

Representations made to public consultation on the Draft SPD between 16 November 2020 and 10 January 2021 and officer response.

R01 - Marine Management Organisation	R19 – Individual
R02 - TFL	R20 – Individual
R03 - Port of London Authority	R21 – Individual
R04 – Highways England	R22 – Individual
R05 – Historic England	R23 – Individual
R06 – Herne Hill Society	R24 – Individual
R07 – City of London	R25 – Individual
R08 - Norwood Forum	R26 – Individual
R09 – Guy’s and St Thomas’ NHS Foundation Trust	R27 – Individual
R10 - Southwark Council	R28 – Individual
R11 - Individual	R29 – Individual
R12 - Individual	R30 – Individual
R13 – Lambeth Council (Conservation & Design)	R31 – Individual
R14 - Individual	R32 – Individual
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R16 – Individual	R34 – Individual
R17 - Individual	R35 – Individual
R18 – Individual	

GENERAL COMMENTS

Respondent no.	Comment no	Comment	Y or N?	Track change edit
R1 Marine Management Organisation	1	The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.	N	Noted.
R2 TFL		We have no comments to make on the draft SPD	N	Noted.
R3 Port of London Authority	1	In principle the PLA supports the identification of various view points within the borough that include views along and across the River Thames, with a number of viewpoints based from the Thames Path and the recognition of the important need to protect such views and access points along the riverside, which is in line with the PLA's Vision for the Tidal Thames (The Thames Vision) (2016) which includes the goal to see more people enjoying the Thames and its banks. Specifically, it is noted that the SPD identifies two categories of protected views, panoramas and landmark silhouettes both of which feature views including the River Thames.	N	Noted
R4 Highways England	1	We have reviewed the documents and are satisfied that the changes will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). We have no comments or objections.	N	Noted

R5 Historic England	1	<p>In general we welcome the draft SPD and the protection it will provide for important local views within and out of Lambeth. General comments:</p> <p>a) It would be helpful for the SPD to identify existing negative elements that detract from views. This can help show where enhancements can be made.</p>	Y	<p>Negative features have been considered. For example, Panorama (i) (c) identifies Herne Hill House and Park View House as negative elements.</p> <p>All the other views have been revisited to ensure negative features are adequately captured. The following edits are proposed</p> <p>Amend text as follows: Landmark Silhouette xiii)</p> <p><i>Description of View (a) (ii)</i> <i>From this central location Lambeth Palace is viewed from the west-north-west. In this location the Elephant and Castle tall building cluster has a <u>negative</u> dominant presence in the backdrop of the eastern end of the Blore building.</i></p> <p>Amend text as follows:</p> <p><i>Description of View (a) (iii)</i> <i>The southern view location is a long-established location from <u>from</u> which to view Lambeth Place face-on. There are numerous historic illustrations from this location. Here the low roof of the Great Hall forms the centre of the composition with the taller parts of the Lambeth Palace complex stepping up on either side. The Elephant and Castle tall building cluster is now visible rising up behind the Great Hall to the left of its lantern. The</i></p>
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				<i>cluster's visual dominance negative effect comes primarily from the fact that they are noticeably taller than the Palace complex <u>and interrupt its silhouette.</u></i>
		b) There are views of the wider city which has evolved to create layers of new development which adds interest to the cityscape. This layering effect could be diluted by larger buildings in the foreground to the detriment of identified views, and this could be mentioned in the SPD.	N	No change. This is captured adequately in the policy wording of Q25 (c) which is quoted in Part 1 and states: <i>(c) Panoramas The objective in identifying these views is to ensure that no foreground or middle-ground development is intrusive, unsightly or prominent in relation to harms an appreciation of the panoramic view as a whole, or landmark buildings within:</i>
		c) It would be helpful to identify any views that are particularly important at night.	N	Officers have revisited all of the views and it is not considered that any have night time features worthy of particular note.
		d) It would be helpful to mention if there are any views particularly vulnerable to seasonal variation	Y	Some views, including Landmark Silhouette xi) and Landmark Silhouette xv) already contain reference to seasonal change in relation to tree screening. However, all of the views have been revisited in order to consider seasonal variation. The following changes are proposed: <i>Landmark Silhouette v)</i>

