

1 Introduction

1.1 The purpose of this topic paper is to draw together the sources of evidence and explain the methodology and analysis that has led to the policy approach taken to tall buildings in the draft Revised Lambeth Local Plan Policy Q26.

1.2 The policy is in three parts:

Part (a) is the policy approach for tall building development that comes forward in Annex 11 locations. There is particular emphasis here on the importance of heritage preservation considerations especially in relation to the Westminster World Heritage Site.

Part (b) identifies the requirements additional to those in Part (a) which proposals that come forward outside Annex 11 locations (windfall sites) will have to meet.

Part (c) seeks to secure improvements where existing tall buildings are identified as having negative characteristics.

1.3 Policy Q26 is designed to complement and be read alongside London Plan Policy D8 (Tall buildings) because together they constitute the Development Plan policies for tall buildings in Lambeth.

1.4 This topic paper provides:

Section 2 – The national planning and guidance context in relation to tall building development.

Section 3 – A list documents that constitute the evidence base.

Section 4 – An explanation of the approach taken to identify locations appropriate for tall buildings.

Section 5 - An explanation of the approach taken to the identification of tall building heights.

Section 6 – How Heritage considerations have been taken into account.

Section 7 – An explanation of the sieving exercise undertaken to ensure robustness.

2 National planning policy and guidance

National Planning Policy Framework (Feb. 2019)

2.1 There are no specific references to tall building development in the NPPF. However, the paragraphs particularly relevant to this type of development are set out below along with an explanation of how Policy Q26 addresses their requirements.

2.2 The identification of the locations on the Annex 11 maps addresses their requirement in Para 119 of the NPPF for LPAs to take a pro-active role in identifying and helping to bring forward development land. The requirements of Policy Q26 (a) (ii) design excellence and (iii) townscape character, ensures that high quality buildings and places are delivered in line with of Para 124 of NPPF.

2.3 Policy Q26 (a) places the importance of the Westminster World Heritage Site and the preservation of heritage asset settings at the very start of the policy to highlight their importance. Part (c) also give opportunity for future enhancement of existing tall buildings considered harmful. This accords with Para 184 which recognises the international importance of World heritage Sites and states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

2.4 Para 185 of the NPPF's requirement that plans should set out a positive strategy for conservation taking into account considerations which include (a) sustaining heritage assets and (c) the desirability of new development making a positive contribution to local character and distinctiveness is addressed by Policy Q26 (a) (ii) design excellence and (iii) townscape character, (b) (i) and (c).

2.5 Para 190 requires LPAs to make evidence based decisions seeking to avoid or minimise any conflict between heritage conservation and the proposal; and Para 193 requires 'great weight' to be given to the conservation of designated heritage assets. The requirements relating to thorough impact assessment through accurate modelling set out in supporting text of Policy Q26 will ensure the policy objective is met.

2.6 Policy Q26 (c) seeks to address the harm that might result from existing tall building development and thus is a positive response to Para 200 of the NPPF which states that LPA's should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of setting that make a positive contribution (or better reveal significance) should be supported.

National Planning Practice Guidance

2.7 'Planning for well-designed places' (Oct 2019) stresses the importance of pre-application discussion including design review as a means of delivering good design (NPPG Para 009 Ref. ID 26-009-20191001). This is reflected in the policy supporting text.

2.8 Historic Environment (July 2019) seeks the proper assessment of impacts (NPPG Para 009 Ref. ID 18a-009-20190723) and (035 Reference ID: 18a-035-20190723 (World Heritage Sites)). This is reflected in the policy supporting text.

3 Evidence base

3.1 The sources used to inform the development of this policy include:

Conservation Area Statements / Character Appraisals

These have been undertaken by the Council to aid an understanding of the special architectural or historic interest of the conservation areas to ensure their effective management:

- 1) Albert Embankment Conservation Area Statement, 2017
- 2) Brixton Conservation Area Statement, 2012
- 3) Kennington Conservation Area Statement, 2012
- 4) Lambeth Palace Conservation Area Statement, 2017
- 5) Lower Marsh Conservation Area Statement, 2009

- 6) Mitre Road and Ufford Street Conservation Area Statement, 2009
- 7) Roupell Street Conservation Area Statement, 2009
- 8) Southbank Conservation Area Statement, 2007
- 9) Vauxhall Conservation Area Statement, 2017
- 10) Waterloo Conservation Area Statement, 2007

Studies

These are Lambeth produced documents prepared to inform policy development:

- 11) Brixton Building Height Study, 2018
- 12) Lambeth Local Distinctiveness Study, 2012
- 13) Lambeth Tall Buildings Study, 2014
- 14) Vauxhall Tall Building Assessment 2018
- 15) Waterloo Building Height Study, 2018
- 16) Westminster World Heritage Site Setting Study (Miller Hare for Lambeth), 2018

Guidance

These are adopted guidance documents that are material planning considerations:

- 17) London View Management Framework SPG, 2012
- 18) London's World Heritage Sites, Guidance on Settings SPG, 2012
- 19) Vauxhall Nine Elms Opportunity Area Planning Framework 2012
- 20) Vauxhall Supplementary Planning Document, 2013
- 21) Waterloo Opportunity Area Planning Framework 2007
- 22) Waterloo Supplementary Planning Document 2012
- 23) Westminster World Heritage Site Management Plan, May 2007

Background Documents

These record the thoughts and concerns of the respective UNESCO missions:

- 24) Report of the UNESCO/ ICOMOS Monitoring Mission to London, 2008
- 25) Report of the UNESCO/ ICOMOS Monitoring Mission to London, 2011
- 26) Report of the UNESCO/ ICOMOS Monitoring Mission to London, 2017

4. The approach taken to identify locations appropriate for tall buildings

4.1 The maps in Annex 11 address the requirements of London Plan Policy D8 B (1) that boroughs should determine locations where tall buildings may be an appropriate and identify them on maps in Development Plans (H8 B (2)). In the consultation draft Revised Local Plan (2018) the locations were captioned 'sites' on these maps. Following detailed discussion with Historic England and to better align with the wording of the London Plan, that has now been changed to 'locations'. This is to avoid misinterpretation of these locations as site allocations which they are not intended to be. In some instances the sieving has identified locations which are equivalent to a single plot / site. However, these should not be viewed as site allocations. In Lambeth Development Plan a site is only

allocated through a site-specific policy that sets out the specific development parameters of that site.

4.2 It must be stressed that the appropriate tall building locations identified on the Annex 11 maps are based on careful 3D analysis on height and visual impact only. As they are not site allocations detailed, site-specific HIAs and heritage appraisals have not been undertaken. The Council will be bringing forward site allocations in a separate DPD.

4.3 One noticeable change in the approach between the adopted (2016) and draft (July 2019) London Plans is the removal of any requirements relating to identifying locations that are 'inappropriate for' and 'sensitive to' tall building development. The GLA has advised that the terms should no longer be used. In the Lambeth Local Plan, 2015 the tall building locations were classified under these definitions so they have had to be revisited with a view to identifying only 'appropriate' locations.

