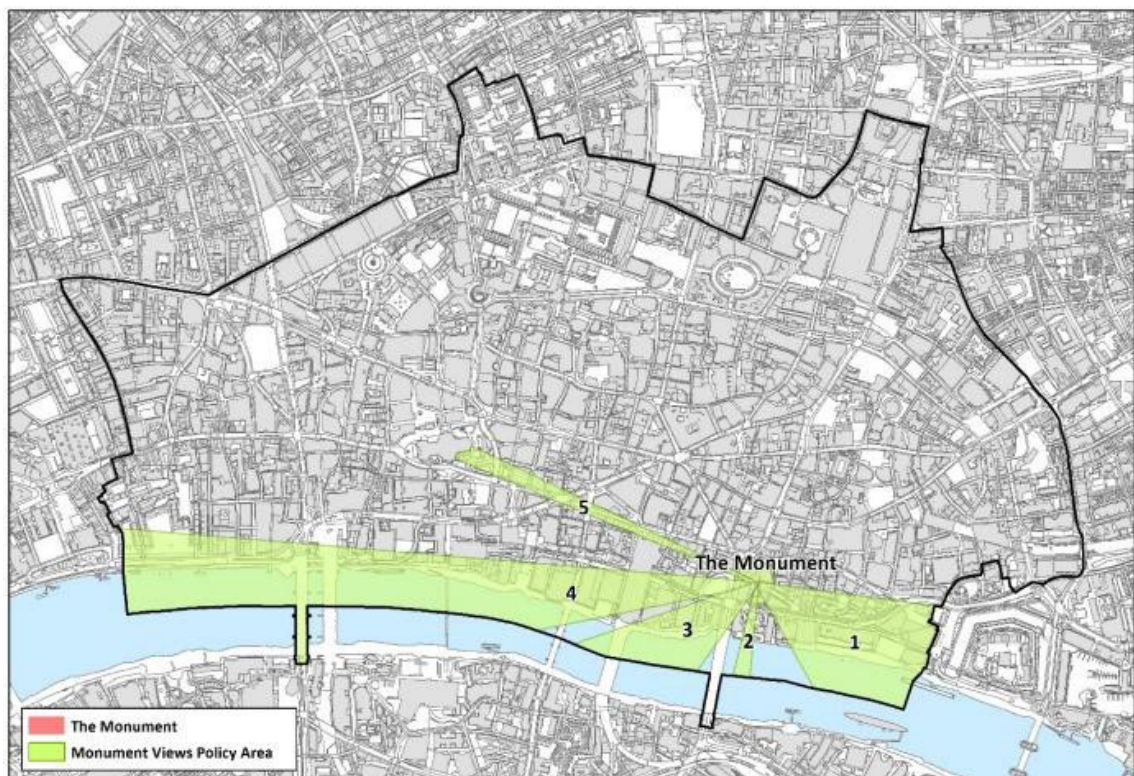


Figure 3. The Monument Views Policy Area.

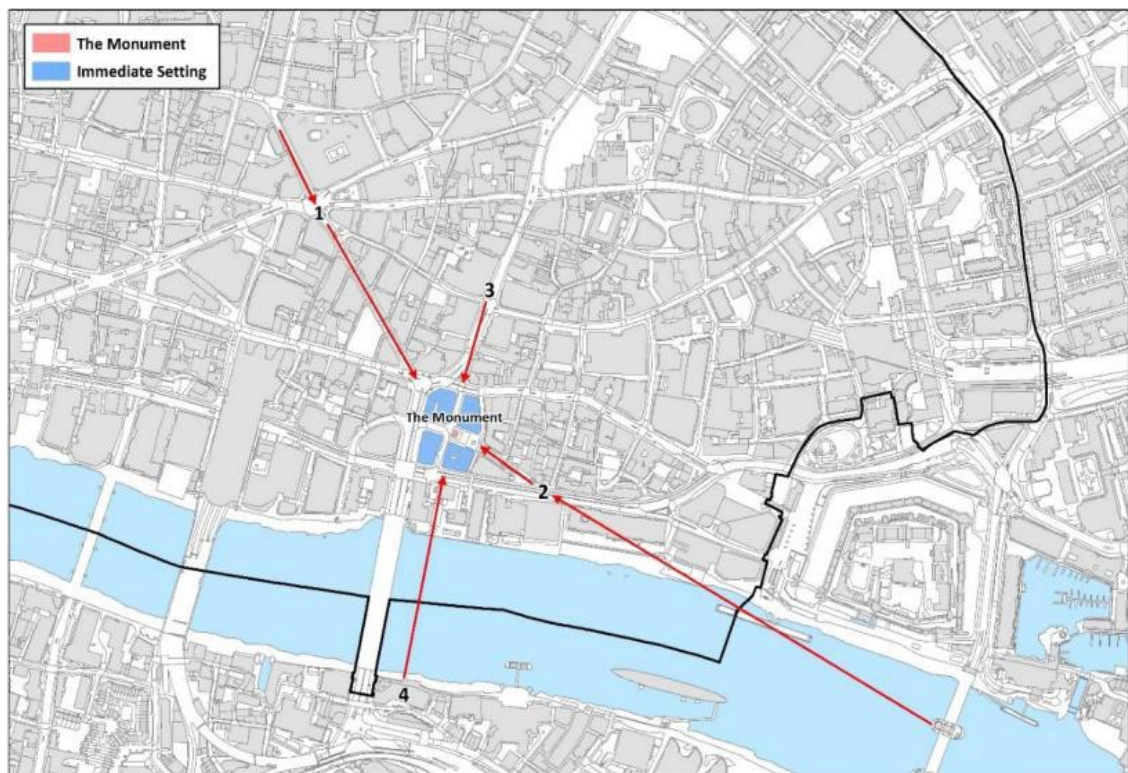


Figure 4. The Monument immediate setting and identified views towards the Monument.

Emerging Local Plan

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

3.0 Methodology

Limitations

- 3.1 The aim of this Heritage Impact Assessment is to identify and assess any potential impacts that the proposed clusters may cause to the significance of the Monument and the contribution of setting to an appreciation of this significance. This is undertaken through an analysis of visual impact, using the modelled indicative visual envelope of each Cluster. These visual envelopes however can only give an approximation of potential height and mass, and it should be noted that the impacts of individual proposals are likely to be altered by their detailed design and individual proportions. The visuals used in the assessment can therefore only be limited in the extent to which they illustrate the impact of any future proposals, however the methodology used has assumed the indicated visual extent of the cluster envelopes to equate to a proposed development.

Methodology

- 3.2 A heritage asset is defined within 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. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”* (NPPF Annex 2: Glossary)
- 3.3 The significance of the heritage assets within and related to future proposals require assessment in order to provide a context for, and to determine the impact of, current development proposals. Significance is defined as, *“the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”* (NPPF Annex 2: Glossary).
- 3.4 Table 1 sets out thresholds of significance which reflect the hierarchy for national and local designations, based on established criteria for those designations. The Table provides a general framework for assessing levels of significance, but it does not seek to measure all aspects for which an asset may be valued – which may be judged by other aspects of merit, discussed in paragraphs 3.5 onwards.