			<p><i>Description of Views (i) and (ii) (i) The campanile tower is a striking landmark silhouette viewed down the tree lined roadway of Christchurch Road The foreground is tree lined roadway. The middle ground is occupied by trees and the tower. The background is clear sky. (ii) The impressive façade and campanile tower of Christchurch (grade I) terminates the vista. The highway and pavement form the foreground. The Church stands in the middle ground framed and in places partially obscured by mature trees. <u>The obscuring effect is reduced in winter when the trees are not in leaf.</u> The building has a strong silhouette against clear sky.</i></p> <p>Landmark Silhouette vii)</p> <p><i>Description of View St Michael's Church is a grade II listed building of exceptional townscape value. The symmetrical façade is perfectly aligned with Lorn Road for the maximum visual effect. This view is a key one in relation to the setting of this designated heritage asset. Harm to the view will result in harm to the setting. St Michael's Church spire terminates the tree lined view down Lorn Road. The grade II listed building forms a landmark at the end of the vista and the church's form is silhouetted against clear sky. The church is within the Stockwell Park Conservation Area. The foreground of the</i></p>
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				<i>view is Brixton Road and the tree-lined Lorn Road where the housing is low-rise and unobtrusive. <u>The canopies of the street trees on Lorn Road partially obscure the view in the summer months.</u> The middle ground is St Michael's Church. The background to the west is clear sky over Stockwell.</i>
		(e) There are some views within the borough towards the City eastern cluster, and Lambeth itself also contains a number of tall building clusters which will eventually form a dramatic focal point in the distance. It would be helpful if the SPD mentioned whether foreground development would begin to obscure/compete with the townscape value of the clusters.	N	None of these contemporary tall building clusters are the subject of local views designation under policy Q25. Therefore, reference to them is not considered necessary within this document .
R6 Herne Hill Society	1	I have responded via Commonplace on behalf of the Herne Hill Society to that section in the draft about Brockwell Park, and the fact that the view of the Palace of Westminster has been removed. I added a comment about adding the panoramic views from Ruskin Park of the Palace and elsewhere, but as it is a new proposal there is not a section in Commonplace about Ruskin Park. The Society would therefore request the council to give serious consideration to protecting the splendid views of central London including the Palace of Westminster, from Ruskin Park. I have some photos which I can email if that would help.	N	The SPD is based on the designated local views within the Lambeth Local plan 2021, additional views can only be added during the plan making process. Views from Ruskin Park were considered and discounted as part of the plan making process for Lambeth Local Plan 2015. See Local Views Study 2014 for evidence base.
R7 City of London	1	We do not have any specific comments to make on the local views set out in the SPD. However, we welcome Lambeth's approach especially in relation to recognising the St Paul's	N	Noted.

		<p>Heights policy in the City of London, which is referred to in the draft SPD. We also welcome the comment under ‘background setting’ in several views that “The addition of further, distant tall buildings will reinforce the landmark status of the distant city”, since this recognises the role of the City Cluster as a landmark feature of the London skyline in its own right.</p> <p>As one of our neighbouring boroughs we look forward to engaging positively with Lambeth now and in the future.</p>		
R8 Norwood Forum and R34 Commonplace	3	<p>1. Can you please advise what the next steps will be on amending the draft and the process for adopting the Local Views SPD.</p> <p>2. The West Norwood Cemetery Conservation Plan highlights the excellent views formerly available from the elevated parts of the Cemetery to the north, east, south east and west (including St. Lukes Church), and outlines the aspiration to reopen these views through the mature trees and undergrowth. Can you please let us know what the process would be to add these views to the SPD if these views are reinstated in the coming years.</p> <p>We look forward to hearing from you.</p>	N	<p>The SPD is based on the designated local views within the Lambeth Local plan 2021, additional views can only be added during the plan making process. Views from West Norwood Cemetery were considered and discounted as part of the plan making process for Lambeth Local Plan 2015. See Local Views Study 2012 for evidence base. It was not considered appropriate to designate views which do not presently exist. Should the views be re-established as part of the cemetery plan new views would have to be designated through the local plan process at some future date.</p>

PART 1 – INTRODUCTION

Respondent no.	Comment no	Comment	Y or N?	Track change edit
R5 Historic England	2	Paragraph 1.7 - There appears to be a minor typo in this paragraph which refers to policy HC3 of the Lambeth Plan, but this should be the emerging London Plan. In addition, the quoted text is part G, not A, of HC3.	Y	Accepted. We have revised text.
R5 Historic England	3	Paragraph 1.10 - Reference to English Heritage's "Seeing History in the View" should be omitted from the text. This guidance has been superseded by Historic England's "Setting of Heritage Asset" Good Practice Advice.	Y	Accepted. Reference omitted. New reference added.

