

Vauxhall & Albert Embankment

Tall Buildings Assessment, 2018



Introduction

This document has been prepared as evidence to the Lambeth Local Plan Review, 2018 and seeks to assess the progress of tall building development in Vauxhall to date with a view to informing the future approach to tall building development in the area.

1. Background

1.1 Vauxhall (including Albert Embankment), Nine Elms, Battersea (VNEB) is an Opportunity Area. The OAPF supports a tall building cluster at Vauxhall within the CAZ. Guidance is set out in the VNEB Opportunity Area Planning Framework, 2012 the preparation of which was informed by eight detailed Technical Assessments including TA2 (Built Heritage Context) and TA3 (Views Assessment).

1.2 The TA documents examined the implications of tall building development on a significant number of heritage assets within the zone of influence around the proposed cluster. This work informed the modelling of the cluster in a range of sample viewpoints from selected sensitive townscape and heritage locations. Those same viewpoints have been subsequently used by applicants to illustrate the visual impact of their proposals.

1.3 Again, whilst not explicitly stated in the TA documents, the 90m limit relating to Albert Embankment was, it is understood, dictated largely by a desire to minimise visibility from views south along Old Palace Yard into Victoria Tower Gardens.

1.4 Section 8 of the VNEB OAPF outlines the recommended approach to tall buildings.

2. Central Vauxhall

2.1 Page 116 (Key principles) of the VNEB OAPF states that the cluster should not be detrimental to the setting of the WWHS from London View Management Framework (LVMF) River Prospect views - LVMF 15A,17A and 18A. LVMF views 17A (from Hungerford Bridge) and 18A (from Westminster Bridge) looking upstream appear to be the primary viewing locations which dictated the composition of the proposed cluster (p122, VNEB OAPF).

2.2 Whilst not explicitly stated within the TA documents or within the OAPF it is understood that the c150m height identified for Vauxhall cluster was set cautiously at 150m primarily, but not solely, because of the anticipated appearance of the cluster in the backdrop of Westminster Abbey in views south down Whitehall and Parliament Street. Westminster Abbey is grade I listed and a key component of the Westminster World heritage Site.

2.3 The cluster composition proposed sees the already completed Vauxhall Tower (180m) as the high point of the cluster with the other tall buildings *'coming forward as separate individual elements on the skyline to a maximum of 150 metres'* (Key principles p116, VNEB OAPF).

2.4 However, elsewhere in the OAPF the advice is more flexible on the building heights:

VNEB OAPF (2012)

| | | |
|------|-------------|--|
| Page | Para | text |
| 121 | text to map | <i>'Buildings <u>in the region of 150 metres</u> are likely to have such a relationship [subordinate to the 180m Vauxhall tower] and anything taller would need to be justified in relation to other developments coming forward and their cumulative impact on affected views.'</i> |

122 Para 1 *'At Vauxhall, buildings in the region of 150 metres could be supported as part of an emerging cluster of tall buildings'.*

2.5 Section 8.2 of the OAPF explores issues around the World Heritage Site and acknowledges potential visual impact on setting but not necessarily harm. It states that the height parameters have been developed with the WHS in mind. Other cluster advice includes:

| Page | Para | text |
|------|------------|--|
| 122 | Para 2 & 3 | <i>Tall buildings within the emerging cluster should appear as individual elements on the skyline and avoid appearing collectively a solid wall of development within the setting of the Palace of Westminster from the river prospects or views within or close to the WHS. It is important to deliver variety in the skyline not just build to the maximum height parameters</i> |

| | | |
|-----|--------|---|
| 122 | Para 6 | <i>The exact form of the cluster should be subject to continuous dialogue between the local planning authorities and key landowners</i> |
|-----|--------|---|

2.6 The Vauxhall SPD (2013) provides further advice:

| Page | Para | text |
|-------|-------|---|
| 42 | 4.921 | <i>The OAPF identifies <u>150 metres as a guideline</u> for tall buildings in this location. The Council considers that this is a maximum height and <u>only in exceptional circumstances will buildings that exceed this height be supported.</u> Buildings will step down in height from the cluster southwards to reflect the change in character locally.</i> |
| 42-44 | 4.922 | <i>There are a number of buildings already developing in the 'Heart of Vauxhall' cluster and as the SPD is published, the Vauxhall Tower is nearing completion. The emerging OAPF envisaged that this building would be the tallest of the cluster with a gradual building up of a group of other towers around it. However, the proposed redevelopment of the Market Towers building which sits on land adjacent to Lambeth and is in Wandsworth, has changed the dynamic of the cluster and moved the peak of the cluster further west towards Wandsworth. The consequence of this is that the Council requires development to step down significantly from the Market Towers development, now known as One Nine Elms. Whilst One Nine Elms is higher than the GLA's indicative 150m threshold set out in the OAPF tall buildings strategy the GLA has stated that it believes that there is a sound urban design rationale for making an exception to this strategy in this particular instance. The consequence is that other buildings within the cluster must <u>remain at around the 150m threshold.</u> (Figure 4.95 shows the market tower scheme in context).</i> |
| 44 | 4.923 | <i>The cluster identified to the east of the railway viaduct is close to both Vauxhall Park, an area of low scale housing</i> |

and the Vauxhall Park Conservation Area. All of these are sensitive to the juxtaposition of tall buildings. It is essential that lower heights are developed in this area for this reason.

