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Your ref 14/02792/FUL
Our ref LA0035

Case Officer
Rob Chipperfield

Date 17 July 2014

Dear Mr Smith,

Town and Country Planning Act 1990

Land to the Front of the London Television Centre, Queen's Walk and Potential Construction Access Routes From Upper Ground SE1

Erection of a pedestrian bridge with incorporated garden, extending for a length of 366m over the River Thames from land adjacent to The Queens Walk on South Bank (in the London Borough of Lambeth) to land above and in the vicinity of Temple London Underground Station on the north bank, the structure of the bridge having a maximum height of 14.3m above Mean High Water and a maximum width of 30m; the development also comprising the erection of 2 new piers in the River Thames; erection of a single-storey landing building (incorporating maintenance, management and welfare facilities and up to 410m² A1 and/or D1 floorspace with additional ancillary service and plant) on land adjacent to The Queens Walk, opposite the ITV building; associated public realm works; works to trees (including the removal of trees); associated construction work (including laying out of a construction access from Upper Ground) and works sites; and works within the River Thames (including temporary and permanent scour protection, relocation of moorings and erection of temporary structures). The application is an Environmental Impact Assessment (EIA) development and is accompanied by an Environmental Statement (ES), which may be viewed with the planning application documents.

I write with regard to your letter dated 9 June 2014 concerning the above application. Please find comments from the City of London Corporation below.

The proposed Garden Bridge would provide a new suspended open space and a pedestrian link across the River Thames which is currently open and free of built structures between Waterloo Bridge and Blackfriars Bridge. It would also create new vantage points affording views of the river, riverside and the central London skyline. However, it would also significantly alter or obstruct many existing views of the City skyline from bridges and the riverside. These views are protected by a range of local and regional policies. Many

of these policies are of long standing and have successfully maintained and improved the views over many years.

St. Paul's Heights

St Paul's Heights building height limitations seek to protect views of St. Paul's Cathedral from the Thames bridges and the south bank. The policy for the protection of the views is contained in the City's Core Strategy, and has operated since 1937, achieving long-term maintenance and enhancement of the views. The application has not included an assessment of the proposals' impact on St Paul's Heights.

The proposed bridge lies in the foreground of important views protected by St Paul's Heights. The views affected fall into two areas: the entire length of Waterloo Bridge and the entire length of the south bank between Waterloo Bridge and the proposed bridge.

There are also views of the Cathedral from Hungerford Bridge which are on the same alignment as those from Waterloo Bridge.

The structure of the Garden Bridge has a maximum height of 18.2m AOD (Bridge Deck), 19.6m AOD (Northern Lift) and 17.4 m AOD (Southern Lift) with handrails adding 1.1m and planting up to 15m when mature. These bridge structures would not directly obstruct the views from Waterloo Bridge but would be prominent in the foreground. In addition the height of the trees and planting, once fully matured, is likely to intrude on protected views of the Cathedral.

Views of the Cathedral from the riverside walk along the south bank would be severely affected by the Garden Bridge, as the view points are at a lower elevation. Views would be significantly reduced or completely obstructed by the structure of the Garden Bridge and the trees upon it.

The Garden Bridge would create new views of the Cathedral from most of its length. From the northern part of the Garden Bridge, views of the Cathedral would be on a similar alignment to the protected view from Waterloo Bridge; because the Garden Bridge is closer to the Cathedral, it is likely that the lower parts of the Cathedral (e.g. of the entablature and west pediment) would not be visible. Unilever House, which significantly infringes the view, would also present a greater obstruction. From the southern part of the Garden Bridge, views would be on a similar alignment to those protected views from the south bank that the bridge would probably obstruct. Further information on this point is required to undertake a detailed assessment.

Monument Views

Views from Wren's Monument to the fire of London are protected by City of London planning policies and detailed in the City of London Protected Views SPD (2012). The site is within Monument View Four: west to Waterloo Bridge and Victoria Embankment. The Protected Views SPD highlights the key features in this view as the River Thames and Waterloo Bridge. The river between Blackfriars Bridge and Waterloo Bridge, as it curves away to the south beside the Victoria Embankment, is the main feature of the view. The view of this upstream stretch of river is considered particularly important because it is the most distant view of the Thames and contributes therefore to the continuity of the whole panorama from the Monument.

The proposed Garden Bridge would be prominent in this view and would result in the view of the river being significantly altered. A further assessment should be made of Monument View Four to show the impact.

London View Management Framework

The London View Management Framework forms the Mayor of London's Supplementary Planning Guidance on the strategic views designated in the London Plan. Designated views 15, 16 and 17 are affected by the Garden Bridge proposals.