PART 2 – PANORAMAS

Respondent no.	Comment no	Comment	Y or N?	Edit
R3 Port of London Authority	2	Panorama Vi and Viii (River Thames: Queens Walk, opposite Westminster World Heritage Site) Noted that the supporting text for this view states that new development should allow the positive attributes of the view to be appreciated without obstruction, which is particularly important given the view location and foreground fall within the 'immediate setting' of the Westminster World Heritage Site. This is supported.	N	Noted.
R3 Port of London Authority	3	Panorama Viii (River Thames: Queens Walk, National Theatre), Panorama ix (River Thames: Queen Elizabeth Hall Roof Garden) and Panorama x (River Thames: Royal Festival Hall) The supporting text for the view guidance states no permanent development is anticipated along the Queen's Walk or on the river at this location of a height that would have an adverse impact on the view which is supported, noting that the erection of temporary installations which often occur along the	N	Noted

		Queens Walk at these locations would be acceptable so long as the some of the view location is kept clear and publicly accessible.		
R8 Norwood Forum R34 Commonplace	1	The proposed protected panorama from Norwood Park (Panorama ii)) looks to the City, but does not include the fine views to areas more to the east - Canary Wharf, Greenwich Peninsula, Dulwich village roofscapes, Dawson Heights, Dulwich Woods and Sydenham Hill Woods. The document states: "(Northwood House, Hamilton Road) frames the right hand side of the view" The proposed panorama should therefore be amended extensively to the right to include the views to the east of Northwood House.	N	The panorama is not proposed. It is already designated in the Lambeth Local Plan (2021) and was carried forward from the Lambeth Local Plan (2015). The view description provides a clear definition of its extent: <i>View NNE from Norwood Park (across LB Southwark) to the city</i> A change to the extent of this view is not possible within the SPD; it would have to be undertaken through the plan making process.
R8 Norwood Forum R34 Commonplace	2	It appears that the only proposed protected view to the east from West Norwood is the fine view from Dasset Road (the Part 3 Protected Silhouettes document does not download from the consultation page, though does from the Commonplace site). There are also further easterly views, often including St. Lukes Church tower, that should be protected. These are always across the valley variously to Canary Wharf, Greenwich Peninsula, Dulwich village, Dulwich College (especially the college tower), Dawson Heights, Sydenham Hill Woods, Dulwich Woods and the Crystal Palace TV tower. In particular the following viewpoints should be added to the SPD: - St. Julian's Farm Road - Wolfington Road - Canterbury Grove - Lansdowne Hill - Lansdowne Wood Close	N	The SPD is based on the designated local views within the Lambeth Local plan 2021, additional views can only be added during the plan making process.

		- York Hill There are lesser views from Casewick and Cheviot Roads and other locations in that area.		
R10 Southwark	1a	Under our duty to cooperate, here are LBS comments on Lambeth's draft Local View SPD. These have been agreed by our Cabinet Member Cllr Helen Dennis. Firstly, we would welcome the opportunity to continue to work together on these matters.	N	We welcome the opportunity to continue working with Southwark on these matters.
	1b	Secondly, we would request Lambeth undertakes the following steps to assist this process: 1. Identifies draft view geometries and threshold planes for the relevant views of landmarks that could potentially impact the development potential of Southwark's adopted development sites and regeneration areas, so Southwark officers can then better understand the potential impact of the implementation of the draft views guidance, in particular: <ul style="list-style-type: none"> • Panorama 1 - ci, cii, ciii • Panorama 2 • Panorama 3 - i and ii • Panorama 4 • Landmark Silhouette 1 	Y	To support the SPD, the designated local views will be permanently added into the Vu-city platform which we consider provides an adequate level of detail for assessment of proposals going forward. It is understood that Southwark Council subscribes to the Vu-City Platform, once uploaded the designated views will be accessible to all subscribers for their own assessment purposes. We consider the Local Views SPD guidance supplemented by the views being set up in Vu-City for all to use will provide an adequate level of information for Lambeth and adjoining boroughs such as Southwark to make an assessment on the impact of emerging schemes upon local views and the landmarks identified within the view composition.