44 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 key viewpoints, particularly from the further distant bridges. However, wherever possible, if there are choices of location and shape for a development.

Challenges in Implementing the Vauxhall Cluster

2.7 The central area of Vauxhall identified as appropriate for a tall building cluster is relatively compact. This means that tall buildings within the cluster are invariably placed close together. The OAPF offers no advice on minimum distances between tall buildings but seeks to ensure the buildings appear as ‘separate, individual elements’ (OAPF, p116). The LVMF river prospect views are kinetic in so much as the viewing location is in most cases the entire length of the bridges. The compactness of the cluster area and the breadth of the viewing / assessment locations means that inevitably the individual buildings overlap in certain views.

2.8 The ability to discern individual buildings within the cluster has thus been considered essential, particularly in light of VNEB OAPF guidance which states that tall buildings should ‘avoid appearing collectively as a solid wall of development within the setting of the Palace of Westminster (p121 VNEB OAPF). During the planning process this has been sought through noticeable variations in height and through the selection a range of contrasting but harmonious building treatments and materials.

Vauxhall Cluster- Analysis

2.9 The table below shows all the approved tall buildings within the Vauxhall cluster. Please note that some approvals predate the guidance issued in the OAPF (2012) and SPD (2013) and therefore may not accord with it.

| Ref | Address | Height AOD | % Variation on the 150m | status |
|--------------|-------------------------------------|--|--|------------------------|
| | St George Tower | 180m AOD | n/a (approved before the 150m guidance) | Completed |
| 09/04322/FUL | Vauxhall Sky Gardens, Wandsworth Rd | 36 storeys (123m AOD) 8 storeys (28m AOD) | -18% -81% | Completed |
| 10/02060/FUL | Vauxhall Cross Island Site- | 40 storeys (146m AOD) | -03% | Permission implemented |

| | | | | |
|-------------------------------|---|--|--|-----------|
| | Wandsworth Rd, Parry St, Bondway and Vauxhall Bus Station | 32 storeys (120m AOD) | -20% | |
| 11/02326/OUT | Nine Elms Point, Sainsbury site, Wandsworth Rd * | C – Block 10 storeys (39m AOD) D - Pinto Tower 19 storeys (70m AOD) E – Block 11 storeys (42m AOD) F – Block 10 storeys (39m AOD) G - Waterford Point 38 storeys (129m AOD) H - Watts Apartments 10 storeys (41m AOD) K – Block 29 storeys (95m AOD) | -74% -53% -72% -74% -14% -72% -37% | On site |
| 11/04428/FUL/ 15/05619/VOC | Vauxhall Square, Bondway, Wandsworth Rd and Parry St | 50 storeys (173m AOD) 50 storeys (173m AOD) 10 storeys (42m AOD) 9 storeys (46m AOD) 20 storeys Affordable Block – (86m AOD) 22 storeys Student Block – (99m AOD) | +15% +15% -72% -69% -43% -34% | On site |
| 14/00601/FUL/ 17/05649/NMC | Aykon, Bondway | 50 storeys (174m AOD) 24 storeys (86m AOD) | +16% -43% | On site |
| 11/04181/FUL | The Atlas, South Lambeth Road * | 32 Storeys (100m AOD) | -33% | Completed |

| | | | | |
|-------------------------------|--|--|--|---------|
| 13/03935/OUT/ 16/05036/VOC | Keybridge House, South Lambeth Road * | 38 storeys (132m AOD) 23 storeys (80mAOD) 10 storeys (40m AOD) 9 storeys (37m AOD) | -12% -47% -73% -75% | On site |
| 17/05311/EIAF UL | Keybridge House, South Lambeth Road * | 19 storeys (71 AOD) | -53% | On site |
| 16/05114/FUL | 12-20 Wyvil Rd * | 35 storeys (126m AOD) 8 storeys (35m AOD) | -16% -77% | |
| 15/06216/FUL | Nine Elms OSD, 10 Pascal St / Wandsworth Road * | 20 storeys (92m AOD) 14 storeys (73m AOD) 9 storeys (38m AOD) | -39% -51% | On site |
| 16/03954/FUL | 1-18 Rudolf Place * | 37 storeys (119m AOD) 6 storeys (34m AOD) | -11% -77% | On site |
| Wandsworth Borough | | | | |
| 2012/0380 | Market Towers | 58 storeys (200m) | +33% | On site |

Conclusion - Vauxhall Cluster

2.10 As shown on the table in para. 2.9 total of 32 buildings over 25m in height have been approved in the Vauxhall / Albert Embankment areas of Lambeth. All of these tall building schemes have been subject to rigorous assessment in line with the advice set out in the VNEB OAPF. All the submitted views have been verified and accord with the view locations in the TA documents.

2.11 In line with the guidance on page 121 of the VNEB OAPF applicants proposing to exceed the guidance height have had to justify the proposal through detailed impact assessment.

2.12 91% of the approved tall buildings are up to the 150m guidance height. The three Lambeth schemes that exceed the 150m height guidance (Vauxhall Square towers (x2) and Aykon) do so by 15-16%.

2.13 The range of heights achieved within the cluster varies greatly and thus meets the OAPF objective of ensuring that 'variety in the skyline is achieved'.

2.14 Care has been taken with the spacing, disposition and treatment of the buildings so that they individually have their own character both in near and distant views.

2.15 The majority of approved schemes are on site and it is not considered that there is much scope to add to the number of tall buildings within cluster due to the very limited number of suitable sites remaining.