Table 1 – Assessing heritage significance

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings and Scheduled Monuments of exceptional quality, or assets of acknowledged international importance or can contribute to international research objectives. Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity.
High	Grade I, Grade II* and Grade II Listed Buildings and built heritage of exceptional quality. Grade I, Grade II* and Grade II Registered Parks and Gardens and historic landscapes and townscapes which are extremely well preserved with exceptional coherence, integrity, time-depth, or other critical factor(s).
Good	Scheduled Monuments, or assets of national quality and importance, or that can contribute to national research objectives. Grade II* and Grade II Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage that can be shown to have exceptional qualities in their fabric or historical association. Grade II* and II Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of outstanding interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Grade II Listed Buildings, Conservation Areas, locally listed buildings and undesignated assets that can be shown to have good qualities in their fabric or historical association. Grade II Registered Parks and Gardens, Registered Battlefields, undesignated special historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Assets compromised by poor preservation and/or poor survival of contextual associations but with potential to contribute to local research objectives. Historic buildings or structures of modest quality in their fabric or historical association. Locally-listed buildings and undesignated assets of moderate/ low quality. Historic landscapes and townscapes with limited sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible/ none	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

3.5 Beyond the criteria applied for national designation, the concept of ‘value’ can extend more broadly to include an understanding of the heritage values a building or place may hold for its owners, the local community or other interest groups. These aspects of value do not readily fall into the criteria typically applied for designation and require a broader assessment of how a place may hold significance. In seeking to prompt broader assessments of value, Historic England’s [Conservation Principles](#) categorises the potential areas of significance (including and beyond designated assets) under the following headings:

Evidential value – *‘derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.’ (Conservation Principles page 28)*

- 3.6 Evidential value therefore relates to the physical remains of a building/structure and its setting, including the potential for below ground remains, and what this primary source of evidence can tell us about the past.

Aesthetic Value – *‘Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive’ (pages 30-31).*

- 3.7 Aesthetic value therefore relates to the visual qualities and characteristics of an asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric, and setting (including public and private views).

Historic Value – *‘derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value’ (pages 28-30).*

- 3.8 Historic value therefore relates to the age and history of the asset, its development over time and the strength of its tie to a particular architectural period, person, place or event. It can also include the layout of a site, the plan form of a building and any features of special interest.

Communal Value – *“Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there” (pages 31-32).*

- 3.9 Communal value therefore relates to the role an asset plays in a historic setting, village, town or landscape context, and what it means to that place or that community. It is also linked to the use of a building, which is perhaps tied to a local industry or its social and/or spiritual connections.

- 3.10 Historic England's Conservation Principles also considers the contribution made by setting and context to the significance of a heritage asset.
- *“Setting’ is an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”*
 - *“Context’ embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places” (page 39).*
- 3.11 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations, but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.12 Once the value and significance of an asset has been assessed, the next stage is to determine the ‘magnitude’ of the potential impact brought about by any development proposals. This impact could be a direct physical impact on the asset itself or an impact on its wider setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset – rather than setting being considered as the asset itself.

4.0 Significance of the Monument

4.1 Built by Sir Christopher Wren and Robert Hook in 1671-77 The Monument to the Great Fire, to give it its full name, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland stone, the largest free-standing classical column in the world, crowned with a gilded flaming orb, supported atop a large cuboid pedestal bearing inscriptions and bas-reliefs describing the circumstances of its conception. The Monument is of exceptional architectural/artistic and historic significance as a City/London-wide Landmark. As a purpose built public viewing gallery, the Monument retained particular interest as a form of civic architecture.

4.2 The following are considered therefore to comprises elements of its significance:

Historic interest:

- (i) As a public monument pre-dating the Georgian era;
- (ii) For its associative and illustrative relationship with the post-Fire rebuilding of the City of London, specifically with regard to the connection with Sir Christopher Wren and his lead role overseeing the reconstruction of the city churches and St Paul's Cathedral;
- (iii) As the tallest free standing classical column in the world;
- (iv) Associative interest with scientist and theorist Robert Hooke, who informed the design.

Architectural interest:

- (v) Considerable rarity value as an example of a colossal column in Britain, subsequently influential in the proliferation of this building typology, thought to influence the design of the Column of Victory, Blenheim Place; the memorial to Charles, 2nd Earl Grey in Newcastle upon Tyne; Nelson's Column, Trafalgar Square and the Elveden War Memorial in Suffolk.
- (vi) Associative interest as an example of a design by Sir Christopher Wren, one of Britain's most well known architects.
- (vii) As an example of English Baroque architecture, and subsequent group value with Wren's designs elsewhere within the city, most notably including St Paul's Cathedral and the city churches.
- (viii) Distinctive material palette in the use of Portland stone, particularly associated with late seventeenth century civic buildings.
- (ix) Through the sculptural quality of the carved panels on the plinth, and use of narrative within the overall design to enhance the commemorative quality.
- (x) For the scale of the design, intended to be dominant within the surroundings, and establish a London-wide presence;

- (xi) For the internal spiral stair providing access to the gallery at finial level, evidencing structural and engineering advances of the era; and
- (xii) For the use and function of the building as a visitor attraction and public viewing gallery.

Artistic interest

- (xiii) The carved panels on the plinth and the sculptural finial; and
- (xiv) Association with numerous artistic representations including drawings, paintings, engravings and prints in the eighteenth century.

Archaeological Interest

- (xv) There remains potential surviving evidence of the early occupation of the site.

Contribution of setting

- 4.3 The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. This contribution is particularly enhanced by its function as a viewing gallery, and as such the Monument can be considered to draw specific interest from its location and proximity to the City centre and riverside, illustrated through the expansive views from the top. Symbolically sited near Pudding Lane where the Fire began, this location is of particular historic interest, also positioned on a near axial alignment with the Old London Bridge, a crossing associated with the founding of the City in Roman times. Alongside the re-built City church towers/spires, the Monument is a prominent feature of many representations of the London skyline, recognisably forming part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge contributing to a sense of gravitas and grandeur within a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.
- 4.4 Therefore the following principal elements of setting are considered to make a substantial contribution to an understanding and appreciation of heritage significance. These elements are cross referenced where appropriate to identified views in local policy:
- i) *Wren-era views of the Monument***
 - a. The Monument has a general skyline presence in views from the South Bank, principally from the SW,S and SE. In these it appears dramatically as Wren's only secular foil to the charismatic clustering of steeples on this skyline.
 - b. From Fish Street Hill and Gracechurch Street (view 3 Monument Views SPD), looking north and south respectively, longer urban views of the Monument are possible, where it reads as a particularly important part of the arrival experience into the City centre.