4.4 At Vauxhall and Waterloo there have been long-held planning policy aspirations for tall building development from the London Plan in the form of Opportunity Area (OA) designations supported by Planning Policy Frameworks for Vauxhall (19) and Waterloo (21) and SPDs for both Vauxhall (20) and Waterloo (22). In both Opportunity Area contexts the wider built environment is heritage rich with high concentrations of sensitive assets.

Appropriate Locations - Waterloo

4.5 The Waterloo Opportunity Area covers a large area across the north of the borough (north of Lambeth Palace / Archbishop's Park) but whilst the Waterloo OAPF (21) is supportive of tall building development it does not identify tall building locations.

4.6 Planning constraints have been used to discount locations— this has been a key part of Lambeth's 'sieving exercise' as required by the London Plan. These have included – public highways and open spaces, heritage assets (including settings and positive contributor buildings in conservation areas) and sites containing newly constructed development that has already optimised site capacity and or built tall.

4.7 At Waterloo the heritage assets are generally concentrated within conservation areas. Conservation area character appraisals for the following CAs have informed the sieving / assessment process- Albert Embankment (1), Lambeth Palace (4), Mitre Road and Ufford Street (6), Lower Marsh (5), Roupell Street (7), Southbank (8); and Waterloo (10). The conservation areas are not characterised by tall building development with the exception of Southbank CA. By discounting the majority of conservation area locations due to heritage sensitivity the range of locations where tall buildings might be appropriate was significantly reduced.

4.8 Consideration was then given to the implications for the settings of heritage assets in particular the Westminster World Heritage Site (23), conservation areas and listed buildings. Some locations were discounted for those reasons. For example, Lambeth North Tube and the bomb site at Hercules Road / Westminster Bridge Road because of the likely adverse impacts on the settings of the Lower Marsh Conservation Area and the nearby grade II listed Lincoln Tower which is an important local landmark. See detailed narrative in Section 7.

Appropriate locations – Vauxhall

4.9 The Vauxhall and Nine Elms OAPF (19) identifies broad areas for tall building development along the Albert Embankment and in the central part of Vauxhall.

4.10 The assessment / sieving process at Vauxhall has been informed by conservation area character appraisals and designation reports for the following CAs– Albert Embankment (1), Kennington (3), Lambeth Palace (4); and Vauxhall (9). With the exception of some locally listed post-war development in the Albert Embankment CA, these conservation areas are not characterised by tall building development. Locations were discounted for heritage reasons (positive contributions or designated in their own right). Locations such as open spaces or public highways were discounted because they are not appropriate for development in principle.

4.11 Consideration was then given to the implications for the settings of heritage assets in particular the Westminster World Heritage Site (23), conservation areas and listed buildings such as the grade I listed Lambeth Palace complex which is sensitively located between both Opportunity Areas.

4.12 The construction of tall buildings at Vauxhall has continued apace since the original evidence based-work was undertaken in 2018. In light of this, and to align with the approach taken at Waterloo, further additional sieving has been undertaken to discount any relatively newly constructed large and tall buildings given they offer no additional development. This has led to a further contraction of the spatial area where appropriate locations might be identified.

Appropriate locations – Brixton

4.13 At Brixton the town centre is mostly within the Brixton Conservation Area (2) which is not characterised by tall building development. However, outside the conservation area a number of large and tall buildings already exist in close proximity to one another – International House, Canterbury House and Brixton Recreation Centre - these provide an urban context where additional buildings of height can be accommodated without harm.

5 Approach taken to the identification of tall building heights

5.1 There are established tall building clusters are the Opportunity Areas of Vauxhall and Waterloo. These Opportunity Areas have long been identified as appropriate for tall building development. Furthermore, middle and north Lambeth are dotted with tall building development dating from the 1950s and 1960s. This is established in the Lambeth tall Buildings Study, 2014 (13) and Lambeth Local Distinctiveness Study, 2012 (12).

5.2 The Council has been mindful that the London Plan identifies tall buildings as those 'substantially' taller than their surroundings when setting the heights in the para 10.124 as required by London Plan Policy D8 A. This work as informed by the conclusions of the Lambeth Local Distinctiveness Study 2012 (12) which assesses the borough' character as well as previous work such as the Lambeth tall Buildings Study 2014 (13) which shows the distribution of tall buildings across the borough. The threshold definition of tall buildings in south Lambeth is lower (25m) than that in middle and north Lambeth (45m) to respect its recognisable suburban character.

5.3 The South Circular Road presents the most logical line to differentiate the low-rise southern part of the borough from the more diverse built environment of middle and north Lambeth for the purposes of tall building policy. The South Circular Road is a long-established and well-known route

making it easily understandable for local residents and policy users from elsewhere. Alternate routes have been discounted as they would have to cut through residential neighbourhoods following the irregular arrangements of Lambeth's largely residential 19th Century streetscape and resulting in different policy approaches being imposed on what are relatively uniform residential roads. The irregularities of the streetscape are appreciable on the map in Figure 1.



Figure 1 – South Circular Road

5.4 The identification of appropriate heights at Waterloo and Vauxhall was a two stage approach. Stage one was the identification of a maximum height using the Westminster World Heritage Site Setting Study, 2018 (16) by Miller Hare who built a 3D constraints model based on LVMF views and clear statutory and policy presumptions in favour of the preservation of the settings of heritage assets. See page 10 of the Miller Hare study (16). The study's contour map of height constraints (NB the heights are shown in 10m increments), when overlaid upon the potential locations, identified the maximum height before harm might result to high status heritage assets such as WWHS and Grade I listed buildings. This was achieved by drawing on their experience from previous tall building applications where the statutory presumption to preserve setting of high status designated heritage assets was a key planning consideration. See page 12 of the Miller Hare study (16).

5.5 Stage two entailed the creation of a 3D model for each location in the VUCity programme. The model took the form was a basic extrusion to the maximum height identified by Miller Hare as the basis for local impact assessment. The models were then scrutinised in VUCity to identify any other potential adverse heritage and townscape impacts. Up-to-date photographs were used to supplement the model. This was particularly useful to understand the real visual impact of trees which the model sometimes fails to adequately represent. Where necessary heights were reduced to a point at which there was no harm to heritage and the townscape impacts were considered acceptable. This work is contained in the Waterloo Building Height Study (2018) and the Brixton Building Height Study (2018).

5.6 At Brixton, which was not covered by the Miller Hare study (16), the stage two assessment was the only one undertaken to identify the appropriate heights.

5.7 The two-stage assessment meets the requirement of London Plan Policy D8 para 3.8.1A 1 which requires boroughs to undertake a sieving exercise to assess the visual and cumulative impacts of potential tall buildings and para 3.8.1A 2 which seeks to identify maximum heights.

5.8 It should be noted that the maximum height identified within the Miller Hare study (16) only relates WWHS, LVMF and high grade listed building settings. A fixed maximum across a site using the Miller Hare study's 10m increments thus only has limited value. Local considerations may place additional height constraints on each location or on part of a location. This has proved to be the case at the Southbank Place development and in relation to the Elizabeth House location where a stepped and sculpted approach to various constraints has been essential to respond to a wide range of considerations. The rudimentary modelling of block forms in VUCity has sought to identify local considerations this but is a fairly crude tool when using block forms for multiple considerations.