3. Albert Embankment

3.1 The OAPF states *'it is anticipated that other tall buildings will come forward on Albert Embankment (maximum threshold c80 metres).'*' (Key principles p116, VNEB OAPF). The relationship between Albert Embankment and the WWHS is identified as a key consideration (para 8.3). However, again, the advice elsewhere in the OAPF is flexible on the building heights:

| Page | Paragraph number / section | text |
|------|----------------------------|--|
| 120 | Albert Embankment | <i>..'tall buildings should generally be <u>no more than 80 – 90 metres</u> in height, should contribute to a varied skyline and should avoid appearing cumulatively as a uniform wall of development in strategic views from Waterloo, Hungerford and Westminster Bridges'</i> |
| 121 | Supporting text to map | <i>..'tall buildings should generally be <u>no more than 80 – 90 metres</u> in height, should contribute to a varied skyline and should avoid appearing cumulatively as a uniform wall of development in strategic views from Waterloo, Hungerford and Westminster Bridges. The WHS should be maintained as the main focus within the townscape composition from the river prospects</i> |

3.2 The Vauxhall SPD (2013), sought to ensure that a wall of development was resisted by imposing a height to plot ratio:

| Page | Paragraph number / section | text |
|------|----------------------------|--|
| 42 | 4.914 | <i>The Council suggests that this is best achieved (in the absence of any GLA density controls), by assuming a plot coverage of no more than 40% can be taken to the full height of the 80-90 metre zone. This will always ensure that there is a separation between towers and that the objective of a varied and interesting skyline is achieved. This figure is arrived at by considering that the amount of high development should be less than 50% of the plot at height. Reducing to 40% does not unduly restrict development at height but does protect the air space at upper levels that is needed to separate towers and prevent the wall effect.</i> |

Implementing Albert Embankment

3.3 The area of Albert Embankment identified as appropriate for a tall building cluster is shallow and linear, following the bank of the River Thames. This means that tall buildings are strung out in a line along the river front. A key objective of the OAPF is the avoidance of the appearance a wall of development. Whilst this has been possible to achieve in views from across the river it has been impossible to achieve in oblique views from the bridges over the River Thames because of the linear arrangement of the sites along the Albert Embankment. Inevitably the individual tall buildings overlap in these oblique views.

3.4 Given the prominence of the river frontage it was considered desirable to use muted materials palettes so that the developments are not overly dominant in views. The tall buildings are generally characterised by pale grey shades and creams which hint at the Portland stone which is common along the river to the north. The noticeable variations in building heights and the reasonably harmonious building treatments and materials have resulted in a tall building cluster which has met the OAPF objectives.

Albert Embankment - Analysis

3.5 The following have been approved along Albert Embankment. Please note that some approvals predate the guidance issued in the OAPF (2012) and SPD (2013) and therefore may not accord with it.

| Ref | Address | Height AOD | % variation on 90m limit | status |
|--------------|---|--|--------------------------|-----------|
| 08/04454/FUL | Parliament House, 81 Black Prince Road | 24 storey (77m AOD) | -15% | Completed |
| 12/01768/FUL | Merano Residences, 30-34 Albert Emb. (Eastbury House) | 21 storeys (68m AOD) 28 storeys (89m AOD) 14 storeys (47m AOD) | -25% -2% -58% | Completed |
| 12/04422/FUL | The Corniche, 20 Albert Embankment (Hampton House) | 25 storeys (80m AOD) 27 storeys (89m AOD) | -12% -2% | Completed |
| | | 16 Storeys (56m AOD) | -38% | |
| 13/00019/FUL | Park Plaza Hotel, 12-18 Albert Emb (Queensborough Ho) | 19 storeys (64m OAD) | -29% | Completed |
| 14/02756/FUL | Westminster Tower, Albert Embankment | No additional height. | n/a | |
| 14/04757/FUL | The Dumont (Prince Consort Ho) 22-29 Albert Emb. | 24 storeys (80m AOD) 30 storeys (98m AOD) 18 storeys (60 AOD) | -12% +8% -34% | On site |
| 16/00795/FUL | Texaco, 36-46 Albert Emb. | Tower one 90m AOD Tower two 90m AOD | 0% 0% | |

Conclusion - Albert Embankment

3.6 In line with the guidance in the VNEB OAPF applicants proposing to exceed the guidance height have had to justify the proposal through impact assessment. Of the 13 tall buildings only one exceeds the 90m – The Dumont - by 8m.

3.7 The range of heights achieved within the cluster varies greatly and thus meets the OAPF and SPD objective of ensuring that a ‘varied skyline’ is achieved.

3.8 Care has been taken with the spacing, disposition and treatment of the buildings so that they individually have their own character both in near and distant views and yet they present a subdued and unobtrusive character in strategic views.

3.9 The majority of approved schemes are completed and it is not considered that there is scope to add to the number of tall buildings already approved due to the very limited number of suitable sites remaining.