			<p>In response to Southwark comments and research carried out by Miller Hare we have made the following amendments:</p> <p>Panorama i) View from Brockwell Park Viewing Location Coordinates E: 531756 N: 174037 <i><u>(i)E: 53172.6 N: 174049.5</u></i></p> <p>2.14 The landmarks of note include – St. Paul’s Cathedral, Telecom Tower, London Eye, city clusters (including The Shard, 122 Leadenhall) and Canary Wharf.</p> <table border="0"> <thead> <tr> <th>Landmark</th> <th>View location</th> </tr> </thead> <tbody> <tr> <td>Telecom Tower</td> <td>E:531638 N:174089 <u>E: 531722 N: 174054</u></td> </tr> <tr> <td>St Paul’s Cathedral</td> <td>E:531637 N:174088 <u>E: 53172.6 N: 174049.5</u></td> </tr> <tr> <td>London Eye</td> <td>E:531636 N:174094 <u>E: 531722 N: 174054</u></td> </tr> <tr> <td>City Cluster v2</td> <td>E:531692 N:174070</td> </tr> <tr> <td>City Cluster v1</td> <td>E:531590 N:174130</td> </tr> <tr> <td>Canary Wharf</td> <td>E:531716 N:174057</td> </tr> </tbody> </table> <p>Panorama iii) View from Gipsy Hill We have omitted view location point (ii) as there is limited access to this view location which provides a glimpsed view of St. Pauls likely to be diminished by approved developments and therefore does not justify full geometric protection.</p>	Landmark	View location	Telecom Tower	E:531638 N:174089 <u>E: 531722 N: 174054</u>	St Paul’s Cathedral	E:531637 N:174088 <u>E: 53172.6 N: 174049.5</u>	London Eye	E:531636 N:174094 <u>E: 531722 N: 174054</u>	City Cluster v2	E:531692 N:174070	City Cluster v1	E:531590 N:174130	Canary Wharf	E:531716 N:174057
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			<p>Viewing Location</p> <p>2.33 For assessment purposes the view is broken into two kinetic experiences. Both sections are <u>The location is within the Gipsy Hill Conservation Area. The views are</u> appreciated on the northward descent from Westow Hill:-The location is on footway adjacent entrance to 12-14 Gipsy Hill.</p> <p>(i) Between Westow Hill to Camden Hill, where the hill steepens as it falls northward. The location is on footway adjacent entrance to 12-14 Gipsy Hill.</p> <p>(ii) The location is on the foot way outside no. 54 Gipsy Hill opposite the tower of the former Christ Church.</p> <p>View Location Co-ordinates</p> <p>(ii) E: 533372 N:170849 E: 533370 N: 170771</p> <p>2.34 Gipsy Hill, with its highway enclosed by properties on either side forms the foreground to the viewer. The foreground is terminated by mature trees at the foot of Gipsy Hill. The middle ground comprises the low lying districts of Dulwich, Camberwell and Walworth. The focus of the view are the distant towers of the City of London. and St Paul's Cathedral's dome. The effect is a striking one and the experience changes as the view descends.</p>
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			<p><i>(i) At the southern, most elevated, end the former church tower at 1b Highland Road sits a prominent landmark of strong silhouette in the middle ground with the distant city cluster and The Shard beyond. The foreground here is of 19th Century buildings enclosing the street and stepping down as it descends.</i></p> <p><i>(ii) At Camden Hill Road Gipsy Hill roadway straightens out. The church tower is a looming landmark form. The vista down the road is terminated by a dense cluster of tree canopies which screen Southwark from view. Above this the city tall building cluster with The Shard at its heart. St Paul's Cathedral remains visible on the east side of the road.</i></p> <p><i>2.35 At the north-most end (Sainsbury Road) only the Shard is visible rising above the treeline which now forms the middle ground.</i></p> <p><i>2.36 St Paul's Cathedral is a designated heritage asset of high value. The significance of this asset to the view comes from it being recognised within the cityscape. Harm to the setting of St Paul's would result if development harmed the viewer's ability to fully appreciate it.</i></p> <p>Visual Management Guidance</p> <p><i>2.37 This view is heavily reliant on all its compositional elements – topography, foreground townscape, middle ground Church</i></p>
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			<p><i>tower (in view i) and distant landmarks <u>city cluster</u>.</i></p> <p>Panorama iv) View from Knights Hill Viewing Location <u>E: 531849 N:171445 E: 531822 N: 171214</u></p> <p><i>2.42 East side of Moving south up Knights Hill on the foot way outside nos. 133 – 153 Knights Hill to a location opposite the entrance to Tivoli Park. The roadway is straight and the view NNE aligns with the tower of St Luke’s Church and the tall buildings of the city cluster beyond.</i></p> <p>Description of View <i>2.43 Knights Hill, with its highway enclosed by mature trees on either side forms the foreground to the view. The middle ground comprises the low lying rooftops of South London including St Luke’s Church at the bottom of Knight Hill with its landmark tower. That tower forms a visual marker of importance in the view – having a complementary form to the distant tall buildings yet contrasting with both in terms of its traditional form and separation distance. The focus of the view is <u>are</u> the distant towers of the City of London and Southwark which include The Gherkin and The Shard. <u>juxtaposition of a Lambeth landmark St.</u></i></p>
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				<p><i>Luke's tower in the foreground with the metropolitan scale cluster beyond.</i></p> <p>Landmark Silhouette i) View of Lincoln Tower View location reviewed with slight change to co-ordinates to ensure view location is on footway. View Location Coordinates E: <u>531059 531062</u> N: <u>179512-179511</u></p>
R10 Southwark Council	2	2. Undertakes an assessment on the significance of the landmark within the relevant panoramic views, and whether consented or emerging schemes in Southwark will impact the proposed Lambeth view thus rendering the view of the landmark 'fully blocked', 'partially blocked' or 'clear'. This should include the use of 3D modelling such as Vu.City (or similar) and a site visit to the viewing location to re-assess whether the proposed landmark is still visible.	N	<p>We have undertaken further assessment of the views into Southwark using the VU City model to ensure that all key landmarks remain visible. This has shown that while Southwark approvals obscure the view of St Paul's Cathedral in some views from Brockwell Park, the identified view with view location co-ordinates remains unaffected. reference to that particular view of St. Pauls has been retained in the SPD.</p> <p>Should consented development completely obscure a view, that designation would have to be removed from the Local Plan through the plan making process.</p>
R10 Southwark Council	3	3. Works with Southwark officers to agree amended wording in the SPD so that the planning guidance is less vague, acknowledges Southwark's development opportunities and	N	We do not consider the guidance to be vague, the development management process is well-established. Lambeth is notified of tall