ii) Subsequent views of the Monument

- a. The view south-east down Princes Street/King William Street (View 1 The Monument Views SPD) is an early C19 diagonal vista aligned on the Monument, with particularly fine long oblique views of it from the top of Princes Street. Built as part of a scheme involving the demolition of Old London Bridge, which removed a key Wren-era view of the building and removed its status as part of the 'arrival experience'; these new views of the Monument are almost compensatory, though clearly created incidentally.
- b. Monument Street was formed in the early 1880s as part of street improvements/relieving traffic to/from Billingsgate. It offers an unusual long-range urban view of the entire structure, from base to top, the upper two-thirds against clear sky (View 2 The Monument Views SPD). This view is indicative of the enduring landmark status of the monument which continued to influence interventions in the City Streetscape.
- c. The Monument continues to have a powerful presence in riparian views in the west from Waterloo Bridge (where the orb is seen commanding clear sky) to from as far away as Greenwich Hill, where it can be seen in conjunction with St Paul's and Tower Bridge. Whilst comparatively diminutive in these views which take in the heights of the modern City Cluster seen to the west, its distinct form retains a symbolic power. Despite the evolution of the city around it, these dramatic changes have continued to ensure its long ranging visibility, evidencing its importance as a City landmark which has been protected over time. Many of these views are identified within the London View Management Framework.

iii) Views from the Monument

- a. The use of the Monument as a viewing platform enabling dramatic panoramic views over the Thames is well established. This enhances an appreciation of its commemorative function and dedication to the City surveyed below. These views are protected through the Monument Views Policy SPD 2020, and identified in the map below. These include views south west and south overlooking the Thames and the City as it meets the waters edge, the City's bridges, as well as the Southbank on the far side of the river (Views 4,3 and 2). View 1 looks south east towards the Tower of London World Heritage Site and Tower Bridge. View 5 looks west towards St Paul's Cathedral. Views north towards the City Cluster are also highlighted within the SPD as of interest, forming a spectacular panorama of diverse City buildings. Views are drawn into the Bank Conservation Area and the City Cluster creating a sense of dynamic movement and interest in the streetscape.

5.0 Proposed Clusters

5.1 Two new locations considered to be potentially appropriate for tall buildings have been identified, indicated in Figures 5 and 6 below. The proposed extent of these new clusters are defined through, a specified geographic area and series of identified contour heights, which outline bands of appropriate height. These new clusters comprise, the City Cluster, located approximately 78 metres to the north east of the Monument, and the Fleet Valley Cluster located approximately 1.4 km to the west. The City Cluster is located close to the Monument to the North East but falls outside of its immediate setting, as defined by the Monument Views SPD (figure 5).

5.2 The CoLC (City of London Corporation) have undertaken a detailed scoping and testing exercise to establish an indicative visual envelope for both Proposed Clusters. A series of hard and qualitative constraints informed amendments to the clusters' overall form, including height and depth, and these are outlined below. This process was iterative and compared a number of different options for the height in different locations.

Hard Constraints

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

These Comprise:

- Strategic pan-London views of the London View Management Framework;
- St Paul's Heights Viewing Points contained in the Protected Views SPD;
- Monument Views contained in the Protected Views SPD;
- Tower of London WHS approaches, and representative views identified in the Tower of London Local Setting Study; and
- Relevant neighbouring borough's strategic local views.
- Future baseline of consented schemes

Qualitative Constraints

- Local heritage assets and their settings;
- Local townscape character.

5.4 How the cluster was specifically modelled in response to the setting of the Monument, including views identified in local policy, is outlined below:

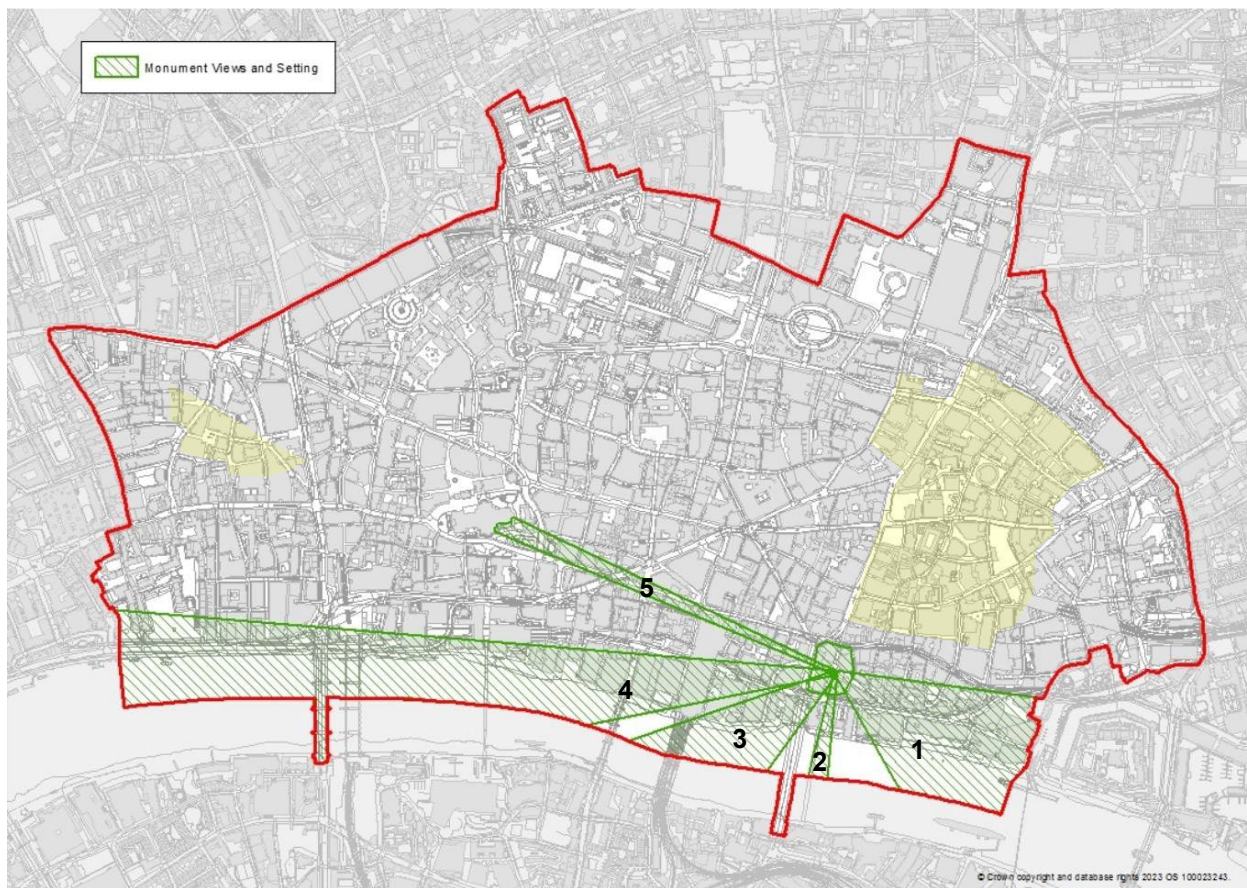


Figure 5. Monument Views Policy Area. Proposed City and Fleet Valley Clusters indicated approximately by the yellow transparency.