4. Further Considerations for the ‘appropriate for tall building’ designation

Heritage Assets

4.1 One failing of the original OAPF tall building area designation (see map Appendix 1) is that it did not recognise on-ground heritage designations which would, as a general rule, not be appropriate for tall building development. For example, numerous statutory and locally listed buildings fall within the area. Furthermore, the Albert Embankment Conservation Area, Lambeth Palace Conservation Area and Vauxhall Conservation Area are each overlapped by the areas identified by tall building. This is illustrated on the maps within Appendix 2, 3 and 4 where the tall building areas are overlaid upon the conservation area boundaries. It is proposed to address this by removing:

- Statutory listed buildings including Brunswick House, 8 Albert Embankment properties on Pratt Walk, and Southbank House,
- Locally listed buildings including Crown PH, MI6 HQ, 2 South Lambeth Place, 1 – 5 Wandsworth Road; and
- Properties and spaces in conservation areas that contribute to the special interest of the three conservation areas.

Heritage Settings and Local Views

4.2 The Westminster World Heritage Site (WWHS) sits to the north of VNEB a short distance from northern end of Albert Embankment. UNESCO’s ongoing concern about tall building development within the setting of the WWHS has resulted in fact finding missions in 2007, 2011 and 2017. The perception of tall building development in Vauxhall and on Albert Embankment in views from Westminster Bridge was a key concern during the 2017 Mission.

4.3 The visual and historical connections between Lambeth Palace (representing church) and Palace of Westminster (representing State) is a key aspect of the Outstanding Universal Value of the World heritage Site. Lambeth Palace is grade I listed and stands immediately north of the area presently identified as appropriate for tall building development.

4.4 The close proximity of the northern part of Albert Embankment to the WWHS and to the viewing position at Westminster Bridge means that tall buildings in that location will be

particularly conspicuous. In light of the UNESCO concerns it is considered that a more cautious approach to tall building development here is now required. However, other considerations impose greater constraints to height in this location. See below.

4.5 Some locally protected views set out Lambeth Local Plan (Q25) and views within and out of the Kennington Conservation Areas also present constraints that were not previously considered. The two relevant local views (see Appendix 5) are:

4.6 Landmark Silhouette (xv) - View east from Victoria Tower gardens to Lambeth Palace uses the whole of the Victoria Tower gardens river frontage as the viewing position. Here the medieval and early modern period towers and turrets of Lambeth Palace can be appreciated silhouetted against the sky.

4.7 The image in appendix 6 illustrates this. The viewer is looking SE towards Lambeth Palace with the northern end of the current tall building area for Albert Embankment in the immediate background (Old Paradise Street, Lambeth Road, and Lambeth High Street). Tall building development in the immediate backdrop here is not considered appropriate given the proximity and resultant harm to the setting of grade I listed Lambeth Palace and the setting of the Lambeth Palace Conservation Area in this local view and in views generally.

4.8 Landmark Silhouette (x) View NNW along Courtenay Street to Houses of Parliament (Elizabeth Tower) takes in the whole length of Courtenay Street which is lined in part by Grade II listed buildings and is a key street within the Kennington Conservation Area. The Elizabeth Tower and its clock face is an unexpected landmark in this street. The Elizabeth Tower is the focus of the view. It is at risk to obscuring and being unduly dominated by tall building development within the view cone (which falls across Old Paradise Gardens, Old Paradise Street; and Lambeth High Street) and the general setting.

4.9 For the reasons outlined in the paragraphs above the northern part of the Albert Embankment area - Old Paradise Street, Lambeth High Street; and Lambeth Road are proposed to be removed because of their unsuitability for tall building development.

Vauxhall Cluster Composition

4.10 The detail analysis in section 2.9 identifies the height of each tall building approval in the Vauxhall cluster. When this is mapped there is a clear difference in the approved heights on either side of the railway viaduct which transverses the cluster. To the north of the viaduct the tallest building heights are achieved – around the guidance 150m height. To the south of the viaduct, immediately adjoining the Vauxhall Conservation Area, the tall building heights are lower - reaching a maximum of 132m. See table below

| Ref | Address | Height AOD |
|--------------|--|--|
| 09/04322/FUL | Vauxhall Sky Gardens, Wandsworth Rd | 36 storeys (123m AOD) 8 storeys (28m AOD) |
| 11/02326/OUT | Nine Elms Point, Sainsbury site, Wandsworth Rd * | C –10 storeys (39m AOD) D - 19 storeys (70m AOD) E –11 storeys (42m AOD) F –10 storeys (39m AOD) G - 38 storeys (129m AOD) |

| | | |
|-------------------------------|---|---|
| | | H - Watts Apartments 10 storeys (41m AOD) K – Block 29 storeys (95m AOD) |
| 11/04181/FUL | The Atlas, South Lambeth Road * | 33 Storeys (100m AOD) |
| 13/03935/OUT/ 16/05036/VOC | Keybridge House, South Lambeth Road * | 38 storeys (132m AOD) 23 storeys (80mAOD) 10 storeys (40m AOD) 9 storeys (37m AOD) |
| 17/05311/EIAF UL | Keybridge House, South Lambeth Road * | 19 storeys (71 AOD) |
| 16/05114/FUL | 12-20 Wyvil Rd * | 35 storeys (126m AOD) 8 storeys (35m AOD) |
| 15/06216/FUL | Nine Elms OSD, 10 Pascal St / Wandsworth Road * | 21 storeys (92m AOD) 14 storeys (73m AOD) 9 storeys (38m AOD) |
| 16/03954/FUL | 1-18 Rudolf Place * | 37 storeys (119m AOD) 6 storeys (34m AOD) |

4.11 This stepping down at the southern edge of the cluster reflects the guidance set out in the Vauxhall SPD.

4.12 It is considered that this lower height of 130m to the south of the viaduct should be formalised in the designation going forward. It is therefore proposed to reduce the guidance height to this secondary tier to 'up to 130m'.