		sets out a commitment to agree a development management process when sensitive development is proposed.		building proposals in Southwark and will continue to comment as an adjoining borough part of the planning process. The purpose of this SPD is to aid Southwark as a decision maker just as much as it is to aid Lambeth.
R11 Common place	1	Panorama I (Brockwell Park) Any comment here would be meaningless because if a big overseas investor comes in with enough cash you'll rewrite the rulebook irrespective of any plans you've previously consulted with residents on. The irony of consulting on local views when you're allowing a 20 storey tower to go up within half a mile of the Town Hall is clearly lost on you.	N	Noted. The reference to a 20-storey tower relates to the HONDO, Popes Road proposal which has now been withdrawn.
R12 Common place	1	Panorama I (Brockwell Park) You haven't stated clearly what these 'viewing towers' are nor how they could be affected.	N	Panorama I (Brockwell Park) Brockwell Park Panorama is split into a) b) and c). The tower reference is on the first page of the panorama section which describes towers visible from view locations a) and b) in Brockwell Park of Lambeth Town Hall's tower and St. Matthew's Church Tower. The document includes view location co-ordinates, images of the towers in views, description of views and visual management guidance. We consider that there is an adequate level of information describing the view of the towers on pages 12 -13 of the SPD.
R12 Common place	2	In respect of the skyline, you should adhere to your own guidelines and not breach them in order to sell off land for	N	Noted

		profit. Lambeth Council has been known to have breached such guidelines within its own conservation area.		
R14 Commonplace		Panorama III (Gipsy Hill) The GIPSY HILL view MUST be protected in PLANNING and LICENCING control. Greater weight on inappropriate development and lighting frontages Gipsy Hill to protect these views of importance.	N	Noted
R17 Commonplace	1	Panorama V (Streatham Common) Fully support	N	Noted
R17 Commonplace	2	Panorama VI (The Rookery) Fully support	N	Noted
R18 Commonplace	1	General comment on panorama section Fully support	N	Noted
R19 Commonplace	1	The information provided is not readable on a mobile phone as the text is blurred. Please sort out this issue. I suggest you upload the information as pdf files.	N	Noted. The consultation was available to read on the Council website (in pdf format) and the Commonplace platform during the consultation period. The PDF files are still available on the Council website to read or download. Have your say on Lambeth's Draft Local Views Supplementary Planning Document (SPD) Lambeth Council
R20 Commonplace	1	Views like these make living here wonderful. They give us perspective, a sense of belonging, beauty, sense of Seasons, air, space, light and sense of where we are in London and in London's history. We must do all we can to preserve them	N	Noted
R21 Commonplace	1	Panorama I (Brockwell Park) Support	N	Noted
R22 Commonplace	1	Panorama I (Brockwell Park) This view, particularly the second panorama has been a spot of so much joy, comfort and relaxation during lockdown. there are few places locally to Brixton where you can see such an expanse of sky and the historic London skyline. Please do all you can to maintain this for now and future.	N	Noted

R22 Commonplace	2	Please can you also add in the views of Battersea Power station that can be seen from some vantage points	N	<p>The designated view in the local plan states that the view faces N and NNE towards the city.</p> <p>The view towards Battersea Power Station is NW. The power station has not been included for that reason. Given their height it is likely that the chimneys of the Power Station will remain landmarks even with further new development in the wider Battersea area.</p>
R24 Commonplace	1	General comment on panoramas section Where is the panoramic view from Ruskin Park? This is a vital local view too!	N	<p>The SPD is based on the designated local views within the Lambeth Local plan 2021. Ruskin Park is not one of those views.</p> <p>The inclusion of additional views can only be made during the plan making process. Views from Ruskin Park were considered and discounted as part of the plan making process for Lambeth Local Plan 2015. See Local Views Study 2014 for evidence base.</p>
R25 Commonplace	1	Panorama VIII (National Theatre) Fully support	N	Noted.
R26 Commonplace	1	I can't read this on my mobile and I should be able to. The text is blurred. Please can you change this for me to comment	N	Noted. The consultation was available to read on the Council website (in pdf format) and the Commonplace platform during the consultation period. The PDF files are still available on the Council website to read or download. Have your say on Lambeth's Draft