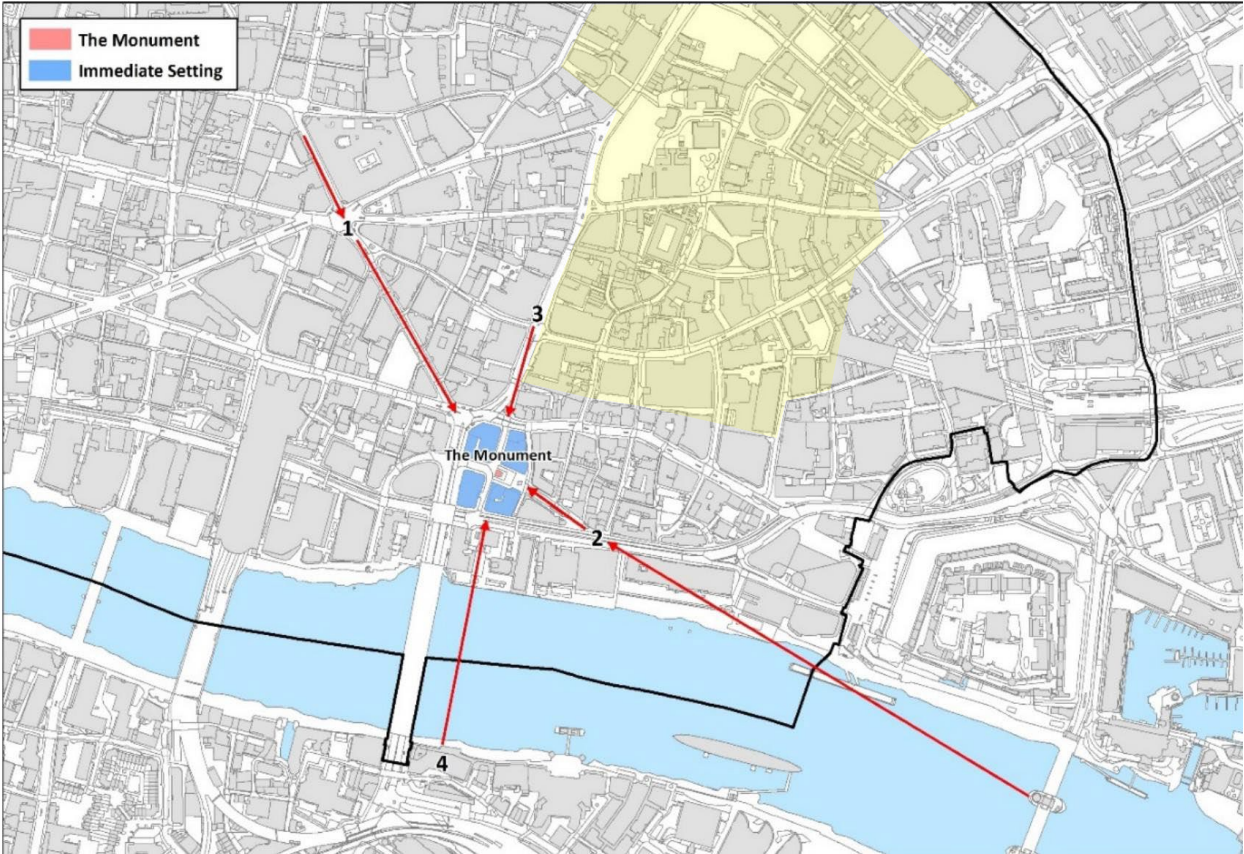


Figure 6. The Monument Immediate setting. Proposed City Cluster indicated by the yellow transparency.

- 5.5 Both Clusters do not extend across the axial views of The Monument as identified within the SPD (Figure 6), however due to the City Cluster's proximity to the north west, the proposed City Cluster was considered likely to appear within the wider field of view within Views 1 and 2, the background of View 4 and frame views within View 3. These views have therefore informed the scoping exercise which adjusted the shape of the visual envelope of each cluster to avoid a harmful impact to the Monument's immediate and local setting. This is set out in detail below. Visuals provided at Figures 7-14 illustrate the potential visual impact of the proposed clusters during the modelling process, showing initial 3D modelling of indicative visual envelopes within the views identified above.¹
- 5.6 The City Cluster is located outside of the views *from* the Monument as identified within the SPD. However as indicated in Figure 5, the Fleet Valley Cluster can be seen to fall within the background of View 5 towards the Cathedral. While the policy explicitly excludes² the background of this view beyond the identified corridor in Figure 5, an assessment of impact upon this view is included in Section 6 for completeness.



Figure 7. View South along King William Street. View 1 as identified in the Monument Views Study Views SPD. As existing.

¹ It should be noted these scoping views are for information to illustrate the scoping process and do not reflect the final form of the clusters or the final list of consented schemes included in the baseline for assessment within section 6.

² The Monument Views Study SPD, p.19.



Figure 8. View South along King William Street. View 1 as identified in the Monument Protected Views SPD. Initial Cluster Scoping Model indicated by the purple transparency. Consented schemes shown in pink.

- 5.7 The scoping exercise ensured in views of The Monument south along Princes Street the existing visible extent of the Monument is retained (SPD View 1). Figure 8 illustrates the sense of an axial approach into Bank junction remains appreciable, with the orb of the Monument continuing to be silhouetted against an open sky. This view is therefore scoped out of further assessment.



Figure 9. View South along Gracechurch Street at the Lombard Street junction. View 3 as identified in the Monument Views Study SPD. Existing.



c

- 5.8 The view of the Monument along Gracechurch Street is intermittent, first apparent from its western side at its junction with Lombard Street (SPD View 3). The viewing gallery of the Monument appears first, before more of the column shaft is revealed as Eastcheap is approached. The church of St Magnus the Martyr (Listed Grade I) is seen to the right of the Monument. The proposed cluster was modelled to terminate north of the Monument, ensuring that the existing visible extent of the Monument seen in the approach along Gracechurch Street is retained, perceived against an expanse of open sky. This has ensured that sight lines towards the orb within this axial view is retained, remaining a point of focus within the view. The existing relationship between Magnus the Martyr is also retained, with both the church spire and orb punctuating the horizon line. This ensures an appreciation of the Monument as part the wider works undertaken by Wren is retained. This view is therefore scoped out of further assessment.

Figure 11. Queen's Walk, looking north from the Southbank. Monument Views Study View 4. As Existing.



Figure 11. Queen's Walk, looking north from the Southbank. Monument Views Study View 4. As Existing.



Figure 12. Queen's Walk, looking north from the Southbank. Monument Views Study View 4. Initial City Cluster Scoping Model indicated by the purple transparency. Consented schemes indicated in pink.

- 5.9 This view is illustrative of the line of the Old London Bridge, and as such has particular sensitivity as the oldest and most complete view from the South bank and river. The Monument is seen over the roof of St Magnus the Martyr Church, and the two retain an appreciable group value, illustrating Wren's wider rebuilding works within the City post Great Fire. As existing the City Cluster is seen in the backdrop. While the orb in this view is experienced against a clear sky, as the viewer moves East-West along the Southbank it is backdropped by Tower 42 to the North. The cluster model was adjusted to retreat away from the western boundary of Tower 42, ensuring the existing glimpses of the orb silhouetted against open sky were retained. The relationship between St Magnus and the Monument is also preserved, with the cluster located to the east. This view is therefore scoped out of further assessment.



Figure 13. View North West from Tower Bridge. LVMF View point 10.A.1. Monument Views Study SPD View 2. As Existing.