5.9 It would only be with the preparation of detailed designs / site allocations that Lambeth feels it could reach clear maximum height parameters for its tall buildings location. It is therefore proposed, in agreement with the Mayor, to allow a degree of flexibility on height at this stage given the clear policy wording objectives of no heritage harm and good townscape outcomes. This is especially important given that VUCity 3D modelling has been in the form of rudimentary volumetric 'blocks' and not architectural forms. As has been shown with consents in Vauxhall (Vauxhall Tall Building Assessment, 2018 (14), proposals can come forward for locations where, through ingenuity and design excellence, sites are optimised and threshold heights exceeded but with no harm results to heritage assets or townscape.

6 Heritage considerations explained

Westminster World Heritage Site Setting Study, 2018

6.1 This evidence (16), prepared by experts in the field - Miller Hare, is essentially a very detailed views study that provides information on thresholds of visibility in relation to WHS and in the settings of other high status heritage assets. Lambeth considers the Miller Hare analysis key to identifying the height constraints for those assets to ensure no harm results. The study was undertaken in collaboration with officers from HE, Westminster City Council and GLA with two joint meetings being held at the Miller Hare offices to discuss the methodology and review the work. In the study (23) Miller Hare has essentially developed a 3D visualisation of the existing LVMF view constraints (23, page 8). In doing so the limitations of the LVMF became apparent. For example 'gaps' remained where there was no height limitation though protected silhouettes or clear LVMF guidance.

6.2 It is in these gaps where matters of judgement must be made (16, page 12). In reaching agreement on heights in these instances GLA, HE and Westminster officers in attendance in the meetings accepted that in some Waterloo locations additional height over what exists presently may be possible without harm resulting to the setting / OUV of the Westminster World Heritage Site. Indeed the objective of Miller Hare study is the identification, for the whole of Waterloo and Vauxhall, of building heights that result in harm to the setting of the WHS and other high grade heritage assets.

6.3 Resources did not allow the Miller Hare study (16) to provide all of the detailed analysis / modelling for each consideration, an example is provided below to show the thought process.

6.4 In LVMF view 27B1 there is a protected silhouette to the Palace of Westminster which means that, in line with the LVMF guidance, any development visible behind that silhouette must be refused. However, there is no such protection to the 'sky gap' to the left of the Elizabeth Tower (where development beyond in Lambeth is visible across Westminster Bridge. See below.



No height constraints Protected silhouette

6.5 The LVMF states:

'453. Through the visual interval between the Clock Tower and the buildings fronting bridge Street, Westminster Bridge can clearly be seen. The view is terminated by recent office and hotel buildings in Lambeth whose low profile does not detract from the vertical form of the Clock Tower.'

6.6 In Visual management Guidance in the LVMF states:

'457 new development glimpsed in the background of views from this part of parliament Square should be of appropriate height, scale, massings and materials to allow full appreciation of the buildings forming the World heritage Site...Development should not detract from the clear separation between the major groups of buildings nor compromise the strong vertical emphasis of the towers defining the extremities of the Palace of Westminster nor detract from the appreciation of Westminster Abbey and St Margaret's Church'.

6.7 Para 457 of the LVMF does not identify an ‘appropriate height’ and one objective of the Miller Hare work (16) was to reach a conclusion on that matter. With the guidance above in mind and following discussion with stakeholders at Miller Hare’s offices it was concluded that buildings heights in Lambeth could be marginally increased in line with the LVMF guidance without harm to the setting of the WWHS. The dotted line on the image below indicates the acceptable height (66m AOD) that was concluded. This ‘no harm’ height of 66m AOD was subsequently added to the Miller Hare model so that it registers as a height constraint.



6.8 A similar approach was taken by Lambeth officers and Miller Hare in other instances with the objective was a ‘no harm’. It should also be remembered that the heights resulting from the Miller Hare were then used as the maximum height presented in 10m increments which was then used as a starting point for local impact analysis in Waterloo. In some locations the heights were reduced further in response to the local impact analysis. See the conclusions set out from page 9 of the Waterloo Building Height Study, 2018 (15).

7. Sieving exercise explained

7.1 In the past Lambeth never had in-house access to detailed 3D modelling programmes and the expense of using external modellers limited its accessibility. This presented limitations on previous evidence base work. For example, whilst general sensitivity could be identified in 2015 the tools were not readily available to drill down further to identify locations within the ‘sensitive to’ areas where tall building might be appropriate. The Miller Hare work (16) coupled with the access to an affordable London-wide 3D model (VUCity) for the first time in 2018 now makes such a detailed understanding possible.

7.2 Westminster World Heritage Site, statutory listed buildings and conservation areas have been at the fore of Lambeth’s assessment. The heritage-led sieving work within the ‘sensitive to’ locations of Lambeth Local Plan 2015’s Annex 11 map has focused on the identification of ‘appropriate’ locations. This can be seen in Figure 2 which contains the 2015 Annex 11 maps with

black shapes showing the currently proposed 'appropriate' locations. All but one of the currently proposed 'appropriate' locations fall within the 2015 'sensitive to' areas. The exception is the ITV site (Waterloo) which has an existing post-war tower.