5. CONCLUSION

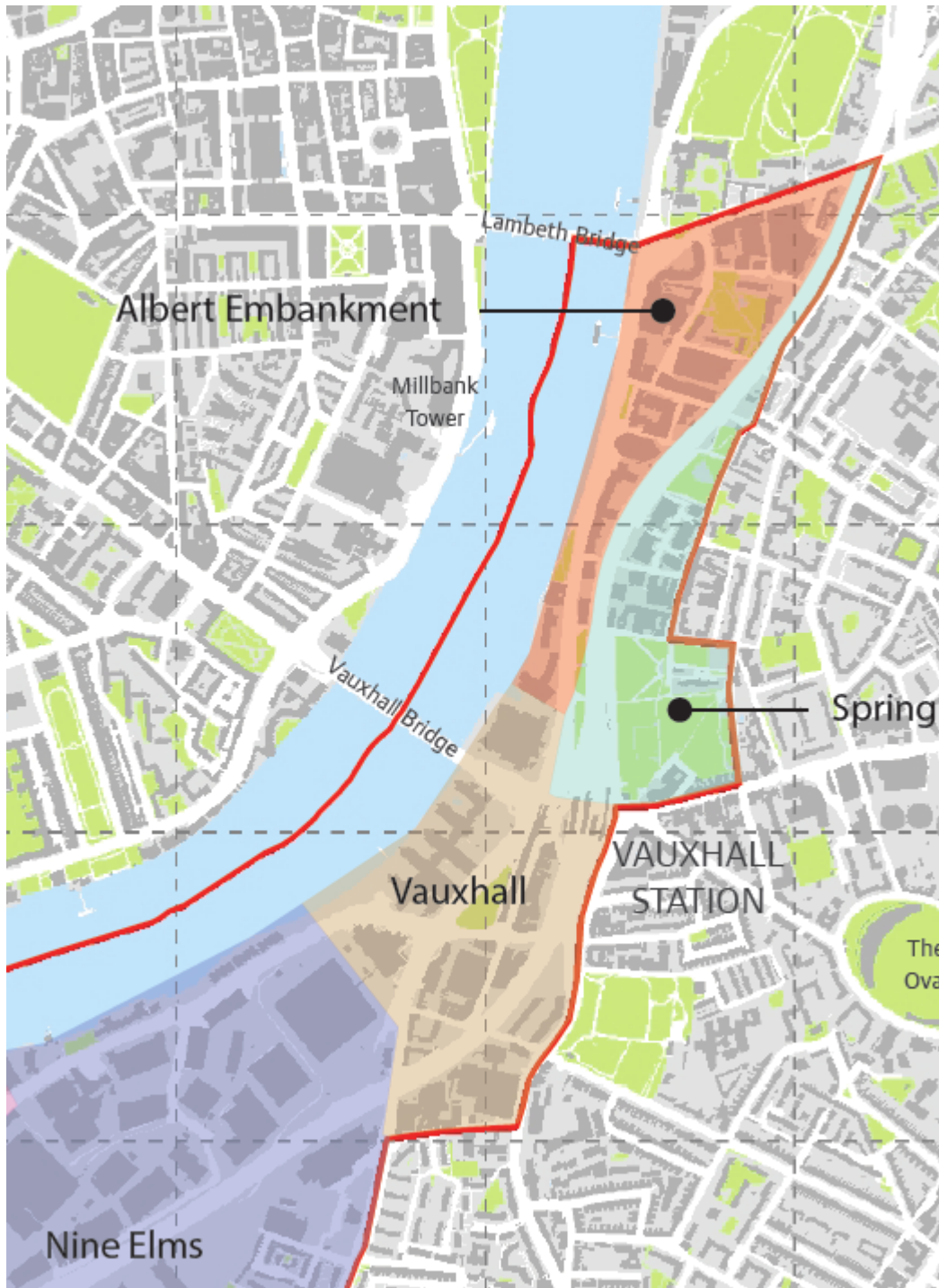
5.1 Parts 2 and 3 of this document have illustrated that 91% of the approved tall buildings in Vauxhall and Albert Embankment are up to the 150m guidance height and the policy aspirations around cluster composition and appearance have been met. Tall building development has therefore met the design objectives set out in the VNEB OAPF and the Vauxhall SPD.

5.2 Part 4 of this document identifies the refinements required to better respond to the on ground constraints – open space, the retention of designated and non-designated heritage assets, local views and the settings of heritage assets. A map showing the reduced tall

building area which results from these considerations can be found in Appendix 5. It is this map that is proposed to be taken forward in the Local Plan Review.