Figure 14. LVMF View point 10.A.View 2 – Monument Views Study SPD. Initial City Cluster Scoping Model indicated by the purple transparency. Consented schemes indicated in pink.

- 5.10 In this view of the Monument from Tower Bridge, the upper portions are seen isolated against the sky to the west of the City Cluster, rising above Customs House (Listed Grade I) and the trees which line the water's edge. The proximity to the Thames is illustrative of the Monuments landmark status as a viewing platform and this relationship is therefore of interest. Modern development along the river is seen to commence east of the Customs House, with the tall buildings of the City Cluster, existing and consented, visible above these later interventions above the waterfront. The dome of St Paul's is seen to the west of the Monument creating a group. The character of the western half of this view therefore contrasts to the hypermodernity of the City Cluster, seen centrally. The western boundary of the proposed cluster as seen in this view was brought in line within the existing consented buildings, leaving a considerable extent of open sky surrounding the Monument. The relationship between St Pauls and the Monument and its proximity to the water's edge is also preserved. The proposed cluster can be seen to remain within an area of greater change, in line with the existing character of this view.³
- 5.11 While the amended form of the cluster is considered to have a neutral impact, as this view is additionally protected within the LVMF, representing view 10.A, this view is scoped in for further assessment in section 6.

Summary

- 5.12 The above assessment has shown how the scoping exercise informed the modelling of the proposed new clusters. This has ensured that in views to the Monument as defined in the SPD, the cluster will not impact how these views presently enable an appreciation of the Monuments significance.
- 5.13 These views have therefore been scoped out of the final assessment of impact, with the exception of View 2 as it reflects an LVMF viewpoint and subject to the additional policy constraints outlined within the LVMF guidance. This view has therefore been brought forward into the final impact assessment, alongside other LVMF views of the Monument.
- 5.14 As noted above, while both proposed clusters fall outside the views from The Monument, the scoping process has found the Fleet Valley Cluster may appear in the background of view 5. An assessment of this view has therefore been included in the final impact assessment.

³ It should be noted a second viewpoint along Monument street is identified however distance from the proposed cluster and alignment of the streets is such that has been excluded from further assessment.

6.0 Assessment of Impact

- 6.1 This section assesses the potential impact of the proposed Clusters upon the significance of the Monument.
- 6.2 3D modelling is used to give an indicative visual envelope to each Cluster, using a defined geographic area and banded contour lines to determine the potential visible height and depth of the Clusters from specific viewpoints. Full details of how each cluster model was produced is found within Miller Hare’s Methodology report. These view points have been selected where the proposed clusters are considered to potentially create a change within the setting of the Monument, which could have a beneficial, adverse or neutral impact on how this setting contributes to an appreciation of significance. This assessment is made with reference to the key contributions of setting outlined in section 4 and those views identified within the Monument Views policy SPD and Protected Vistas SPD. This section therefore includes an assessment of the scoped in views noted in section 5, as well as identified views within the London Metropolitan Views Framework, where the Monument is noted as a landmark feature or notably visible.
- 6.3 Where appropriate assessment views will be group together where the nature of the impact upon appreciation of significance is the same. Baseline photography is provided to establish the existing character of the view, and the CGI modelled view shows consented schemes. This view including the proposed clusters is then provided showing potential visual impact.

LVMF 16B.2, 15B1-2,



Figure 15. Gabriel's Wharf, Southbank, looking east. LVMF 16B.2. As Existing,

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Figure 16. Gabriel's Wharf, Southbank, looking east. LVMF 16B.2. Proposed City Cluster shown in purple transparency.



Figure 17. Waterloo Bridge Downstream, centre of bridge, 15.B2. As Existing.

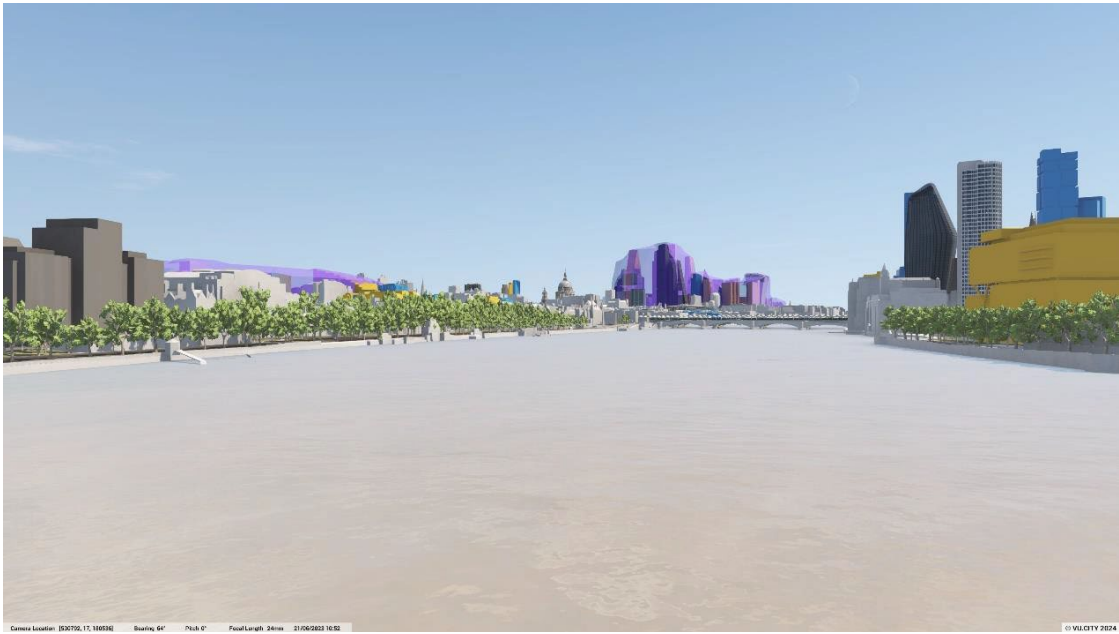


Figure 18. Waterloo Bridge Downstream, centre of bridge, LVMF 15.B.2. Proposed clusters shown in purple transparency. Yellow and blue buildings are those that are consented and under-construction respectively.



Figure 19. Waterloo Bridge Downstream, close to the Westminster bank. LVMF 15 B.1. As Existing.

Figure 20. Waterloo Bridge Downstream, close to the Westminster bank. LVMF 15 B.1. Proposed clusters shown in the purple transparency.



Figure 20. Waterloo Bridge Downstream, close to the Westminster bank. LVMF 15 B.1. Proposed clusters shown in the purple transparency.