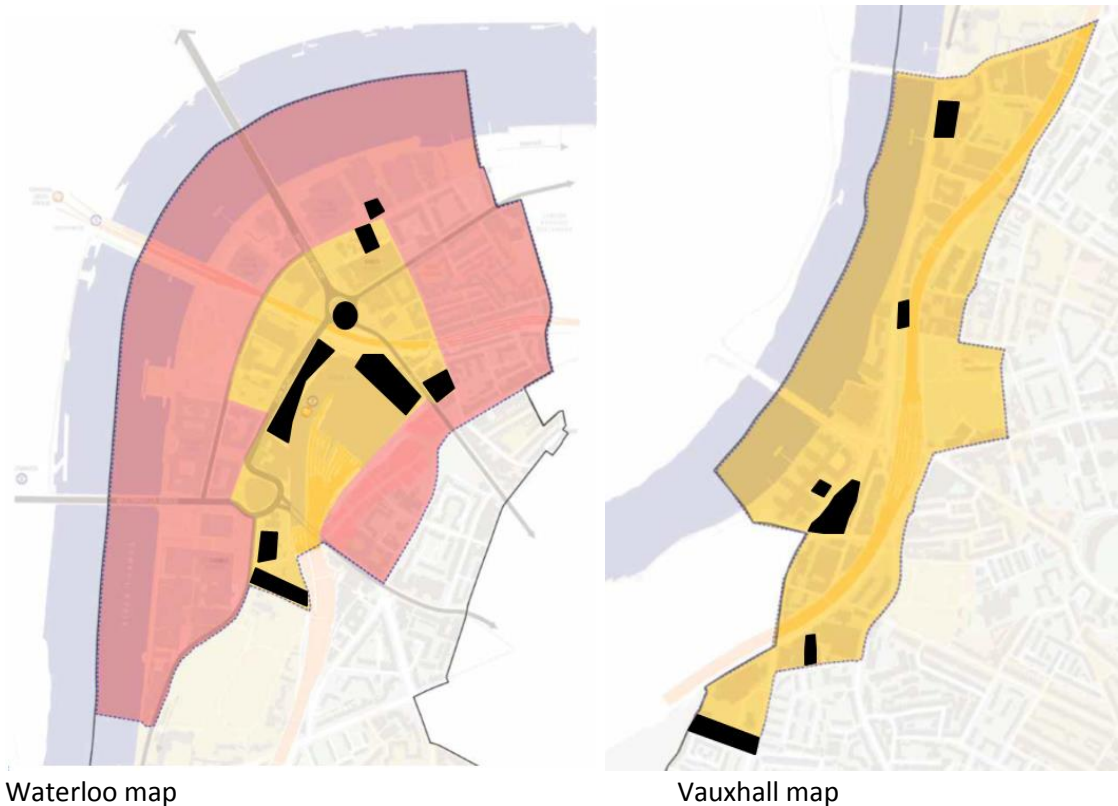


Figure 2 – 2015 Annex 11 maps (pink = 'inappropriate for', yellow = 'sensitive to'). The black shapes are the currently proposed tall building locations.

7.3 It should also be remembered that, as well as the extensive heritage impact based sieving, the amended tall building policy wording very much places heritage considerations at the fore of the policy approach showing Lambeth's understanding of the heritage issues and commitment to ensure no harmful impacts.

Sieving – Waterloo

7.4 The 'Areas Appropriate for Tall Building Development' (figure 14) of the Waterloo SPD (2013) which was subsequently reproduced in Annex 11 of the Lambeth Local Plan (2015) is considered flawed as it was not based on an accurate understanding of heritage designations or townscape analysis. For example it divides Waterloo Conservation Area into two parts 'sensitive to' and 'inappropriate for' tall building development without evidence to justify such an approach. That is the reason Lambeth was reluctant to carry this map forward in the Local Plan, 2015 and has not relied on it going forward.

7.5 When undertaking the constraints analysis sieving, the six conservation areas within the Waterloo Opportunity Area have significantly limited the area available for tall building

development. The concentration of listed buildings within the Opportunity Area has further reduced the potential locations because of the adverse impact likely to result to their settings.

7.6 For example, tall building development on Lambeth North LU Station and on the gap site at 79-87 Westminster Bridge Road (corner of Hercules Road) were both discounted because of the adverse impact that would result to (i) the setting of the Lower Marsh Conservation Area (5) in views from the NE and (ii) on the adjoining Grade II listed Lincoln Tower (in views from every direction) and because of the likely adverse impact on the locally significant view (Policy Q25 (b) (2) (i)). See below.

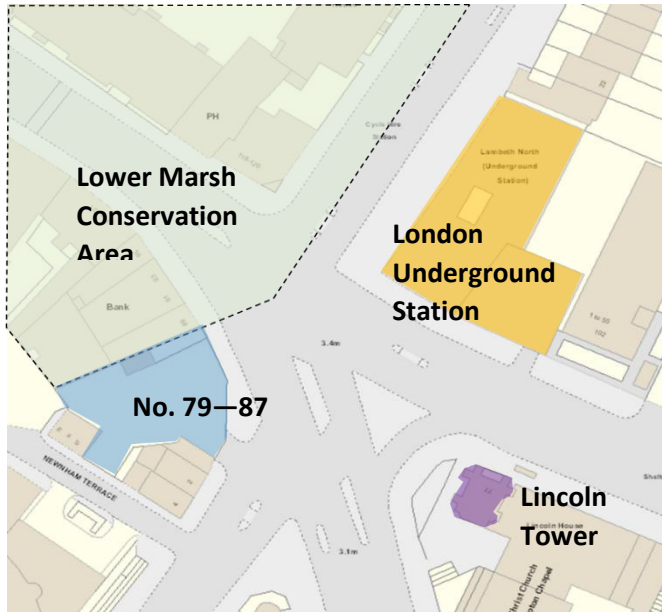
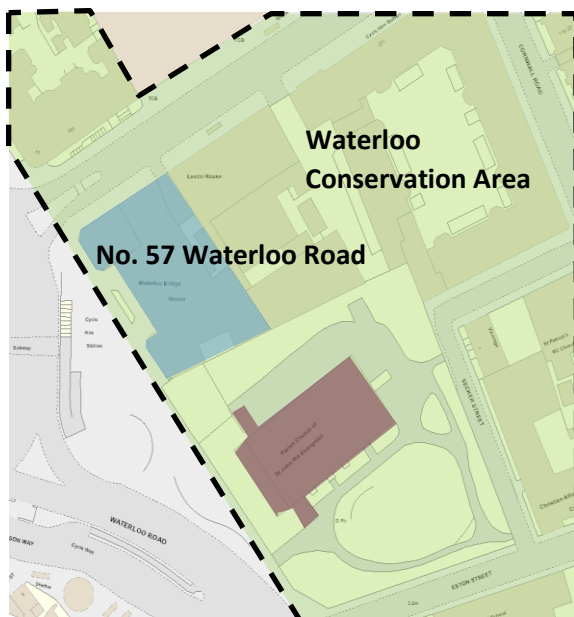


Figure 3 – Plan showing the heritage constraints around Lambeth North LUL station and nos. 97 – 81 Westminster Bridge Road

7.7 Similarly, the James Clerk Maxwell Building at no. 57 Waterloo Road has been discounted because it is identified in the Waterloo Conservation Area Statement, 2007 (10) as a positive



contributor to the Conservation Area and because of the likely adverse impact of tall building development on the character and appearance of the conservation area and the setting of the Grade II* listed St John's Church which adjoins to the South.

Figure 4 – Plan showing the heritage constraints to the James Clerk Maxwell Building, 57 Waterloo Road

Sieving - Vauxhall

7.8 In response to representations to the draft Revised Lambeth Local Plan (2018) the Vauxhall locations have been further sieved which has resulted in a further reduction in the locations considered appropriate for tall building development. Existing large and tall development which already optimises site capacity (much of it very recent or under construction) has been discounted because the development potential has already been met. Small sites that are heavily constrained by existing tall development or other constraints have also been discounted. A list of these discounted locations is provided in Appendix 1.

7.9 Furthermore, a drafting error which showed the workshops of 8 Albert Embankment appropriate for tall building development has been corrected (removing that location in accordance with existing site allocations in the Lambeth Local Plan, 2015 and in order to protect the setting of the Grade II listed London Fire Brigade HQ Station which is the focus of local view Q26 (b) (2) (xiv) Millbank to 8 Albert Embankment).

7.10 In responding to the draft Revised Lambeth Local Plan (2018) the Mayor of London stated:

Following the report of the joint ICOMOS/ICCROM Reactive Monitoring Mission to the Westminster World Heritage Site (WHS) and the recommendations of the World Heritage Committee in 2017 in regard to the development of tall buildings in the Vauxhall area, the borough should consider if the extent and height guidance for the areas identified in the Vauxhall tall buildings map in Annex 11 and related Policy Q26 is sufficiently sensitive to the impact of new tall buildings on the Outstanding Universal Value of the World Heritage Site.