15B.1 Waterloo Bridge: downstream: close to the Westminster bank (crossing bank)

This view is not assessed in the Environmental Statement or Design & Access Statement. The impact of the proposed Garden Bridge on this view and how the view evolves as the viewer walks along Waterloo Bridge (the dynamic / kinetic view identified in the LVMF) should be assessed.

15B.2 Waterloo Bridge: downstream – at the centre of the bridge (approximate centreline of bridge)

This view is an iconic view of the City, where many historic landmarks and modern buildings can be seen set against a foreground of the curving open River Thames. The proposed development appears to make little impact on the view of St. Paul's Cathedral, but views of the City skyline as a whole, including important historic features such as City churches, and the Eastern Cluster of tall buildings would be partially obscured by trees when they have matured. The Garden Bridge would dramatically alter the foreground setting of this view by removing the existing sense of openness between the viewer and the City. These changes would be mitigated in part by the creation of new views from the Garden Bridge itself but such views would be different and would not be available at night.

16A.1 The South Bank: outside Royal National Theatre

The proposed development would significantly impact on the view of St. Paul's Cathedral from this location. The Cathedral is at the very edge of the view, on the right. The southern Garden Bridge structure would obscure the drum and peristyle of the Cathedral, with tree planting at the southern section gradually intruding into views of the Cathedral before totally obscuring it by projected year 25. Views of the Cathedral will be lost as the viewer moves east along the South Bank.

17B.1 Golden Jubilee / Hungerford Footbridges: downstream – crossing the Westminster bank and 17B.2 Golden Jubilee / Hungerford Footbridges: downstream – close to the Westminster bank

See comments relating to 15B.2, above.

The maximum height of the proposed Garden Bridge is stated as 18.2m AOD (bridge deck). However, the maximum height of the trees once they are fully mature is not clear and therefore it is difficult to judge their impact on protected views. It is likely that trees could further intrude into views of the Cathedral, important landmarks and the City skyline as a whole. Unless a regime of long-term maintenance is agreed in respect of the height of the trees these protected views will be obscured.

Planning Statement, Design & Access Statement and Environmental Statement

The Planning Statement and Environmental Statement highlight key views in addition to the LVMF Protected Vista Linear Views and River Prospects. . We believe key Viewpoint 17 would be negatively impacted as the Cathedral is likely to be almost completely obscured by the proposed bridge, with fully matured trees obscuring it in the view altogether (along with the remainder of the City). There is a similar impact to that of River Prospect 16A.1 from the South Bank referred to above.

New views from the Garden Bridge

The Garden Bridge would create new views of the Cathedral and the City from most of its length at times when it is open. Existing night time views that are adversely affected or lost due to the Garden Bridge would not be mitigated by new views from the Garden Bridge as it is not intended to be open to the public at night. The new views would be closer than the existing protected views from Waterloo Bridge with slightly different geometry leading to parts of the existing view no longer being visible and Unilever House becoming a more prominent foreground obstruction.

It is likely that the emerging cluster at Broadgate / Principal Place in Hackney / Bishopsgate Goods Yard would become much more prominent in the view from the Garden Bridge and could have a detrimental impact on the view of St. Paul's Cathedral from this location.

Photomontages should be provided by the applicant in order to properly consider the above issues.

Impact on City Heritage Assets

In relation to the impact of the proposed bridge on the setting of designated and undesignated heritage assets within the City it is concluded that the proposed bridge does not detrimentally impact on their significance.

Conclusion

The Garden Bridge would have a major impact on views of St Paul's Cathedral and the City from the south bank and Waterloo Bridge, and is expected to significantly alter Monument View Four. From a large section of the riverside walk between Waterloo Bridge and the proposed Garden Bridge views would be severely obstructed, and St. Paul's Cathedral would cease to be a significant landmark in much of this part of the south bank. The view from the southern section of Waterloo Bridge would be impacted upon due to the St. Paul's Heights infringements detailed above. In respect of the strategic views designated in the London Plan and detailed in the LVMF, Waterloo Bridge view (15B.2) is one of the iconic views of the City that would be dramatically altered by the proposed Garden Bridge although the view of the Cathedral itself would remain with appropriate garden maintenance. We request that a maintenance plan is put in place to ensure that tree growth and planting does not obscure the views of St. Paul's Cathedral protected under St. Paul's Heights, Monument Views or LVMF Mayoral strategic views.

The provision of a new public pedestrian crossing across the river which potentially enhances the attractiveness and accessibility of central London could be seen as a public benefit to be weighed against the loss of significant views of St. Paul's Cathedral and the City skyline.

Yours sincerely

Mrs W. A. B. Hampson
Chief Planning Officer and Development Director