- 6.4 In these views the orb and viewing platform of the Monument is just appreciable above Blackfriars bridge, seen distantly and isolated against the sky. The distance in these views is such that the Monument is not noted as a Landmark within the LVMF guidance. Proximity of the Monument to the riverside and city centre is however appreciable, with the bend in the river allowing expansive views towards the heart of the city seen over intervening bridges. This enhances an appreciation of the symbolic positioning of the Monument at the city centre, also underscored by its isolated appearance against an open sky. In 15.B2, and 15.B1 existing development can be seen to join with the silhouette of the column below the viewing platform, also falling in the backdrop of the column but below the viewing platform in view 15.B2.
- 6.5 The Cathedral is seen centrally within these views, with the Dome and Western Towers appearing prominently above the north bank of the river. These views are therefore broadly illustrative of the associative interest of the Monument, highlighting the relationship to Wren's wider influence upon the post Great Fire rebuilding of the city. It should be noted that City Cluster is presently located between the Cathedral and the Monument in these views, and this group value is better illustrated elsewhere. In the existing views the form of 20 Fenchurch Street creates an abrupt termination to the eastern extent of the Cluster within these views with the Monument seen at some distance beyond. The overall character of these views towards the Monument is considered to be largely fortuitous with an incidental quality established through the partial occlusion by Blackfriars' bridge. However the gilded orb of the Monument continues to draw the eye, through both its metallic colour and isolated appearance on the skyline.
- 6.6 The proposed City Cluster will potentially extend the visible extent of the City Cluster further towards the Monument, infilling the existing sky-gap between the two. The form of the Cluster has however been modulated so that it slopes downward towards the orb, leaving the open sky setting of the orb and viewing platform free from development. In views 15.B1 and 15.B2 this extended visual envelope stops short of the Monument, avoiding conjoining with its silhouette. While this will potentially change the character and extent of the City Cluster as perceived in these views, it is considered that an appreciation of its symbolic power of the Monument remains undiminished. The proposed Clusters have been deliberately modelled to create a defined slope,

decreasing in height so that its final eastern edge falls below the height of the viewing platform, establishing a sense of deference. As such the proposed City Cluster form will draw the eye along the skyline towards the orb, improving the ability to identify the Monument within this distant view. Additionally the relationship between the Cathedral and the Monument is considered to be preserved, remaining positioned either side of the City Cluster. In respect of 15.B1 and 15.B2 the overall potential impact of the proposed cluster upon the view is considered to be neutral, preserving those aspects of setting which make a positive contribution to the Monument's setting.

- 6.7 With regards to 16.B2, the proposed cluster falls just short of the silhouette of the Monument below the viewing platform. This distance is such that the cluster from this viewpoint appears to join with its outline on the skyline, albeit a telephoto Lense would continue to show an appreciable gap. There is the potential here therefore for a harmful impact, eroding the current isolated appearance of the Monument seen against the sky, and therefore diminishing its landmark character. This potential harm will be in part mitigated by the improved legibility of the Monument, as described above, with the downward slope of the cluster leading the eye to the viewing platform and orb. The Proposed cluster will remain appreciably deferential, and the influence of the Monument on the surrounding townscape made clear by the termination of the Cluster at the Monument's location. Similarly the relationship between the Monument and riverside will also remain intact. To avoid a harmful impact future proposals should therefore seek to minimise the appearance of bulk and reduce distant visibility through the careful selection of materials and detailed design.

LVMF 5A.1 and 5A.2



Figure 21. LVMF Viewpoint 5A.1 at the Wolfe Statue looking North West. As existing.



Figure 22. LVMF Viewpoint 5A.1 Wolfe Statue looking North West. Proposed clusters indicated in the purple transparency.



Figure 23. LVMF Viewpoint 5A.2 Information board looking North West. As Existing.



Figure 24. LVMF Viewpoint 5A.2 Information board looking North West. Proposed clusters indicated in the purple transparencies.



Figure 25. Viewpoint 5A.2 Information board looking North West. Proposed clusters indicated in the purple transparencies. Leaf cover removed.

6.8 Viewing location 5A includes two assessment points, taking in the formal, axial arrangement between Greenwich Palace, and the Queen's House. To the West the view takes in central

London and St Paul's Cathedral, best seen from Assessment Point 5A.2, and this viewpoint includes a Protected Vista towards the Cathedral. In 5A.1 and 5A.2 the tree line in the foreground obscures the silhouette of the Cathedral dome and development further to the west, however the cathedral is just about appreciable.

- 6.9 The Monument is seen distantly in these views, just appreciable with a telephoto lens but not to the naked eye. The upper portion of the column and orb is seen close to Tower Bridge and the Cathedral, forming a dramatic group. This view is particularly idiosyncratic, with the Cathedral dome appreciated centrally with the two Towers of the bridge and the Monument mirroring the appearance of the Cathedral's western towers to the west. This relationship therefore enhances an appreciation of the Monuments landmark quality, and associative connection with Wren.
- 6.10 Within these views the City Cluster is seen, commencing to the east of the landmark grouping around the Cathedral. The tall buildings which comprise the Cluster are perceived as a separate group on the skyline, with open sky between the two creating a sense of focus upon the Cathedral. To the west consented development at 1 New Street Square and 6 Fetter Lane are seen to the west of the cathedral's south western towers, with a sky gap remaining between the two.
- 6.11 Figures 23, 24 and 25 show that the proposed City Cluster will preserve the existing sense of two distinct groups on the skyline, maintaining the focus on the Cathedral in the view, located well beyond the extent of the protected vista and seen to the right of consented schemes located in the foreground. The Fleet Valley cluster is centred on the silhouette of consented development around New Street Square, rising slightly above the existing roofline, but appearing no further towards the outline of the Cathedral's western towers. The existing visible extent of the Monument is preserved and the hierarchy between the three landmarks of Tower Bridge, the Monument and the Cathedral is retained. Therefore while the overall visible extent of the Clusters seen in this view will potentially increase, this is considered to preserve the contribution of this view to the setting and ability to appreciate the significance of the Monument.

LVMF 10.A



Figure 26. View North West from Tower Bridge. LVMF View point 10.A.1. Monument Views Study SPD View 2. As Existing.



Figure 27. View North West from Tower Bridge. LVMF View point 10.A Monument Views study View 2. Initial City Cluster Scoping Model indicated by the purple transparency. Consented schemes indicated in pink.

- 6.12 In view 10.A the Monument is seen to the west of the City Cluster, with the orb and upper portion of the column seen against a clear sky and above the treeline along the north river bank. This view also takes in the upper portion of the Dome of St Paul's cathedral, and the spires of each punctuate the horizon line, contrasting to the relatively uniform building heights below. This underscores the historic associations between the two, sharing a connection with Wren and his master planning of London's rebuilding post Great Fire. The appearance of both along the water front also enhances an appreciation of both building's landmark character. The City Cluster in the baseline is seen to commence to the east, leaving an expanse of open sky between the Monument and Cluster free from development. The tall buildings of the Cluster are seen to rise above where later twentieth century development has occurred in the foreground along the water's edge so that the Cluster is presently perceived as located within an area of change.
- 6.13 The proposed City Cluster is visible in this view, its western boundary hugging the consented schemes which currently define the Western extent of tall buildings within the cluster. Therefore while the visible extent of the City Cluster will potentially increase in this view, this increase is largely located above the consented buildings which fall between 20 Fenchurch Street and the apex of the Cluster. This increase therefore retains the extent of open sky between the Monument and cluster, preserving an appreciation of its isolated silhouette on the skyline. The existing appreciable relationship with St Paul's is also preserved. The overall potential impact of the proposed cluster's on how this view contributes to an appreciation of the Monument's significance is therefore neutral.

LVMF 25a 1-3.