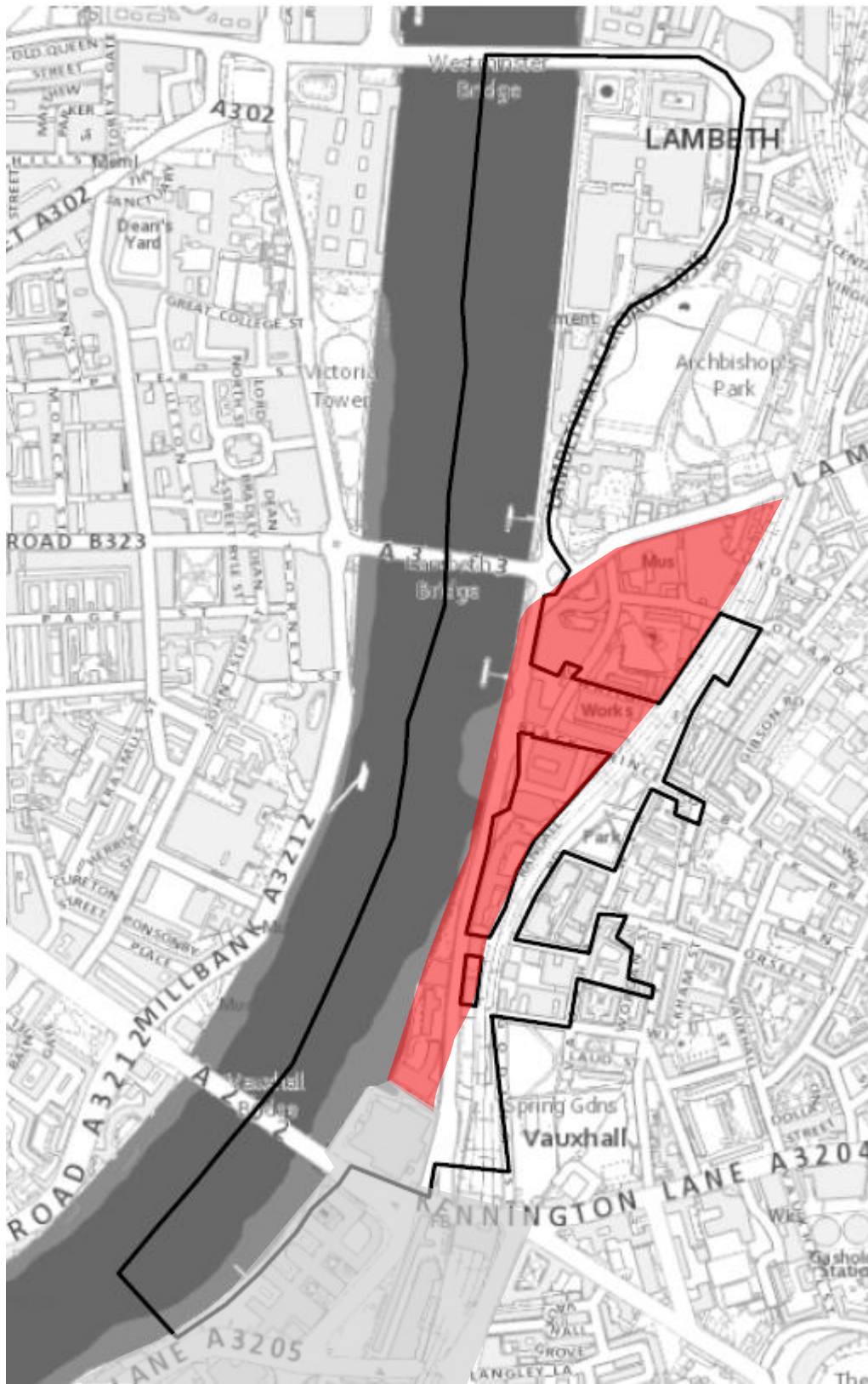
APPENDIX 1

Map extract from the VNEB OAPF showing the Albert Embankment tall building area in orange and the Vauxhall cluster area in cream.