In particular, the borough should consider if there is sufficient justification to designate the land to the northwest of the Wandsworth Road along the river Thames [St George Wharf] as an area appropriate for further tall building development, given its visual proximity to the WHS, it being within the Thames Policy area and the requirements of Draft New London Plan Policy D8C parts 1e-f and 3a.

7.11 In determining every application for tall buildings the individual and cumulative visual impacts of tall buildings have been assessed in a wide range of views the locations of which were established in technical documentation supporting the Mayor's VNEB OAPF, 2012 (19). The sensitivity of tall building development in relation to the Westminster World Heritage site in particular comes from key view locations from the River Thames Bridges and from Whitehall. It was the Westminster Bridge view that was the focus of the Vauxhall discussion during the UNESCO Mission, 2017. The Mission (26) reported:

Buildings planned and already consented in the "Vauxhall opportunity area" (Nine Elms complex and others) show another striking example of this cumulative effect. Vertical accents formerly assured only by historic buildings (towers, cupolas and pinnacles) are losing their clear visibility and outstanding character. Newly erected tall buildings in a proliferation

result a higher but almost homogenously “closed”, horizontal skyline. By continuing to “raise” the skyline, the effect is to diminish the scale and importance of the most prominent historic buildings such as the Palace of Westminster.

7.12 This is a matter of judgement and having been represented on all three UNESCO Missions, Lambeth does not agree with the UNESCO Mission (26) that the impact of the Vauxhall tall building cluster on the setting of the Westminster World Heritage Site is harmful. When viewed from Westminster Bridge the Vauxhall cluster is discernibly distant and sufficiently separate from the Palace of Westminster as to not diminish its scale and primacy. If anything it is the presence of the Grade II listed Millbank Tower in Westminster which, by virtue of its closer proximity to the WHS, glazed treatment and sheer mass, which causes the most harm. The Council is of the opinion that the detailed guidance on cluster formation and sensitivity set out in the VNEB OAPF, 2012 (19) and the Vauxhall SPD, 2013 (20) have been sufficient to deliver built outcomes as anticipated by policy which cause no harm to OUV. It should be noted also that the Vauxhall cluster is nearing completion with only a handful of undeveloped tall building locations remaining.

7.13 Setting aside the matters of judgement, Lambeth fully acknowledges the importance of the WHS and it has been the primary consideration of the evidence based work undertaken for Waterloo and Vauxhall. In response to the Mayor’s concern in relation to the land between Wandsworth Road and the River additional analysis has been undertaken. It is outlined below:

Land between Wandsworth Road and the River

7.14 The VNEB OAPF identifies this location as suitable for tall building development up to / around 150m. In the Lambeth Local Plan, 2015 the location is identified as ‘sensitive to’ tall building development. No change in height was proposed in the draft Revised Lambeth Local Plan (2018) although the ‘sensitive to’ designation was not carried forward for the reasons outlined in para. 4.3 of this document.

7.15 This land is bounded to the SW by the borough boundary with Wandsworth, to the NW by the River Thames, to the NE by Vauxhall Bridge and to the SE by Wandsworth Road. It is occupied by the St George Wharf development which comprises mixed use blocks with gull wings (c2003) and the slender, glazed Vauxhall Tower (c2011). The majority of the scheme is residential. However, there is a single office element (Phoenix House) in the centre of the facade fronting Wandsworth Road. See Figure 5.







- | | | | |
|-------------------------|---|----------------------------|---|
| Largely Residential use |  | Office use (Phoenix House) |  |
| Listed Building |  | St George Wharf Tower |  |

Figure 5 – Plan of the Land between the River Thames and Wandsworth Road



Figure 6 - St George Wharf as viewed from across the River. The highest central part rises to c70m AOD.

7.16 The development has been universally derided as an example of poor design. It has twice won the Architects' Journal's 'Worst building in the world' award and Time Out magazine has lamented its 'bug-eyed apartments and blueish tinge of disappointment'. It is also included on the Telegraph newspaper's 'London's ugliest buildings' list. There is no aesthetic reason to seek the retention.

7.17 Because of its situation on a bend in the River, St George Wharf is clearly visible in views down the river from the north. See image below dating from October 2018.



Figure 7 - View from Westminster Bridge looking South, October 2018.

7.18 It provides the foreground of the Vauxhall tall building cluster in these views. The Vauxhall cluster as a whole is conceived a loose cluster of individual buildings stepping down from a high point at Market Towers (200m AOD). The Vauxhall SPD, 2013 (20) talks about the importance of the general heights within the cluster rising up to around 150m AOD with building heights being lower to the south and east of the railway viaduct but makes no specific reference to heights of the cluster where it meets the River Thames even though it stresses the importance of the cluster compositions in views from the river in particular:

4.924 The view from Westminster Bridge in the OAPF and the views from the bridges further north on the river – Hungerford and Waterloo, are seen to be critical views in assessing the cluster. Due to the sheer size and number of planned tall buildings in the cluster, it will be difficult to separately view planned towers from these viewpoints, particularly from the further bridges...

7.19 In response to the Mayor, the Council asked Miller Hare to provide additional views taken from their 3D model showing indicative heights of the existing policy position (150m) and a potential lower height of 100m over the St George Wharf Development. The verified model images (which include proposed and approved tall buildings in pink to indicate the anticipated cluster) are discussed below.



Figure 8 - River View - Westminster Bridge (LVMF 18)

7.20 In reference to figure 8, in townscape terms the St George Wharf development is fussy and complicated. As a built form it appears diminutive in scale when compared to its tall building background. Note the sky gap in the cluster immediately behind its tallest part with the Vauxhall Sky Gardens tower visible through the gap. The presence of this gap is considered by Lambeth to undermine the cluster composition.

- (i) Redevelopment on the St George Wharf site in varying heights up to 100m in height would not be problematic in terms of the cluster composition although a reduction in heights towards the river would be desirable to allow a 'stepping down' to the riverside.
- (ii) Some development up to 150m on the St George Wharf site could be possible although this is only likely to be acceptable as a single tower rather than as a wall of development. A single tower behind the tallest part of Phoenix House would benefit the cluster as it would partially fill the gap.