Figure 28. The Queen's Walk at City Hall looking north. LVMF 25.a1. As Existing.

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Figure 29. The Queen's Walk at City Hall looking North. LVMF 25.A1. Proposed clusters indicated by the purple transparency.



Figure 30. The Queen's Walk at City Hall looking North. LVMF 25.A2. As Existing.

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Figure 31. The Queen's Walk at City Hall looking North. LVMF 25.A2. Proposed cluster shown in purple transparency.



Figure 32. The Queen's Walk at City Hall Looking North. LVMF 25.A3. As existing.



Figure 33. The Queen's Walk at City Hal Looking North. LVMF 25.A3. Proposed clusters indicated by the purple transparency.

- 6.14 These views look North over the riverside from the Southbank, close to City Hall. They illustrate a kinetic sequence as the Monument is viewed along the Queen's Walk moving from west to east. In these views The Monument is seen partially to the west of the City Cluster, with the golden orb perceived clearly against the sky, temporarily passing behind the masts of HMS Belfast in 25.A2. Only the upper portion of the column is visible, with the lower extent located behind late twentieth century development. In these views contemporary building at New Court also falls behind the column of the Monument in 25.A2 terminates below the viewing gallery. This building is seen close to the Monument in both 25.A1 and 25.A3. In this view the western edge of the city cluster is presently defined by 20 Fenchurch Street, which creates an abrupt termination to the grouping of tall buildings seen centrally. The consented baseline shows this boundary to be softened slightly by future development, creating a more sloped silhouette to the cluster on the skyline. Despite development in the background, the prominence of the Monument in these views, seen above twentieth century buildings along the water front, is illustrative of its design as a landmark viewing platform, making a positive contribution to its setting appreciation of its significance.
- 6.15 In these views the proposed City Cluster will not extend beyond the consented schemes to the west of 20 Fenchurch Street, leaving the existing extent open sky behind the Monument preserved. While the density of the Cluster in this view will potentially increase, this is considered to maintain the overall hierarchy to the townscape seen in this view, with the Cluster presently appreciated as a clear grouping of tall buildings on the skyline. The overall potential impact upon these views contribution to the setting and appreciation of the Monuments significance is therefore considered to be neutral.

Monument Views: View 5



Figure 34. Monument Views SPD View 5, looking north west from the viewing gallery. As Existing.



Figure 35. Monument Views SPD View 5, looking north west from the viewing gallery. Proposed clusters indicated by the purple transparency.

- 6.16 This view is varied architecturally looking west from the Monument's viewing gallery over the City Centre, and includes a partial view of the Cathedral seen to the south west. The foreground comprises a mix of contemporary development seen laterally, and an axial view along the approach to Bank junction, lined with nineteenth century buildings. The foreground where just below the Cathedral is however generally twentieth century in character and with a mix of styles and materials establishing a sense of diversity. The dome, drum and peristyle of the Cathedral are visible alongside the western towers, however the quality of the view is however informal seen above the roofline and plantwork of intervening development. The Cathedral however remains a key feature of the view, featured prominently in the skyline.
- 6.17 As existing, the sky space between the southern Cathedral tower and the Cathedral drum is presently backdropped by more distant development. Further consented development is seen between the western towers and drum of the Cathedral, rising slightly above the existing built horizon line. A sufficient contrast in materiality between the fabric of the Cathedral and the modern building behind however ensures that the towers and drum remain legibly distinct and part of the same structure. Other Wren buildings of note visible from this view point includes the spires of St Bride's Church, St Mary Le Bow and of St Mary Aldermary (later reconstruction). Additionally glimpses of the top of the Old Bailey cupola, the BT Tower and Barbican towers and the tower are also possible. This view therefore is illustrative of the landmark quality of the Monument, built to provide long ranging views to other structures of symbolic, cultural, and spiritual importance. The intervisibility with other buildings associated with Wren is of particular importance, and illustrative of several key aspects of the Monument's significance.
- 6.18 The proposed Fleet Valley cluster will be potentially visible in this view, appearing to the right of the BT Tower and extending across the field of view to meet the drum of the Cathedral. While this will increase the height of visible development where adjacent to the BT Tower, the proposed height of the Cluster either matches or falls below the height of existing and consented schemes, where visible between the Western Towers and the Drum. Views along the approach to Bank junction, as well as glimpses of the other landmarks noted above are also preserved.
- 6.19 Therefore while the proposed clusters will create a visible change in this view, the overall potential impact of the proposed clusters upon this views contribution to setting an appreciation of the Monument's significance is considered to be neutral. This neutral impact is however contingent on the retention of a sense of material contrast between the Cathedral fabric and development seen behind.

Summary of Impact

- 6.20 An overall assessment of impact to the Monument is made below. This assessment confirms the extent to which those aspects of setting which contribute to an appreciation of the Monument's significance as identified in section 4 are affected (paragraph 4.3 i.a-b, ii.a-c, iii.a). This assessment is also made with reference to the identified vulnerabilities of the Monument's significance to Tall Building development, as highlighted in section 2 of the Tall Building's Evidence Base.

i) Wren era views

A. This assessment has indicated the Monument will retain a general skyline presence in views from the from the south bank, (LVMF Views 16.B2 and 25.A1:2:3) preserving an appreciation of group value as a secular foil to steeples which comprise the City Churches.

While the extension of the City Cluster eastwards has the potential to appear from a distance that it joins with the silhouette of the Monument below the viewing gallery within 16.B2, harm arising through the perceived loss of an isolated silhouette to the column is potentially mitigated by the increased legibility of the Monument in this view, with the slope of the cluster drawing the eye to its location. The orb and viewing gallery in this view will retain their open sky back-drop, so that the landmark symbolic quality of the Monument remains appreciable. Similarly the Monument's importance illustrated in its influence over subsequent development will remain clearly appreciable through the termination of the cluster at its location. It is noted that the view of the Monument from 16.B2 is incidental in quality, to the extent that it is not identified as a landmark feature within the Visual Management Guidance of the LVMF and this view is also not specifically identified in the Monument Views Study. Section 5 has shown that Wren era views from the south bank are best represented by View 4 of the Monument Views Study, looking directly north along the alignment of Old London Bridge. This view is preserved in full, protecting the intention to create a dramatic arrival into the city centre from the south bank. Notwithstanding this in order to avoid the potentially harmful impact highlighted above, individual tall building proposals should seek to ensure the silhouette of the Monument in 16.B2 remains distinctive through careful selection of materials and detailed design.