APPENDIX 2

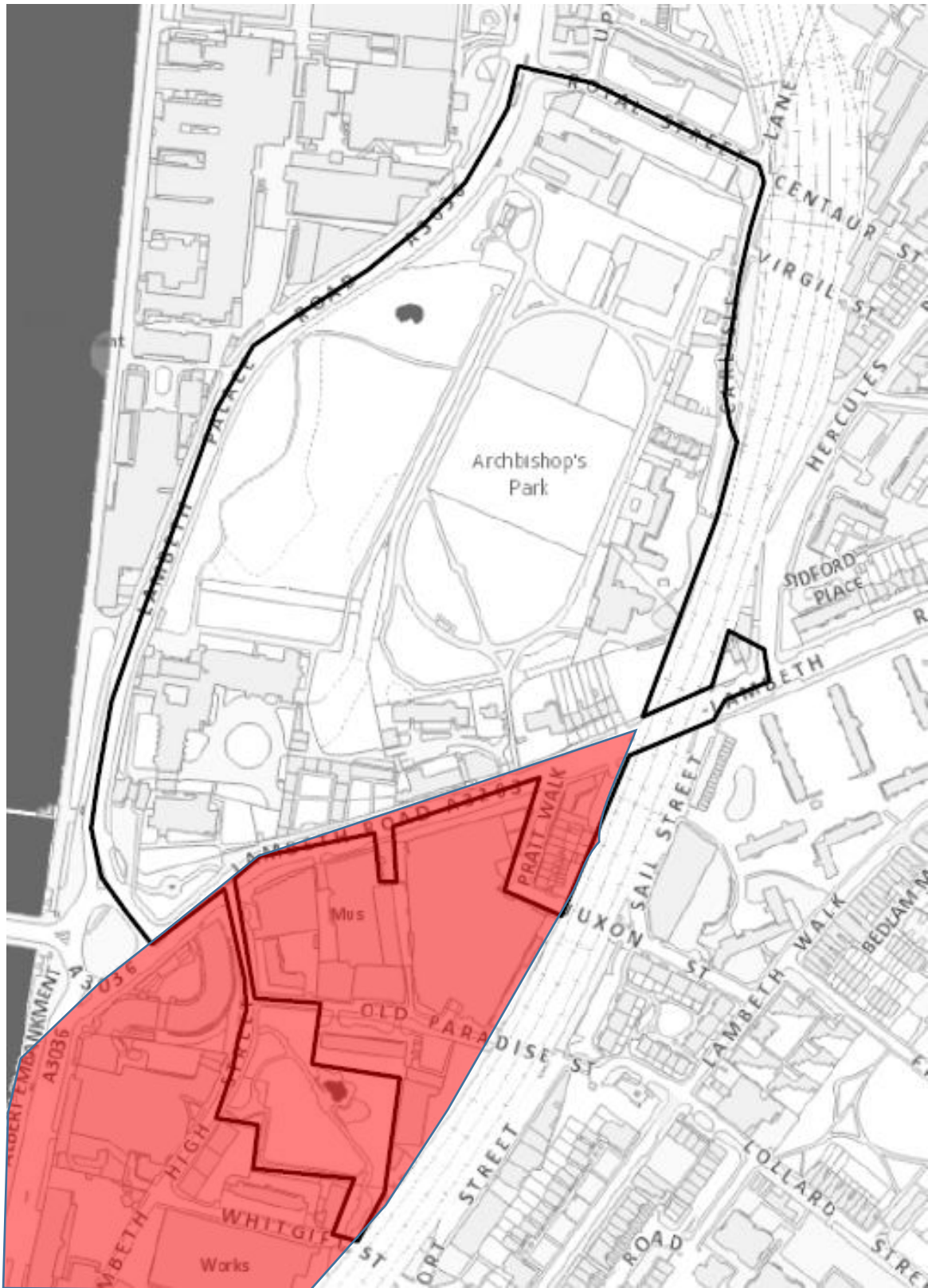
Albert Embankment Conservation Area Map



Red and grey shading reflects the areas shown in the OAPF map in Appendix 1.

APPENDIX 3

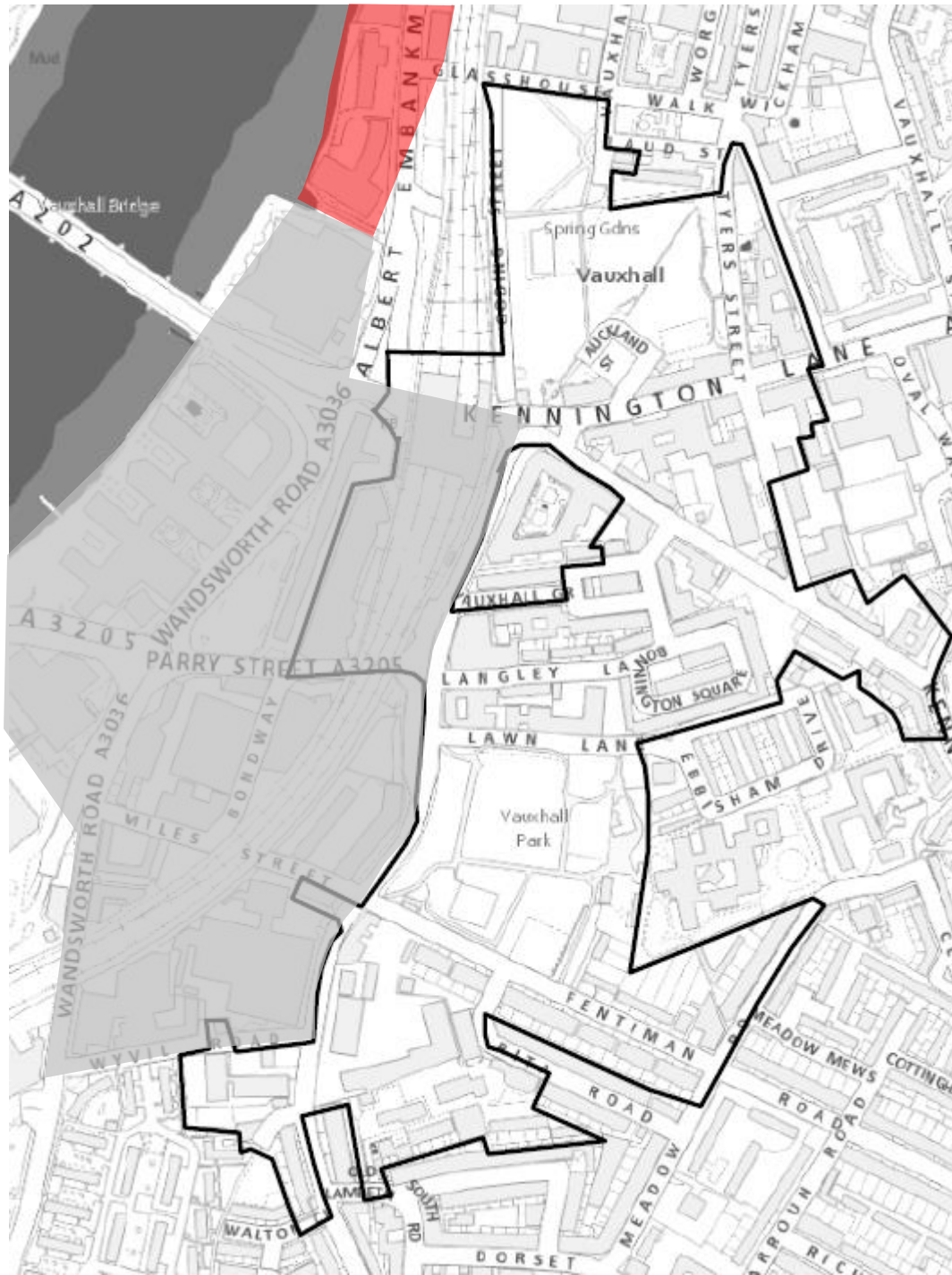
Lambeth Palace Conservation Area Map



Red shading reflects the areas shown in the OAPF map in Appendix 1.