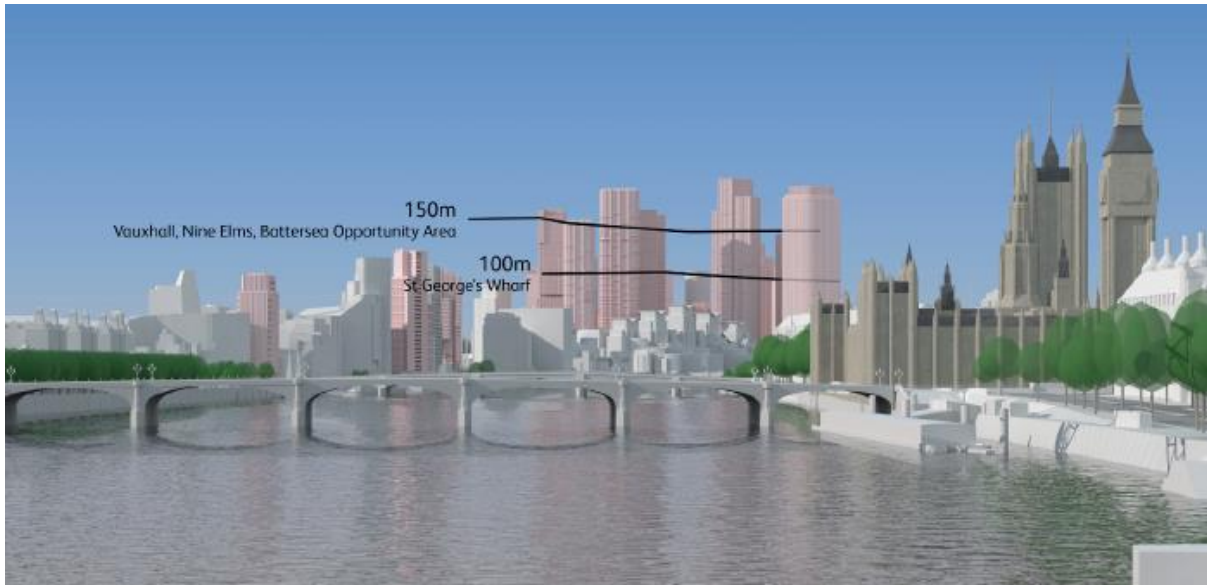


Figure 9 - River View - Hungerford Bridge (LVMF 17)

7.21 With reference to figure 9, again, the St George Wharf development is seen as a busy and overly complicated form stretched out before the tall building cluster. Again, the sky gap in the cluster immediately behind its tallest part of the St George Wharf complex weakens the cluster composition.

- (i) Redevelopment on the St George Wharf site in varying heights up to 100m in height would not be problematic in terms of the cluster composition although a reduction in heights towards the river would still be desirable to allow a 'stepping down' to the riverside.
- (ii) Some development up to 150m on the St George Wharf site could be possible although this is only likely to be acceptable as a single tower rather than as a wall of development. A single tower behind the tallest part of Phoenix House would benefit the cluster as it would partially fill the gap.

7.22 Conclusions of the river view analysis in relation to the LVMF views shown Figures 8 and 9:

- (i) Stepping down towards the River Thames is compositionally desirable in the river views.
- (ii) Modelling shows that whilst up to 150m might be achievable in a single location within the site such a height would not be appropriate across the whole site as it would result in a dominant wall of development.
- (iii) A point block behind the central tall element of St George Wharf would help cluster composition by filling the 'gap'. 150m is considered a suitable height given the established / emerging cluster.



Figure 10 - Whitehall View (A Westminster Metropolitan View)

7.23 This view from the cenotaph has Westminster Abbey in the foreground with consented and anticipated cluster development shown in pink beyond. Millbank Tower, the nearest tall building, is nearest the viewer and the most visually prominent. It is separated from the distant cluster by the River Thames. Beyond Millbank Tower the existing St George Wharf development is not visible. Aykon Tower, Bondway (under construction) is visible to the left of Millbank Tower. Market Towers (under construction) and the Vauxhall Tower (grey coloured) are both visible behind the Abbey roofscape.

7.24 Whitehall conclusions:

- (i) Development up to 100m on the St George Wharf site would have a negligible impact on this view and on the OUV of the Westminster World Heritage Site.
- (ii) Development up to 150m on the St George Wharf site is not considered to harm the cluster composition as it would be noticeably lower than most of the visible buildings and partially screened by the Millbank Tower. There would be no adverse impact on the OUV of the Westminster World heritage Site.
- (iii) Should a single tall building come forward to the centre of the George Wharf site it would appear to the left of the Millbank Tower and in front of the Aykon. Such a development would not harm the cluster composition or to the OUV of the Westminster World Heritage Site.

7.25 Conclusion - Given its recent construction date and the very many individual ownerships it is unlikely that the residential elements of St George Wharf will come forward for redevelopment. However, the single commercial element - Phoenix House could come forward. Its location sits immediately behind the tallest central element of the existing building. The testing has shown that a tall building here up to 150m here would have a beneficial impact on cluster composition in views from the river. Such a form would not have an adverse impact on the setting/ OUV of the Westminster World Heritage Site. The Annex 11 map has been amended to show only the location of Phoenix House as an appropriate location – to a height of 150m.

8 Approach to tall buildings outside of locations identified as ‘appropriate’

8.1 Policy Q26 clearly directs tall building development to those locations identified as appropriate and is explicit that there is no presumption in favour of tall buildings outside of these locations. However, in the Council’s view it is not possible to preclude completely the possibility of tall buildings in other parts of the borough. It is therefore important to have provision within the policy for proposals coming forward outside the locations identified in Annex 11 of the DRLLP PSV. Part (b) of the policy anticipates such a ‘windfall site’ scenario and applies a robust approach to assessment with applicants being required to meet additional criteria than those set out in Part (a). The Council have discussed this approach with the GLA, in the context of Draft London Plan policy, and understand GLA officers to be supportive in principle.

8.2 In the Council’s view, this approach is reasonable and justified given (i) limited resources do not allow an exhaustive borough-wide survey to identify and test every potential appropriate location; (ii) past experience has shown that acceptable tall building schemes do occasionally come forward on windfall sites outside of locations identified through the plan-led process (see the examples below); and (iii) the forthcoming Site Allocations DPD will allow for further testing of some sites outside of the locations identified in the DRLLP PSV, resulting for potential additional site-specific policy on tall buildings in some cases.

8.3 In recent years Lambeth has benefited from at least two such ‘windfall’ opportunities. One example is the Shell Centre redevelopment off-site affordable housing provision at Lollard Street, Kennington where, amongst conventional housing, a new tall building has been successfully integrated within an existing post-war group (Figure 12). The second example is the BRX development which forms part of the Stockwell Park Estate regeneration in Brixton (Figures 14 and 15). The additional density afforded by the tall element contributed significantly to the optimisation of the sites, the delivery of much-needed housing and project viability.