B. Views from Fish Hill and Gracechurch Street have informed the modelling of the potential City Cluster so that its visible extent is pulled substantially back away from the Monument. In these views the existing visibility of the Monument is preserved in full. While the proposed Cluster will create change its wider setting, this retains the existing character of these views, presently defined by the existing tall building development within the cluster. The contribution of this aspect of setting to an appreciation of the Monument's significance is therefore preserved, with an overall neutral impact.

ii) Subsequent Views of the Monument

- A. As above, the view south-east along Princes Street/King William street has informed the modelling of the proposed cluster, so that it is pulled well back in these views, retaining the fine long oblique views of the monument from the top of Princess Street. The contribution of this aspect of setting to an appreciation of the Monument's significance is therefore preserved, with an overall neutral impact.
- B. The proximity of Monument Street to the Monument and location to the south of the proposed cluster ensures that the existing character of these views, including sight lines to the entirety of the Monument are preserved. The intervening development and angle of the road is such that the proposed clusters will not be visible in these views. The contribution of this aspect of setting to an appreciation of the Monument's significance is therefore preserved, with an overall neutral impact.
- C. The above assessment has demonstrated that the Monument will continue to have a powerful presence in riparian views (LVMF 15.B1-2) and Greenwich (5A). In these views the visible extent of the City Cluster will potentially increase and densify, but remains pulled back from the Monument, retaining the Monument's distant visibility and existing open sky setting. As present the City Cluster dominates in terms of scale, and the Proposed Cluster does not alter this existing character. Similarly the Fleet Valley cluster is seen but is considered to preserve the extent to which the Monument is appreciable. As noted in section 4, the symbolic power of the Monument and overall hierarchy to the skyline in these views is not drawn principally from a sense of scale but rather the sense of a prominent location on the water front, presence along the skyline, and group value with other landmark monuments.

The contribution of this aspect of setting to an appreciation of the Monument's significance is therefore preserved, with an overall neutral impact.

iii) Views from the Monument

A. The proposed clusters are located outside of the identified views from the Monument, ensuring its function as a public viewing platform, enabling long range views over the surrounding City is preserved. An assessment of View 5 from the Monument looking north west towards the Cathedral has demonstrated that the Fleet Valley cluster will potentially be visible in the backdrop of this view, seen behind the Western Towers and Cathedral Dome. The indicative visual envelope of the cluster in this location has been shown to fall below consented development which presently infills the gap between the towers and Dome, so that the overall impact of the proposed cluster on this view is considered to be neutral. As noted above, this neutral impact is contingent upon the retention of distinction in materiality between any proposed new structure and the fabric of the Cathedral. Notwithstanding this, the visibility of the Cathedral and its prominence within the view is considered to be preserved, protecting the sense of group value with this strategic landmark. The contribution of this aspect of setting to an appreciation of the Monument's significance is therefore preserved, with an overall neutral impact.

- 6.21 In reference to the potential vulnerabilities of the Monument, as identified within Section 4, the location of the City Cluster to the north west has avoided any occlusion or loss of clear sky setting in views associated with Wren era approaches into the City, and includes the preservation of its existing prominence in the view North along the Queen's Walk, on the alignment of Old London Bridge.
- 6.22 The location of the City Cluster to the northwest ensures that there is no loss of clear sky setting or prominence within nineteenth century views west along Monument Street, or from Tower Bridge. Similarly distant views from Waterloo Bridge and Greenwich have been shown to retain an open sky setting behind the orb. While these views are generally only perceptible through magnification, the proposed cluster does not impede the existing extent to which it forms a recognisable landmark on the horizon line.
- 6.23 In views from the Monument viewing platform, it is acknowledged that the Fleet Valley cluster has the potential to appear behind the western towers of the cathedral, matching the roofline of consented development. This view is therefore particularly sensitive to development within the Fleet Valley Cluster, and in order to maintain a neutral impact, new development should ensure a contrast between the stone of the western towers and backdrop is maintained.
- 6.24 An assessment of potential impact has found in all cases the proposed clusters have a neutral impact upon the views assessed, preserving how these views contribute positively to or aid an appreciation of the Monument's significance.

7.0 Conclusion

- 7.1 This report has assessed the potential impact of the Proposed City Cluster and Fleet Valley tall building areas upon the significance of the Monument to the Great Fire of London, Grade I. This assessment has found these impacts to be indirect, affecting the setting of this designated heritage asset. A definition of how this setting presently contributes to an appreciation of the Monument's significance has been provided, establishing specific criteria against which the Proposed Clusters could be assessed (section 4). Strategic and high-level viewpoints where the impact could potentially be appreciable were also identified, drawing upon existing policy including the Protected Views and Monument View Study SPDs as well as LVMF Guidance.
- 7.2 This report has demonstrated an iterative scoping process ensured both proposed clusters fall outside of the immediate setting of the Monument as defined in the above SPDs, as well as outside the Protected Vistas from the Monument. The assessment found that the Fleet Valley cluster while falling outside of the vista defined by the policy, will be potentially visible in the backdrop of View 5 from the Monument, looking North West towards St Paul's. Within this view, the potential visual envelope of the Fleet Valley cluster follows the line of consented development, appearing west and between the western towers of the Cathedral and the Cathedral Dome. The indicative potential height of the cluster would however preserve an appreciation of the gilt pineapple finials of the twin western towers against sky and would result in no further erosion of the dome and south western towers beyond consented development. Tall buildings could therefore be potentially be acceptable in this location, should they continue to retain a distinction between the fabric of the cathedral and background development, ensuring the legibility and prominence of the Cathedral in this view is preserved and delivering no further infill of the open sky silhouette of the Cathedral.
- 7.3 Additionally it was found that the proposed clusters would not transect or obscure identified views to the Monument. However it was established that the proposed City Cluster would be peripherally visible within the wider field of view within a number of these views. The assessment found that while the proposed clusters created a visible change within the wider surroundings, this on the whole preserved the ability to appreciate the Monument's significance. Specifically the assessment found the proposed clusters would retain an appreciation of its historic and symbolic location on the line of Old London Bridge seen along the water front. Its group value with the steeples of the City Churches was also found to be preserved, and the symbolic contribution of the Monument to the skyline composition of the Cathedral and Tower Bridge, where seen distantly from the east was also found to be retained. While the proposed City and Fleet Valley Clusters could be understood to potentially increase in terms of their visible extents in these views, this was not considered to prevent how these identified views enabled an appreciation of the Monument's significance. With regards to LVMF viewpoint 16.B2 from Gabriel's Wharf, the Monument here is distantly and partially visible on the skyline, with the orb and viewing gallery seen against an open sky. Here the City Cluster is perceived as potentially joining with the sky silhouette of the Monument, meeting its outline below the viewing gallery. This would potentially undermine the extent to which the Monument is appreciated in this view as a landmark, albeit this landmark quality and the Monument itself is not specifically identified within the Visual Management guidance of the LVMF, and in a magnified view a gap would remain appreciable. This harm could be potentially mitigated through the improved legibility of the Monument through the form of the proposed cluster. Specifically the proposed slope of potential development is considered to aid the Monument's identification on the skyline in this distant view, drawing the eye towards the orb and viewing platform which would remain free from

development. Notwithstanding this, future tall building proposals will therefore need to carefully demonstrate an avoidance of this potential harm.

APPENDIX 1

Listed building descriptions

Name: THE MONUMENT, MONUMENT STREET EC3

Grade: I

List Entry Number: 1193901

Date first listed: 04-Jan-1950

2. 1671 to 77 by Wren. Built to commemorate Great Fire of 1666 which began nearby. Colossal Doric column of Portland stone on high base with carved reliefs etc. Capital supports gallery, with plain iron railing and later cage, reached by spiral staircase round open well. Crowning finial of gilt copper supported on stone drum. Scheduled AM.



Figure 36. Map, Source: Historic England.