				Local Views Supplementary Planning Document (SPD) Lambeth Council
R29 Commonplace	1	<p>Panorama III Gipsy Hill</p> <p>The account is poor as it fails to mention the view is seen at the top of Gipsy Hill from the Lambeth "Westow Hill Conservation Area". The view is enjoyed and often as its photo from this conservation area at the Westow Hill top of Gipsy Hill. The skyline London view is also over Gipsy Hill is also enjoyed from Westow Hill looking down Woodland Road and Beardell Street and Coopers Yard.</p>	N	<p>The SPD is based on the designated local views within the Lambeth Local plan 2021, additional views can only be added during the plan making process.</p> <p>Views from within conservation areas are normally identified though the preparation of Conservation Area Character Appraisal documents.</p>
R31 Commonplace	1a	<p>Panorama I (Brockwell Park)</p> <p>I am responding on behalf of the Herne Hill Society. We note that the view of the Palace of Westminster from Brockwell Park has been removed. We assume this is because the previous view has now been obscured by the cluster of new tower blocks in and around Vauxhall and Nine Elms.</p> <p>Could you confirm this in the final document and also let the Society know whether the protected view from Brockwell park was taken into account by officers and the planning committee when considering the application for these new towers within Lambeth and whether the borough was consulted by Wandsworth is relation to those towers within that borough.</p>	N	<p><i>(xii) View N from Brockwell Park to the Victoria Tower of the Houses of Parliament</i></p> <p>The view was removed from Lambeth Local Plan 2021, because the view had been obscured by development on the Albert embankment that had been approved before the formal adoption of the Local Plan 2015. It wasn't until the Local Plan review before the view could be formally removed.</p> <p>Since that time the Vu-City 3D model of the city has come available which ensures that all decisions are now informed by an accurate model of the city. That should go some way to ensuring that this doesn't happen again.</p>
R31	1b	<p>In view of the removal of this view, the Society would like the views of the palace of Westminster from Ruskin Park to be added as a new protected view.</p>	N	<p>The reason for the removal of the Westminster view is outlined above</p>

				Views can only be added through the plan making process. The view from Ruskin Park was considered for the Local Plan 2015 but discounted. The reasons are set out in the Lambeth Local Views Study, 2014.
R32 Commonplace	1	Panorama I (Brockwell Park) Please Don't obscure this view!!	N	Noted.
R33 Commonplace	1	Lambeth council cannot be trusted, don't listen to residents, and I look forward to campaigning to vote them out at the earliest opportunity. Ethnic and social cleansing inform policy in this sham Labour 'council'.	N	Noted.
R35 Commonplace	1	I am astonished to see no reference to the view from the park towards the currently invisible Cressingham Gdns estate. This is also roughly the site of the sunset. As your other panoramas make clear, it is the ONLY view that does not place the park firmly in a big city. All that is seen are trees and a church spire. It is the one "country" view. As such it is clearly differentiated as a unique amenity for the thousands who visit the park. We cannot afford to lose it. Yet the council itself wishes to destroy this view with an ugly block that will rise above the treeline & destroy for ever the precious rural illusion. Leaving to one side the fact that this development is a rather cowardly attempt to begin the destruction of the whole estate without any overall plan open to scrutiny - unwanted and a huge financial risk. The council has been gifted a masterpiece of design in the Cressingham Gdns estate, which blends invisibly into the park - both from a panoramic distance and close up at the very entrance to the estate. It should be something to show off to architects and town planners as best practice, responsibly preserved by the council. This development shames the council, in so many ways. Ruining the panorame is just one of them.	N	The SPD is written to explain the designated local views contained within the Lambeth Local plan 2021. Additional views can not be added to the SPD. They can only be added during the plan making process.