8.4 The Etherlred Estate dates from the 1960s / 1970s and its at Lollard Street comprises three tall buildings on a podium which created a significant physical barrier to natural permeability at the eastern end of the Estate. (Figure 11) The provision of the Shell Centre off-site affordable housing allowed this problematic podium to be replaced with new housing (terraced houses and a tower) with two new public routes which significantly increased legibility. It also reprovided the local daycare nursery into modern fit-for-purpose facilities. Planning Applications Committee report - [Nursery School, 10 Lollard Street, London, SE11 6UP \(Princes Ward\) \(14/00509/FUL](#)

8.5 As part of a comprehensive renewal plan On the 1970s Stockwell Park Estate / Robsart Village Estate residential blocks were being refurbished or redeveloped. In the 2017 Masterplan the Thrale House site on Stockwell Road by the skate park was initially identified as a seven storey development delivering 154 dwellings. The masterplan has been implemented in phases with Thrale House coming forward in one of the last, established in 2007. Given the dated nature of the masterplan the site potential was revisited and it was established that there was capacity to optimise the site with a ranging from one to five, seven, nine and 20 storeys. The greatest height was placed adjoining the skate park which marks a gateway into Brixton Town Centre from the north. Detailed assessment concluded that a tall building in this context would not be uncharacteristic of a Lambeth Estate. A total of 177 homes were delivered with an affordable housing provision of 46% (habitable rooms) and the new arrangement provided better quality open space / public realm than the masterplan scheme. Planning Application Committee Report - <https://modern.gov.lambeth.gov.uk/documents/s80359/Thrayle%2520House%252015-04500-FUL.pdf>



Figure 11 – Part of the Lollard Street development site prior to redevelopment



Figure 12 - Lollard Street scheme



Figure 13 – Lollard Street scheme






Figure 15 – Thrale House prior to redevelopment.

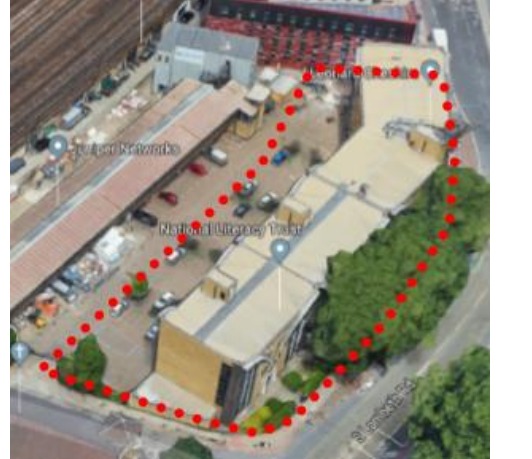

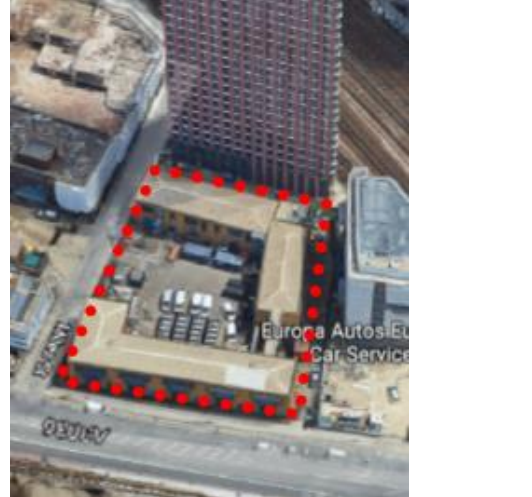


Figure 16 – The Thrale House scheme.

APPENDIX 1– Further discounted sites - Vauxhall

Location	Reason	Birds-eye view
Land bounded by Albert Embankment, Black Prince Road, Salamanca Street and railway viaduct	Development, mostly within last decade, has optimised capacity in this location.	
Land bounded by Albert Embankment, Tinworth Street Salamanca Street and railway viaduct	Development, mostly within last decade, has optimised capacity in this location.	
Vauxhall Square - Land bounded by Bondway, Miles Street, Parry Street and Wandsworth Road	Tall building development currently underway.	

<p>Aykon - Land bounded by Bondway, Parry Street, and railway viaduct.</p>	<p>Tall building development currently under way.</p>	
<p>Rudolf Place, Miles Street</p>	<p>Tall building development currently under way.</p>	
<p>Keybridge – Land bounded by Miles Street, South Lambeth Road, Wyvil Road and railway viaduct.</p>	<p>Tall building development currently under way.</p>	
<p>Atlas – 30 – 60 South Lambeth Road</p>	<p>Tall building development recently completed.</p>	

<p>66 – 70 South Lambeth Road</p>	<p>Site not suitable to tall building development due to small size and proximity to approved / existing tall development. Proximity to locally listed building (St Anne’s Church) and prominent location within setting of Vauxhall CA.</p>	
<p>St George Wharf and St George Tower (residential elements), Wandsworth Road</p>	<p>Development, mostly within last 15 years, has optimised capacity in this location. See para 4.14 for detailed narrative.</p>	
<p>113 Wandsworth Road</p>	<p>Site not suitable to tall building development due proximity of existing tall development (Urbanest). Proximity to locally listed and statutory listed buildings (101 – 111 Wandsworth Road) precludes height in order to protect their settings.</p>	

131 - 136, Wandsworth Road

Development currently under construction.



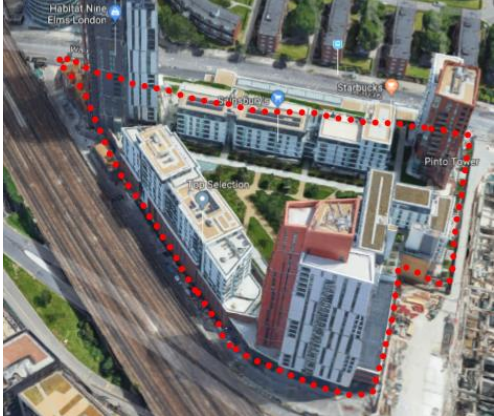
Sky Gardens- 143 – 161 Wandsworth Road



Relatively recent tall building development.



Sainsbury site, 62 Wandsworth Road

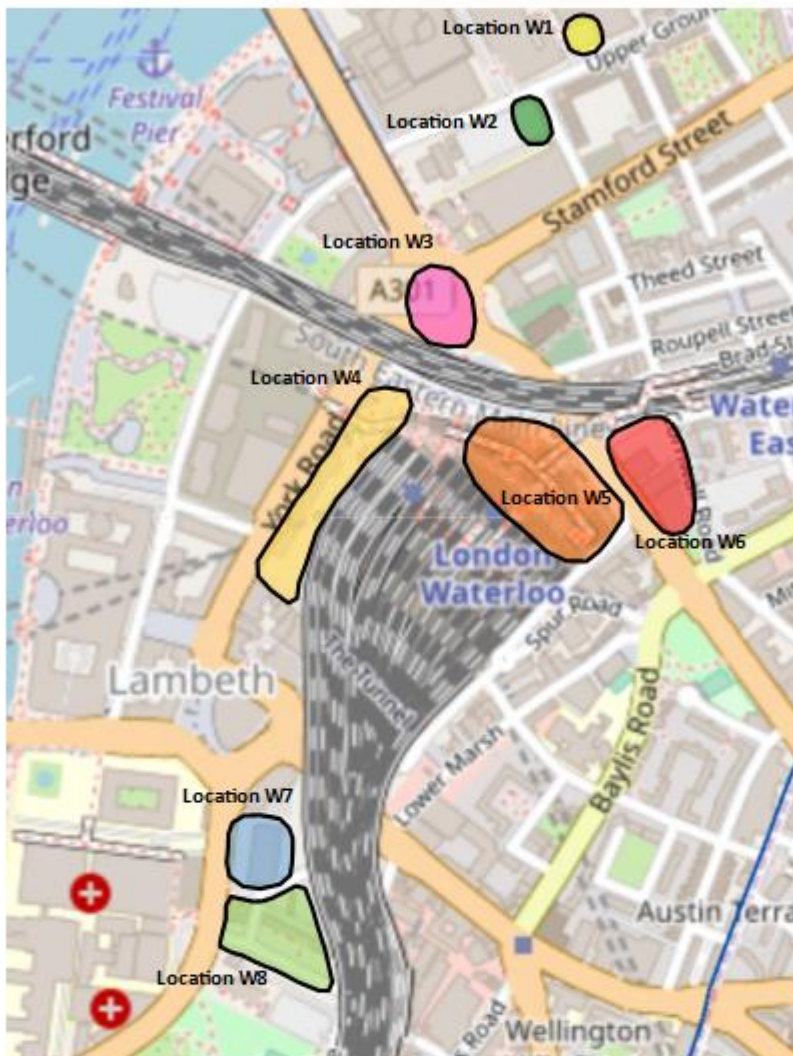
Development of tall buildings recently completed.