APPENDIX 4

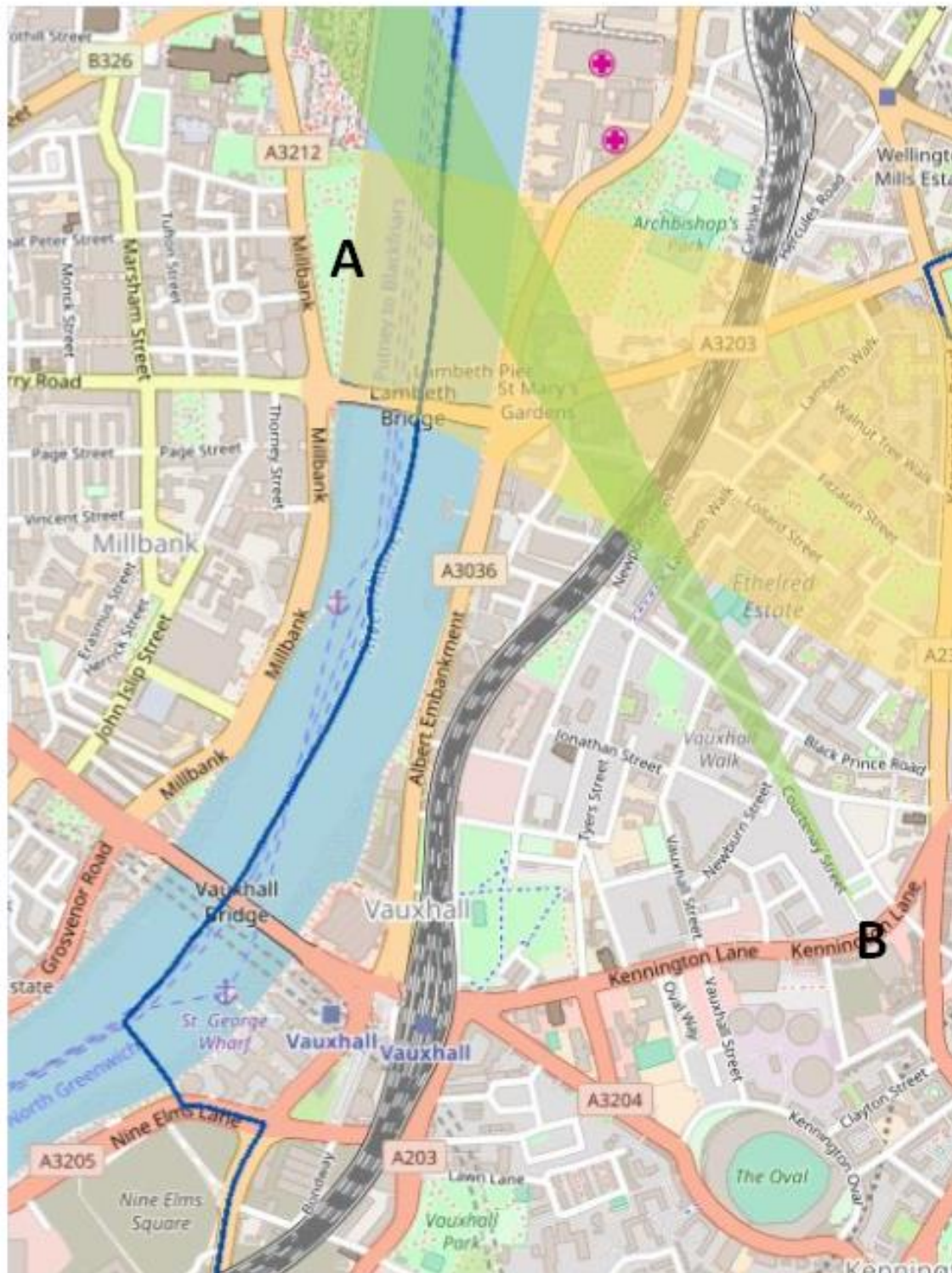
Vauxhall Conservation Area Map



Red and grey shading reflects the areas shown in the OAPF map in Appendix 1.

APPENDIX 5

Relevant Local Views



A Landmark Silhouette (xv) - Victoria Tower gardens to Lambeth Palace

B Landmark Silhouette (x) Courtenay Street to Houses of Parliament (Elizabeth Tower)

APPENDIX 6

Photographs of the local views mapped in Appendix 5.



Landmark Silhouette (xv) - Victoria Tower gardens to Lambeth Palace



Landmark Silhouette (x) Down Courtenay Street to Houses of Parliament (Elizabeth Tower)

APPENDIX 7

Proposed Vauxhall and Albert Embankment Tall Building map