PART 3 – LANDMARK SILHOUETTES

Respondent no.	Comment no	Comment	Y or N?	Edit
R3 Port of London Authority	4	<p>Landmark Silhouette xii: View South West from St George Wharf Pier to Battersea Power Station along the River Thames</p> <p>The supporting text for this view it states that the foreground and middle ground development is not anticipated on the River Thames and that development here should not cause unacceptable visual competition with Battersea Power Station. Noted that the SPD also states that proposals on the pier gangway which obscure views from it will not be acceptable.</p> <p>With regard to this silhouette specifically to note there has previously been proposals for the Pimlico Cycle / Pedestrian crossing here which may need to be considered as a potential future change in this area.</p>	N	Noted. We have chosen not to mention this as this proposal has no certainty of delivery at present.
R3 Port of London Authority	5	<p>Landmark Silhouette xv View E from Victoria Tower Gardens to the Lambeth Palace complex</p> <p>Within this silhouette the guidance states that development here should not harm the viewer’s ability to appreciate the picturesque silhouette of Lambeth Palace against clear sky nor should it dominate Lambeth Palace in the view, the guidance also specifically states that any structures on the terrace should be placed away from the river retaining wall so that the views can be enjoyed by terrace users.</p>	N	Noted.

R3 Port of London Authority	6	<p>Landmark Silhouette xvi from Millbank to 8 Albert Embankment, Landmark Silhouette xvii from Millbank to Vauxhall Cross Building (MI6) and Landmark Silhouette xviii: From Queens Walk to St Pauls Cathedral</p> <p>For each of these silhouettes, the guidance states that no additional development is anticipated here but that any redevelopment within these areas should seek to minimise the height of structures to ensure they do not obscure the viewer's appreciation of the landmark buildings, and also that development on along the riverside must not obscure views out across the River Thames.</p>	N	Noted. The guidance quoted relates the River Thames in the foreground of these views.
R5 Historic England	4	Part 3, Landmark Silhouette ii) - there is a sentence in the third paragraph of the "description of the view", that could be omitted: " <i>Given that St Luke's tower is a designated heritage asset.</i> " This sentence may be a typo.	Y	Accepted. The sentence has been omitted.
R9 Guy's and St Thomas' NHS Foundation Trust	1	<p>Landmark Silhouettes</p> <p>St Thomas' Hospital and other GSTT assets are located within multiple Landmark Silhouette views set out in draft Policy Q25 of the Draft Reviewed Lambeth Local Plan and the SPD. The objective of the identified Landmark Silhouettes is to 'ensure that no foreground development obscures or is intrusive, unsightly, visually dominated or competes with and no background development harms, the silhouette of the assets'.</p> <p>GSTT assets are visible within:</p> <ul style="list-style-type: none"> ▪ Landmark Silhouette viii) ▪ Landmark Silhouette ix) ▪ Landmark Silhouette xi) ▪ Landmark Silhouette xv) 	N	<p>It would be premature to anticipate development in these instances, the purpose of guidance is too help applicants understand the significance of views, each case will have to be assessed on its merits at application stage. The St Thomas's site sits within a number of strategic views and therefore the effect of development would also have to be assessed against the London Plan 2021 policies and LVMF (London View Management Framework)</p> <p>The effect on designated views will be considered as part of the site allocation</p>

	<p>Healthcare Services Proposals</p> <p>The Draft Reviewed Lambeth Local Plan includes the allocation of a MedTech Health Cluster around St Thomas' Hospital as well as the allocation of 'Site 1 – Land north and south of and including 10 Royal Street', which is earmarked for the expansion of St Thomas' Hospital and owned by the Guy's and St Thomas' Charity. The allocation of both areas will provide the basis for delivering new health facilities and other beneficial uses that will enable the advancement of medical research and the ability of the healthcare service to serve the community, which has become significantly more important since the arrival of the COVID-19 pandemic. As this allocation comes forward, it is noted that it will result in changes to this area in terms of townscape views.</p> <p>Furthermore, the Trust has many potential future development opportunities within the Borough benefiting both the local and wider community. However, as outlined above, St Thomas's Hospital and other GSTT assets are within multiple Landmark Silhouette views. The Trust is keen to ensure that the location of these assets within the local views does not inhibit future healthcare services' opportunities and proposals. The Trust would like to emphasise to the Council that future healthcare service proposals within St Thomas' Hospital and the surrounding area will be of a high quality design, responding to site context and local character.</p> <p>We question whether sufficient allowance has been given to future development and allocations, if the proposals would result in changes to the existing composition of the local views identified within the Local Views SPD.</p> <p>The middle ground within Landmark Silhouette 'xv' is very likely to change, either through changes within the Hospital campus or adjacent. It is important to ensure the protection of heritage assets and local views, however, an appreciation and</p>		<p>process and again when planning applications are assessed.</p>
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R15 Commonplace	1a	<p>Landmark (v) Christ Church</p> <p>For complete transparency, I am part of Christchurch Road CLT, which is aiming to develop the piece of vacant fenced off land (you classify this as open land) on right hand side of viewpoint (i) of this view.</p> <p>I'm supportive that broadly not allowing a development to interfere with the "silhouette against clear sky" is sensible from both viewing point (i & ii). I think that this can be applied without problem to the background view of (i). I also think your description of the area and view points from both directions are suitable.</p>	Y	<p>Error accepted. Text has been amended for clarity:</p> <p><i>(i) Whilst the landmark campanile is the important focal point of the view the enclosure formed by <u>Christchurch House foreground buildings on Norwood Christchurch Road</u> are essential compositional elements – <u>providing</u> framing and depth.</i></p>