<p>10 Wyvil Road</p>	<p>Site not suitable to tall building development due to small size and proximity to approved / existing tall development (Keybridge and 18 – 20 Wyvil Road) and location within setting of the Vauxhall CA and locally listed Griffin Belle PH.</p>	
<p>22 Wyvil Road</p>	<p>Site not suitable to tall building development due to small size and close proximity to existing tall building (Sky Gardens) to the west and approved tall building scheme next door (east) (18 – 20 Wyvil Road).</p>	

APPENDIX 2– Proposed Annex 11 Maps

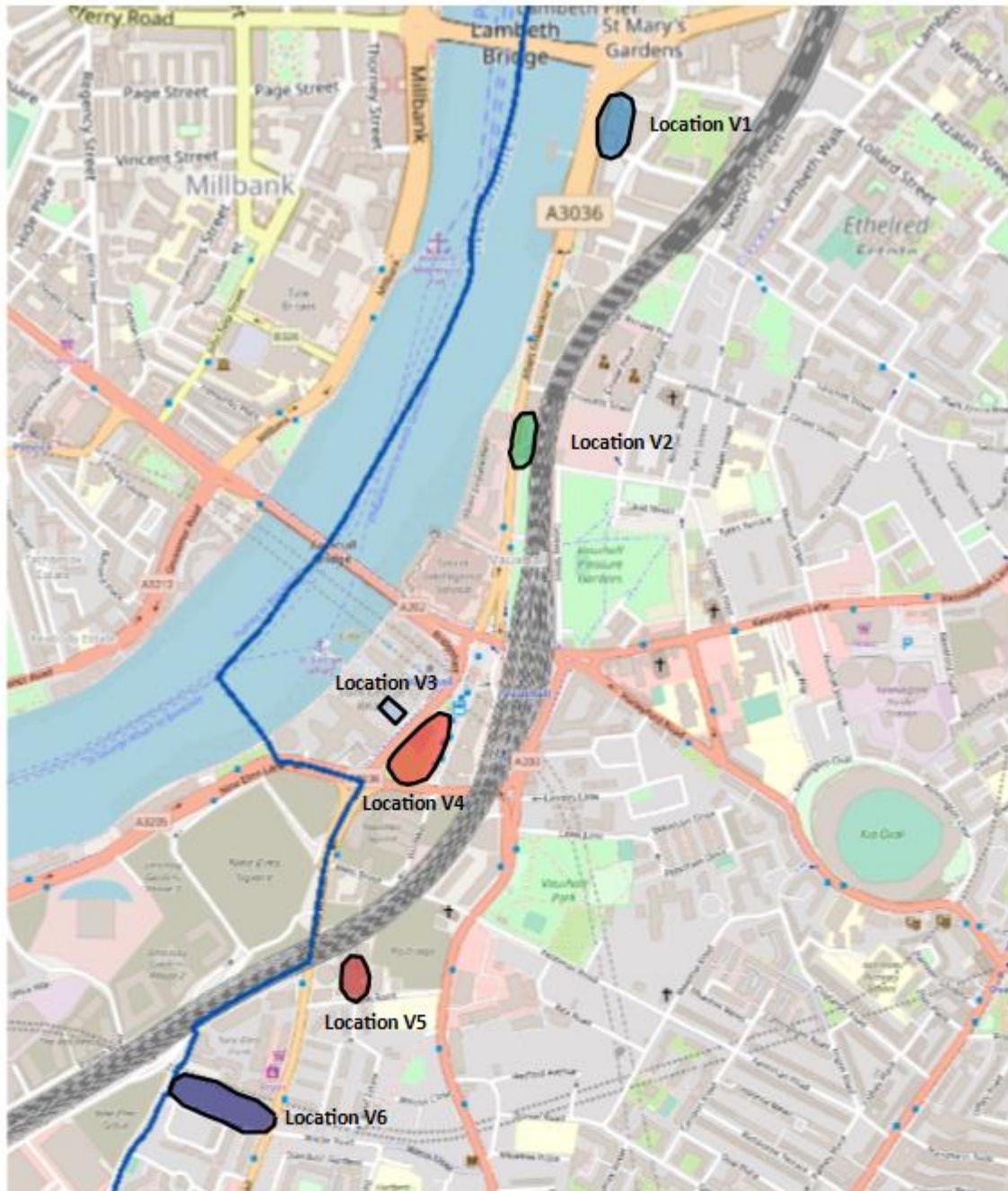
Annex 11 Waterloo locations appropriate for tall buildings



General building heights

Location W1	Former ITV tower	100m AOD point block
Location W2	Doon St / Upper Ground	110m AOD point block
Location W3	Waterloo Roundabout	130m AOD point block
Location W4	York Road / Leake St	125m AOD (N). Up to 55m AOD (S)
Location W5	Waterloo Station	70m AOD well spaced for good townscape
Location W6	Waterloo Road / Cornwall Road	70m AOD stepping down to S
Location W7	Lambeth Palace Rd / Upper Marsh	60m AOD
Location W8	Royal St / Upper Marsh	50m AOD well spaced for good townscape

Annex 11 Vauxhall locations appropriate for tall buildings



General building heights

Location V1	4-6 Albert Embankment	90m AOD
Location V2	36-46 Albert Embankment	90m AOD
Location V3	10 Wandsworth Road	150m AOD
Location V4	Wandsworth Road / Parry St / Bondway	150m AOD
Location V5	12-20 Wyvil Road	130m AOD
Location V6	Pascal Street	100m AOD

Annex 11 Brixton locations appropriate for tall buildings



General Building Heights

Location B1 International House

65m AOD point block

Location B2 Former Canterbury Arms / Pop Brixton

A development of varied building heights ranging from 15m AOD to 30m AOD to 65m AOD ensuring that the tall elements are arranged to optimise daylight and sunlight, ensure no over-bearing impacts and be sympathetic to the scale and form of surrounding buildings especially in relation to the character and appearance (inc. setting) of the Brixton Conservation Area.