	1b	<p>However, I do find it rather contradictory that you can say that development of 5 story Christchurch House entail "buildings on Norwood Road [that] are essential compositional elements", yet at the same time you claim under "management of the viewing location" that:</p> <p>"(i) Whilst the façade and landmark campanile is the important focal point of the view the enclosure formed by mature trees essential compositional elements – providing framing and depth. New development should not harm the overall composition of the view nor compete with it as a silhouette against clear sky compositional elements".</p> <p>How can it be that buildings in one side are legitimate compositional elements, yet are seemingly entirely discouraged on the other side of the road by virtue that they will impact on trees which are also supposedly a essential compositional element in the viewpoint. Can buildings on both sides, that sensitively respond to each other and keep a large portion of the veteran and highest quality trees not become essential compositional elements.</p> <p>I do not wish to undermine the importance of this viewing corridor or the prowess of exceptional Grade I listed building. However, I believe the stance taken here is contradictory and ultimately, anti-development on this critical site. Following from the NPPF's presumption in favour of sustainable development, I think this wording should be clarified and reformed to take a stance that promotes a greater possibility</p>	N	<p>Not accepted. The respondent has confused the guidance for the two views. The quoted text relates to view (ii) not view (i).</p> <p>Officers have reviewed the content and do not consider the advice contradictory. Buildings are not contributory in view (ii) but make a clear contribution in view (i).</p>

		of sensitive and high-quality design on this site that can both frame and ultimately enhance the silhouette of the campanile tower and wider church.		
R16 Commonplace	1	Landmark XIII (Battersea Power Station) Their is no mention of the proposed Nine Elms Pimlico walk and cycle Bridge between Battersea Power Station and St George Wharf.	N	We consider it premature to include proposed plans at this stage as there is no certainty of delivery.
R18 Commonplace	2	General comment on landmarks section Fully support	N	Noted
R23 Commonplace	1	Landmark VII (St Micheal's Church) Fully support	N	Noted.
R27 Commonplace	1	Please, please, please don't build that tower funded by Taylor McWilliams - this will destroy the local community and its death will be on your hands as a council.	N	Noted. The respondent refers to the HONDO proposal for Popes Road, Brixton which is yet to be determined.
R28 Commonplace		General comment on landmark section Missing view/silhouette. From Brockwell Park south to Holy Trinity Church on Trinity Rise, Tulse Hill.	N	This view is not protected in the Local Plan, 2021 and therefore is not included in the SPD. However, it is identified as important in the Councils Draft Brockwell Park Conservation Area Appraisal (2020).

PART 4 – ROOFSCAPE

Respondent no.	Comment no	Comment	Y or N?	Edit
R13 Commonplace	1	Could the statement be amended along the lines of 'well designed, visually attractive and supportive of bio-diversity' as enhancing the quantity and variety of species of birds, insects and plants will add to the quality of the view as well as the sustainability of the city.	Y	Accepted. The text has been amended: <i>Roofscape Views</i> <i>The policy objective in identifying roofscape views is to acknowledge the important role roofscape plays in the viewer's appreciation of the wider cityscape. The objective is to</i>

				<i>ensure that new roofs and roof alterations (especially plant enclosures) are well designed, <u>biodiverse</u> and visually attractive in order to sustain or enhance the views of Waterloo and north Lambeth from the London Eye.</i>
R16 Commonplace	2	Although in the distance the, Vauxhall Cross view will change as the Vauxhall Cluster of circa 50 storey Tower Blocks are built. Similar consideration should be given to Towers built near the south side of the Thames between Westminster and Lambeth Bridges.		Noted. Officers do not consider edits necessary in relation to a changing wider context as the existing text is considered adequate.
R18 Commonplace	3	General comment on roofscape section Fully support	N	Noted
R30 Commonplace	1	Only an observation, but how clearly this shows what an eyesore the Tower in Nine Elms is. It would be interesting to see drawn in the planned towers on Vauxhall Cross to see their impact on the views as well	N	Noted.
R13 General matters picked up by officers			Y	Page numbers and paragraph numbers have been added.
			Y	Typographical errors have been corrected.
			Y	Landmark Silhouette xv – the image showing view location (a) (i) has been replaced – it erroneously looks towards St Thomas’ Hospital rather than to Lambeth Palace.